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5	UNITED STATES
6	ENVIRONMENTAL PROTECTION AGENCY
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9	PESTICIDE PROGRAM DIALOGUE
LO	COMMITTEE MEETING
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L3	May 14-15, 2015
L 4	
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L8	Conference Center - Lobby Level
L9	2777 Crystal Drive
20	One Potomac Yard South
21	Arlington, VA 22202
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1	PROCEEDINGS
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3	MR. HOUSENGER: Good morning. Welcome back to
4	day two. This morning's first session is going to be on
5	school IPM, and Bob McNally, our Director of BPPD is
6	going to chair this session. So, Bob.
7	MR. MCNALLY: Thanks, Jack. The first part
8	will be an overview of what we talked about on Wednesday.
9	Frank Ellis and Dawn Gouge are going to provide a quick
LO	overview of the key points from Wednesday's discussion.
L1	The second part will be a more full description of the
L2	Washington State School IPM pilot that the PPDC launched
L3	a couple years ago. So, most of the time will be devoted
L 4	to that, but Frank wants to give an overview, sort of, of
L5	the EPA program at this point. So, let me turn it over
L 6	to Frank.
L7	MR. ELLIS: Thanks, Bob. Good morning,
L8	everyone. We want to take a few minutes to fill you in
L 9	on our workgroup meeting that we had Wednesday. It was a
20	really exciting meeting, well attended, lots of energy
21	and enthusiasm from folks in this room and folks on the
22	phone that participated remotely. So, we wanted to give
23	you a flavor of some of the things that we talked about.
24	Our workgroup has a fairly broad charge around

integrated pest management, but we focused this meeting

- 1 strictly on schools because we have a significant
- 2 investment of resources within the pesticide program on
- 3 school IPM, and within the regions as well.
- 4 So, some of the things that we've talked about,
- 5 which the workgroup members have been engaged with us
- for, I'd say, several years now on the development of a
- 7 recognition program for schools, we talked about where we
- 8 are with that program and how that's moving along through
- 9 the process. We hope to have that program rolled out
- 10 within the next year.
- 11 We talked with them about and filled them in on
- 12 our resource investment, the FTEs that we have dedicated
- 13 at headquarters and within the regional offices to school
- 14 IPM and some of the challenges around that.
- 15 We also talked about our planning documents,
- 16 the regional work plans, our headquarters and center of
- 17 expertise work plans for this fiscal year. We spent
- quite a bit of time talking about what our center has
- 19 been active in doing and promoting. You all may be
- familiar with our school IPM webinar series. It's been
- 21 very successful. It's gotten lots of attention, lots of
- 22 attendance. So, there's been that effort.
- There's been a number of outreach efforts. We
- 24 successfully revamped our website within the last couple
- of weeks. We got that launched, so we have a better,

- 1 clearer presence on EPA's website about school IPM.
- We talked a bit about our grants programs, our
- 3 ongoing grants, and we had a grants cycle in 2012 and
- 4 another in 2014. So, we filled in folks on the
- 5 accomplishments of the projects that are ending and gave
- 6 them updates on the projects that are underway.
- 7 We also spent quite a bit of time getting a
- 8 briefing that you all are going to get just in a few
- 9 minutes here on the Washington State pilot and the
- 10 accomplishments of that project and what their plans are
- 11 for the rest of this year.
- 12 So, I wanted to touch very briefly on our
- overall school IPM strategy. You all have heard this
- 14 before, so I'll be very brief with it. Our effort is to
- 15 focus here within our resources on national and state
- 16 engagement.
- 17 We want to influence school districts and
- school aid organizations, get those folks to help us
- carry the message as well. The bottom line is we want to
- 20 make it easy for school administrators to say yes to IPM.
- 21 We want to give them the tools to be able to do that,
- 22 make a persuasive case as to why it's in their best
- 23 interest and generally make it easy for them.
- 24 We want to get school IPM in to the life blood
- 25 of schools to build it into the way that they do business

- 1 as pest management. So, it's not a person-specific
- 2 enterprise; it's something that is built into the way
- 3 that they manage their pests, regardless of who is in
- 4 what position within the organization.
- 5 As we've talked, our emphasis is more wholesale
- 6 rather than retail, so we have limited local investments
- 7 and local engagements there, but that is still a part of
- 8 several of our regional programs. They do have the
- 9 element of on-the-ground engagement with school
- 10 districts.
- 11 We have three basic groups that are doing this
- within EPA at headquarters here. We're providing overall
- guidance on the program, working to engage national
- school-related organizations and get them to help in the
- 15 charge, and we manage the grants program here out of
- 16 headquarters. So, folks at the center, which is
- 17 physically based out of region 6 in Dallas, they're
- 18 providing information tools and technical assistance to
- schools and helping spread the IPM message in general.
- Our regions, as you know, are engaged with the
- 21 states and tribes and districts at that level, and
- 22 they're also very involved with the state level school
- 23 IPM working groups and also the state coalitions that are
- in several states across the country.
- 25 So, with that, I want to turn it over to Dawn

- 1 Gouge and let her speak to kind of the outcomes of
- Wednesday's meeting.
- 3 MS. GOUGE: Thank you. Good morning, ladies
- 4 and gentlemen. So, our workgroup really took a pretty
- 5 critical look at what was going on both nationally in
- 6 partnership with EPA and school IPM and what was being
- 7 achieved. We really came to a very strong consensus that
- 8 the EPA -- they're establishing effective tools to
- 9 facilitate IPM adoption and diffusion nationwide. We've
- seen some considerable progress as a result of this, and
- 11 I'll show you some graphs in a minute.
- 12 They're effectively supporting change agent
- 13 capacity building. Of course, we can always do more of
- this, and you always need more of this, but I would
- 15 encourage the agency to continue investments in capacity
- 16 building.
- 17 And then, expanding stakeholder engagement and
- increasing awareness, I can't remember a time when I went
- 19 to every professional meeting and looked at all of the
- 20 association and organization newsletters and journals and
- 21 EPA, EPA, EPA, EPA. They're all present. They're
- 22 presenting. They're involved.
- 23 This has really been an incredible advantage
- for us as academics leveraging our time to be involved in
- 25 school IPM implementation. It, of course, trickles down

- 1 to what's actually happening in the schools. So, we feel
- 2 that the EPA school IPM program is really being very
- 3 effective and causing a good deal of change at the ground
- 4 level.
- 5 Some findings as we investigated the nuts and
- 6 bolts of what was going on, we really hoped for a faster
- 7 route to a recognition program for schools. So, this is
- 8 school districts that are excelling in school IPM. We
- 9 wanted an instant award with an EPA plaque and a logo and
- 10 a letter and everything else. Of course, that just
- 11 doesn't happen overnight. It actually takes
- 12 approximately 18 months to 2 years. So, we're halfway
- through that process now. The center staff and the
- 14 headquarter staff have worked to get all of that
- paperwork in and through the process.
- So, our anticipation is that this will be a
- 17 long-lived awards program. The IAQ program lasted 10
- 18 years. So, that's a pretty good outcome. We want to
- double that for school IPM, at least. We reviewed the
- 20 different criteria and the different tiers of the
- 21 recognition program and found it to be just absolutely
- 22 excellent.
- I believe there's going to be a public comment,
- 24 and some of our comments going in will be to encourage
- 25 the recognition system to build in something beyond

- 1 checklists, so something that will include evidence that
- 2 activities and impacts are being generated.
- 3 We did find that there was a need to accurately
- 4 reflect the FTE effort. This is something that probably
- 5 impacts all of us in the light of budget cuts and
- 6 catastrophic human resource cuts. People have several
- 7 jobs to do now. Although we have, in theory, a dedicated
- 8 FTE for school IPM in each region, the reality of it is
- 9 that those folks are having other things placed upon
- 10 their shoulders. Some of them are minimally able to
- 11 really address school IPM, some are heavily invested.
- 12 So, we'd like to make sure that we're not just saying
- this number of people are generating this impact, but get
- 14 a handle on what the actual human investment really is.
- 15 We're really excited for what's happening next
- 16 year because there's so many things that will come to
- 17 fruition. We feel like all of these tools and activities
- are culminating, and the next 12 to 18 months will be
- 19 really rather exciting.
- So, we had some suggestions. We wanted to
- 21 encourage EPA to continue to share goals and objectives
- and steps so that those of us that are working in the
- 23 trenches can help to facilitate the process and meet
- 24 those objectives and work in partnership with the agency.
- 25 We would encourage that the national change

- 1 agent corps, those folks out in the trenches, as well as
- 2 the PPDC subcommittee, be used as subject matter experts
- 3 whenever needed. So, we all sort of wanted to volunteer
- 4 our time to put in reviewing and strategizing.
- 5 We wanted to continue to encourage the agency
- 6 to support the retail end of things through effective
- funding streams. That really makes an enormous -- it's
- 8 great to have a wholesale program, but it's rather
- 9 useless unless you have a retail end of it. That
- 10 typically is the rest of us.
- 11 One of the strongest recommendations I have
- 12 personally, please recognize the high-performing regions
- for their dedication to school IPM. Anything that we can
- do to encourage the regional school IPM folks to be
- 15 involved -- and we understand there are time constraints
- and reality constraints, but we want to do everything we
- can to recognize those who have invested time, energy,
- 18 and their lives.
- 19 More suggestions, continue to look for ways to
- include environmental health professionals as well as
- 21 pest management professionals as partners in the process.
- We do a fairly good job with the pest management
- 23 professionals, but there's always room for improvement
- there. But environmental health professionals are really
- 25 a relatively large group of individuals who regularly go

- 1 into schools, inspect schools, and close schools because
- of pest-related issues. So, we really wanted to make
- 3 sure that we were reaching out.
- 4 I'm glad Robin isn't here because she'd shoot
- 5 me. I didn't include, and I should have, school nurses.
- 6 We do have some programs specifically aimed at engaging
- 7 school nurses. We need to do more of that on the retail
- 8 end.
- 9 We wanted to recognize the Center of Expertise
- 10 for outstanding webinars, facilitating stakeholder and
- 11 change agent connections, the website establishment -- I
- 12 checked that out last night. That was really cool -- the
- 13 model contract that's being developed, the recognition
- 14 program, and the professional organization outreach
- 15 efforts that have been underway.
- There's an enormous amount of time, agency
- time, being invested in spending what little travel
- dollars they have getting people to those very visible
- 19 places. I'm here to tell you it does make a difference,
- 20 so our thanks for that.
- 21 Now, I just wanted to shift into a very quick
- 22 overview of some of the things that the committee touched
- on. This is kind of what the work force for school IPM
- looks like nationally right now. You can see there is
- 25 investments from four NIFA IPM centers. We have the

- 1 Center of Expertise, and the regions, and the
- 2 headquarters staff involved in school IPM.
- 3 Then we have the boots on the ground, these
- 4 four working groups. Those are state-lead agency people,
- 5 they are pest management professionals, they are
- 6 university faculty, and a wide variety of different
- 7 individuals, also NGOs.
- 8 This is kind of the result. I don't want to
- 9 say this has happened in the last year; this has happened
- 10 over years. But I wanted to show you where we're at. We
- 11 took a very, very critical view of really what's going on
- where, and this is the result. So, you can see that the
- west coast is doing fairly fantastic.
- We have pink bars in those states that have
- 15 very rigorous statewide school IPM efforts. That does
- 16 not mean that every school has a very perfect IPM program
- 17 at all. What it means is that there's an infrastructure
- and a program and a statewide effort with multiple people
- involved in providing support for that.
- Of course, we do have some states that are less
- 21 engaged. The blue columns indicate expanding coalitions
- 22 where there is focal points of activity that are
- 23 expanding. Then, of course, unfortunately, we do have a
- 24 few states that aren't doing an awful lot. But those are
- 25 fewer and fewer.

