



Teresa Marks  
Acting Director

# Department of Pesticide Regulation

Gavin Newsom  
Governor

Jared Blumenfeld  
Secretary for  
Environmental Protection

## **PESTICIDE REGISTRATION AND EVALUATION COMMITTEE (PREC) Meeting Minutes – March 15, 2019**

### **Committee Members/Alternates in Attendance**

Amalia Neidhardt, Department of Industrial Relations (DIR) –via webcast  
David Ting, Office of Environmental Health Hazard Assessment (OEHHA)  
Jim Seiber, University of California, Department of Toxicology  
Jodi Pontureri, State Water Resources Control Board (SWRCB)  
Karen Morrison, Department of Pesticide Regulation (DPR)  
Kevi Mace-Hill, California Department of Food and Agriculture (CDFA)  
Lynn Baker, California Air Resources Board (CARB)  
Patti TenBrook, U.S. Environmental Protection Agency, Region 9  
Ruben Arroyo, California Agriculture Commissioners and Sealers Association (CACSA)  
Valerie Hanley, Department of Toxic Substances Control (DTSC) –via webcast

### **Visitors in Attendance**

Anne Katten, California Rural Legal Assistance Foundation  
Arthur Lawyer, Exponent  
Ben Sacher, Syngenta Crop Protection  
Brad Hooker, Agri-Pulse  
Darren Van Steenwyk, Clark Pest Control  
Dave Lawson, Western Plant Health Association (WPHA)  
Deldi Reyes, California Environmental Protection Agency (CalEPA)  
Emily Marquez, Pesticide Action Network  
Jean-Mari Peltier, Environmental Solutions Group (ESG) –via webcast  
Jodi Devaurs, California Cotton Ginners and Growers and Western Agricultural Processors  
Lori Lim, OEHHA  
Marla Livengood, California Strawberry Commission  
Renee Pinel, WPHA  
Rich Breuer, SWRCB  
Steve Williamson, Public Observer  
Sum Peirson, Public Observer –via webcast  
Vernon Hughes, CARB  
Walter Mayeda, CACSA –via webcast

### **DPR Staff in Attendance**

Andy Rubin, Human Health Assessment Branch  
Aron Lindgren, Pesticide Registration Branch  
Brenna McNabb, Pesticide Registration Branch  
Chris Collins, Environmental Monitoring Branch  
Denise Alder, Pesticide Registration Branch  
Edgar Vidrio, Environmental Monitoring Branch  
Jill Townzen, Pesticide Programs Division  
Kara James, Pesticide Registration Branch  
Nathan Desjarlais, Enforcement Branch  
Pam Wofford, Pesticide Programs Division  
Peter Lohstroh, Human Health Assessment Branch  
Randy Segawa, Pesticide Programs Division  
Russell Darling, Pesticide Registration Branch  
Teresa Marks, Director's Office

#### **1. Introductions and Committee Business – Karen Morrison, Chair, DPR**

Approximately thirty-seven (37) people attended the meeting and fifty-two (52) webcast viewers.

#### **2. Air Monitoring Updates – Edgar Vidrio, DPR**

DPR recently moved the Air Monitoring Network (AMN) location within the community of Shafter. Shafter is an area of high pesticide use and is one of eight locations in the state where DPR and ARB are monitoring for 31 pesticides as part of AMN. The original site was located at Shafter High School. The city of Shafter requested that DPR vacate the sampling site because the city is preparing to perform renovations on the property. DPR managed to find another location within the community at Sequoia Elementary School. This would not have been possible without ample notice of the renovations and a contract with Richland School District to secure the new sampling site. The new site at Sequoia elementary is less than a quarter mile from the previous site. When comparing the new site and the old site, the only significant difference is the location. There will not be any changes in monitoring, equipment, number of target pesticides, and sampling routine. Because the two sites are relatively close together, DPR does not expect many differences between samples.

In addition to these site changes, there was also an elevated 1,3-dichloropropene (1,3-D) air concentration in Parlier (Fresno County) in 2018 and this detection led to a follow-up investigation. DPR has been monitoring for 1,3-D at Parlier since December 2016 as part of DPR's Study 309. The study looks at historically high use communities for this pesticide. An air sample collected at the site on October 10, 2018 came back with a concentration of 111 parts per billion (504 µg/m<sup>3</sup>), which is the highest concentration measured in ambient air monitoring studies conducted by DPR or ARB to date. Although, the 24-hour concentration does not necessarily indicate that DPR's 72-hour acute human health screening level of 110 parts per

billion (ppb) was exceeded. The measured value may cause the annual average concentration at this site to exceed DPR's regulatory lifetime cancer risk goal (0.56 ppb) if continued over several years. All the sub-chronic (3 ppb) and acute (2 ppb) cancer risk screening levels were exceeded in the Parlier sample. Upon receipt of the confirmed monitoring results, DPR began an evaluation of preliminary 2018 Pesticide Use Report data looking at all reported applications made within 5 miles of the monitoring location in the days and weeks prior to sample collection.

