



Region 5 Pre-SFIREG Fall 2025 Meeting Report

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EPA Region 5 Pre-SFIREG Fall 2025 Meeting Report

Meeting Dates: October 27th and 28th, 2025

Meeting Location: Springfield, IL with Microsoft Teams Meeting teleconference

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In Attendance: Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin

1. State Updates:

Ohio

Ohio continues to work on Certification and Testing (C&T) updates. Under supervision applicator provisions were removed from regulations, but returned under new statute. Regulators are working on how to address this issue. Pesticide registration fees increased from \$150 to \$250. Ohio continues to develop their new database for licensing, and enforcement will migrate next.

Michigan

Michigan is meeting with stakeholders as they continue C&T plan implementation. Michigan eliminated territories for field staff, assigning investigations sequentially. Michigan performed an “inspection blitz,” in which they organized in an Incident Command System structure and performed a specific kind of inspection over a geographically defined area. Inspectors paired up and completed four inspections, after which all inspectors returned to the ICS command site to discuss and complete documentation. This enables information and knowledge sharing, comparison of notes and techniques, and increases uniformity and consistency amongst inspectors.

Minnesota

Minnesota continues to put effort and resources forward to address point and nonpoint pollution. Despite the ongoing water quality efforts, there is nitrate and treated seed litigation against the state. Minnesota has observed a peak of clothianidin and imidacloprid in the spring surface water discharge, which it surmises is likely related to treated seed. Also observing chlorothalonil metabolite, 4-hydroxy chlorothalonil, in private groundwater wells. Highly pathogenic avian influenza continues to be a drain on resources. Minnesota conducted 32 applicator workshops, reaching roughly 3,000 applicators. Minnesota asked registrants to add state specific information to dicamba label if approved by EPA.

Indiana

Indiana must readopt their rules every five years. That process will begin with stakeholder meetings in November. State marketplace inspections are increasing. Indiana is developing a new database. Continuing education units (CEU) uses a custom system. Indiana has observed significant growth in unmanned aerial system (UAS) applications. There are presently around 40 conventional (fixed and rotary wing) manned aerial application companies. There are about 250 UAS companies.

Illinois

Illinois hired a new registrations specialist. New legislation was passed that requires a 72 hour notice for turf applications within a quarter mile of a school. Other new passed legislation includes CEUs. Rollout will begin in 2028, and applicators will pay the additional cost.

Commercial applicator licensing goes from \$80 to \$100, private from \$60 to \$90, and product registration will be an additional \$25. 243 pesticide misuse complaints this year, 62 involving tree damage. Noted a concern regarding the slow trickle of product labels with Endangered Species Act (ESA) language on them. The concern is the application industry may not take the issue seriously due to the slow outflow of label updates. A notable enforcement case involved the burning of old mini-bulk containers near a creek that will likely result in criminal charges.

Wisconsin

Wisconsin noted some staffing vacancies in compliance section. C&T plan implementation is on track. It is a lengthy and involved process, but at present is on track to meet the plan goals and timeline. Right of way application by county highway departments continue to increase. Imazapic and aminopyralid are being used to keep down grass and weed growth, saving counties tens of thousands of dollars in cutting costs. While the state has made the county highway departments aware of the risk of using persistent and mobile active ingredients, they continue to apply them while the cost savings exist. Wisconsin is moving into a new database similar to other states, and has recently begun certification and licensing renewal applications online.

2. PALM

Region 5 SLAs have not observed any significant use of PALM by applicators at this stage. A notable positive aspect is applicators are able to enter information into PALM until they achieve the necessary points for their active ingredient and application area and stop.

3. Endangered Species Act

Region 5 state authorities vary for conservation programs. Different agencies are responsible for different conservation programs, with varying foci. While Region 5 states may be interested in aiding in evaluation of state conservation programs for ESA purposes, SLAs are already pressed on personnel and resources.