- 1 We asked ourselves, are we empowered to
- 2 implement IPM in our schools. Well, clearly, I think we
- 3 have a system that is working and expanding fairly
- 4 rigorously. We know we need three things, competent
- 5 change agents and rock solid leadership.
- 6 We need to accept feedback from stakeholders.
- 7 I'm reminded of that every day. We need to allow
- 8 programmatic evaluation. Those of us involved in
- 9 translational research can confirm that things change
- 10 constantly. So, we need to be very willing to adapt to
- 11 that and roll with it as we discover more.
- I wanted to say that we did identify some weak
- points. We have very good education materials. We have
- some training efforts. We have some national
- 15 coordination, but we do feel that we need some stronger
- 16 national coordination in order to drag those states that
- showed little sign of life into joining the rest of us
- that have rigorous IPM programs. That's what it's going
- 19 to take, is some really strong national leadership. And
- 20 more training because that is lacking. Some states do it
- 21 very, very well. That graph that I showed you with the
- 22 pink bars, those states do it phenomenally well.
- 23 Training and education, who thinks it's the
- 24 same thing? Anybody think it's the same thing? Nobody
- 25 thinks it's the same thing. I bet there's somewhere in

- 1 here -- okay, so it's not the same thing. I just want to
- demonstrate this by saying that if you have a 12-year-old
- 3 and you get that paper from school saying do you allow
- 4 your child to attend sex education, you sign off on that
- 5 dotted line, would you sign if it said will you allow
- 6 your child to engage in sex training? It's different.
- 7 It's different.
- 8 Training is different. This is what training
- 9 looks like. I wanted to show some actual pictures. This
- 10 is IPM. This is training, not education. This is a
- 11 gopher. This is a rat of some kind. These are bugs.
- 12 These are real people walking around doing real IPM.
- 13 Same thing here. This kind of learning is not achieved
- 14 by sitting on your butts and watching PowerPoint. It's
- 15 training. It's on your feet, crawling around. It's
- 16 dirty and it hurts. This is what it looks like. If you
- 17 come out of a field and you're not filthy or in pain, you
- 18 need to go back and do it again.
- 19 So, just to wrap up school IPM, we have a brand
- 20 new revised pest management strategic plan. This is a
- 21 NIFA-supported document, and it's kind of our go-to
- 22 bible. It has pretty much everything you can possibly
- 23 imagine in it pertaining to school IPM. So that is just
- about to be submitted, and it will be our third revision.
- 25 So, it really is a document worth taking a look at.

- We have NPMA partners working stronger with us
- 2 now than ever before. We have some collaborative ties
- 3 and some common standards. So, that is super exciting.
- We expect to make some significant progress because of
- 5 that.
- 6 School-related pesticide application
- 7 legislation is increasing nationally. This is always an
- 8 opportunity for engaging school districts on IPM
- 9 programs. It is an opportunity to expand their
- 10 understanding of IPM by way of making sure that they're
- in compliance with their state laws.
- We have had a reduction in change agent
- workforce. We have fewer boots on the ground this year.
- 14 By next year, we will have fewer again. So, we need to
- 15 make sure that we are investing our time and energy and
- 16 funds to do those activities working with groups that
- will provide things that will make a significant
- 18 difference in the next few years.
- 19 Other issues that were identified, we talked
- 20 about tribes and territories reporting desperate need for
- 21 pesticide safety training. This is nothing new, but in
- 22 light of catastrophic events lately, even more requests
- are coming in. We don't expect that to abate anytime
- 24 soon.
- 25 Pesticide abuse is significantly evident. Bed

- bugs, I note New York there was a few. (Inaudible) said,
- oh, thank goodness, New York has fewer bed bugs. I'm,
- 3 like, no, it's not true. It might be in New York. I
- 4 don't know. I don't live there. But it's not true
- 5 anywhere else, I can tell you that. So, bed bugs are
- 6 still increasing, still a problem. It's directly related
- 7 to the absolutely terrible low-income family abuse and
- 8 misuse of pesticides in homes.
- 9 I will wrap up with that. Thank you very much.
- 10 MR. McNALLY: Any questions, maybe one or two
- 11 questions, before we turn to the description of where we
- are on the Washington State School IPM project?
- 13 Mark.
- 14 MARK: Actually, more by way of comment. Over
- 15 time, this is in the last 18 years, we should recognize
- that has happened, which has gone from 6 percent of
- 17 states in 1996 to 60 percent of the states in 2015. This
- last large increase is, in no small way, because of the
- school integrated pest management initiative from the
- agency and what they've done.
- 21 Probably, the two things I want to make sure
- 22 that are out there again is the fact that if we really
- want to take it all away, we're going to need more
- 24 accountable participation from all the regions. That
- 25 needs to be happening. It's a difficult thing for

- 1 headquarters to deal with, I admit that. But I do want
- 2 to say that that in fact is the reality.
- 3 Furthermore, strategic planning is something
- 4 that most units hate to do because they don't know how to
- 5 do it. But if we don't have transparent objectives with
- 6 strategies to reach goals to share with the partners that
- 7 are out there and with the quality control/quality
- 8 assurance with that, then again, we won't have a
- 9 sustainable program, which is what we would like to do
- 10 working our way out of that job. Thank you.
- MR. MCNALLY: Ray.
- 12 RAY: What it sounds to me like is you're
- 13 connecting a lot of activity, measuring a lot of
- 14 activity, but is the control of pests and disease vectors
- and disease organisms in schools actually improving as a
- result of EPA's efforts? How is this being measured?
- 17 MR. MCNALLY: I think the data at this point,
- 18 Ray, is very anecdotal. I think one thing we might want
- 19 to take a look at in a more structured way is seeing what
- 20 that looks like. Obviously, at the end of the day, we
- 21 want to see a reduction in pest pressures and
- 22 appropriately a reduction in the use of pesticides and
- only use them when they're needed. But at this point, I
- 24 don't think there's a comprehensive study that could
- 25 demonstrate a before and after look at what those numbers

- 1 might look like.
- 2 RAY: So, what's the evidence of overuse of
- 3 pesticides in schools?
- 4 MR. MCNALLY: There's not so much evidence of
- 5 overuse. I think what we're saying is it's a pragmatic
- 6 approach. You use pesticides when you need to, but if
- 7 you maintain cleanliness and do other things around the
- 8 school, the need to have someone coming in and applying
- 9 pesticides is reduced accordingly. So, we think there's
- 10 a time and a place for it, but not as a routine measure
- 11 to try to address the pest pressure problem.
- 12 RAY: Okay.
- MR. MCNALLY: Nichelle.
- 14 NICHELLE: I'm sure I must have missed it,
- 15 maybe in the first presentation, but how many schools are
- involved in the program? Then, my second quick question
- is, I know parents tend to like to be involved in what
- their kids eat in the school and what sort of products
- 19 are being used in the school. So, is the PTA involved in
- these efforts?
- MR. ELLIS: I would say that the number of
- 22 schools varies by state and locale as far as which have
- 23 IPM programs. Some of the grants that we funded are
- 24 working specifically with school districts in certain
- 25 areas. But nationally, I can't say we can put a number

- 1 on that right now.
- To your point about the PTA, that's one
- 3 organization that we are interested in improving our
- 4 partnership with, because we feel that they have a good
- 5 outreach opportunity to schools, and something that we
- 6 are certainly pursuing.
- 7 MR. MCNALLY: Just a follow up, when you
- 8 hear about the pilot from the folks in Washington State,
- 9 they can give you some sense of how things are going with
- 10 different schools throughout the State of Washington in
- 11 terms of acceptance and how they've made some inroads
- over the last year and a half to build coalitions
- 13 throughout the state.
- 14 UNIDENTIFIED MALE: To answer both of the
- 15 questions from Ray and from Nicole (sic), actually,
- 16 coincidentally, yesterday an article came out in the
- 17 Journal of Environmental Health which actually does
- 18 provide some of those statistics regarding the number of
- 19 schools and also illustrates a few cases with regard to
- vector pest management and integrated pest management
- 21 around schools.
- The simple metrics, Ray, is that if we can have
- 23 fewer pest problems, pest complaints, documented pest
- 24 complaints when we don't use pesticides, then because we
- 25 were able to eliminate conducive conditions, then those

- 1 pesticides that were being used on a regular basis before
- those remediations took place were unnecessary.
- MS. GOUGE: I just wanted to clarify a couple
- 4 of things. To respond to Ray, many of us track data
- fairly rigorously. I couldn't say that we track every
- 6 single school with regard to pest incidents and all the
- 7 pesticide use, but our aim is to reduce pests. That is
- 8 our aim. We go in and we're focused on reducing pests,
- 9 not reducing anything else. We're reducing pests. We
- 10 track that most rigorously of all.
- 11 We'll use pilot sites to make sure that what
- 12 we're doing is, in fact, reducing pests. So, I did want
- 13 to clarify that. I would say that all of the school IPM
- 14 change agent corps do that to some extent within their
- own states. Also, the overuse of pesticides was not
- 16 actually in schools. That was particularly focused on
- 17 low-income housing. That is data that was drawn from a
- 18 survey that was conducted the end of last year, beginning
- 19 of this one.
- 20 Also, in response to Nichelle, we changed our
- 21 newsletter from a school IPM newsletter to a school and
- 22 home because so much of the information was going home.
- 23 We were getting so many requests from parents that they
- 24 wanted to know what was going on. So, there's definitely
- 25 room for improvement, certainly, but many of us actually

- 1 do generate events as well as outreach materials that are
- 2 focused on parents and guardians, as well as school
- 3 managers. Thank you.
- 4 MR. MCNALLY: Let me move the agenda along. We
- 5 have Juliann Barta and Carrie Foss. Juliann is from
- 6 Region 10; Carrie is from Washington State. They wanted
- 7 to give you a status report on where we stand on the
- 8 school IPM pilot in Washington State, which the PPDC
- 9 launched about a year and a half ago. So, Juliann and
- 10 Carrie.
- 11 MS. BARTA: Thank you. I'm Juliann. I work
- out of EPA's Region 10 in Seattle. Region 10 covers the
- 13 states of Alaska, Idaho, Oregon, and Washington, and the
- 14 tribes within. I am also the school IPM coordinator for
- 15 that region. So, we'll be talking today about the
- 16 Washington State School IPM pilot project, which has been
- 17 an idea that was formed through PPDC, and it's about
- trying to implement a statewide school IPM program and
- increasing school IPM implementation statewide with our
- 20 school districts.
- 21 Standing next to me is Carrie Foss. I'll let
- you introduce yourself really quickly.
- 23 MS. FOSS: I'm with Washington State
- 24 University, based in Puyallup. I'm the urban
- 25 IPM director at Washington State University. One of my

