
Overview of EPA's Proposed Labeling for Pesticide Spray and Dust Drift



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Outline

- Overview of Pesticide Drift
- Proposed Labeling Guidance
- Supporting Documents
- Related Drift Efforts
- Questions



Pesticide Spray and Dust Drift – What is It?

- Definition: the physical movement of pesticide droplets or particles through the air from the target site to any non-target site
- Pesticide spray and dust drift occurs during application or soon thereafter



Pesticide Spray and Dust Drift – What It's Not

- Pesticide drift does not include the movement of a pesticide caused by other types of airborne migration, such as
 - volatilization from the application site after application
 - windblown soil particles



Background on Drift



- Drift happens
- Long history of incidents from pesticide drift
 - 2500 reported incidents / year
- Broad interest by public and private sectors and general public
- Existing product labels contain widely varying language

Background on Drift – PPDC Workgroup

- The Pesticide Program Dialogue Committee (PPDC) drift workgroup formed in 2006
- Goal: to provide recommendations to EPA about how to address pesticide drift to water
- April 2007 final report recommendation: standardize drift labeling
- Drift labeling should be
 - Concise
 - Clear
 - Enforceable



EPA Drift Workgroup

- EPA drift workgroup formed in February 2008
- Workgroup includes
 - OPP, OECA, OW, OGC, OSA, and OPEI
 - EPA Regional Offices (5, 9)
 - State Lead Agencies (MN, IN)
- Goal: to develop guidance on pesticide drift labeling



Purpose and Goal

- Purpose:
 - to provide guidance to applicants and registrants on revising pesticide drift labeling to improve its consistency, clarity, and enforceability

- Goal of the new labeling:
 - to minimize drift and to protect people, other non-target organisms, and the environment from adverse effects that may be caused by off-target pesticide drift



Applicability

- All outdoor use pesticides which have the potential to drift during application, including
 - solid and liquid formulations
 - ground, aerial, and handheld application methods
 - agricultural, commercial, and residential use sites



Labeling Statements

- The proposed labeling includes two components: a general drift statement, and product-specific application restrictions
- This approach sets a risk-protective standard for all products, while allowing flexibility to tailor mitigation to address the risks of particular pesticides



General Statement for Agricultural and Commercial Products

“Do not apply this product in a manner that will contact workers or other persons, either directly or through drift. In addition, do not apply this product in a manner that results in spray [or dust] drift that could cause an adverse effect to people or any other non-target organisms or sites.”



General Statement for Non-Commercial Products

“Do not apply this product in a way that could contact people, or that results in spray [or dust] drift that could cause harm to people, pets, property, aquatic life, wildlife, or wildlife habitat.”



Product-Specific Statements

- Product-specific application restrictions will be determined on a case-by-case basis, through OPP's usual risk assessment processes
- Restrictions *could* include
 - maximum/minimum wind speeds
 - maximum release height
 - minimum droplet or particle size
 - buffer zones for sensitive sites
- The draft PR Notice *does not* require these kinds of restrictions for all products



Drift Labeling Interpretation

- Provides guidance to state and tribal officials about how EPA intends the new drift labeling statements in the PR Notice to be interpreted
- State and EPA enforcement/compliance representatives led the development of this document
- Provides typical examples of how the labeling could be interpreted in real-world spray drift cases



Additional Information and Questions for Commenters

- This document includes:
 - background information on pesticide drift
 - a description of EPA's comprehensive approach to addressing drift
 - a "reader's guide" to the draft PR Notice
 - specific questions about the draft PR Notice for stakeholder input



Some Topics/Questions for Comments

- EPA's definition of drift
- Range of products covered by the guidance
- “Could cause” adverse effects
- EPA's use of the terms “harm” and “adverse effects”
- EPA's use of the term “sensitive sites”
- Labeling formats
- Implementation timeframes
- Compatibility with existing laws



Additional Information

- Draft Guidance (PR Notice) on Pesticide Drift Labeling:
 - Docket EPA-HQ-OPP-2009-0628 at [regulations.gov](http://www.regulations.gov)
 - Comment period opened November 4, 2009
 - Comment period closes March 5, 2010

- EPA Pesticide Drift Factsheet:
 - <http://www.epa.gov/opp00001/factsheets/spraydrift.htm>



Questions/Contact Information

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Additional Slides



Related Drift Effort: Drift Petition Regarding Children's Exposure

- Petition filed by EarthJustice, Farmworker Justice, on October 13, 2009
- Asks EPA to evaluate children's exposure to pesticide drift and volatilization, and pesticides in wind-blown soil particles
- Also asks EPA to adopt interim requirements for "no-spray" buffer zones around areas where children congregate



Related Drift Effort: Worker Risk Policy Paper

- On December 9, 2009 EPA published a paper for comment describing how risk assessment techniques developed in implementing the Food Quality Protection Act of 1996 (FQPA) will be applied to any pesticide risk assessment, so long as it is consistent with good scientific practice and is not otherwise prohibited by law
- Result in more comprehensive and consistent evaluation of potential risks of food use pesticides, non-food use pesticides, and related occupational exposures

<http://www.epa.gov/pesticides/health/worker-rsk-assmnt.html>



Comment Periods

- Draft PR Notice on Pesticide Drift Labeling:
 - Docket EPA-HQ-OPP-2009-0628 at [regulations.gov](http://www.regulations.gov)
 - Comment period closes March 5, 2010

- Petition to Protect Children from Pesticide Drift
 - Docket EPA-HQ-OPP-2009-0825 at [regulations.gov](http://www.regulations.gov)
 - Comment period closes March 5, 2010

- Worker Risk Policy Paper
 - <http://www.epa.gov/pesticides/health/worker-rsk-assmnt.html>
 - Docket EPA-HQ-OPP-2009-0889 at [regulations.gov](http://www.regulations.gov)
 - Comment period closes April 12, 2010

