

Call started at 3pm Eastern

Present: Tim Creger, Bonnie Rabe, Kathy Booker, Rose Kachadoorian, Dennis Howard, Chuck Moses, Cary Giguere, Tony Cofer

Oregon's AEZ and Train the Trainer (TTT) concerns

Kachadoorian: A lot of states have TTT programs in place, but Oregon did not. With the mandate for training to begin January 17, 2017, Oregon is not going to be able to meet that date. Even with training materials from PERC, they won't be ready until November. That doesn't give enough time for actual training. The requirement should be delayed, ideally a full year.

Regarding the AEZ, a lot of farmworker housing is in close proximity to orchards, some is inspected by OSHA and appears to be in good shape. But there is other housing that isn't in good shape. OSHA and ODA believe it may be more dangerous for workers to move per the AEZ, rather than sheltering in place. Could there be standards for the shelters? OSHA is going to rulemaking saying that workers can stay in the AEZ if the structure is fully enclosed and tightly constructed to minimize outside air entry if closed properly. Having a meeting later in the day on the rule making with EPA R10.

Kachadoorian is requesting AAPCO support Oregon's stance and the director is going to ask NASDA to support as well.

Comments: Creger, WPS is set in stone at this time. The interpretive guidance should assist. The guidance hasn't been seen yet though. It may include language to take wind direction into account for portions of the AEZ that go outside of the ag establishment property. Creger just went through the draft inspection guidance, and couldn't see anything related to that for the AEZ. If AEZ language isn't on a label is it enforceable? Letter ideas: open with WPS specifically, and TTT section, remove comma after the word guidance.

Cofer: We are talking about the enforcement of the rule and therefore it is relevant to discuss. That should be explicit in the letter to EPA. Kachadoorian: well this will also increase worker safety by improving housing, and it is permanent. Rabe: is this specific to orchards? Kachadoorian: Not necessarily. Should the letter be to OPP and OECA? The delay in timing does affect OECA. It puts everyone into noncompliance without the delay. Cofer and Creger discussed and agreed. Bamber asked about the 6 month implementation, and it was unclear if that applies to TTT.

DfE

Creger discussed his correspondence with John Conner, an attorney representing CSPA, about state registrations of DfE logo'd products. Apparently it was put into NSPIRS and states may have inadvertently registered products that are considered misbranded. Looking for a formal response from AAPCO. Creger proposed reaching out to the states and seeing if they are aware of the labels. This does appear to be a situation where the registrants are slipping labels through that they know states are not okay registering. There was quite a bit of discussion about the issue and next steps. Creger will move forward with contacting states.

*AAPCO BOD Call
July 28, 2016
Amy Bamber, Executive Secretary*

Doodle after august 29th for conference planning.

Meeting adjourned 4:25pm

Respectfully submitted,

A handwritten signature in black ink that reads "Amy Bamber". The signature is written in a cursive style with a large initial "A".

DRAFT