- 1 charges is school IPM.
- 2 MS. BARTA: So, I'll just get started and tell
- 3 you how we structured this program. We have these
- 4 different components that we've used throughout this past
- 5 year. So, this is an 18-month project, and we're about a
- 6 year into it. So, we're more than halfway through. How
- 7 we structured it is we decided we wanted to first do some
- 8 focus group meetings at school districts to kind of get a
- 9 handle on actually what are the needs that the school
- districts have and how they would like support from folks
- 11 like extension and EPA.
- 12 We've also worked on making sure that we're
- 13 working really closely with our partner organizations and
- 14 expanding partnerships, finding new ways to connect with
- 15 organizations within Washington State.
- 16 Another way we've handled this issue is we've
- looked at encouraging peer mentoring. So, rather than
- having someone from the government providing information
- 19 on IPM to a school, we're trying to have the school
- 20 districts encourage each other and share lessons learned
- and successes with each other. So, we're using a peer
- 22 mentoring model.
- 23 Another way that we're trying to encourage
- implementation is through recognition. We have a few
- different recognition programs available to school

- districts. I'll talk a little bit about that later.
- Then, finally, documenting progress and lessons
- 3 learned, so trying to track everything that we've been
- doing this past year. So, again, the focus group is
- 5 primarily to get a handle on what the school districts
- 6 are looking for in terms of resources and support, rather
- 7 than trying to guess what that is. We've done that
- 8 through a number of meetings.
- 9 We've brought together our champion school
- 10 districts. These are school districts that are IPM star
- 11 certified, which Carrie will talk a little bit about, but
- 12 it's one of our recognition programs. That's through the
- 13 IPM Institute of North America. We got input
- 14 from them.
- 15 We've also done it through some of our
- 16 conferences. We have a Washington Association of
- 17 Maintenance and Operations administrators, which school
- 18 facility managers attend, and we also had a
- 19 coalition event recently. We kind of had an informal
- 20 focus group meeting on that, too.
- 21 Through this, we discovered some of the
- 22 materials that really were requested. We found that
- 23 simple one pagers for different audiences within a school
- 24 district were something that was wanted. Also, looking
- 25 at outdoor IPM, a lot of resources available are related

- 1 to indoor IPM. So, that was something else that came out
- 2 of these meetings.
- 3 Something that we found is that many of these
- 4 materials are already out there online, but we are
- 5 working on making sure that people know they're available
- 6 and bringing them to events and, when appropriate,
- 7 expanding our web site, particularly the Washington State
- 8 University School IPM website.
- 9 Something else that we found through the focus
- group meetings is they provided a lot of input on ways to
- 11 get mileage out of EPA's recognition program, which, as
- 12 you've heard, is still under development. A lot of it
- has to do with branding, so making sure that the parents
- 14 know about this program. They see this logo and it's
- 15 recognizable. So, some of that is input we've been
- 16 providing to EPA headquarters about ways to make this a
- more successful recognition program.
- So, next I'm going to talk about how we've been
- working with our partners within Washington State. I'll
- 20 let Carrie talk about UPEST.
- MS. FOSS: Well, first of all, let me thank you
- 22 for inviting us to present on our project. I'd like to
- 23 thank the PPDC IPM workgroup for suggesting the project
- and EPA for supporting it, because what we've seen is
- 25 some of the intent of our project is to take what we know

- works to get school IPM implemented at the ground level,
- 2 but to also increase our partnership between EPA Region
- 3 10 and WSU.
- 4 There has been a committee in Washington State
- 5 since 1994 that's had a focus on school IPM for about the
- 6 last 16 years. It's called UPEST. It stands for Urban
- 7 Pesticide Education Strategy Team. We're educators. We
- 8 try to provide resources. I've worked with school
- 9 districts a long time, but the last few projects,
- 10 including this project, have really helped us improve
- 11 what we're doing and get a lot more work done. It's been
- 12 fantastic.
- 13 One of the suggestions that came out of the
- 14 PPDC IPM workgroup specifically for this project in
- 15 Washington State was to expand UPEST for all of these
- 16 years it's been in existence. It's an interagency
- 17 committee. We've had representation from Department of
- 18 Health, EPA Region 10, Washington State University,
- 19 Washington State Department of Agriculture, industry, and
- 20 Washington State Department of Ecology.
- 21 But, as a result of this project, we were
- 22 encouraged to expand and reach other partners. We've
- actually brought in some folks. For example, we have a
- health professional now on the committee. We have
- 25 representation from our state's Department of Education

- 1 that connect with all the school superintendents.
- 2 They've been a great asset. And then, also we have
- 3 brought in just a couple other folks. But one of them is
- 4 one of the ESD representatives. So, that's helped us
- 5 with this project in different ways. We'll kind of touch
- on those as we go about it.
- 7 We are bringing in guest speakers. We're
- 8 having NCAP, and I think there might be representation
- 9 here from NCAP. They'll be talking to us a little bit
- 10 more about their school IPM efforts so that we can work
- 11 together better and have a better result.
- 12 MS. BARTA: So, one of the things I've been
- 13 trying to do for this project is look at what other
- states and regions have done and use their successes.
- 15 EPA Region 2 in New York put together a letter of support
- 16 that they sent out to their New York school districts.
- 17 It was interagency, so they had multiple organizations
- 18 sign this letter. It's just a letter that states we
- 19 strongly support school IPM, here are some resources, and
- 20 has some high-level signatures.
- 21 So, we did something similar in Washington
- 22 State. We had the Department of Education for Washington
- 23 State, OSPI, the Department of Health, Washington State
- University Extension, and EPA Region 10 all draft this
- 25 letter and sign it. It was sent through OSPI, through

- our Department of Education, to all our K-12 Washington
- 2 public school districts.
- 3 Some of the benefits that came out of this is
- 4 it really helped us make connections with these different
- 5 organizations, particularly the Department of Education.
- 6 It also increased requests to join Washington State
- 7 University's distribution list, e-mail distribution list,
- 8 so there was more interest in the program.
- 9 Oftentimes at these events, we hear from the
- school district facility managers that they're really
- interested in implementing an IPM program, but they want
- support from their administration. So, we found that
- providing this letter could be a good tool that they
- 14 could use. It's something that I've been personally
- bringing to these events and handing out, saying, use
- this to get your principal or your superintendent on
- 17 board. So, I think it was a good exercise that came out
- 18 of this project.
- 19 We also are fortunate in Washington State in
- 20 that Washington State has a Department of Health, a
- 21 school environmental health coordinator. She's been a
- 22 great resource for us. She puts on these annual school
- 23 environmental health workshops. She had nine happening
- 24 this past year throughout the state and was able to allow
- 25 myself to come and present on IPM.

I provided some of the basics on IPM, but my purpose mainly was to let the school districts know about other resources, including Carrie being able to provide technical assistance and then the resources available to them online and the recognition programs available to them. Again, trying to reach the administration, the Department of Health and myself are going to set up a table and try to make some connections with the school district administrators, the principals and the superintendents. This one event has a huge attendance, 500 to 800 attendees, so I'm hoping this will be a good

way to make some inroads with the audience.

Also, in Washington State, EPA Region 10 has an interagency agreement with the Indian Health Service, the Portland area Indian Health Service, which covers tribes within Washington, Idaho, and Oregon. Through a school IPM project, what we've been able to do is provide training to IHS Environmental Health and Safety officers. These are folks who are already going to tribal schools and doing environmental health and safety walkthroughs.

So, we're providing training in IPM and having them do some IPM assessments, because they're already on the ground visiting these schools. This has been a way for us to reach to some of the schools that are within

- 1 Indian country. We're also trying to replicate this
- 2 project in other regions.
- 3 MS. FOSS: So, one of the activities in this
- 4 project is to build on what we've used before, models
- 5 that we know work. I've been doing coalition events for
- 6 a while. Basically, what a coalition event is, is an
- 7 opportunity to bring school districts together to talk to
- 8 each other, learn something, and for us to connect with
- 9 them so that we can find out who needs some help, who
- 10 wants recognition. Then we can actually get out there
- 11 into the school district to help them fully implement
- 12 their IPM program.
- 13 This model is based on Mark Lame's Monroe model,
- 14 diffusion model. Of course, I've tweeked it in
- 15 Washington State. But we decided, Juliann and I decided
- 16 to include four coalition events in this project. We've
- 17 already had two. Because it's a statewide project, we
- had one in Spokane, which is eastern Washington, and
- then, more recently, we had one in Federal Way.
- We also wanted these to be peer mentoring
- 21 opportunities. So, in Spokane, we actually had a school
- 22 district that had gone through the IPM star evaluation
- 23 process -- I'll talk a little bit about that more -- come
- and present on not only the process but on their IPM
- 25 program, which is wholly functioning. It's a great

- opportunity for the other school districts to learn how
- 2 you go about this. They're doing parts of it.
- How do you formalize a program? So, that's
- 4 what happened in Spokane as well as some other
- 5 presentations that we had. These are educational
- 6 opportunities and networking and peer mentoring, so it's
- 7 kind of team building within the state for the IPM
- 8 program. They're not training events usually, but we
- 9 will have one training event.
- 10 The second one we held in Federal Way. It was
- 11 such a great experience, because years of work and seeing
- 12 the school districts so enthusiastic and encouraged. We
- had Dr. Tom Green come from the IPM Institute of North
- 14 America. He presented on the business case, all the
- aspects of the business case related to school IPM,
- 16 liability, health, environmental protection, and money.
- 17 The school districts wanted to take that information back
- to their administrators and encourage their
- 19 administrators in that way.
- 20 We also had Sherry Glick from the
- 21 Center of Expertise come and present as well. So, it was
- 22 an opportunity for EPA headquarters and centers to
- 23 connect more with the school districts in our state. But
- the best part of the event was when the school districts
- 25 started giving us ideas and opportunities and helping

- 1 each other right there.
- 2 This event wasn't just for large school
- districts or small school districts. The people in
- 4 attendance represented 18 percent of the student
- 5 population in Washington State. We have over a million
- 6 students in Washington State. We have 295 school
- districts, yet the folks there were representing 17
- 8 percent of all of that. They were excited at the end,
- 9 and everybody wanted more help and more implementation.
- 10 That's what we want to see, and that's how we're moving
- 11 this project forward.
- 12 The third event that we're going to have will
- 13 be this summer. This is a training event. I've done it
- 14 a couple times already for the school districts in
- 15 Washington State. Thankfully, Bobby Corrigan was willing
- 16 to come out again this summer, do a two-day rodent
- 17 academy. It's hands on.
- Our two number one pests in Washington State at
- schools are rodents, we have a lot of rat problems, and
- 20 weeds. So, when Dr. Bobby Corrigan comes and I say, can
- 21 you put your hand up if you want to have this rodent
- 22 academy at your school district, because they know it is
- 23 hell for them, everybody puts their hand up. They're not
- 24 shy. We need help. So, he's coming and he's going to be
- 25 helping our school districts with hands-on training,

- learning about inspections, learning about management,
- 2 learning about monitoring and reporting.
- 3 I'll just mention the final event will be for
- 4 recognition of the school districts that are IPM star
- 5 certified. IPM star is a certification program that is
- 6 offered through the IPM Institute of North America. It has an
- 7 interview process. You actually go into the schools and
- 8 look at their IPM programs and their pest problems. You
- 9 evaluate that. If they have an exemplary program, they
- 10 get an IPM star certification.
- 11 We have quite a few school districts in
- 12 Washington that have received this. We are going to have
- 13 several more this summer. It's not part of this project,
- but it's just another way for us to connect with the
- 15 school districts and get more bang for our buck. So, in
- the fall, as the final coalition event, we are going to
- 17 have a recognition program for EPA -- I think Juliann is
- 18 going to talk more about that -- if they pilot their
- great stars as well as the IPM star certified. We will
- 20 have EPA there. We'll have Dr. Tom Green there. I know
- 21 the school districts will be excited.
- 22 One of the things that happened in Washington
- 23 State is because of these certification recognition
- 24 programs and the technical assistance, the school
- 25 districts are a little bit in competition. It's like

- 1 everybody wants to have it.
- 2 Because I've been using the IPM star
- 3 recognition program for a while, we have school districts
- 4 in our state that are very invested in school IPM.
- 5 They're willing to help other school districts. So, one
- of the parts of this project was to develop a core of
- 7 champions. Our IPM certified school districts are our
- 8 core of champions. They're helping the other school
- 9 districts, willing to present at coalition events.
- 10 MS. BARTA: So, Carrie had mentioned the IPM
- 11 star program. You heard that EPA headquarters is
- developing a recognition program. I actually got the
- okay to pilot the first tier of the recognition program,
- 14 the Great Start Award program.
- 15 So, I'm currently offering this up to school
- districts, for school districts who don't already have a
- fully implemented program in place but they are
- interested in putting one in place. So, this is a way to
- 19 recognize school districts that are taking those first
- 20 steps. They include things like putting together an IPM
- 21 policy and making sure that there's someone in the school
- 22 district who is designated as the IPM coordinator and is
- 23 receiving training. This is something that I'm currently
- 24 offering and hoping to get some school districts on board
- 25 for.