4. C&T Plan Implementation and Obstacles

Region 5 states are on track or largely complete on implementation of their Certification and Testing plan requirements. Given the state of progress across Region 5, not much use is expected from the draft "Guidance for Certifying Authorities on Submitting Modifications of EPA-Approved Certification Plans." However, in the event a significant change is required, the 120 day timeframe in the guidance could present a problem. States may need to respond to stakeholder or legislator issues in quick order, and 4 month turnaround will be unworkable. This could result in significant delays in states meeting implementation timelines.

5. Worker Protection and Cannabis

State representatives discussed Worker Protection requirements and compliance actions at cannabis growing facilities. The majority of states in Region 5 have some form of legal cannabis production. Multiple factors create challenges unique to each state. Laws, regulations, authorities and responsibilities vary.

6. UAS

UAS use continues to increase rapidly. Continuing to monitor Federal Aviation Administration (FAA) rules on beyond-line-of-sight operations. Indiana is leading the way for the region, producing

how-to-comply materials and hosting a workshop. Indiana noted that while there are currently 40 conventional, manned aerial application companies, there are 250 UAS companies. None of the Region 5 states have been involved in any downed aircraft investigations, nor do any plan to be. Those are expected to be handled by the FAA and state agencies will only become involved if requested by such agencies.

7. Bilingual Labeling

Bilingual labeling is largely a functional non-issue from states in Region 5. Multiple states have translated their certification exams into Spanish, with low double digit numbers of Spanish language tests being administered. Anecdotally, English terms that ESI applicators are familiar with become unfamiliar once translated. While Region 5 states are monitoring the continued development of bilingual labels, experience with Spanish language labels and certification testing thus far does not show it to be a significant issue, despite a high proportion of Spanish speakers amongst applicator and worker populations within Region 5.

8. Registration

The RUP Report is of little use to Region 5 states unless it is updated more frequently. A March only update is only useful in March. Updates should coincide with changes, regardless of the season.

9. Treated Seed

States in Region 5 handle treated seed differently. Some states regulate their production, use, and disposal from end to end, others at point of treatment, and others no differently than the EPA. Given the unique topography and hydrogeology of the upper Midwest/Great Lakes region, and also likely states bordering the Mississippi River, the impact of the pesticide load from neonicotinoid treated seed is both a regional and watershed-specific concern. The prevalence of neonicotinoids in the majority of commercial seed makes alternatives nearly impossible to realistically achieve. Neonicotinoids are becoming a significant topic amongst environmental non-governmental organizations in the upper Midwest.

10. Pesticides in Water, Water Quality

Pesticides in water, water quality issues, and treated seed are interrelated issues for most Region 5 states. While use of the Pesticides in Water Calculator (PWC) is minimal, if at all, all Region 5 states perform varying levels of water quality monitoring. Minnesota has perhaps the most robust water quality monitoring program in the region. They conduct a significant amount of ground and surface water collection, and their results are published in a very extensible format for public use.

11. PFAS and Pesticides

Trifluoroacetic Acid (TFA) is not directly monitored across all of Region 5. It is included in Minnesota's overall water quality monitoring efforts as a degradant of several active ingredients. As there are multiple sources of TFA, which complicates monitoring. One challenge within the region is potentially varying definitions of PFAS. Some states are following EPA definitions, while others may expand or reduce the definition of PFAS, impacting the efforts and resources available or necessary to address the issue. Authorities at the state level are also a challenge, as some Departments of Agriculture have levels of authority and responsibility for PFAS contamination, while in others the authority and responsibility may reside with respective Departments of Natural

Resources or Environmental Quality. There is not a uniform approach across Region 5, and resources vary significantly. Some states are able to take a more proactive approach, while others are constrained to dealing with PFAS effectively as any other water and soil contaminant. It may be prioritized, but specific available resources are not nearly sufficient, given the levels of contamination. At present, no states in Region 5 register adjuvants.

12. Future Region 5 Pre-SFIREG Meeting Dates:

Minnesota will host in the spring.

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