

November 30, 2020

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SUBJECT: Draft Findings and Recommendations of the Expert Review Panel for the Eastern San Joaquin Surface Water Monitoring Program

Dear Mr. Weisberg:

The Pyrethroid Working Group (PWG) appreciates the careful review of the Eastern San Joaquin Surface Water Monitoring Program conducted by the Expert Review Panel. The PWG also appreciates the opportunity to review the Panel's Draft Findings and Recommendations (Draft Report), and we understand and appreciate the Panel's concerns with respect to changing pesticide use practices. The PWG submits this letter to help inform the Expert Review Panel of the Central Valley's Pyrethroid Control Program and the PWG's proactive stewardship efforts that are occurring to protect water quality from current and future use pesticides.

By way of general background, PWG is a recognized authority for research and information regarding pyrethroid-based pesticides. As the leading manufacturers of pyrethroid pesticides, we work with federal, state and local regulators to ensure that our products are used properly. The PWG is comprised of the following companies: AMVAC Chemical; BASF Corporation; Bayer CropScience; FMC Corporation; Syngenta Crop Protection; and Valent USA LLC.

For over ten years, the PWG worked closely with the Central Valley Regional Water Quality Control Board (Central Valley Water Board) and other stakeholders in the development of amendments to the Water Quality Control Plan for the Sacramento and San Joaquin River Basins (Basin Plan) for Control of Pyrethroid Pesticide Discharges (Pyrethroid Control Program). The Pyrethroid Control Program was adopted by the Central Valley Water Board in 2017, and subsequently approved by the State Water Resources Control Board in 2018, and certain total maximum daily load provisions by the United States Environmental Protection Agency (U.S. EPA) in 2019. The Pyrethroid Control Program became effective on April 22, 2019. Key provisions in the Pyrethroid Control Program include the need for pyrethroid monitoring plans as well as a requirement for pyrethroid management plans when a pyrethroid trigger (acute or chronic) is exceeded. Pyrethroid monitoring for agricultural dischargers includes baseline monitoring, and, if required, trend monitoring. When trend monitoring is required by the Central Valley Water Board, the Pyrethroid Control Program specifies that the program needs to collect information necessary to determine the extent that management practices are being implemented to reduce off-site movement of pyrethroid pesticides and whether alternatives to pyrethroid pesticides are being discharged at concentrations that have the potential to cause or contribute to exceedances of applicable pesticides. Thus, with respect to pyrethroid pesticides, the Pyrethroid Control Program already anticipates the need to address changes in pesticide use. Because this practice is already part of the Basin Plan, the Expert Review Panel's concerns, at least in part, are already addressed.

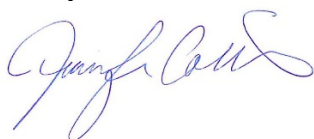
On the issue of stewardship, PWG has been at the forefront for more than a decade in helping to inform structural pest control professionals, homeowners and gardeners on proper pesticide application practices to protect water quality. Since their inception, these programs have been developed and executed in partnership with the California Department of Pesticide Regulation (DPR). Our on-going stewardship programs include the following:

- Apply Responsibly, a stewardship program aimed at educating gardeners and homeowners about the proper use of pesticides – especially how to prevent runoff into waterways. Along with DPR, the Apply Responsibly program has also partnered on public awareness campaigns with municipalities, including Roseville and Santa Clarita.
- “Protégé Su Hogar” or “Protect Your Home,” which is a Spanish language program, primarily in Los Angeles and Southern California, geared toward stewardship of homeowner use of pyrethroids in urban communities.
- “PWG2PMP,” a stewardship program for structural pest control professionals, which consists of educational materials, including a website (<https://www.pwg2pmp.com>.) This industry alliance has been aggressively promoting DPR’s label changes to ensure proper application methods are being followed to protect California waterways. The PWG2PMP program includes providing Pest Control Operators (PCOs) with the most current policies, regulations and training pertaining to pyrethroids.

The PWG is now moving to commence similar stewardship programs for agricultural applications of pyrethroids in the Central Valley and on the Central Coast. For this effort, the PWG is looking to start by preparing training videos to assure that growers are aware of label requirements for all applications, including rates and buffer zones. We intend to also actively work with the East San Joaquin Water Quality Coalition and others to engage with growers to refine techniques to limit pesticide run off, including development of appropriate approaches to sediment and erosion control. This information can be incorporated into irrigated lands management plans as each Coalition determines appropriate. Moreover, while the PWG’s efforts will be geared specifically to pyrethroid pesticides, the recommended practices and stewardship information would also apply to other pesticides for the protection of water quality. We consider this to be an important benefit for all.

In summary, the PWG looks forward to its continuing collaboration with the Central Valley Water Board, East San Joaquin Water Quality Coalition and others to ensure proper use of important agricultural materials for protection of the environment in general, and water quality specifically. Thank you for providing us this opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jennifer Collins".

Jennifer Collins,
PWG Regulatory Agent