- 1 Something we've been trying to do throughout
- 2 this project is just trying to document progress and show
- 3 which school districts that we've been able to have some
- 4 impact on. I'm really keeping track of what school
- 5 districts have attended events and our EPA webinars. If
- 6 they have a policy or plan, if we have that information,
- 7 we're tracking that.
- 8 Whether they've received any information from
- 9 us, including follow-up information. At all these
- 10 events, we always have a follow-up form, and we ask
- 11 people what topics they're interested in and provide
- follow up for them. So far, we've reached over 75
- 13 Washington school districts through all these events and
- 14 through all this outreach. At the end of this project,
- 15 we will provide much more detailed information on the
- 16 impact.
- MR. MCNALLY: Excuse me, Juliann. Let me just
- do a time check. I think we're probably a little bit
- over. We've had more questions for the earlier part. We
- 20 need to finish up in the next several minutes so we keep
- 21 on schedule. Thank you.
- 22 MS. BARTA: I think I have just a few more
- 23 slides. We are doing a survey in Washington State to see
- 24 the progress that school districts have made in terms of
- 25 IPM and whether they have a policy or an IPM coordinator.

- 1 Those were a few of the things that the survey is asking.
- 2 So, that will also help us with reporting out.
- 3 So, really briefly, just on the lessons learned
- 4 that I've taken away this past year, the first one might
- 5 seem obvious but it's really important to emphasize, and
- 6 that's how critical it is to have strong partnerships.
- 7 For us in Washington State, we've really been able to use
- 8 the Department of Education capabilities to reach out to
- 9 their school districts, as well as the Department of
- 10 Health events and expertise to help us.
- 11 Some other things, from the focus group, they
- really gave us a good handle on when is the best time to
- have these events, because the school district facility
- managers have a lot on their plate, and just recognizing
- that the timing of the events is critical for
- 16 participation.
- 17 We want to reach as many students as possible,
- but it's also important to take into account the small
- 19 school districts and the rural school districts because
- 20 they can be great change agents and they can help us with
- 21 diffusing school IPM to other districts.
- 22 Something that I've heard is that EPA is
- 23 considered a regulatory agency. When we do a walk
- through in a school, oftentimes there's this concern or
- fear that that's going to be associated with an

- 1 inspection or a fine. So, just being aware of that and
- 2 letting folks know we're here for education, for
- 3 technical assistance. I am not an inspector. So, that's
- 4 something that's come out of this.
- 5 In terms of measurements, on a state scale,
- 6 it's pretty easy to track outputs, but you guys know
- 7 outcomes can often be more difficult, such as the
- 8 decrease in pest complaints. That's why it's really
- 9 important to have a few pilot schools where you can track
- 10 more of that detailed information.
- 11 MS. FOSS: I'll wrap this up. I told the IPM
- workgroup the other day that I can spend a half hour on
- 13 this slide, but I won't. In fact, Dawn did such a great
- job with her slide, we just appreciate USDA's support and
- 15 involvement in school IPM, as well as EPA's, and all of
- our partners throughout the country within the state and
- 17 the materials and support that EPA has provided through
- 18 the Center of Expertise, as well as the projects. Like,
- 19 Dawn is working on a national curriculum project.
- There's going to be a national resource website.
- So, we are connecting and using all those
- 22 materials as we go forward. Thank you.
- 23 MR. MCNALLY: So, I think we'll be around at
- the break, the EPA people, to talk about our program in
- 25 general. I think some of the research that Mark and Dawn

- 1 have done, if you want to talk to them about the
- 2 effectiveness of school IPM programs, feel free to ask
- 3 any questions of them at the break or at other times
- 4 during the day. So, thank you very much.
- 5 MR. HOUSENGER: Thank you very much.
- 6 Our next session is on the endocrine disruption
- 7 screening program. David Dix isn't able to be with us
- 8 today, but his deputy, Steve Knott, is. For anybody who
- 9 has been following the EDSP, they know it's been a long
- 10 time coming. It was required in 1996 by FQPA. I think
- 11 what we're going to talk about today is how far it's come
- and how fast it's going at this point. So, I'll turn it
- over to Steve.
- 14 MR. KNOTT: Thanks, Jack. I wanted to thank
- 15 the PPDC for this opportunity to provide an update on the
- endocrine disruptor screening program. There are really
- 17 exciting changes that are taking place in the science for
- 18 the program.
- 19 As Jack said, my name is Steve Knott.
- 20 Actually, I'm the Director of the Exposure Assessment
- 21 Coordination and Policy Division in the Office of Science
- 22 Coordination and Policy in EPA's Office of Chemical
- 23 Safety and Pollution Prevention. Our office of Science
- 24 Coordination and Policy has the lead for coordinating on
- 25 the science behind or underlying the endocrine disruptor

- 1 screening program.
- 2 Just a very brief recap of the history of the
- 3 EDSP. It is a statutory program established under the
- 4 Food Quality Protection Act and amendments to the Safe
- 5 Drinking Water Act, both in 1996. Subsequent to the
- 6 passage of those acts, the agency sought the advice of
- 7 outside scientific advisors, the Endocrine Disruptor
- 8 Screening and Testing Advisory Committee, and established
- 9 the program in 1998 really to address both human health
- 10 and ecological effects from interactions with the
- 11 estrogen, antigen, and thyroid pathways.
- 12 From the beginning of the program, it was
- envisioned as a three-phase program, the first phase
- being a prioritization step to identify those chemicals
- 15 that we need further evaluation, the second being a
- screening step to identify those chemicals that have
- 17 bioactivity or potential to interact with the endocrine
- 18 system, and then the third phase being longer term,
- multigeneration studies to collect data that would be
- 20 necessary for risk assessment.
- 21 The expectation was that fewer and fewer
- 22 chemicals would proceed through each of these phases of
- 23 the program. So, the quote I have up there is from the
- 24 (inaudible) committee. I wanted to point out that they
- 25 envision the prioritization step as including

- 1 consideration of both bioactivity and exposure
- 2 information. At that time, around 1998 or 1999, the
- 3 agency brought the available tools to the joint meeting
- 4 of the Scientific Advisory Panel and Science Advisory
- 5 Board.
- At that time, the science advisors found that
- 7 those tools were not quite ready, not even for use in
- 8 prioritization. But we've come a long way since that
- 9 time period. We are now at the point where we can use
- 10 these tools in what we're calling an integrated
- 11 bioactivity exposure ranking approach.
- 12 Just a very brief overview of what the approach
- is, the IBER, the integrated bioactivity exposure
- 14 ranking, approach really makes use of three primary data
- 15 streams. There's science throughput, bioactivity
- information from programs such as the agency's ToxCast
- 17 program, there's high throughput exposure information,
- and again, there's the agency's ExpoCast program, and
- 19 then there's also high throughput toxicokinetic
- 20 information or also reverse toxicokinetic information.
- 21 I'll talk a little bit more about each of those data
- 22 streams on future slides.
- 23 So, the need for taking this approach is pretty
- 24 straightforward. There's a lot of chemicals that risk
- assessors and risk managers need to consider. There's

- approximately 84,000 chemicals in the TSCA inventory, about 1,000
- 2 registered pesticides. For the endocrine disruptor screening program
- 3 itself, approximately 10,000 chemicals have been identified as
- 4 needing to be considered or addressed in some way.
- 5 The approach that has been taken thus far has
- 6 only identified 174 chemicals in the first two lists to
- 7 potentially move into screening. So, many of these
- 8 chemicals have limited available information, so we
- 9 really need a more strategic approach to targeting data
- 10 collection and further assessment.
- 11 Again, just expanding a little further on the
- need, I mentioned list one and list two. They're based
- primarily on exposure consideration. I pointed out a
- 14 number of times that these are not presumed to interfere
- 15 with the endocrine systems of humans or wildlife. They
- were selected primarily on exposure considerations. So,
- 17 the key point there is that other chemicals in the
- 18 universe could have higher priority if we were looking at
- 19 both bioactivity and exposure together.
- 20 As I'll go into a little more later, the
- 21 toxicity information is available for some of those list
- 22 one and list two chemicals, the 174, and it demonstrates
- 23 what we've seen so far. It demonstrates that yes, when
- these two components are considered together, some of

- 1 these chemicals maybe should have had a lower priority.
- 2 Just kind of to recap, the first two lists, 174
- 3 chemicals, of those, 52 have gone through the lower
- 4 throughput existing tier one screening. It's obvious
- 5 that continuing through that process is going to take
- 6 many decades to get through the screening of the EDSP
- 7 universe of chemicals.
- 8 So, a more strategic approach was needed. As I
- 9 mentioned previously, there have been a lot of
- 10 advancements in science of high throughput tools,
- 11 particularly since the original peer review of the SEP,
- 12 SAB. We really realized that it reached a point, a
- turning point or a pivot, in the science that's available
- to us for the EDSP.
- 15 In 2011, the agency developed a work plan
- entitled the EDSP21 Work Plan. This is available on our
- 17 website, which is listed here. It basically describes an
- iterative step-wise approach to incorporating these high
- 19 throughput tools into the program. We're now, I believe,
- well into the second phase here where we are really
- 21 poised to begin to use high throughput tools as an
- 22 alternative to some of the existing lower throughput
- assays.
- The third phase that we're working toward would
- 25 be to ultimately be able to use these high throughput

- 1 tools for the screening and to make decisions about which
- chemicals need more detailed testing and appear to type
- 3 multigeneration study to develop information for risk
- 4 assessment.
- 5 To expand a little further on the integrated
- 6 bioactivity and exposure approach, basically, the dose
- 7 response information from high throughout bioactivity
- 8 assays is converted to a putative human bioactive dose
- 9 using the reverse toxicokinetic information. Then these
- 10 doses are compared with information from high throughput
- 11 exposure estimates to yield some ranking or priorities
- among the chemicals that we're looking at.
- 13 So, in this case, for instance, the lower 95
- 14 percent competence interval on dose and the upper 95
- 15 percent competence interval on exposure, we look at that
- distance to give us some indication across the large
- group of chemicals as to what rank or order or priority
- 18 they should have.
- So, to demonstrate this approach, the agency
- developed a white paper this past year based on the
- 21 information that's available thus far. There's
- 22 bioactivity information out of Toxcast for approximately
- 23 1,800 chemicals. The Expocast, the early, I believe
- 24 it's referred to the second generation, results are
- approximately 8,000 chemicals. Then, the sort of limit