In addition to the evaluation, DPR also reached out to the Fresno County Agricultural Commission to obtain any additional 1,3-D application information available. After reviewing the preliminary use data, DPR isolated five 1,3-D applications that were the likely sources of the high detection due to various factors such as location, timeframe, application method, and average use per application. These particular applications were about one-tenth of a mile to 1.1 miles from the monitoring site and occurred less than eight hours prior to the beginning of air sampling. Additionally, these applications were applied using the Nontarpaulin/Deep/Strip (Field Fumigation Method 1210) method and approximately 675 pounds were used during these applications on one to three acre fields. DPR also used local computer weather modeling, AERMOD, in order to simulate the five applications and compare that to the measured value. A memo with more information has been posted on DPR's website and is available for viewing.

The modeling set up conveys the sampling station and mapping of the five applications. There are three sources and each of the applications has its respective start time, amount of product used, and application rate. This model was used in conjunction with the air weather data. There are two weather stations that could be used for modeling for this site. Both sites were used in the modeling scenarios to analyze the detections. One is located in Fresno's airport and the other is from the California Irrigation Management Information System (CIMIS). The CIMIS site is not meant for modeling purposes but it has some information necessary to have a complete data set. The modeling results were only able to determine concentrations in order of 30.1-35.5 ppb, which is only about a third, about 27% - 32%, of the measured value. This may be due to a number of uncertainties. Some of these may include the representative weather station, wind conditions, fumigant emission profile, and application information. California has a robust pesticide use database, but the information it contains is not detailed enough for these modeling scenarios, which is why some of the application information is incomplete. In addition to this, the 72-hour rolling averages for the reported applications were modeled for seven days and the results showed an average 72-hour concentration ranging from 12.3-14.5 ppb.

Currently, DPR is in the process of adding acute mitigation to the 1,3-D cancer mitigation regulation and consulting with various agencies, including ARB and OEHHA, to develop a Risk Management Directive. More information regarding the 1,3-D human health risk assessment and mitigation can be found at DPR's website at [https://www.cdpr.ca.gov/docs/whs/active\\_ingredient/index.htm](https://www.cdpr.ca.gov/docs/whs/active_ingredient/index.htm). More information regarding AMN can be found at DPR's website at <https://www.cdpr.ca.gov/docs/emon/airinit/airmenu.htm>.

### **3. AB 617: Community Air Protection Program – Vernon Hughes, CARB**

The legislature passed Assembly Bill 617 in July 2017. The bill recognized CARB and the air districts have been improving air pollution at the regional level for years. However, there is still a problem with air pollution in many communities, so the bill focuses on a program for community scale reduction. CARB developed guidelines for the program and met with community members and air districts. The blueprint for program implementation was approved in October 2018. The goal is to build a community-focused framework for a long-term program. Over time, building strong partnerships with communities, developing statewide strategies to reduce emissions at the local level, and implementing targeted community clean air plans is important to the program. CARB is also looking at transferability and choosing diverse types of communities with various geographies and resources. It is also important to track progress and data, invest in clean technology that can be used throughout the state, expand air monitoring, improve data accessibility, and collaborate with land use and transportation agencies.

In 2018, CARB selected ten communities throughout the state of California. These communities vary in geographic diversity and source diversity. There are six air districts covered by the ten communities. Three communities were selected for air monitoring, one for emission reduction, and the other six were chosen for emission reduction and air monitoring.

The initial ten communities are working on tight deadlines in order to keep the program on track. CARB must approve the programs selected for emission reduction by October 2019, while those selected for air monitoring need their programs approved by July 2019. In order to meet these deadlines, the emission reduction communities need to establish community steering committees, convene the committees, discuss concerns within the community related to air quality, and devise strategies for approval.

Community air grants are another aspect to the program and are primarily for community-based organizations to build their capacity to participate in the program. There are a number of elements, in terms of informational and educational capacity building, participating in steering committees or workshops, or monitoring if the communities are interested in employing their own monitors. There have been a number of awardees in the first year of the program, such as Californians for Pesticide Reform, who focus on capacity building and collecting data with the drift catcher at several sites.

