SFIREG
Environmental Quality Issues (EQI) Working Committee Update

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WORKING COMMITTEES

SFIREG has three Working Committees.

The Pesticide Operations and Management (POM) Working Committee is focused on registration, certification, and enforcement related pesticide issues of national or regional importance. POM Committee Members

The Environmental Quality Issues (EQI) Working Committee is involved with pesticide issues related to water quality, threatened and endangered species, human health and the environment, risk assessments, and technical aspects of the implementation of pesticide programs. EQI Committee Members

EQI Resources

The Endangered Species Strategy Implementation (ESI) Working Committee is involved with implementation of EPA's strategies to support ESA compliance. ESI Committee Members

The committees meet jointly.

EQI Working Committee

- Focused on issues related to water quality, human health and the environment, risk assessments, and technical aspects of the implementation of pesticide programs.

- Current EQI members are:
  - Pam Bryer (ME) (2026)
  - Beth Carter (IN) (2027)
  - James Cooper (FL) (2025)
  - Xin Deng (CA) (2027)
  - Henry Hamilton (NC) (2027)
  - Rajinder Mann (MN) (2025)
  - Hotze Wijnja (MA) (2025) (Chair)
  - Christina Zimmerman (WA) (2026)

EQI Topics and Action Items

Pesticides and Water

- Required Program Area in FIFRA Cooperative Agreement Guidance (CAG)
- Ensure that pesticides do not adversely affect the nation's water resources
- State Lead Agencies (SLA's) to assess and report on state specific information and data

A. Required Program Area: Pesticides in Water (06)	
Ensure that pesticides do not adversely affect the nation's water resources.	**Required Activities:** 06.01.01 Share existing data: Provide EPA with access to water quality monitoring data either collected, referenced, or discovered by the grantee, that is not available via a readily/publicly accessible website. See OPP Guidance for Submission of State and Tribal Water Quality Monitoring Data, Appendix 5. 06.01.02 Identify POIs: Develop a list of Pesticides of Interest (POI) for your program. The list should be discussed with your region. Include pesticides which have a potential to threaten local resources, as well as pesticides that may have water quality concerns in multiple regions. Attach the POI list to the FIFRA Grant Database. See the FGD Master User Guide link in Appendix 2 for attachment instructions. 06.01.03 Identify POCs: Identify Pesticides of Concern (POC) by evaluating the POIs to determine whether human health or environmental reference points are likely to be approached or exceeded. Pesticides that are approaching or exceeding reference points may be considered POCs. Provide a list of POCs, and briefly explain why they are a concern. 06.02.01 Monitor compliance and respond to pesticide water contamination events especially where water quality standards or other reference points are threatened. 06.01.04 Manage POCs: Actively manage POCs beyond the label to reduce or prevent further contamination of local water resources. Briefly describe management actions. 06.01.05 Demonstrate progress: Show that management actions have effectively reduced or are likely to reduce the risk that concentrations will exceed reference points. 06.01.06 Re-evaluate: Upon receiving new information, reevaluate POIs and POCs. New information may include new hazard data, a significant change in use, or a new OPP risk assessment or registration. These evaluations could result in adding or removing POIs and/or POCs from current lists. 06.01.08 Where appropriate, coordinate prevention and protection of water resources with other agencies responsible for water resource protection. 06.01.09 Respond to OPP requests, as discussed with the region, to evaluate additional POIs that have water quality concerns. 06.01.10 Optional Monitoring: Grant funds may be used to support a monitoring component of the water program, if 06.01.02 through 06.01.06 are being addressed. This activity needs to be discussed with the project officer.

Pesticides and Water Quality

- EQI: Improve the abilities for sharing of information on water quality activities and findings among SLAs, both regionally and nationally
  - Pesticides of concern, pesticides detections, and mitigation efforts for pesticides in water
- Formerly done through the Pesticides of Interest and Tracking System (POINTS) (2007-2021)
  - Attempts to maintain and improve POINTS (draft Issue Paper ~ 2018)
  - Discontinued as reporting tool under Cooperative Agreement in 2021
  - Currently POINTS is maintained at WSU to allow access to historic data (see resource)
- Current attention
  - How EQI can assist with improving the pesticides and water program, including data sharing, analysis, and support regulatory program.

Pesticides and Water:
Suggestions to modify CAG requirements

- Provided Comments to EPA for updates to *Pesticides and Water* reporting criteria in Cooperative Agreement Guidance (July 2024)
- Suggestion considered options to make the requirements more practical and meaningful for SLAs in context of their programs and resources
- Better recognition of value of state water monitoring data supplied to EPA for regulatory decision making