- 1 at this point is in the reverse toxicokinetic
- 2 information. At the time of the white paper, there was
- 3 information available for about 239 chemicals.
- 4 So, in the white paper, we present the early --
- 5 in these high throughput bioassays to identify
- 6 bioactivity, they get a concentration of chemical that is
- 7 bioactive in that in vitro, in the test system. What
- 8 they do is take analyst studies and some cell-based
- 9 studies to convert that to what might be a concentration
- in human or another animal target species in the blood
- 11 that might also be bioactive. So, it's trying to, in a
- sense, scale up from the in vitro bioactivity to what
- might be happening in an organism. It doesn't mean
- that it's bioactive in the organism; it's just an attempt
- 15 to scale it up so we're making a more appropriate
- 16 comparison to the exposure estimates.
- So, these are the preliminary results that were
- presented in the white paper for the 239 chemicals. It
- just shows the type of output for this. Again, the
- 20 ranking in this case is simply just the ratio of, again,
- 21 the lower limit on bioactive dose to the upper limit on
- exposure.
- 23 Given that we were taking that kind of ratio,
- things are a little bit turned around here in some sense
- in that the lower lefthand corner of the plot is actually

- 1 the higher priority or an indication of higher priority.
- 2 So, these are the lower IBER scores or integrated
- 3 bioactivity exposure rankings. The lower ones in this
- 4 case are the higher priority. The upper part of the
- 5 curve is the higher scores.
- 6 It basically indicates that these would have
- 7 maybe lower priority for doing further evaluation or
- 8 testing. You can see that as I mentioned earlier -- it's on the
- 9 list one and list two chemicals for which information was
- 10 available. You can see that many of them are falling at
- 11 that upper portion of the curve, or maybe their
- 12 priority should have been a little lower.
- So, an important part of bringing these tools
- into the program is building our scientific competence.
- 15 A critical component of that is scientific peer review.
- 16 So, this past year, the agency held two FIFRA
- scientific advisory panels to review white papers,
- develop different aspects of the program. The first one
- 19 was in July dealing with the exposure models and then,
- 20 most recently, in December dealing with some of the
- 21 bioactivity information and this integrated bioactivity
- 22 exposure approach.
- In the July SAP meeting, there were really two
- 24 primary focuses for the charge. One relates to what is
- 25 known as the systematic empirical evaluation of models

- framework, which is being used in the Expocast program to
- 2 sort of optimize and calibrate the high throughput exposure models and
- 3 then, also, the reverse toxicokinetics that we were just
- 4 talking about. The charge is focused primarily on those
- 5 two areas in July. We also asked about some future
- 6 directions, including being able to begin to think about
- 7 extrapolations, ecological targets.
- 8 One thing I would never do is try to summarize
- 9 the recommendations of the FIFRA SAP in one slide, but
- 10 here it is. I would just encourage everyone to visit the
- 11 website, definitely look at the SAP documents, and the
- 12 full minutes from the meeting to get a good sense of the
- 13 overall recommendations and discussion from the panel.
- I have tried to capture some of the highlights
- 15 from the July meeting here. We basically found that the
- themed framework was scientifically sound and suitable
- for the purpose that we were looking at. They did
- 18 recommend that further work be conducted to evaluate the
- 19 variability and uncertainty in the models. This was kind
- of a recurring theme in the cross, I think, of both
- 21 meetings that we had this year.
- 22 Again, with respect to the first toxicokinetics
- work, the panel felt that this was going in the right
- 24 direction. Really, there's no other viable approach to
- doing this. Again, there were some technical aspects

- 1 that they felt we needed to continue to look at,
- 2 including that the model didn't necessarily predict the
- 3 steady state concentrations in vivo. They had some
- 4 comments along those lines. They also felt additional
- 5 chemicals would be useful. There was no consensus at
- 6 that point on this particular application of the reverse
- 7 toxicokinetics.
- 8 For the December SAP meeting, the charges
- 9 focused on, again, three areas primarily, the estrogen
- 10 receptor bioactivity model, the antigen receptor
- 11 bioactivity model, and then the overall integrated
- 12 approach. Again, taking the risk of summarizing it in
- one slide, I'll encourage you to look at the panel's
- 14 report.
- The panel is very positive about the overall
- 16 approach. They believe the agency was capturing worst
- 17 case scenarios in an attempt to account for variability
- and uncertainty. They also felt that even though this is
- 19 a complex model, it was simple enough so that it's still
- transparent and would be very usable in a broader community.
- 21 They felt this was a very good starting point for the
- 22 direction that the agency is headed.
- 23 Again, a lot of the comments focused on
- variability and uncertainty, collecting more data,
- 25 particularly bioactivity data and exposure data. They

- 1 did express some concern about how well the models were
- 2 capturing specific human populations, agricultural
- 3 workers, chemical formulators, pregnant women. So, there
- 4 were a number of technical comments related to those
- 5 groups.
- The agency is considering the recommendations
- 7 that we received this past year from the SAP. I just
- 8 highlighted a few areas where I believe work is moving
- 9 out already, looking at next generations of the exposure
- 10 models, including, for example, a high throughput version
- 11 of the SHEDS model, which is the (inaudible) human exposure
- 12 simulation model.
- 13 Looking at other areas like groundwater,
- 14 drinking water, dermal and inhalation exposures, the
- 15 steady state issue in relation to exposures, and I also
- 16 mentioned future areas of extrapolations to ecological
- species, also expanding the number of chemicals for
- 18 biomonitoring, and also doing additional reverse
- 19 toxicokinetics work. Again, that, thus far, is sort of
- 20 the limiting step in the number of chemicals that we're
- 21 looking at.
- 22 So, with that, I just want to acknowledge that
- there are many, many folks across the agency and also
- 24 other federal partners in this work. So, I've provided
- an acknowledgment here of the different offices and our
- 26 partners at NIH that have been most directly involved

- 1 with the work over the past year, in particular.
- With that, I'll entertain any questions.
- 3 MR. HOUSENGER: Thanks, Steve. We can take
- 4 questions, but just to kind of put this in perspective a
- 5 bit, when we went out with our first list, one chemical
- 6 (inaudible) was 67 chemicals, of which we took 52 after
- 7 registrants cancelled some pesticides or inerts. From
- 8 the time that we issued the test order to the time that
- 9 we completed our weight of evidence was about five years.
- So, that's 52. You can do the math and see how
- long it would take us to get through 10,000 of these.
- 12 We've been talking about Tox 21 for a long time, but this
- 13 really is exciting in terms of the resource savings, the
- 14 identification of which chemicals are bioactive and need
- 15 further testing. I never thought I'd see it before I
- 16 retired, so maybe now I can retire.
- 17 Cheryl.
- 18 CHERYL: So, this is just a real simple point
- of clarification. Since we are in the PPDC, the
- 20 pesticide discussions are what we've been listening to
- 21 for a day and a half. Your slide on page 4, I just want
- 22 to clarify for the whole audience it says limiting and
- 23 existing available data for many chemicals is next to nil
- for new substances. We're talking about the broad range
- of all chemicals. We are not talking about pesticides,

- 1 because pesticides have a whole set of data that all come
- 2 in from new registrations. I just want to clarify
- 3 because of the venue we're in. Thank you.
- 4 MR. HOUSENGER: Mae.
- 5 MAE: Hi, thanks. I was just wondering of your sense of
- 6 time line going forward for, say, the three chemicals and
- 7 tier two things coming out?
- 8 MR. KNOTT: One thing I'll note with respect to
- 9 tier two, you may be aware that we just closed the
- 10 comment period on draft guidelines for the three tier two
- 11 studies. I believe it closed the end of March. So,
- we're working through the comments we received on those.
- 13 We're hoping over the next several months to be able to
- 14 move forward with the guideline documents reflecting the
- 15 comments that we received.
- With respect to future lists, I'm not really in
- 17 the position to comment. We're focusing in my division
- on the underlying science. We're working toward
- 19 expanding the use of these tools, looking at this larger
- group of chemicals. Again, as I mentioned, we have the
- 21 239 as sort of the basis for the white paper in December.
- 22 We're looking to expand that and continue to expand the
- 23 number of tools that we're bringing into the program.
- 24 Working really toward future implementation and
- 25 scientific peer reviews, of that information.

- 1 MR. HOUSENGER: Liz.
- 2 LIZ: It wasn't apparent to me, maybe you said
- 3 it, but I'm interested in list one and the status of the
- 4 weight of evidence documents.
- 5 MR. HOUSENGER: So, those are currently being
- 6 completed. We expect them out in June.
- 7 Mark.
- 8 MARK: Really valuable and certainly focused on
- 9 the future this research and this approach that the
- 10 agency is taking. I have a lot of respect for what
- 11 you've done. The question I have relates to predictive
- 12 confidence into the future and routine application
- 13 thereabout.
- 14 MR. KNOTT: I think that is an important
- 15 point. It's sort of iteratively building confidence in
- these available tools. Going back to that EDSP 21
- 17 diagram that sort of maps out the division for the
- program, it was very iterative and stepwise. The key
- 19 part of that is getting peer review, building confidence
- 20 in our applications.
- So, that third phase is a little bit longer
- 22 term phase where the point we hope to get to is where the
- 23 high throughput available information can be used to make
- 24 decisions about which chemicals really need more detailed
- study, for instance, in a multigeneration study to

- 1 collect information for risk assessment.
- So, I don't know if that addresses your
- 3 question, but I agree it's an iterative process, and
- 4 we're building confidence and making sure that we bring
- 5 these tools to peer review as we bring more tools into
- 6 the program.
- 7 MR. HOUSENGER: Nichelle.
- 8 NICHELLE: This is an incredible amount of work
- 9 that guys are doing. Just a quick question that you
- 10 probably just touched on, but maybe you could just
- 11 clarify for me. As we move forward reviewing these tiers
- of chemicals, would the results that you guys have
- determined be incorporated in registration review as the
- 14 chemicals come up for review? Or, do we wait until the
- decade long process is done before we see those data
- incorporated in risk assessment?
- 17 MR. HOUSENGER: I think certainly we'll know
- which chemicals exhibit bioactivity. Then, requiring
- 19 tier two testing is a longer process, if they go into
- 20 tier two. So, I'm not sure how that works out in terms
- of reg review, which is supposed to conclude in 2022. I
- 22 think it's a decision of whether to go forward and get
- 23 mitigation on things that you know are posing an issue
- 24 today versus waiting for everything to be wrapped up
- 25 neatly. So, I think part of that is the estrogen

- 1 component of this is a lot farther along than the
- 2 androgen, which is pretty close, and then the thyroid is
- 3 a little further out.
- 4 So, how that all matches up, I don't know. I
- 5 think it makes sense to take action on chemicals, put
- 6 mitigation measures in place when you know there's a risk
- 7 rather than wait for it to all be perfect and do it then.
- 8 Pat.
- 9 PAT: Obviously, the animal welfare groups have
- 10 been following the EDSP for quite a few years. When the
- 11 program first came out, there was a potential with 10,000
- 12 chemicals for millions upon millions of animals to be
- used in the testing. The 52 chemicals that were tested
- in tier one, we did the calculation and we came up with
- about 30,000 rats, frogs, and fish that were used just
- 16 for those 52 alone.
- 17 So, we are really ecstatic about the success
- 18 that has been demonstrated with the ToxCast data, how you
- 19 guys have been handling it. I think at one of the more
- 20 recent SAPs, the relationship between the ToxCast data
- 21 and what was found in vivo was exceptional. They found
- 22 that the ToxCast assays were very highly predictive. In
- 23 some cases, there was thought that they actually were
- 24 superior to some of the in vivo tests.
- 25 So, I just wanted to just make that comment,

- 1 that we are very supportive and give a lot of praise to
- 2 EPA on this work. Hope it continues. I don't know if it
- 3 will get applied to list two, but certainly going forward
- 4 from there. Thanks.
- 5 MR. HOUSENGER: Ray.
- 6 RAY: EPA has put forth a tremendous effort and
- 7 a very deliberate scientific approach to the question of
- 8 endocrine disruption. We applaud the agency for that
- 9 work. You're the world leader. There's a lot of
- 10 interest worldwide in this, particularly in Europe where,
- for some reason, they haven't seen the need to apply much
- science to the effort. They're proceeding with
- 13 identifying endocrine disruptor criteria without any
- 14 testing or science behind it.
- 15 What's the level of dialogue with your European
- 16 colleagues on their efforts, because we're hoping that
- they're going to follow your lead?
- MR. KNOTT: Well, speaking on the science side,
- we do have engagement through OECD, primarily. We have,
- actually, all along in the program, including with the
- 21 development of the original tier one assays. There's the
- validation management group for nonanimal, which I
- 23 believe is an area to engage on these approaches. At
- least on the science side, we are continuing to engage,
- 25 primarily through OECD.