Another area CARB has developed in addition to the blueprint is an online resource center. This center keeps track of materials as they evolve. Communities can also deploy monitoring networks and CARB will review the networks as they become available and classify the types of information. There are also technological assessments that evaluate air quality data, source attribution, and air quality models. CARB is working with DPR to create links between the resource center and the department.

In February 2019, CARB started community meetings to select Year 2 communities. In July 2019, the communities will start the monitoring for Year 1, Year 2 community recommendations will be due along with community meetings, and a draft of Year 1 emission reduction program

submissions. By December 2019, CARB will select Year 2 communities and consideration for Year 1 community emissions reduction programs bto continue until March 2020.

**4. Pesticide Information for the Community Air Protection Program**  
**– Randy Segawa, DPR**

Assembly Bill 617 includes expanded air monitoring and/or additional emission reductions in ten communities, including Calexico, El Centro, Heber, and Shafter. Pesticide usage have been discussed in these communities during committee meetings. There is information for monitoring, emission reduction strategies, incentive programs, and other information with links to pesticide information on DPR's website. Currently, DPR has the air monitoring protocols, standard operating procedures, sample collection procedures, quality control procedures, and the air-monitoring database. The database has results for all samples collected by community, type of pesticide, and year. CARB will also be linking sales and use data from DPR's website as well as the current pesticide use reports, California Pesticide Information Portal (interactive online database where users can query pesticide use reports), and pesticide use data. In 2016, DPR evaluated the fumigant and organophosphate use data for 1267 communities throughout the state from 2012-2014. These communities were ranked for fumigant and organophosphate use.

DPR releases a volatile organic compound (VOC) emission inventory each year for five non-attainment areas that do not achieve the ozone standard. DPR is currently developing a pesticide active ingredient emission inventory by using the pesticide use report data to evaluate fumigants and organophosphates. The pesticide use report data does not indicate how much of a pesticide has been emitted in the air, so DPR must calculate the emission factors and determine how much of each pesticide applied is emitted in the air through either drift or volatilization. The emission factor is going to vary by active ingredient and application method. Once the emission factors are determined, DPR will be able to estimate how the active ingredient emissions for all cultural applications, by multiplying the pounds of the active ingredient applied by the emission factor. Because this calculation will be made for every application, there will also be various spatial scales used to calculate the annual total active ingredient applications.

To view CARB's online resource center, please visit <<https://ww2.arb.ca.gov/capp-resource-center>>. For more information regarding DPR's Air Program, please visit DPR's Web site at <<https://www.cdpr.ca.gov/docs/emon/airinit/airmenu.htm>>. For questions, please contact Randy Segawa at <[Randy.Segawa@cdpr.ca.gov](mailto:Randy.Segawa@cdpr.ca.gov)> or by telephone at 916-324-4137.

## **5. Carbon Monoxide Devices to Control Burrowing Rodents – Jill Townzen, DPR**

In 2012, California Food and Agricultural Code (FAC) section 6025.4 was added to CDFA's Vertebrate Pest Control Research. Prior to this addition, it was illegal for anyone to kill a vertebrate with carbon monoxide, but now carbon monoxide devices can be used to control populations of burrowing rodents. In 2015, FAC section 12999.5 was amended and FAC sections 14160 and 14161 were added. These changes required DPR to develop and enforce regulations for the use of these devices. Since then, DPR has provided guidance (enforcement letters) as to how these devices should be used, including regulation as devices and not pesticides. Devices are not required to be registered with DPR or file use reports. However, devices must bear the U.S. EPA Establishment Number. California considers use of carbon monoxide devices as pest control, so the devices are subject to general standards of care regulations. Anyone performing pest control for hire must be registered and licensed by DPR. Additionally, DPR recommends that carbon monoxide devices should not be used within 100 feet of an occupied structure and nearby unoccupied structures be aerated prior to reentry.

The proposed regulations follow DPR's guidance. The law and recommendations require current devices to bear the U.S. EPA Establishment Number, be used at a specified distance away from an enclosed structure, use protective eyewear when the devices are in use, and require recordkeeping, including reporting of adverse effects. These are in line with the guidelines that DPR already has in place.

For questions, please contact Environmental Program Manager I (Specialist), Jill Townzen at <Jill.Townzen@cdpr.ca.gov> or by telephone at 916-324-6174.

## **6. Field Fumigation Posting Rulemaking – Regina Sarracino, DPR**

Existing regulations need to be amended for clarity, enforceability, consistency with the federal level, and to align fumigation posting requirements with pesticide product labeling due to changes to the federal Worker Protection Standard (WPS). There is a minor edit to the definition of the term 'handle,' which is in DPR regulations. DPR is replacing the word 'greenhouse' with the term 'enclosed space,' which is now the new word for those types of spaces. There is also a minor edit to remove an outdated reference to the definition of 'closed system,' which has been changed in regulations. This still maintains the need for 'closed system,' but now does not refer to the old definition.

