Message

From: Nguyen, Khue [Nguyen.Khue@epa.gov]
Sent: 11/17/2022 1:49:19 PM
To: Arrington, Linda [Arrington.Linda@epa.gov]; Koger, Demariah [Koger.Demariah@epa.gov]; Biscoe, Melanie [Biscoe.Melanie@epa.gov]
CC: Javier, Julie [Javier.Julie@epa.gov]
Subject: RE: Etofenprox PID: EPA Internal - Baseline FIFRA Eco Risk Mitigation Guidance
Attachments: esa-workplan-update.pdf

Hi all,

I'm looking at the final version of the ESA workplan update, and the only mention of dust-off is related to treated seed dust-off.

What Demariah is referring to seems to be a separate issue—dust off from the granular formulations, which we haven't regulated before, and is not mentioned in the ESA workplan update. The granular dust off issue was not considered in the baseline mitigation workgroup discussions, and can't really be written under the "FIFRA Interim Ecological Mitigation" section of the PID. The entire suite of the fifra baseline mitigation language is in the appendix of the workplan update—the two docs are closely related. I think it would be unfair to stakeholders to propose something new under "FIFRA Interim Ecological Mitigation" that is not part of the ESA workplan update.

If you think it is necessary, it should be under the chemical-specific mitigation section, and the existing risk assessment should identify granular dust off as an issue, and a clear rationale should be provided in the PID for why you are including it.

Thanks,

Khue Nguyen
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From: Arrington, Linda <Arrington.Linda@epa.gov>
Sent: Wednesday, November 16, 2022 7:36 PM
To: Koger, Demariah <Koger.Demariah@epa.gov>; Biscoe, Melanie <Biscoe.Melanie@epa.gov>
Cc: Javier, Julie <Javier.Julie@epa.gov>; Nguyen, Khue <Nguyen.Khue@epa.gov>
Subject: RE: Etofenprox PID: EPA Internal - Baseline FIFRA Eco Risk Mitigation Guidance

Hi All

Thanks Mel for your input on the late hit about dust free granules. So just thinking where would we put the information if not in the ESA mitigation section to get comments. This only has come to light because of the ESA activities. I'm not sure what Elissa thinks so I will send the note for her thoughts. However I agree this is broader than etofenprox and I would rather be we silent for now.

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From: Koger, Demariah <Koger.Demariah@epa.gov>
Sent: Wednesday, November 16, 2022 3:42 PM
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Cc: Javier, Julie <Javier.Julie@epa.gov>; Nguyen, Khue <Nguyen.Khue@epa.gov>
Subject: RE: Etofenprox PID: EPA Internal - Baseline FIFRA Eco Risk Mitigation Guidance

I am looping in Linda.

Linda- please see Melanie's email below regarding the possible language for the dust off from the granules.

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Subject: RE: Etofenprox PID: EPA Internal - Baseline FIFRA Eco Risk Mitigation Guidance

Thanks for the heads up, Demariah! I have not heard of this type of restriction before, and sounds like something we in PRD should discuss more broadly for granular products.

Are Linda and Elissa supportive of including text to solicit comment? Just be aware that if it is not proposed and you want to propose it after the comment period, there would need to be an amended PID. It may/may not be worth it depending on when the pyrethroids are re-evaluated again as a group (presumably after we get additional pollinator data, which is approximately 2 years away).

If this goes into the etofenprox PID, I wouldn't include it in the section that is specifically for the "FIFRA Interim Ecological Mitigation" (as we are now unfortunately calling it), since it isn't considered for the other Q4 cases and not vetted through the workgroup and upper management.

Adding Khue, for coordination purposes.

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From: Koger, Demariah <Koger.Demariah@epa.gov>
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Cc: Javier, Julie <Javier.Julie@epa.gov>
Subject: Etofenprox PID: EPA Internal - Baseline FIFRA Eco Risk Mitigation Guidance

Hi Melanie,

The etofenprox team met yesterday to discuss the proposed mitigation, including the baseline eco mitigation. In the FIFRA mitigation meeting last week, the team agreed that the spray drift mitigation does not apply to the agricultural use of etofenprox (which is only on rice, granular application). However, yesterday the team discussed the possibility of spray drift from the dust off from the granules and recommended for us to not require spray drift measures provided that the granules are dust free. EFED mentioned that they worked with RD on a new product to make sure that it is dust free, and hence, the label will not need the spray drift measures.

We weren't sure how to require this mitigation measure since this sounds like a change in the formulation of the existing product.
The team have decided to include the discussion of the dust off in the PID for awareness and request public comment, but not propose a dust free formulation since this is not the usual label change.

The team wanted to bring this to your attention as something that may come up with other AIs, and we may need to develop mitigation measure to address the dust off from granular applications.

Please let me know your thoughts on this plan and let me know if you have any questions.

Thank you,

DeMariah

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Subject: EPA Internal - Baseline FIFRA Eco Risk Mitigation Guidance

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Q4 PID Teams,

Attached is the latest, cleaned-up version of the **Baseline FIFRA Eco Risk Mitigation Guidance** for Chemical Teams to help with any follow-ups from yesterday's discussion.

At this point I has been provided to PRD-All, but only the Q4 PID teams for BEAD and EFED. There are some upcoming changes to definitions and efficacy discussions before it will be sent to BEAD-All and EFED-All.

Best,

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