- 1 MR. HOUSENGER: Sue.
- 2 SUE: I know it may not be possible, but I was
- just wondering, based on your -- you've already looked at
- 4 some of the list one and list two chemicals through your
- 5 IBER approach. You acknowledge that some of them really
- 6 should have been given a low priority. Are you going to
- 7 use that information to revise this too before you go out
- 8 with test orders for the full battery of screening
- 9 assays?
- 10 MR. KNOTT: I don't think I'm in a position to
- 11 comment fully on that, but I will say that what I've
- shown was a demonstration of the approach that was
- 13 brought to the Scientific Advisory Panel back in
- 14 December. So, we still have to take those
- 15 recommendations under consideration and continue to work
- on the models.
- 17 MR. HOUSENGER: I think some of that is
- dependent on how fast the science progresses and where we
- 19 are and do we really want to issue test orders or do we
- 20 want to wait for this to catch up. Those are things that
- 21 we're considering as we're moving forward.
- 22 All right, thanks, Steve.
- 23 Let's take a quick break, seven minutes. I
- 24 know how well everyone adheres to these time frames.
- 25 (Whereupon, a brief recess was

1 taken.) 2 MR. HOUSENGER: Our last topic for today is 3 from Bill Jordan on regulatory retrospective review. 4 MR. JORDAN: Of course, because Jack knew that 5 this would be the most fascinating topic, he put it last 6 on the agenda. Because I know I'm going to do such a 7 fabulous job and because we take schedules very 8 seriously, I'm anticipating that you will not have any 9 questions and that you all allow me to complete this 10 presentation in under 15 minutes so that we can get back 11 on schedule. 12 There are two pieces of paper in the folder 13 that relate to this particular session. The first is one 14 page, one sheet, a copy of the different slides that I'm 15 using here. The other is a letter authored by our own 16 PPDC member, Ray McAllister, that was sent out in 17 response to the webinar that we had before this PPDC 18 meeting in person, in which I invited people to send us 19 additional ideas about regulatory retrospective reviews. 20 I just wanted everybody to have Ray's letter because it shows the kind of breadth of thinking in terms of topics 21 22 that might be taken up and considered in the regulatory 23 retrospective review process. 24 So, a little bit of background and history 25 here. In 2011, President Obama signed an executive order

- 1 that went to all federal agencies directing us to take a
- 2 hard look at the way we do business, our regulations and
- 3 our processes, so that we could make changes to those
- 4 regulations and processes that would increase efficiency,
- 5 that would reduce burden or improve effectiveness of our
- 6 responsibilities as government public servants.
- 7 It has sort of two parts to it. The first is
- 8 to reach out to the public and ask for ideas, because the
- 9 public, you all, are the ones who are affected by our
- 10 work in government. Then the second piece is to evaluate
- 11 those ideas. Once it seems like they have a lot of
- 12 promise, to follow through and work on them and make our
- regulations more streamlined or repeal those that we
- don't need or modify them in order to make them more
- 15 efficient, and so on.
- We did that. We had a public engagement
- 17 process including talking to PPDC and we got a lot of
- different suggestions, as you can see in the CropLife
- 19 letter, which renewed the recommendation that we look at
- 20 a number of different things. As a whole, EPA identified
- 21 35 particular projects that we wanted to work on. OPP
- 22 had five of them.
- 23 I'll quickly identify the five that we had.
- One was modernizing science and technology methods in
- 25 regulation, reducing whole animal testing, reducing

- 1 costs, improving efficiencies. The second is online
- 2 reporting of health and safety date. The third, working
- 3 on our export notification requirements for chemicals and
- 4 pesticides. The fourth, integrating pesticide
- 5 registration reviews. The fifth, strengthening the
- 6 certification of pesticide applicators.
- 7 So, we've been working on those five. I'll
- 8 sort of summarize where we have landed on them in a
- 9 moment, but I just want to let you know that one of the
- 10 things that's in the executive order is that this is not
- 11 a one-shot deal. This is not once and done, but rather
- something that we should be doing on an ongoing basis.
- So, that's the reason I'm back here talking with you
- 14 today about soliciting more ideas for making our work
- 15 better.
- We have a docket, which you see identified on
- the slide, that covers all of the regulatory
- 18 retrospective reviews. We post a progress report every
- 19 six months on our website. You can see the link address
- on this slide for that.
- 21 In January of 2015, the status of our efforts
- 22 were that EPA had completed 21 of the 35 retrospective
- 23 reviews, but we announced that we were adding 5 more, 2
- of which come from the Office of Pesticide Programs. So,
- 25 that means that we now have 19 currently underway, and

- 1 we're open to looking at ideas about adding more.
- The two that were added from 2014 are our work
- 3 on the confidential statement of product specifications,
- 4 also known as confidential statement of formula, and the
- 5 FIFRA pesticide import revision rule. So, the two that
- 6 we have finished are the one dealing with the export
- 7 notification. We issued a final rule that addressed
- 8 recommendations from our Office of Inspector General. We
- 9 realized that we had a wording problem with it, so we
- 10 rushed through a final regulation that amended that. So,
- I think we now have a more effective export notification
- 12 program that's still streamlined.
- 13 Then, the second one that we have dealt with is
- 14 the integrated pesticide registration reviews. This is
- 15 the effort to bring chemicals that are similar in their
- biological effects and similar in their use patterns
- 17 together. We've done that through the registration
- 18 review program.
- 19 We are also trying to streamline that process
- 20 by introducing the focus group meetings and very early in
- 21 the process clarifying use patterns and identifying
- 22 particular concerns and trying to make sure that our work
- 23 moves ahead in an efficient manner, both for the external
- 24 stakeholder community and for ourselves.
- 25 Just a quick word about our continuing efforts

- 1 modernizing science and technology methods. You just
- 2 heard about the work that we're doing on endocrine
- disruptors. That is an important and exciting piece of
- 4 that work. Online reporting, we have established a
- 5 portal for submission of materials for applications for
- 6 registration and amended registration electronically.
- 7 Kevin Keaney talked yesterday about the
- 8 certification of pesticide applicators. That regulation
- 9 is an old one. We're proposing amendments that build off
- of the experience in the state programs. It should be
- 11 out as a proposal this summer.
- The confidential statement of product
- specifications, also known as CSF, is something that
- 14 we're working on jointly with our colleagues in Canada,
- so that a single submission of the CSF will satisfy both
- 16 US EPA and Canada PMRA requirements, a saving score of
- 17 the people who do business regulatory-wise. But also,
- importantly, capturing that electronic form that will
- 19 allow us to keep better records and manipulate them much
- 20 more quickly.
- 21 Then, the FIFRA pesticide import rule revisions
- 22 are part of a larger effort across the entire government
- 23 to move to an electronic processing of import information
- and make the trip through customs and border protection
- 25 at our ports much easier. We know from our experience

- in the pesticide world that reviewing notices of arrival
- 2 is a process that creates a lot of work for our regional
- 3 offices. If we can figure out ways, and we have, we
- 4 believe, come up with some very important ideas to
- 5 streamline that process and make it more efficient.
- 6 So, all of those are showing a lot of promise
- 7 in the regulation changes that accompany that for the
- 8 automated customs environment (ACE). It should be out toward
- 9 the end of this year.
- 10 So, in 2015, we're reaching out again to you
- 11 all to hear ideas. We want to find ways not only to
- 12 change regulations but also to focus on our business
- processes and reduce things that are unnecessary or
- burdensome, modernize our regulatory program. Our
- 15 continued emphasis on IT upgrades is one of those areas.
- When you respond to this, we'll look hard at
- 17 your comments. We'll select the ones that seem like they
- have the biggest bang for the buck in terms of using your
- 19 taxpayer dollars wisely. So, that means that we won't be
- able to do everything on the list, but that doesn't mean
- 21 those are bad ideas. We want to hear them, and we'll get
- 22 to them as we can.
- 23 The last thing is that it's not just you all we
- 24 want to hear from. State partners, reach out to your
- 25 colleagues, small businesses, general public in terms of

- 1 access to information, and things like that. So, we are
- 2 asking for your feedback by June 26th. That's a little
- 3 bit over a month. Send your submissions to our docket
- 4 number that you see listed on the slide here. You reach
- 5 that docket through www.regulations.gov. Then we'll be
- 6 busy over the coming months thinking about which ones we
- 7 are going to tackle.
- 8 So, there you go, Jack.
- 9 MR. HOUSENGER: Well, you made that more
- 10 interesting than it sounded.
- MR. JORDAN: It sounded, what, boring?
- 12 MR. HOUSENGER: Well, more interesting than the
- 13 title would indicate.
- 14 Are there any comments or questions?
- 15 Sue.
- 16 SUE: Just one. I know you said, Bill, that
- 17 this wasn't meant to be a one-off exercise; this would be
- 18 something that would be ongoing. In fact, an executive
- order can be a one-off. So, let's say the executive
- order in the next administration is repealed. Is this
- 21 something that you're looking to institute, basically, as
- 22 general EPA policy in the future?
- 23 MR. JORDAN: You know, I think whether there's
- an executive order or not, we, in the pesticide office,
- 25 have been open to suggestions from all quarters about how

- can we do our business better. The PRIA process
- 2 improvement group is a fertile source of suggestions and
- 3 ideas. So, too, are the PPDC. Some of the things that
- 4 have come up in PPDC conversations have sparked us into
- 5 reworking our activities. So, I think I can't make a
- 6 promise on behalf of the whole agency, but knowing the
- 7 culture of OPP, I think I can say yes, we'll still keep
- 8 listening.
- 9 MR. HOUSENGER: Mark.
- 10 MARK: When I look at a perspective like this
- and the retrospective aspects of it, and begin to think
- 12 about what about the future, what about how EPA deals
- with certain drivers and change agents, probably the most
- 14 significant thing happening in the United States today is
- 15 invasive species.
- In terms of pesticides, redirecting pesticides,
- increasing spray programs, et cetera, I think two really
- good examples are the brown marmarade (phonetic) stink
- bug and the spotted wing drasopahlla (phonetic). From the
- 20 standpoint of pest management, everything is changing in
- 21 an invasive world.
- 22 So, when you look at this kind of activity and
- 23 you talk about trade and you talk about basically making
- 24 it I don't want to say easier, more electronically-based
- 25 importation process, I know that checking up on invasives