Another item proposed is an amendment to the section on personal protective equipment (PPE). When PPE is exempted in certain situations, such as using in a closed cab or a closed system, the current terminology states the exempted items must still be available. DPR proposes to update the language so that PPE is in immediate reach. This is in order to align with new label requirements and clarify the term 'available.'

The last item for proposed changes is regarding the fumigant field posting. There are already regulations regarding field posting, particularly soil fumigation posting, and these specify that it is the responsibility of the property operator to do the following: sign posting that includes label

information, date, and a date to remove the sign. DPR proposes changing the removal of the sign to within three day or entry of the area because the removal now is upon completion of aeration. The sign must be legible throughout the posting period.

Furthermore, there will be an added section to DPR's regulation to help exempt public agencies from certain requirements during an emergency. There is a similar regulation now for vector control, which exempts them from consent and notification. This is especially for when the property owner or property operator is unavailable or not cooperative and there is a public health emergency. This would allow immediate disinfection actions in order to protect public health. If there were a contaminated site, whether on private or public property, this would allow disinfection and antimicrobial activities to occur. One example is the Hepatitis A outbreak, which had multiple sites that needed immediate attention. This would only happen during an official public health emergency and documented by the local public health officials or the Department of Healthcare Services.

## **7. Committee Comment**

Ruben Arroyo asked what direction the wind came from in regards to the five applications that led to detections in Parlier. Edgar Vidrio replied that they are coming from different areas and there is not predominant wind direction. The information in CIMIS shows the wind is coming from the northeast for that specific 24-hour period.

David Ting asked if it was possible to conduct a pilot study that could give better real-time results in order to improve air monitoring. Edgar Vidrio replied that DPR is not aware of information or equipment that can provide real-time results at the level of detection the department is looking for. The devices that can record concentrations usually measure at the ppm range and the department wants figures in ppb ranges, so these would not be of any use to the study. Lynn Baker concurred with Edgar Vidrio's statement.

Lynn Baker asked if the study looked at the Visalia meteorological data because Visalia is south of Parlier and has a commercial airport. If there are similar meteorological conditions to the north and south of Parlier, then there may be reason to expect that those same conditions are actually happening in Parlier as well. Lynn Baker recommended looking at the adequacy of mitigation for untarped applications since there was quite a difference between the CIMIS data and Fresno. Edgar Vidrio replied that he does not believe that DPR has the data from that airport but it will be looked at later to see if it can provide some new information.

Ruben Arroyo asked if current permit conditions would be effected by the 1,3-D risk assessment. Karen Morrison replied that DPR is not revisiting the risk assessment at this time. DPR is looking at a risk management directive, which will instruct mitigation levels and potential strategies for that mitigation. At this time, DPR is working to accelerate a full rule-making package for both acute and cancer, so there are no anticipated changes for the permit conditions.

David Ting encouraged DPR to conduct further validation to results in terms of acute, sub-chronic, and chronic measurements or estimates. David Ting clarified that he meant to conduct validation studies of the models used if possible. Karen Morrison added DPR has been looking

into conducting validation studies of the models. Being able to look at regulatory actions for pesticides is an expanded tool that DPR has and the department is currently working through a peer review for modeling practices with other agencies.

Kevi Mace-Hill asked how many of the air monitoring sites have their own weather stations. Edgar Vidrio replied that three of the eight sites have their own monitoring weather stations, two of which are operated by CARB.

Kevi Mace-Hill then asked if DPR has compared the accuracy of modeling from using those stations to using airport stations. Edgar Vidrio replied that when DPR deploys their own weather station, DPR compares the modeling and onsite weather data to offsite weather and airport data. However, for the air network, DPR has not done this because the stations are not on site.

Kevi Mace-Hill asked if 1,3-D exceedances occurred in Parlier last year, making this the second exceedance. Edgar Vidrio replied that DPR did talk about a 1,3-D application with a concentration of approximately 15.1 ppb in 2017. DPR also discussed a 1,3-D detection in Shafter with a 50.5 ppb concentration.

James Seiber asked if DPR goes back to the applicator to see if there was an error made in the application when detections are found. Edgar Vidrio replied that monitoring is not an analysis of the applications in real time. James Seiber then followed up by asking if there were other fumigants being monitored at the same time. Edgar Vidrio replied with an affirmation and added that monitoring stations generally look for 31 different pesticides at once and multiple fumigants.

