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## Structural Fumigation Committee Report April 22, 2025

Chairs, Derrick Lastinger (GA), Courtney Frazier (FL)

Members: John Scott (CO), Kelly Friend (FL), Bonnie Rabe (Rollins), Ken Kendall (Ensystex), Norman Goldenberg (Namron Business Associates), JD Darr (NPMA), Chris Gorecki (Rollins), Michael Kelly (TX), Allen Fugler (Capitol Risk), Ryan Okey (SC), Rick Bell (Arrow Exterminators), Ken Everett (CA) Tim McPherson, (Douglas Products), Chris Davis (Rentokil), Dale Dubberly (Ensystex), Derek Johnson (Cardinal Products), Adam Yamamoto (HI), Allison Cuellar (TX), Staci Johnson (Ecolab), Jim Wright (BASF).

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**

Jim Wright (BASF) new member

#### **Meetings**

The committee met on April 22<sup>nd</sup> at the Antler Hotel in Colorado Springs.

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#### Agenda for April 22<sup>nd</sup>

1. Committee report & membership
2. U.S. EPA Update
3. U.S. EPA Training Request - Allison Cuellar
4. Registrant Updates – Douglas & Enystex
5. Regional Training – Ryan Okey
6. NPMA Update – JD Darr
7. Other topics?
8. Future activities and meetings

The committee discussed each agenda item including the following highlights:

- Douglas and Ensystex discussed provided the following updates:
  - Re-registration of SF will be delayed. SF draft risk assessments are also delayed, and the new timeline will be announced in the future.
  - EPA approved the *SF-ExplorIR Plus* clearance device. The new device includes a software update and there was discussion among the SLA's to learn more about how to inspect and determine if a device is new including the software update. Action Item – request training on the new device.
  - New SF labels will be required by July 11, 2025. The existing stocks with labels prior to July 11<sup>th</sup> have no expiration date.
  - Registrant stewardship training have been offering new and old label requirements.
  - Registrants offered training to any SLA's on the new labels and to reach out if needed.
- Training
  - Action Item – reach out to EPA and SF team to learn more about training and field experience needs.
  - There's a need for training on the commodity side and the committee discussed several efforts including a Fumigation Academy for PMP's on June 3-5, 2025, in Long Beach California.
  - Derek Johnson discussed future training and details should be announced in fall of 2025.
  - NPMA offered to help support any potential field training for EPA staff.
- California DPR safety branch reported a new safety concern for inspectors. The concern is regarding containers with a plastic lid such as a YETI cup trapping SF and causing potential exposure during post-aeration inspections. DPR is drafting BMP's to address the concern.

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

## **U.S. EPA**

The agency was contacted to submit an update to ASPCRO. On April 22, 15<sup>th</sup>, U.S. EPA PRD fumigation lead reported the following to the committee:

*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>. EPA is briefing new leadership and working on revising the SF risk assessments.

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 new fumigation 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. Please don't hesitate to contact ASPCRO if we can provide additional information or assistance.*

In 2024, EPA did inquire about possible training on commodity applications of sulfuryl fluoride at mills and other storage and treatment facilities. ASPCRO will follow-up with EPA on training needs.

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### **Future activities**

The committee also plans to meet on August 26<sup>th</sup> prior to the board meeting.