Colorado Dept. of Agriculture FY2018 EPA EOY Review

Executive Summary – Pesticide Program Implementation

The Colorado Dept. of Agriculture (CDA) met all pesticide program implementation workplan commitments for FY18 and continues to implement an outstanding pesticide program that meets all EPA cooperative agreement requirements. Work under the pesticide implementation program was on schedule and all end-of-year template reports and reporting forms for worker protection, water quality, and endangered species were submitted within the required time frame. All water quality (POINTS database) reporting requirements were met according to schedule for FY18. CDA included a Certified Applicator report for FY18 in the narrative tab of the template. EPA's Certified Pesticide Applicator Reporting Database (CPARD) was updated in FY18 (CPARD 2.0). CDA entered all data in CPARD 2.0 for FY18 and back data for the last few years when CPARD was not available. not functional during FY17, CDA will update CPARD when the database is available to use.

CDA's WPS activities during FY18 included the enhancement and expansion of the pesticide safety education infrastructure in Colorado and continued WPS training for Colorado growers and agricultural establishments in cooperation with CSU. CDA continued to implement an excellent WPS outreach campaign to stakeholders.

In FY18, CDA's Groundwater Protection Program continued to monitor wells to detect the presence of pesticides in groundwater. CDA held an annual meeting of its Agricultural Chemicals and Groundwater Advisory Committee. CDA continued to fulfill EPA's water quality requirements for monitoring and management of Pesticides of Interest and Pesticides of Concern.

CDA continues to communicate with EPA Region 8 on the status of ESPP implementation. CDA also continues to work with the Colorado field office of the Fish and Wildlife Service (FWS); each Section 18 request submitted to EPA in 2018 was also provided to FWS for review. FWS provided comments back to CDA and also directly to EPA. CDA also provides information on 24(C) approvals to the FWS. No enforcement violations were issued based on endangered species restrictions in FY18.

Unfortunately, toward the end of FY18, CDA lost their C&T Coordinator and the position has remained vacant for several months. It remains uncertain whether the C&T position will be filled in FY19. Region 8 has serious concerns that, without adequate staff dedicated to the C&T program, CDA may not meet C&T commitments in FY19 and beyond. Of most concern to R8 is that CDA may not be able to revise the state C&T Plan on schedule to meet the March 2020 deadline for submission to EPA.

Recommendations/Conclusions

CDA maintains open lines of communication with Region 8 and continues to implement an exceptional and responsive Pesticide Program. However, Region 8 has serious concerns that CDA may not be able to meet C&T commitments in FY19 and beyond due to staffing issues. Of most concern to R8 is that CDA may not be able to revise the state C&T Plan on schedule to meet the March 2020 deadline for submission to EPA. CDA has already fallen behind schedule on C&T Plan revision in FY19. OPP sent a state plan survey to all states early in FY19; all SLAs have completed the survey except for CDA. The CDA program manager has, however, indicated that the survey will be completed during the C&T PREP course in spring 2019. Region 8's overall recommendation is that CDA dedicate staff and other resources to the C&T program and C&T plan revisions so that the state can continue to benefit from the excellent state-run C&T program that CDA has been administering for years. EPA is developing a template for states to use for assistance in revising their state plans. Region 8 encourages CDA to continue open communication regarding the state C&T program and progress on plan revisions.

EOY General Information:

1. Project Period: Oct.1, 2017 – Sept. 30, 2018
2. EPA Assistance Agreement Number: BG96810417
3. Review method: On-site at CDA
4. Review participants: EPA: Peg Perreault, Colorado Project Officer; David Golden, Pesticide Enforcement; Blake Huff, Montana and Tribal Project Officer. Grantee: John Scott, Pesticide Section Chief; Matt Lopez, Enforcement Specialist; Mike Rigirozzi, Private Applicator Program Coordinator; Laura Quakenbush, State Pesticide Registration Manager.