



Chronology of ASPCRO attempts to develop a Termiticide Performance Standard

August 27, 2002 – ASPCRO Resolution passed at General Membership meeting, in response to efforts by industry groups to reach agreement with USEPA on revising existing process for termiticide registration:

It is hereby resolved that in the event that the discussion process with all parties does not reach a consensus within 90 days from this date, August 27, 2002, the President of ASPCRO is authorized to appoint a committee of ASPCRO members for the purpose of drafting model guidelines for the purpose of facilitating the ability of each state to call for necessary and relevant data, by registrants, in support of termiticide registrations.

April 15, 2003 –Termiticide Efficacy Group, the committee formed by the resolution – first conference call

May 20, 2003 – Second Conference call – RISE, NPMA, working with USEPA on agreement. Committee decided to review Florida rule on efficacy.

June-August 2003 – Series of conference calls which tracked establishment of the TSRP and decided that a different committee needed to be formed to work on a national efficacy standard.

August 23, 2003 –Termiticide Efficacy Group dissolved,

September 25, 2003 the ASPCRO Board created the Termiticide Standards Committee (TSC) in order to implement Resolution II passed at the 2003 ASPCRO Annual Meeting.

ASPCRO will continue to work with USEPA to review proposed efficacy policy and guidelines and establish a committee with appropriate representation from previous committees, with the goal of working with USEPA to update existing product performance standards and acceptable test conditions for all termite control products. This committee should consider the provisions of Florida Rule 5E-2.0311 Florida Administrative Code as a recommended basis for performance standards and acceptable test conditions for USEPA to use for soil applied termiticides, baits, and wood treatments.

November 5 and 6, 2003 in Decatur, Georgia – Committee met and revised 810.3600

July 14, 2004 – TSC met with USEPA and presented revisions to 810.3600, (also proposed joint USEPA/ASPCRO training).

December 8, and February 28, 2004 – met with USEPA to present final 810.3600 revision (EPA: “will see how to implement”)

April 2005 – First joint training in Georgia.

May 25, 2005 – Meeting with USEPA, determination that a SAP may be needed.

June 11, 2006 – Letter from Jim Harron to Lois Rossi, asking for quick action on 810.3600

October 19, 2006 – meeting with USEPA. “No decision yet from management on revision”

March 15-16, 2007 – meeting with stakeholders in New Mexico – proposing ASPCRO standard, pushback from industry that it needed to be an EPA rule and that guideline revision was coming.

May 21, 2007 – meeting with USEPA, Lois Rossi directed staff to develop work plan for revision

April, 2007 – Second joint training – in Ft. Lauderdale.

November 6-7, 2007 – Second stakeholder meeting, in Atlanta. Reviewed draft efficacy standards document.

January 24, 2007 – meeting with USEPA. EPA tentatively planning on a stakeholder’s meeting in April. ASPCRO provided “Key questions” document as a summation of the issues to be addressed in this process.

July 21-22, 2008 – USEPA stakeholder meeting in Arlington. Consensus test document produced.

November 24, 2008 – Meeting with USEPA – EPA stated that a rule would be developed and provided a timeline, which would have been available in draft in mid-2009, for comments at end of 2009.

July 7-8, 2009 – Meeting with USEPA - Termiticides identified as part of one product performance / efficacy rule for structural pest products. Timeline presented as 12/2010 proposed rule (hope to be final 11/2011) to put performance standards in place. Revisions of 810.3600 guidance revision may happen prior to Rule, potentially an internal document by August of 2009. Available to states after 3 month internal review.

August 29, 2009 – TSC meeting - EPA told us at that meeting that they would incorporate rule into 2010 FEAD rulemaking on pests of public health significance. Concern that timeline will slip – some rules take over ten years. Committee proposed to give them six months (until January – February), then revert to original idea to adopt an ASPCRO standard.

September, 2009 – Third joint training in Louisiana and Mississippi

January 11, 2010 – meeting with USEPA – rule making will be incorporated as part of efficacy for public health pesticides. Timeline uncertain. Probably 2011 for proposed rule.

April 5, 2010 – Joint TSC/ASPCRO BOD meeting in Charleston, W.Va. Decision to proceed with standards document to be circulated for comments and presented to August 2010 meeting.

June 29-30, 2010 – Stakeholder meeting in Atlanta, Georgia to review and revise document. “Statement of purpose” section added.

August 31, 2010 – TSC committee meeting. Decision to circulate document for comments. Comments to be due by October 15, 2010.

October 29, 2010 – Extensive comments by TLRC received by TSC

January 31-February 1, 2011 – Joint TLRC/TSC meeting in Decatur, Georgia. Document extensively revised.

February 21, 2011 – Revised document circulated for comment.

May 2, 2011 – Extensive comments received from RISE

July 20, 2011 – Responses provided to RISE comments. Document provided to Board for discussion at annual meeting.