



Structural Fumigation Committee Report April 21, 2021

Chair, Derrick Lastinger (GA)

Members: John Scott (CO), Kelly Friend (FL), 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), Jesse Cuevas (CA) Tim McPherson, (Douglas Products), Cindy Fulton (WY), Chuck Tindol (Rentokil), Dale Dubberly (Ensystem), Courtney Frazier (FL)

The ASPCRO Structural Fumigation committee submits the following report for the 2021 Board of Directors mid-year 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 and Courtney Frazier with FDACS was added to the committee.

Meetings

The committee has not met since August 2020.

U.S. EPA

The agency was contacted to submit an update to ASPCRO. U.S. EPA PRD fumigation lead reported the following to the committee:

OPP is working to finalize Interim Decisions (ID) for the structural/commodity fumigants. The Draft Risk Assessments (DRA) and Proposed Interim Decision (PID) for propylene oxide (PPO), and phosphine and aluminum and magnesium phosphides (the metal phosphides) were completed and released for public comment in fall 2020. After a 30-day comment period extension, the comment period ended in January 2021. The PPO ID is expected to be completed in summer 2021, and the phosphine and metal phosphide

ID is expected to be completed in fall 2021. The ethylene oxide DRA was released for public comment in fall 2020 and the PID is scheduled for fall 2021. The inorganic sulfites ID was completed and is expected to be released in spring of 2021. All registration review decisions are required to be completed by September of 2022. The draft risk assessments for all fumigants are therefore planned to be completed no later than September of 2021.

EPA will be reaching out to ASPCRO separately regarding next steps for sulfuryl fluoride on the OIG audit. A webinar on sulfuryl fluoride clearance devices is being planned for this spring. The Agency will send details to ASPCRO once available.

Fumigation Management Plans

No activity

Future activities

The committee plans to have a meeting prior to the annual meeting scheduled in August 11-12, 2021. The committee will meet as needed.

U.S. EPA was contacted in August 2020 to gauge potential needs for training and/or discussions. EPA fumigation contact forwarded the offer to the EPA fumigation workgroup and reported back that a general structural pest management training is needed that focuses on structural pesticide application, uses, and practices.

Summary

Registration Review: SFC is routinely communicating with OPP as they finalize risk assessments and preliminary interim decisions for the structural/commodity fumigants. SFC continues to offer and provide resources and assistance to EPA for training needs and discussion regarding the state regulation and the use of the structural/commodity fumigants. ASPCRO has worked with NPMA to host 3 fumigation workshops for EPA pesticide reevaluation scientists (Total of 46 EPA staff participated in these workshops).

Clearance Device Study: SFC is following EPA's Clearance Device Study. EPA has completed the study and had planned to post to the public docket by October. There is an ASPCRO request pending with EPA to learn more about the study.

Air Permits: SFC started a dialogue with the Mid-Atlantic Regional Air Management Association (MARAMA) which is made up of 11 states. In 2019, MARAMA issued a fumigation white paper focusing on fumigation and environmental agencies regulating fumigants as air pollutants. Ryan and Derrick attended a MARAMA fumigation workgroup meeting & webinar on December 15, 2020. NJ, NC and MD environmental departments presented information on fumigation operations and rulemaking.

PERC: SFC has been meeting with Sandra McDonald on the PERC Non-soil fumigant project. SFC has several members that are also serving on the PERC project workgroup. SFC continues to provide support and a network of experts

to assist when needed. ASPCRO assisted with the learning objective ranking survey and collecting information from ASPCRO members and affiliates. The NSF Exam workgroup finalized the test blueprint and is currently reviewing the manual and writing examination questions.

Respectfully submitted,

A handwritten signature in black ink that reads "Derrick Lastinger". The signature is written in a cursive style with a prominent initial "D".

Derrick Lastinger, Chair