

SFIREG's Environmental Quality Issues Working Committee met in a separate session from POM in April 2016 in Denver Colorado.

Three items were discussed during that session.

- 1) Development of an educational module related to benchmarks,
- 2) Plant back restrictions related to application to cover crops; and,
- 3) Filling vacancies for EQI resulting from time limits for membership and retirement of current members

## **Benchmarks**

During the December 2015 meeting of full SFIREG, EQI presented an issue paper that made the case for the development of an educational module that focuses on the development, and application of benchmarks including those developed by OPP, Health Based Screening Levels developed by USGS/EPA and those that might be developed by individual states.

Due to the increased focus on pesticide monitoring and subsequent questions regarding "what do the monitoring results mean" EQI felt it necessary to begin development of a draft module that could be used at PREP courses and/or made available via the web to SLA's and the public that would educate and make transparent how benchmark's are used and their potential limitations in the regulatory arena.

To that end, EQI discussed the elements that may appear in such an educational module. A draft outline of an educational module was to be developed based upon the discussion held at the Denver breakout session. As of June 1<sup>st</sup> the Chairman was evaluating feedback for the session and a draft outline for the module was nearing completion and then subsequent submittal to EQI Committee members for approval. At that time it is envisioned that the outline would be submitted to EPA and PREP officials for comment and feedback hopefully resulting in full development of the educational module.

### **Preliminary Draft Outline Elements**

- A) General
  - Definition of Terms
  - Review of OPP's Use of Various Species and Benchmark Endpoint
    - o -Why multiple benchmarks for same A.I.
  - Public Perception of Benchmarks
  - Sister Agency Perception of Benchmarks
  - Current Media Applications (Water, Soil, etc)
- B) B) History Benchmarks
  - Original Need

- Definition of Terms Used
  - Relationship to Pesticide Management Plans and National Pesticides of Interest List
  - OPP Aquatic Life Benchmarks
  - Heath Based Screening Levels
  - State Derived Benchmarks
- C) Development of Benchmarks
- Development Process Used by EPA
  - Development Process Used to Create HBSL's
  - Comparability Between Benchmark Lists (Federal, State, etc)
  - What Triggers a Modification to a Current Benchmark
- D) Acceptable Uses / Regulatory Limitations
- Role in Evaluating Water Quality Monitoring Data
  - Use in Defining Management Measures and their Success in Pesticide Management Plans
  - Relationship to Pesticides of Concern Designations
- E) Role of Laboratories
- Detection Limits as Applied to Benchmarks (Benchmarks below Laboratory Detection Limits
  - Interaction in OPP as Benchmarks are Developed
- F) Expansion of Benchmarks
- Need for Benchmarks for Other Media (sediment, soil, air?)
  - Improving Communication Between Developers of Benchmarks and Implementators
- G) Risk Communication
- Environmentally Based Benchmarks
  - Human Health Based Benchmarks
  - Potential Partnerships to Consider

### **Plant Back Restrictions**

In 2015 SFIREG submitted comments to USDA regarding language proposed in a bulletin that seemed to be at odds with plant back restrictions contained in certain pesticide labels. Those comments were largely rejected by USDA and not considered in USDA's finalization of the bulletin(s). Concern regarding this issue has remained among members of EQI. Research conducted during the past year by member tend to indicate that there still is sufficient uncertainty regarding this issue that EQI has assigned its Maine Representative Lebelle Hicks to begin development of a white paper that presents the technical concerns, especially the use of "cover crops" for forage and potential marking as an animal feed. Within the white paper Hick will carefully describe the issue, technical analyze the issue and propose

options for resolution. This paper is preliminary scheduled to be presented to EQI Committee members at the fall joint meeting in Washington DC.

### **Filling of Committee Vacancies**

A majority of EQI Committee members are scheduled to depart in 2016 (end of term or retirement) as a result it is necessary to actively recruit replacement members. Additionally, since 2013 EQI has operated with reduced membership. There is a feeling that the Committee could benefit from increasing its membership by one or two (still putting EQI membership below allocated slots). In the recruitment of new members focus should be placed on potential members that are willing to actively participate in the activities of the Committee and look for diversification of technical specialties.