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## Structural Fumigation Committee Report August 26, 2025

Chairs, Derrick Lastinger (GA), Courtney Frazier (FL)  
Members: John Scott (CO), Kelly Friend (FL), Bonnie Rabe (Rollins), Stephen Vantias (Ensystem), Megan Striegel (NPMA), Chris Gorecki (Rollins), Michael Kelly (TX), Ryan Okey (SC), Rick Bell (unaffiliated), Ken Everett (CA) Tim McPherson, (Douglas Products), Chris Davis (Rentokil), Mike Borys (Ensystem), Derek Johnson (Cardinal Products), Adam Yamamoto (HI), Allison Cuellar (TX), Staci Johnson (Ecolab), Jim Wright (BASF), Sean Brantley (Emory Brantley & Sons), Shannon Sked (Western Pest Services)

The ASPCRO Structural Fumigation committee submits the following report for the 2025 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**

Updated membership with new members:  
Stephen Vantias (Ensystem)  
Mike Borys (Ensystem)  
Megan Striegel (NPMA)  
Sean Brantley (Emory Brantley & Sons)  
Shannon Sked (Western Pest Services)

#### **Meetings**

The committee met on August 26, 2025, at the Holiday Inn Portland, Maine.

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#### Agenda for August 26<sup>th</sup>

1. Committee report & membership
2. U.S. EPA Update
3. U.S. EPA Training Request - Allison Cuellar
4. Registrant Updates – Douglas & Ensystem

5. Fumigation Academy and other Trainings
6. NPMA Update – Megan Streigel
7. Other topics?
8. Future activities and meetings

The committee discussed each agenda item including the following highlights:

- The current membership list was reviewed and updated with 5 new members.
- Douglas and Ensystem discussed provided the following updates:
  - EPA approved the *SF-ExplorIR Plus* clearance device. The new device includes a software update.
  - New SF labels have been distributed with new products since July 11, 2025. The existing stocks with labels prior to July 11<sup>th</sup> have no expiration date and some states reported audits of fumigations with the new labels.
  - Registrant stewardship training has been offering new and old label requirements. 2026 trainings will focus on the new labels.
  - Registrants offered training to any SLA's on the new labels and to reach out if needed.
- 2025 Fumigation Academy in Long Beach California – this new comprehensive multi-day course on fumigation was discussed. The course was successful and organizers plan to do the course again in the future.
- NPMA reported significant staff changes at US EPA at all levels in the pesticide programs.
- ASPCRO plans to meet with EPA in September to discuss a possible field training experience focused on commodity fumigations in 2026. New Jersey and Pennsylvania were mentioned as possible locations. Shannon Sked and Douglas' representatives offered to assist if needed.
- Some state officials in attendance provided updates for their respective states.
  - Hawaii reported on Profume fumigations of wood mulch to prevent the further spread of coconut rhinoceros beetle (CRB).
  - Georgia reported that they will host a basic state inspector training for EPA Region 4 state inspectors that will include commodity and structural fumigation training provided by Enystem and Cardinal Products is scheduled for September.
  - Florida: Is working on updating rule language to align with the new SF labels. Conducted training with field inspectors to prepare for new labels and will host another training once the rule making has been finalized.
- Follow-up discussion regarding California DPR safety branch report of a new safety concern for inspectors. The concern is regarding containers with a plastic lid such as a YETI cup or storage container trapping SF and causing potential exposure during post-aeration inspections. Douglas plans to conduct further testing. Douglas also plans to update BMP's that will be specific to California and will share the draft with the committee.

The agency was contacted to submit an update to ASPCRO. On August 6<sup>th</sup>, the U.S. EPA PRD fumigation lead reported the following to the committee:

***There have been no updates to the structural fumigants since April 2025 but provided the following update for reference:***

*OPP is working to finalize Interim Registration Review Decisions (ID) for the structural/commodity fumigants. Registration review is a process that re-evaluates all pesticides on a 15-year cycle to ensure that as science evolves, older pesticides are still safe for human health and the environment.*

- **Inorganic sulfites:** The Interim Decision (ID) was completed and published to the Federal Register on Apr 28, 2021.
- **PPO:** The ID was completed in June 2021. EPA released an [update to the PPO ID](#) in December 2021 to clarify ambiguous language in the original ID.
- **Phosphine and aluminum and magnesium phosphide:** The [ID](#) was released in June of 2024.
- **Ethylene oxide (EtO):** The [ID](#) and updated label language for ethylene oxide (EtO) products were released in January 2025. The ID and associated mitigation measures address public comments on the PID.
- **Sulfuryl fluoride:** EPA recently reviewed and approved a new clearance device (SF-ExplorIR Plus) and has updated the sulfuryl fluoride clearance devices webpage: <https://www.epa.gov/ingredients-used-pesticide-products/sulfuryl-fluoride-clearance-devices>

Sulfuryl fluoride is still undergoing EPA' s re-evaluation process, Registration Review, wherein all uses of sulfuryl fluoride are being assessed.

On July 11, 2024, EPA announced the approval of revised sulfuryl fluoride labels that add safety measures to prevent deaths and serious injuries when people re-enter homes fumigated with sulfuryl fluoride. The safety measures are described in the June 2023, Revised Mitigation and Response to Comments on the Sulfuryl Fluoride Draft Interim Mitigation Measures Memorandum, which addresses the 2016 Office of Inspector General (OIG) audit to increase safety and compliance during fumigations. The revised labels now include: Increased warning sign specifications; standardized elements for fumigation logs; removal of all product references of clearance devices from labels; citing the EPA website for structural fumigations for effective clearance device information and registrant stewardship plans; and enhanced aeration requirements for structural fumigations. While these label updates focus on residential structural fumigations, sulfuryl fluoride and all of its registered uses are still undergoing registration review, a process that re-evaluates all pesticides on a 15-year cycle. **The remaining registration review risk assessments for sulfuryl fluoride are anticipated to be completed and issued for public comment in TBD.**

Tiffany Green is the primary fumigant coordinator for EPA. Steven Peterson is the team lead for SF re-registration.

**Workshops for US EPA**

*Since 2015, ASPCRO has hosted 5 workshops that focused on non-soil fumigations. Over 50 EPA officials attended these workshops providing much needed information exchange. ASPCRO looks forward to continuing a dialogue with EPA on the draft mitigation measures and future issues.*

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**Future activities**

The committee also plans to meet prior to the board meeting at the mid-year meeting in Orlando, Florida.