



Structural Fumigation Committee Report August 23, 2019

Chair, Derrick Lastinger (GA)

Members: John Scott (CO), Kelly Friend (FL), Linda Johns (MT), Bonnie Rabe (Rollins), Ken Kendall (Ensystem), Norman Goldenberg (Namron Business Associates), Jim Fredericks (NPMA), Chris Gorecki (Rollins), Michael Kelly (TX), Allen Fugler (Capitol Risk), Ryan Okey (SC), Rick Bell (Arrow Exterminators), John McHugh (HI), Jesse Cuevas (CA), Tim McPherson, (Douglas Products), Cindy Fulton (WY), Chuck Tindol (Rentokil)

The ASPCRO Structural Fumigation committee submits the following report for the 2019 Board of Directors annual board meeting.

The purpose of the ASPCRO Structural Fumigation Committee was established in 2014 to be a resource for US EPA as the non-soil fumigants go through registration review. The committee will maintain open communication and dialogue with other associations to most efficiently and effectively coordinate and collaborate on committee work.

Activities

Membership

The committee webpage was updated with the 2019 mid-year meeting report and committee membership changes. Cindy Fulton (WY) and Chuck Tindol (Rentokil) are the newest members.

Meetings

On April 1, 2019, the committee met before the mid-year board meeting in Minneapolis, Minnesota. The following committee members were present at the meeting: Jim Fredericks (NPMA), Chris Gorecki (Rollins), Cindy Fulton (WY), John McHugh (HI), Kelly Friend (FL) and via teleconference: Linda Johns (MT), Michael Kelly (TX), Tim McPherson, (Douglas Products), Ken Kendall (Ensystem), and Norman Goldenberg (Namron Business Associates). Clint Sowle (Ecolab), Marie Horner (Arrow Exterminators), Mike Page (ASPCRO), Liza Fleeson-Trossbach (VA), Ellen Thoms (Douglas Products) also attended the meeting.

On April 1st, the committee met before the mid-year board meeting in Minneapolis, Minnesota. Jim Fredericks shared some industry concerns and

challenges with state environmental agencies potentially regulating fumigants as air pollutants. ASPCRO will follow-up with EPA to see if they have any involvement. ASPCRO will also reach out to New Jersey to learn more and offer assistance. There was no update provided by PERC before the meeting. Jim Fredericks discussed a meeting with EPA regarding clearance devices and the EPA protocol for testing the devices. There was a discussion regarding spray foam insulation and how homes with this type of insulation require longer aeration times. Ellen Thoms with Douglas Products discussed some current research that is being done on homes with spray foam insulation installed in the attic. Kelly Friend discussed a recent incident involving an endangered species and a structural fumigation. While there were no pesticide label violations found, Fish and Wildlife did take an action for 7 dead bats. There was a discussion to consider adding something to the consumer checklist to assist with prevention.

Fumigation Management Plans

No activity

U.S. EPA

The agency was contacted to submit an update to ASPCRO prior to the annual meeting. U.S. EPA PRD reported the following to the committee:

OPP is currently evaluating gaps in the data base for the structural/commodity fumigants as some of the data requested for quantitative risk assessment are still pending submission. All registration review decisions are required to be completed by September of 2022. The draft risk assessments are therefore planned to be completed no later than September of 2021, but the assessments may be moved up in the schedule if OPP identifies opportunities for streamlining.

*OPP has continued to make progress on OIG's recommendations for structural fumigants. OPP's Biological and Economic Analysis Division (BEAD) lab in Ft. Meade has started preliminary testing of the clearance devices. A preliminary evaluation of the sulfuryl fluoride devices is expected to be completed by **October 2019**. Revised stewardship and fumigant management plan requirements will be incorporated during the decision phase of registration review.*

Since December 2016, the structural fumigant action team has continued to meet to make progress on the OIG's recommendations from their report titled, "Additional Measures Can Be Taken to Prevent Deaths and Serious Injuries from Residential Fumigations." EPA has been working with NPMA, ASPCRO and the registrant on developing fumigant management plans for sulfuryl fluoride. EPA's BEAD Lab in Ft. Meade is conducting an independent validation of the devices used to clear structures fumigated with sulfuryl fluoride.

There is a recommendation in the draft FY18 National Program Manager Guidance and FY18-21 FIFRA Cooperative Agreement Guidance. The recommendation in the NPM states, "Encourage states and tribes to undertake special compliance initiatives related to certification requirements that may

focus on sale and distribution of restricted use pesticides (RUPs) to applicators in fumigation sector(s) of concern due to the high potential for severe, acute incidents from exposure.”

Future activities

The committee plans to have a meeting on August 26th at 2:30 P.M. at the annual meeting in Franklin, Tennessee and will discuss the following items:

Agenda

- a. Committee report & membership
- b. U.S. EPA Update
- c. NPMA Update – Jim Fredericks
- d. State clean air permitting concerns
- e. U.S. EPA testing of SF Clearance devices
- f. Spray Foam Insulation Research– Tim McPherson
- g. PERC Non-soil Fumigation Project – Sandra McDonald
- h. Future activities and meetings

Respectfully submitted,



Derrick Lastinger, Chair