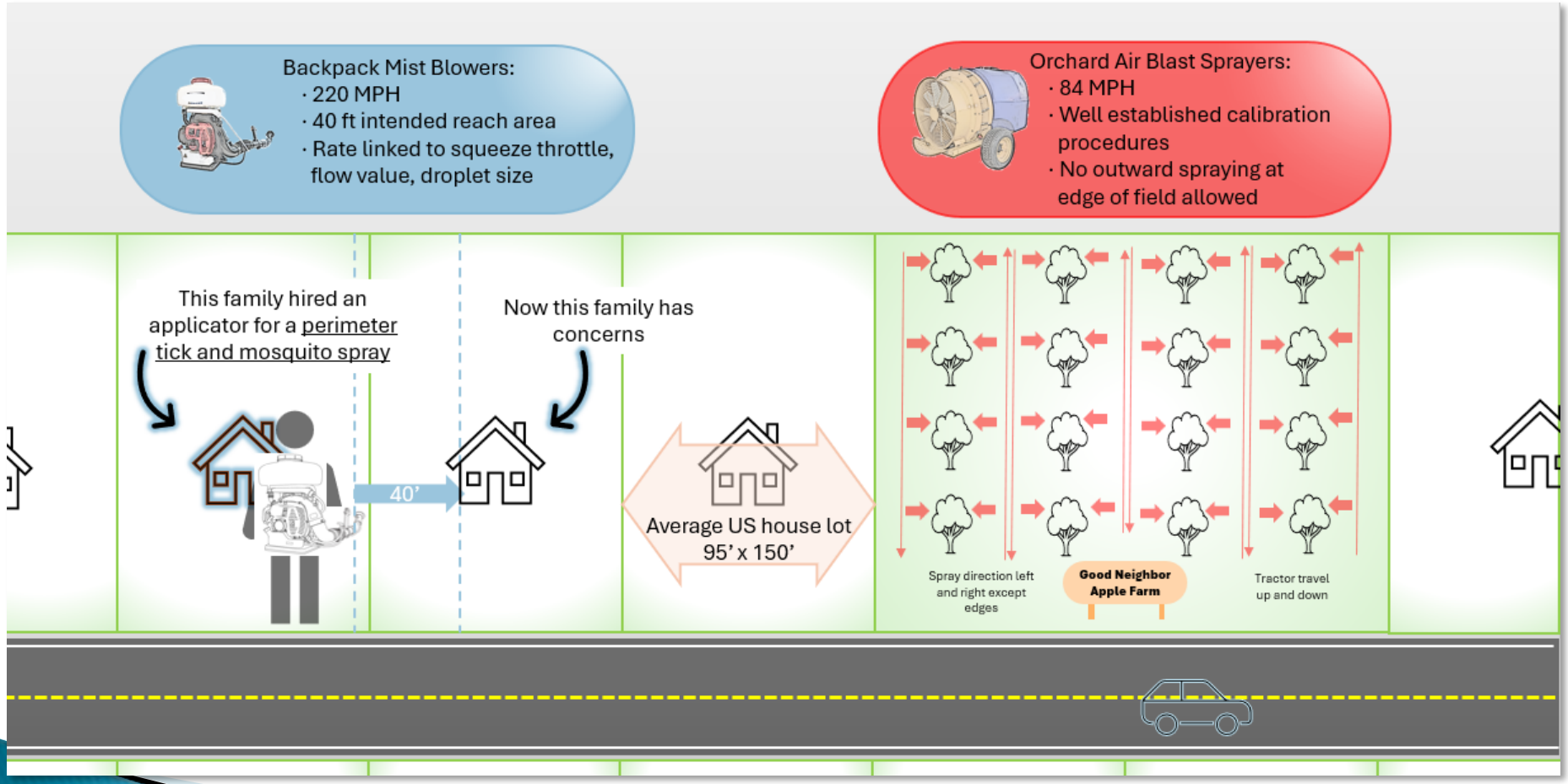
Pesticides and Water:
Inquiry and Feedback from SLAs

- Currently mechanisms of data sharing:
  - Various efforts, in some regions/states not at all
  - Mechanisms range from data entry in data exchange platforms (such as WQX), making reports available online, and other less formal ways of sharing information.

- Recognize that a **more unified approach and system** for info/data sharing would be useful but challenges with such an effort are also pointed out

- Use of a **template** for water quality information sharing could be considered (example from Region 7 states)

Mosquito Adulticide Mist Blower Use in Residential Settings



Issue Paper: Mosquito Adulticide Mist Blower Use in Residential Settings, September 2023.

Mosquito Mist Blower Issue

- Residential use pesticide labels:
  - Directions do **not** include restrictions that protect non-applicator humans from direct exposure from spray or drift.
  - Do **not** have requirements designed to protect humans or pets from exposure to drifted upon surfaces before the drift residues have dried.
  - Intentionally treated target areas are addressed on labels but drifted- upon nontarget areas are **not**.

- The significance of human and pet exposures through direct drift or contact with wet nontarget areas has become a greater concern with growth of mist blower use

- Increasing numbers of incidents for SLAs and enforcement staff

Mosquito Mist Blower Issue Paper

(Submitted to EPA in 2023)

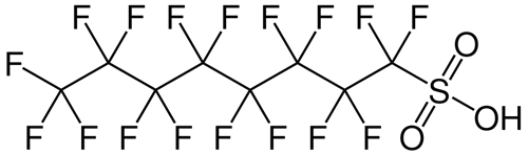
- Suggested label language to address issue:
  1. “Do not apply this product in a way that will contact any person or pet either directly or through drift.”
  2. “Keep adults, children, and pets away from treated surfaces until the targeted areas and their surroundings are completely dry.”
  3. “Do not apply this product in a manner that allows spray to drift to adjacent off-target areas.”