- isn't part of the EPA's responsibility, but it is part of
- 2 the EPA's responsibility in terms of controlling these
- 3 guys and having materials to be able to do that.
- I see this moving, accelerating, and becoming a
- 5 much more significant push back on government and the
- 6 agency is going to live that. It's going to be a lot of
- 7 pressure. I just wondered if we could have a comment on
- 8 that, and maybe think about how to integrate that whole
- 9 subject arena into the next meeting or something that we
- 10 could explore some ways of dealing with these major
- 11 drivers across this country.
- 12 MR. JORDAN: Thanks. In the next session,
- we'll talk about possible topics for the next meeting.
- 14 So, that's one that I think goes on the list. In terms
- of the retrospective review, I encourage you to send in a
- 16 letter and particularly think about what would we in the
- 17 pesticide office need to do differently from the way
- we're doing things now; for example, in the emergency
- 19 exemption program or in the IR-4 program or something
- 20 like that. So, help us understand the implications of
- 21 increasing pressure from invasive species.
- 22 Cheryl.
- 23 CHERYL: Thank you, Bill, for that enthralling
- 24 talk. I have a follow-up question now. All of this
- 25 makes great sense. You're saying you don't need an

- 1 executive order to make process improvements. Good,
- good, good. I'm just struck at, again, the type of
- 3 things that have been picked off are really big and
- 4 broad. It looks like they take a lot of time. They're
- 5 comprehensive, which is all great, but they don't get
- down to some of the specifics, say, to the letter that
- 7 Ray sent in. They could be rolled up in there somewhere.
- 8 I'm wondering if there's something behind the
- 9 scenes that's kind of driving that. If you're looking to
- 10 have a less cumbersome process, do you have a less
- 11 cumbersome streamline process to address specific things
- or do they all have to roll up into these big mega things
- 13 that take a long time? Is that partially being driven
- 14 some way kind of -- is there budget money set aside to
- pick these projects off?
- MR. JORDAN: Thank you for saying it was
- 17 enthralling. I'm pleased. That's a great question.
- 18 When the president sends out a memo saying make
- 19 government work better, the kinds of things that they're
- looking for in the White House and at the higher levels
- of EPA management are not small projects. They want
- things that are big and impactful.
- 23 That said, that leads us to put forward the
- 24 kinds of things that you see on the list. Then, there's
- 25 a person who carefully tracks all of that stuff and makes

- 1 sure that we're continuing to move ahead on all of those
- 2 fronts.
- 3 We're still looking, and we understand and
- 4 appreciate the fact that smaller changes, a lot of small
- 5 changes, will actually add up to major improvements. So,
- 6 the reality that things don't make it onto the list
- 7 doesn't mean that we're ignoring them. So, if there's
- 8 some smaller change that we can make and not even go
- 9 through the White House and administrator level tracking,
- 10 we can do that and are eager to do that.
- 11 CHERYL: Is there a budget implication in some
- of this that if you get on the list, you get -- are the
- agencies fighting to get on the list so they can do this
- so they have time and money, or you have to do this in
- 15 addition to everything else?
- MR. JORDAN: This is, generally speaking, in
- 17 addition to everything else.
- 18 MR. HOUSENGER: All right, Ray.
- 19 RAY: You sound reluctant there. I find the
- 20 administrative process of contributing to this docket a
- 21 bit confusing, and I'm supposed to be an expert. It
- 22 appears that the docket is under the Office of Air, and
- 23 yet it's got that word pesticides just kind of hidden
- there. The docket is closed. How do we contribute to
- 25 it?

- 1 MR. JORDAN: The docket is under the Office of
- 2 the Administrator, Administrator not Air. I think the
- docket is opening up or it's always open, but we'll check
- 4 on that and get back to all of you.
- 5 MR. HOUSENGER: Thanks, Bill.
- So, the final session we'd like to hear about
- 7 topics we can talk about at our next PPDC meeting in
- 8 October. We're going to treat this as just kind of a
- 9 brainstorming of ideas because October is a ways away.
- 10 We realize that things change. Also, the membership is
- 11 going to change somewhat between now and then.
- 12 So, anybody have topics they want to consider?
- 13 We'll do it by e-mail to solicit other comments when it
- 14 becomes closer and nail down the agenda.
- 15 Valentin.
- 16 VALENTIN: Just a couple of comments and then
- 17 my suggestions for topics. First of all, I want to thank
- 18 EPA for continuing to work in improving WPS. Also, I
- 19 want to thank the incident workgroup yesterday who did a
- 20 wonderful job in sharing what work needs to be done. I
- 21 think with the WPS' implementation, workers will be
- 22 better off, will have more knowledge and will be able to
- 23 identify potential health exposure incidents.
- So, I think that it's important that we
- 25 streamline our current pesticide exposure reporting

- 1 incidents system. So, I volunteer myself. I may or may
- 2 not be in the PPDC group, but I volunteer myself to be
- 3 part of the incident reporting workgroup.
- 4 MR. HOUSENGER: Thank you.
- 5 Dawn.
- DAWN: Thank you. I have two items for
- 7 consideration. I'm not really sure if either of them
- 8 could be addressed at the next meeting, but here's my
- 9 ideas. I was on a NIFA meeting just recently where
- 10 we discussed specifically California ag pesticide use
- 11 trends. There has been, over time, quite a dramatic
- reduction in reproductive toxends, cholinesterase,
- inhibitors, groundwater contaminants.
- 14 Carcinogen use has just started. There's no
- 15 change, decrease or increase. Fumigants look like
- they're actually increasing as opposed to decreasing.
- 17 So, I'm just wondering if there is a way of having a
- discussion on those findings. That was just a snapshot
- 19 of things that I remember in my brain out of a huge
- 20 report that's being compiled. But that might be relevant
- 21 information for discussion.
- 22 My second point was the issue of cannabis
- 23 growing. I'm not even sure if I can say that. Pseudo-
- 24 legal cannabis growing and the fact that unregistered
- 25 pesticides or unlicensed applicators and pretty dramatic

- issues are emerging as a result of that. Thank you.
- 2 MR. HOUSENGER: Mark.
- 3 MARK: Of course I'm going to say school IPM.
- 4 I think that the agency has made some investments. I
- 5 think it's clear that we're at a tipping point and to
- 6 follow that through with the activities of particularly
- 7 the Center and where we're going. So, that's obvious
- 8 that I would say that.
- 9 The other thing that I was thinking about is
- something that came up yesterday, global climate change.
- 11 I am curious with regard to what the office is doing
- 12 regarding pesticides in a proactive sense regarding
- 13 global climate change and its effects. So, it would be
- nice to hear what's going on, and I assume something is.
- 15 So, I personally would like to hear about that. I think
- it's probably a pretty important thing.
- 17 MR. HOUSENGER: Cynthia.
- 18 CYNTHIA: We would like to hear from the
- 19 Economic Analysis Division about their work. In a
- 20 couple of examples, we were quite impressed by EPA's
- 21 analysis of neonic treated seeds and wondering sort
- of how you can continue to do that sort of work without
- 23 being hauled in front of congress.
- 24 Secondly, as part of that, we'd be interested
- 25 in hearing how OPP is quantifying the value of ecosystem

- 1 services from the Economics Analysis Division.
- 2 MR. HOUSENGER: Beth.
- BETH: Thank you. Two topics to suggest. One
- 4 would be from an international activities update, in
- 5 particular, our members are always interested in finding
- 6 out where do we stand in terms of harmonizing
- 7 requirements with Canada, in particular.
- 8 The second topic, I think some time ago, there
- 9 was a Federal Register notice that talked about the 25B
- 10 rulemaking, but it was part of like a two or three part
- 11 process. There's going to be a product performance
- 12 standard that I think needed to come out before you
- 13 actually moved forward with the 25B rulemaking. So, just
- an update on where all of that stands would be very
- 15 helpful. Thank you.
- MR. HOUSENGER: Ray.
- 17 RAY: I'd like to echo Beth's concern about the
- international activities update. I would like to see a
- 19 fairly in-depth discussion of the range of international
- 20 activities that OPP is involved in and has responsibility
- 21 for. I'm sure the agency recognizes the importance of an
- 22 international role, but I'm not sure you all appreciate
- 23 the full extent of your influence worldwide and its
- impact on U.S. businesses. You're the leader in many
- 25 respects.

- 1 Years ago, I was in a meeting with
- 2 international colleagues where they did a rating of
- 3 pesticide regulatory agencies around the world and gave
- 4 this list of things they were rated on, things we always
- 5 criticize you for.
- 6 MR. HOUSENGER: We appreciate that, Ray.
- 7 RAY: In that rating, EPA came out on top in
- 8 every respect. We want to recognize that. In that
- 9 respect, you are an example to everybody else. It's
- important to maintain that example and to maintain the
- 11 effort that goes into that example.
- 12 So, I'd like to see you explain to us what you
- see your roles and responsibilities are and us have an
- opportunity to explain to you what we see as your roles
- and responsibilities in the international area.
- MR. HOUSENGER: Matt.
- 17 MATT: I'm going to agree with Ray there. I
- 18 know, Ray, you and I don't always agree, but in this case
- 19 I think having myself lived in various countries
- overseas, the importance of EPA and how pervasive the way
- 21 you think, the way you do things, affects small
- governments that can't afford to do them the way you do
- 23 them is amazing. It's just truly amazing. So, I
- 24 definitely support that because I think it's very
- 25 important.

- 1 The other thing I wanted to mention was this.
- I had the experience a little while ago of attending a
- 3 meeting where the people from the Wisconsin agricultural
- 4 support office talked about minority farmers in Wisconsin
- 5 and talked particularly about the Mung
- 6 population but other populations as well.
- 7 One of the questions they asked was, well, what
- 8 kind of advice do they get on pesticides and where do
- 9 they get their pesticide information, because they're
- 10 selling those products at farmers markets and people are
- buying those products, oftentimes with the assumption
- that these are nicely organically grown products.
- 13 The response I got was that oftentimes the
- 14 nonliterate farming population will ask their children
- who are literate to go in and read the labels for them
- and tell them what to use. Now, most of what they're
- going to get is off the shelf, the kind of stuff that
- 18 you'd have in a garden store, but there's no pre-harvest
- intervals stated on those things. So, my concern is that
- there may be an excessive amount of pesticides that ends
- 21 up in farmers markets.
- I don't know what EPA has done at looking at
- 23 that question, but it's a concern of mine. If it's done,
- 24 great. But it seems to me to be something we should pay
- 25 attention to, because community supported agriculture and

- 1 farmers markets are so pervasive and highly esteemed at
- 2 this point for their health contributions. Of course, I
- 3 won't be there to talk about this.
- 4 MR. HOUSENGER: You can always come as a guest.
- 5 Nichelle.
- 6 NICHELLE: So, USGS spends a lot of time
- 7 tracking pesticides in waterways. Maybe we can look at
- 8 how to improve EPA's monitoring of that sort of data and
- 9 how we can better use that data in risk assessments.
- MR. HOUSENGER: You assume we don't, but we can
- 11 talk about that.
- 12 Mark.
- 13 MARK: I just want to bring up, I guess, in
- 14 this section the issue of invasives and its impact on
- 15 pesticide use, particularly close to harvest, as a key
- driver of massive change in many of the states.
- 17 MR. HOUSENGER: Steve.
- 18 STEVE: I guess I'll state the obvious, managed
- 19 pollinators, especially in light of the White House
- 20 report that's supposed to come out in the next two weeks.
- 21 By October, we should know what wheels have started
- turning and where we are.
- 23 MR. HOUSENGER: It's a good bet that will be
- 24 one of the topics.
- 25 Liz.

