Message

From: Edwards, Jeffery [jeffery.edwards@nebraska.gov]
Sent: 8/13/2020 8:28:34 PM
To: Green, Jamie [Green.Jamie@epa.gov]
Subject: RE: Follow-up Questions

Sorry Jamie, here is what I have to respond with. There may be additional comments from Dan LeMaistre or Dave Haldeman at a later date. See my additions and comments in red..

From: Green, Jamie <Green.Jamie@epa.gov>
Sent: Friday, August 7, 2020 12:02 PM
To: Edwards, Jeffery <jeffery.edwards@nebraska.gov>
Subject: Follow-up Questions

Hi Jeff – Thanks for the insights yesterday. I'm going to reach out to some other parts of the Agency and just wanted to confirm with someone quickly if I have sufficiently captured the questions you all had. As we get further along there will likely need for some more direct conversations and exchanges of information but was hoping this would be enough to give others a sense of what we're looking for and help them identify who might be most able to help.

Please let me know what you think.

Have a great weekend!

Jamie

- Land application of waste with pesticide residues, when done at agronomic rates, is a not uncommon disposal mechanism. The challenge here appears to be both the levels of the residues and the amounts of material originally being land applied per acre. The state is having difficulty determining what would be a typical agronomic rate as seed bags don't have the have the typical rates of application found on most pesticide labels. My sense is we have a good idea as to what the rates are but that the acreage they applied at wasn't enough and they over applied the wet cake in lbs / acre. We don't believe they have enough acreage to apply the wet cake to manage all that they have and produce. Because it is believed it would be a one-time shot and they will continue to produce the wet cake.

  NE would like assistance in determining what would be an acceptable agronomic rate for the insecticides and fungicides per acre. This would help them determine if there is any potential at all for this means of disposal (e.g. what concentrations would need to be achieved and/or acres required).

- What are the various exposure routes for these pesticides? This would relate to the recent concern expressed by the university and the possible effect on their bee colony.

- What would be the expected degradation rates and mechanisms for these residues in the environment – to include ground water, surface water, soil, wet cake?
  Note that ground water is between 30 to 40 feet in the area. The state should begin to receive sampling results from ground monitoring at the end of August or September. I don't have anything to add.

- Are there treatment options available to reduce the pesticide concentrations found on the seed corn prior to processing? Any mechanisms that might increase the rate of degradation of the pesticide residues in the wet cake? In the actuality it is the process methods that they have chosen. Treated seed corn into ethanol has

actually concentrated the insecticide and fungicides and that the bio char process and potential roasting of the material in batch mini oven as one proposal could concentrate it in ash.

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From: Green, Jamie <Green.Jamie@epa.gov>
Sent: Thursday, August 13, 2020 3:23 PM
To: Edwards, Jeffery <jeffery.edwards@nebraska.gov>
Subject: FW: Follow-up Questions

Hi Jeff – Apologize for reaching out again - I'm leaving later next week for vacation and was hoping to get OPP thinking about this before I left. If you think it would be ok – I could send what I have and then amend it later if you guys come up with any additional thoughts.

Thanks

From: Green, Jamie
Sent: Friday, August 07, 2020 12:02 PM
To: Jeffery Edwards <jeffery.edwards@nebraska.gov>
Subject: Follow-up Questions

Hi Jeff – Thanks for the insights yesterday. I'm going to reach out to some other parts of the Agency and just wanted to confirm with someone quickly if I have sufficiently captured the questions you all had. As we get further along there will likely need for some more direct conversations and exchanges of information but was hoping this would be enough to give others a sense of what we're looking for and help them identify who might be most able to help.

Please let me know what you think.

Have a great weekend!

Jamie

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