- EPA response (2024):
  - Recommendations include that manufacturers consider voluntarily adding or amending label use directions to include mister-specific application directions
  - States could also provide guidance on best practices

Mosquito Mist Blower Issue:
Current Activities

- Seeking input from Associations and Industry on label language that can address the issue
- Considerations of how to address residential chemical trespass.
- Goal is to develop language that registrants can use
- Seek collaboration with EPA to implement such label language

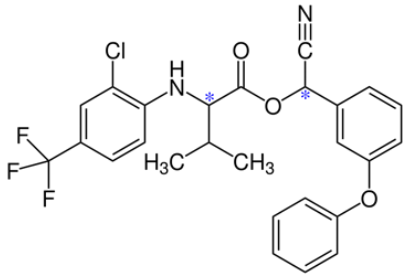
PFAS and Pesticides



- Following developments related to PFAS contamination linked to fluorinated containers

- PFAS testing in pesticide products:
  - EPA efforts with follow-up on published test results
  - Analytical method development by EPA
  - EQI continues to follow developments related to PFAS and Pesticides, including regulatory aspects, testing of pesticide products and containers, and method development for different types of product formulations

- PFAS definition and Pesticides
- Adjuvants; Pesticide Degradates
- Regulatory developments (federal and state)
- Progress with EPA's PFAS Action Plan



Pesticide-Treated Seeds
Issue Paper (2022) and EPA Response (2023)

- Identified questions and concerns relating to pesticide-treated seeds, including aspects related to treated article exemption; tracking of treated seeds; assessment of environmental fate and ecological risks; better information on use of treated seeds; and seed bag labeling.

- EPA response referenced the response to a petition on treated seeds:
  - Regulation of treated seeds, risk assessments for treated seeds, impacts to pollinators, seed treatment residues, and impact to non-target organisms.
  - Additional responses and information were to be addressed in an Advanced Notice of Proposed Rulemaking (ANPRM).

- In 2023, ANPRM for public comment to seek additional information on use of pesticide treated seed and paint.

Pesticide Treated Seeds

- SFIREG Comment on ANPRN (Feb. 2024): Appreciate the thorough approach in seeking public and stakeholder input to seek feedback to provide additional information for a more informed federal regulatory decision related to registration, labeling, comprehensive and enforceable label instructions, use, tracking, storage, planting, and disposal of treated seed.

- EQI and SFIREG continue to follow the developments, including state legislative actions

- EQI follows updates on research on dust generation during treated seed planting

ESA and Pesticides

- ESA related activities have included:
  - Contributions to SFIREG comment letters

- Current activities: Identify aspects where EQI can assist and contribute, in collaboration with ESI and POM
  - Insecticide strategy, pesticide treated seeds as an application method and treated article exemption.
  - Following the developments of tools to evaluate effectiveness of ESA mitigation efforts.
  - For example, the pesticide mitigation assessment tool (PMAT) for evaluating the effectiveness of field-level mitigation practices in reducing off-field pesticide transport for protection of endangered species.

Issue Papers and Previous Topics

- Mist blower and Residential Mosquito Control issue paper (2023)
- Pesticide-Treated Seeds Issue Paper (2022)
- Cover Crop Issues and Plant-Back Restrictions (2019)
- Dicamba-over-the-top (OTT) related issues (2016-2022)
- Methomyl Fly Bait and Misuse Incidents (2023)
- Guidance for use of Aquatic Life Benchmarks (2023)

Other Topics of Current Interest

- Developments of Models and Tools
  - EPA's Pesticide and Water Calculator: interest in new developments of this modeling tool
- Regulatory developments related to Rodenticides
- Specific pesticides of interest:
  - For example, dicamba, atrazine, chlorpyrifos, glyphosate, OPs, and others

EQI Resources

- Accessing POINTS
  - Access historic data captured in the database

POINTS (Pesticides of Interest Tracking System)

Accessing POINTS (Pesticides of Interest Tracking System)

May 2024, Washington State University confirmed that they will continue to host historical data in

- Aquatic Life Benchmarks:
  - Use for State-Lead Agencies

EPA's Aquatic Life Benchmarks: Use for State-Lead Agencies

- **What are aquatic life benchmarks for registered pesticides?**
  - Values set by EPA's Office of Pesticide Program (OPP)
  - Based on scientific studies to estimate the concentrations below which pesticides are not expected to represent a risk of concern for aquatic life
  - Can be used to identify and prioritize sites or pesticides that may require further investigation
  - Find more information here: https://www.epa.gov/pesticide-science-and-assessing-pesticide-risks/aquatic-life-benchmarks-and-ecological-risk
- **How can State-Lead Agencies use the benchmarks?**
  - To compare environmental data to the benchmarks, start by searching the table for the pesticide of concern. Associated degradates will also appear.

Below is an example for the active ingredient fipronil.

Thank You

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