- 1 LIZ: I have just a little suggestion. As a
- 2 result of the comparative efficacy claims report we heard
- 3 yesterday, I would like to suggest that it actually
- 4 become a part of the comparative safety statements
- 5 workgroup.
- 6 MR. HOUSENGER: Gabrielle.
- 7 GABRIELLE: A couple of dittos. The
- 8 international one is a ditto. I was also going to say
- 9 the same thing that Steven just said. I think the other
- 10 thing that would be good is to get a more detailed update
- on where EPA is on the actual risk assessment side for
- pollinators, because there's been a lot going on there.
- I don't think this group has been briefed on it or had a
- 14 chance to provide input on it.
- 15 I just want to say one thing that I keep
- 16 saying. As you are structuring this meeting, make sure
- 17 that if it's really something for feedback, that you give
- 18 us time. As I said the first time I came here, I don't
- 19 really care what we talk about, I just care about that
- it's something where we can make a meaningful difference.
- I'm not always convinced that's happening. So, I just
- 22 want to say that.
- There are some really complicated issues,
- 24 especially in the risk assessment, especially in the
- 25 environmental risk assessment arena, that haven't really

- 1 been brought forward to this group. Maybe I missed one
- or two, but for some really serious admittedly
- 3 controversial discussions.
- 4 Certainly, right now we're looking at how is
- 5 EPA using epidemiological data in their assessments.
- 6 When is it appropriate, when not, how do you use that. I
- 7 also ditto on how can the modeled drinking water or has
- 8 the modeled levels in water -- because that goes into
- 9 different parts of the risk assessment -- relate to
- 10 actual monitoring data, because there's a real big issue
- 11 there? So, there's a lot of details going on and a lot
- of changes being made.
- I made the mistake, and I'm not sure it was the
- 14 right thing to attend the environmental risk assessment
- 15 meeting a couple weeks ago here, which was totally off
- the deep end for me. But it was helpful for me just to
- 17 see there's a lot going on there with some really serious
- 18 consequences for how you're doing that part of the risk
- 19 assessment.
- 20 My very first thing I ever did in DC and PPDC,
- 21 that is something I expect to be brought to this group,
- 22 even if it's sciency. I'm not talking about the SAP kind
- of stuff. We're willing to give you feedback, so here's
- 24 some things to think about in that process. That's not
- 25 easy stuff, I know that.

- So, that would be my other plug, make sure we
- 2 have meat to chew on. Make sure there's protein for us
- 3 to chew on.
- 4 MR. HOUSENGER: Louis.
- 5 LOUIS: I would like to simply raise my
- 6 support for two things that have been mentioned. First
- 7 is the point Matt raised about EPA continuing or to
- 8 initiate in a better way how to monitor the use of
- 9 pesticides by, I will say, small farmers, not just the
- 10 minority farmers, because there are a lot of small
- 11 farmers who are not minority. They do things in pretty
- much the same way. We have done a lot of surveys and
- pretty much know where to get the advice for pesticide
- 14 usage from.
- 15 But I think if you look at violations, they're
- among the group that would violate a lot more than anyone
- 17 else, because the eye is not on them. They figure well,
- 18 they can do things a little different. But I think it
- 19 would be helpful to try to monitor that process among the
- 20 small growers a little more than is being done at the
- 21 moment.
- The other point I'd like to raise support is
- 23 Mark's mention of the brown marmarated stink bug. That has repercussions
- 24 on pesticide usage because it started out with fruits and
- a lot of vegetables that are grown by small growers.

- 1 Their first tendency would be to spray them. So, they're
- 2 related, pesticide usage on invasive pests, as well as
- 3 other pests.
- 4 Of course, a lot of them claim to be organic
- 5 farmers until you go to the farmers market and collect
- 6 some samples and do some assessments of them and you find
- 7 a lot of pesticide residue on some of those, as we have
- 8 found.
- 9 So, those are two areas that I certainly would
- 10 give my support.
- 11 MR. HOUSENGER: Nichelle.
- 12 NICHELLE: So, as Louis raised that point with
- these invasive pests that we are to deal with, maybe EPA
- can give us some feedback on the use of section 18
- 15 exemption and how that's being used by EPA in some states
- 16 to address some of these emerging pressures, and how we
- 17 also tackle resistance and using section 18 to sort of
- 18 tackle resistence as they pop up.
- MR. HOUSENGER: Valentin.
- 20 VALENTIN: Aside from the incident reporting
- 21 discussion, one thing that just occurred to me is that
- 22 I'd like to be able to hear EPA's strategy or plan to
- 23 roll out the WPS improvement. What's your plan to try to
- 24 make sure that you reach from the small growers to
- 25 minority growers?

- 1 MR. HOUSENGER: Dawn.
- DAWN: I would be remiss if I didn't ask for an
- 3 update from the public health group, specifically with
- 4 regard to residents, low-income residents and bed bug
- 5 issues, and any kind of improvement in the guidance that
- 6 the proportion of society can access on what's likely to
- 7 help the situation as opposed to make it worse.
- 8 MR. HOUSENGER: Doug.
- 9 DOUG: I would suggest, too, that we continue
- 10 on MRL issues. I know Lois did a lot of work on that.
- 11 We should continue to monitor and study those, both
- 12 domestically and import.
- MR. HOUSENGER: Tommy.
- 14 TOMMY: I'd like to have a discussion around
- worker protection standards and how EPA shares that
- responsibility with OSHA. So, where does one pick up
- where the other drops off?
- MR. HOUSENGER: Sharon.
- 19 SHARON: I'd like to have a discussion on the
- 20 Endangered Species Act consultation process and where EPA
- 21 is at at that time.
- MR. HOUSENGER: Okay, I think that's it. I had
- 23 a couple requests. In a quick session yesterday on
- 24 updates, the eight updates, people wanted to provide
- comments. You can either do that by writing directly to

- 1 the presenter or providing them through Dea. We'll get
- 2 them either way.
- 3 Then, recognizing that this is the last time
- for some of you, I just wanted to thank you for your
- 5 service here.
- It's only my second PPDC meeting chairing in
- 7 person, at least, and I heard a lot of good feedback from
- 8 this, anywhere from our website to pollinator plans,
- 9 which I think draws a lot of attention always, and just
- 10 highlights to me how difficult a subject it is to figure
- 11 out what the right thing to do is.
- 12 I think when our plan finally comes out for
- 13 comment, I encourage everyone to comment on it. It's not
- an easy thing to put together to say this is definitely
- 15 the right way or not. But I think what we've done is
- given it our best shot. We need input from you people.
- 17 Whenever one of these meetings happens, it's
- always a lot of work by a lot of people here at the
- 19 agency to put the presentations together. Hopefully,
- 20 they are things that you wanted to hear. We're always
- 21 looking for topics and topics that hit a lot of different
- 22 people, not just single topics that someone is interested
- 23 in.
- I know this time we had a little trouble
- 25 getting topics. I know a lot will be going on. At that

- point, the pilots will be out for ESA. The pollinators,
- 2 we will be rolling that out. The endocrine decisions
- 3 will be out. So, there's certainly a lot that's going to
- 4 be pertinent at that point.
- 5 Finally, thanks to every one of you who I know
- 6 takes out time to come review the information, give us
- 7 feedback. It's hard to sit in Washington and know that
- 8 you're doing the right thing. So, it's always good to
- 9 hear from real people, not that these people aren't.
- 10 Anyway, I just wanted to thank everyone.
- 11 We have time for some public comments. I think
- 12 we only have one person that has signed up, and that is
- 13 Pat Risotto from BNA.
- MS. RISOTTO: No, no, I was just signing
- 15 in.
- MR. HOUSENGER: Oh, you were just signing in.
- 17 Well, then, we have no one. So, I would suggest that you
- 18 say something.
- Do we have any comments from the phones?
- MR. GRAGG: Yes, this is Richard Gragg at
- 21 Florida A&M University. My comment is for today's session, which was
- very interesting, like yesterday. One, I agree with the
- 23 need to collect data on the effectiveness of the school
- 24 IPM activities. Number two, I have a question on how
- 25 does the EDSP screen for mixtures, and are the ESDP

- 1 results integrated into cumulative risk assessment
- 2 protocols and guidance?
- 3 And on the future discussions, I would like to
- 4 hear about how the OPP is addressing environmental
- justice issues, the EJ Plan 2014, the upcoming EJ 2020,
- and the EJ screen tool, and the new technical guidance
- 7 for assessing environmental justice in regulatory
- 8 analysis.
- 9 And then I think another future discussion is
- 10 are there any type of -- I think there needs to be a
- 11 discussion about pesticide usage in urban and community
- gardening. Is there a need for any type of MP or other
- 13 type of management practices for these users? Thank you.
- MR. HOUSENGER: Thank you.
- 15 Gabrielle, I think it's the 22nd or 23rd of
- 16 October.
- Julie.
- JULIE: Really quick, and this is just in
- 19 addition to the suggestion on invasive species. We might
- 20 also want to consider the effects of invasive species on
- 21 endangered species and the role that the control of
- 22 invasive species has in protecting endangered species.
- 23 MR. HOUSENGER: So, with that -- Mark, did you
- have something?
- 25 MARK: It was just a question about -- I've got

- 1 the dates down for next time. I do want to speak my very
- 2 strong preference for face-to-face meetings rather than
- 3 webinar. I know that things had to be done a certain way
- 4 and that you did the best under the circumstances. But
- 5 it makes a huge difference. So, I would certainly want
- 6 to put that preference out there.
- 7 MR. HOUSENGER: Yes, we heard that loud and
- 8 clear, especially after the second webinar. But it is a
- 9 good opportunity to meet face to face and you get a lot
- 10 more done. So, we plan on two a year and letting people
- 11 know well in advance so you can plan for it.
- 12 SUE: We were kind of talking
- about it out on the street yesterday. You tend to have
- these Thursday and Friday afternoon. Friday's flights
- 15 are expensive and it's extremely busy at the airport. Is
- there a chance you can consider doing it like a Wednesday
- 17 and Thursday morning to keep everybody away from that
- 18 expensive and hectic travel time on Fridays?
- 19 MR. HOUSENGER: One of the problems is getting
- 20 this room because it's booked. Usually, Fridays are open
- 21 so we only have to jockey for one day.
- 22 Dawn.
- 23 DAWN: Really quickly and hopefully Florida A&M
- is still on the phone. We have extensive data regarding
- 25 school IPM practices going back 15 years, and we're still

1	compiling datasets. Every time we incorporate a new
2	element and we modify something, we track it. If we
3	didn't collect data, none of us employed by universities
4	would have a job for very long.
5	MR. HOUSENGER: All right, now we're done.
6	Thank you very much. Have safe travels home.
7	(Whereupon, the meeting was
8	concluded.)
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