



**U.S. Environmental Protection Agency
Office of Pesticide Programs**

***Proposed Product Labeling for
Spray/Dust Drift***

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EPA's Proposed Action

- *Draft Guidance* for labeling statements for controlling spray and dust drift
- Position on drift
- A plan to get these and other statements on product labels
- Call for public review and comment

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What Are The Documents?

- Draft Pesticide Registration Notice or PR Notice
 - Draft guidance
 - OPP website: www.epa.gov/pesticides/
- Federal Register Notice – availability of PRN, public comment period

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Why?

- Legal/regulatory requirements for product labeling
- Concerns about drift and incidents
- Improve labeling
 - Consistency
 - Expectations and directions for applicators
 - Enforceability for EPA, state, tribal authorities
- Public comment—complexity, different opinions

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Scope and Purpose

- Agricultural, industrial, horticultural, home/garden sprays and dusts
- Not other formulations—fumigants, granulars
- Not certain uses—mosquito adulticides for public health programs
- Not meant to supercede more requirements on labels and by states, tribes

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Definitions

- EPA limits the meaning of the term “spray or dust drift” to the following:

“Spray or dust drift is the physical movement of pesticide droplets or particles through the air at the time of pesticide application or soon thereafter from the target site to any non- or off-target site. Spray drift shall not include movement of pesticides to non- or off-target sites caused by erosion, migration, volatility, or windblown soil particles that occurs after application or application of fumigants unless specifically addressed on the product label with respect to drift control requirements.”

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Definitions

- EPA defines the term “no-spray zone” (also known as “buffer zone”) as follows:
 - “ A no-spray zone is an area in which direct application of the pesticide is prohibited; this area is specified in distance between the closest point of direct pesticide application and the nearest boundary of a site to be protected, unless otherwise specified on a product label.”

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EPA’s Position on Pesticide Drift

- Important responsibilities:
 - EPA to ensure that use will not cause unreasonable adverse effects
 - States, tribes, EPA carry out enforcement to ensure compliance
 - Applicators to protect people and the environment

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EPA’s Position (continued)

- EPA takes very seriously potential adverse impacts from drift
- Labeling must be clear for applicators and enforceable for government
- Recognize *de minimus* drift

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Position Statement--Applicators Must:

- Not allow pesticide spray or dust to drift from application sites and contact-
 - People and animals
 - Sensitive sites: structures people occupy at any time, parks and recreation areas, nontarget crops, aquatic and wetland areas, woodlands, pastures or rangelands
- Follow label statements about controlling drift
- Consider and use other measures, including those required by states and tribes

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Proposed Labeling Directions

- Generic directions for all application methods:
 - “Do not allow spray to drift from application site and contact...”
 - “Applicator must use all other measures necessary to control drift.”
- Specific directions for each type of application method

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Ground Boom Applications--Proposal

- Nozzle height maximum 4 feet
- Wind speed maximum 10 mph, measured by anemometer
- Use spray quality/droplet size (provided by registrant) per ASAE standard or VMD for spinning atomizer nozzles

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 **Orchard/Vineyard Airblast--Proposal**

- Do not direct spray above trees/vines
- Turn off outward pointing nozzles at row ends and outer rows
- Wind speed range of 3 to 10 mph, measured by anemometer outside and upwind side

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 **Aerial Applications--Proposal**

- Boom width maximum 75% wingspan or 90% rotary blade
- Use upwind swath displacement
- Wind speed range of 3 to 10 mph, measured by anemometer
- Use spray quality/droplet size (provided by registrant) per ASAE standard or VMD for spinning atomizer nozzles
- With a no-spray zone, limit release height to 10 feet maximum

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 **Overhead Chemigation--Proposal**

- Maximum wind speed of 10 mph

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 **Handheld Sprayer--Proposal**

- Maximum wind speed of 10 mph
- For sprays, apply largest droplets possible

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 **Other Labeling May Be Appropriate**

- Depends on potential risks of product/uses, incident history, science
- No-spray zones, tighter limitations of the above directions, prohibition of an application method
- *Flexibility* of product specific labeling to address risks and uses

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 **No-spray Zones**

- Proposal: "Do not apply this product within (distance) of (sensitive areas to be determined for the product). Under no circumstances apply this product within (distance) of people or these areas."
- Risk assessment/management decisions determine need for, distances, and sensitive areas to be protected
- Implementation plan under development

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Rationale for Proposed Label Statements

- If adopted, will be adequate to protect from unreasonable adverse effects
 - Meets responsibilities of applicators, registrants, and government
- Addresses factors that are most influential in cause and control
- Clear, concise, readily understood

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Proposed Implementation

- 90 days for public comment on any and all aspects
- Assess comments, revise guidance as appropriate
- Issue final guidance (PRN) with labeling statements and implementation plan
 - Summer 2002???

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Proposed Implementation

- Place new statements on labeling--new products, amendments, reregistration
 - Entertain requests for alternate wording
- Goal: new labeling on most products by October 2003-4???

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EPA's Bottom-line Message

- Serious about concerns of drift and its adverse effects
- Improvements in education/behavior, technology and labeling are key
- Be flexible
- We're open to other ideas to achieve our goals

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