James Seiber asked if the air monitoring plans, like the emission reduction plans, have to be approved by CARB. Vernon Hughes replied that CARB will review the air monitoring plans, but for statute, it is not required for CARB to approve them.

Patti TenBrook asked if it would be possible to give a community the VOC data and do the calculations for them if it is not in one of the five non-attainment areas. Randy Segawa replied that DPR calculates two different versions of the VOC inventory, unadjusted and adjusted. The unadjusted version is based strictly on the pesticide use reports and the fraction of VOCs contained in the product that is being applied, so this is an estimate of the maximum amount of air exposure to VOCs. The adjusted version accounts for the fraction that is emitted in the air for fumigants. DPR currently has those emission factors for all fumigant applications but only for non-attainment areas due to the regulation. The regulation requires the specific application method be identified for non-attainment areas, which is only 4-5 regions. DPR has been looking at recent pesticide use reports, information voluntarily provided by growers, and information required from agricultural commissioners as part of the permit codes. Recently, more than 90% of the statewide fumigant applications include that code, which means DPR will now be able to calculate the active ingredient and VOC emissions.

Ruben Arroyo asked who is going to provide additional support and information to communities and train, monitor, and collect at these stations. Randy Segawa replied that air monitoring is the responsibility of the local air districts but there will be additional air monitoring that may or may

not include pesticides. As soon as this is conducted, it would be done by the districts. In addition, as Vernon Hughes mentioned, there are grants that other organizations can use to conduct monitoring within the communities. Ruben Arroyo also asked if DPR would be part of a cooperative effort with those organizations to monitor for pesticides and ensure that data is collected correctly. Randy Segawa replied that DPR attended the Shafter steering committee meeting. If pesticide monitoring is included in Shafter's air monitoring plan, then DPR will review and assist them with procedures to ensure validation.

Lynn Baker asked if any data collected by air districts in these communities would be added to the online resource center. Vernon Hughes replied that communities selected for monitoring or those that conduct monitoring under AB 617 can enter data into a portal that is being established under contract. Within the blueprint, there is the recommended protocol for collecting data and this includes establishing exclusive monitoring objectives, quality routines, and more. For other monitoring that may be conducted in and around communities, there could be a discussion on classifying quality and other factors that could be handled by the steering committee in relation to how data are collected. Lynn Baker then asked if that would include air monitoring data for pesticides collected by air districts as well as monitoring collected by community organizations like Californians for Pesticide Reform. Vernon Hughes replied that that is correct.

Lynn Baker asked what methods are going to be used to obtain emission factors. Randy Segawa replied that DPR has some air monitoring data for a number of organophosphates, which can be used to determine the emission factors.

Jodi Pontureri asked if it would be the responsibility of the property owner, property operator, or both to post the sign. Regina Sarracino replied that the property operator is responsible.

## **8. Public Comment**

Anne Katten stated the high spikes that have been associated with untarped applications is extremely concerning. Therefore, the untarped applications should be ended for immediate mitigation. Anne Katten then asked how long the acute level has been a 72-hour average. Karen Morrison replied that the screening level has always been a 72-hour average. Anne Katten further asked if the people that work and live in the Parlier area have been notified of these high levels. Edgar Vidrio replied that the only contact happened during the investigation phase when DPR reached out to the County Agricultural Commissioner office. Anne Katten replied by stating that DPR should be contacting people because the department has more resources than the county. Karen Morrison commented that contacting people has been in practice for DPR. Anne Katten asked if adding the acute mitigation to cancer would add any delay. Karen Morrison replied this would likely cause a six to seven month delay. The current mitigation for cancer is still ongoing, but DPR is looking at each at the same time. Anne Katten then commented that the delay is unacceptable because residents have been exposed for too long already. Anne Katten then asked if DPR thinks more staff would accelerate the change so that the deadlines are met and if they knew that just regulating the township was inadequate for cancer control. Anne Katten clarified that before this finding, it was already apparent that 1,3-D usage was causing spikes in this area. Karen Morrison replied that DPR had been developing the cancer mitigation

and reviewing all of the data holistically to determine whether the protections in place were adequate. Anne Katten replied that DPR needs to stay with the timeline for cancer and if adding more staff is necessary, then it should be done.

Dave Lawson commented that he recognized that some of these detections had been covered before and DPR has done an excellent job with mitigation and monitoring because some of the numbers are very conservative. Dave Lawson then asked if there was a smoking gun for any of the five sites, if DPR was looking at the potential accumulation over five or six days from other applications, and if there is potential to get more specific information that could help with the modeling for the five sites from the fumigant management plan. Edgar Vidrio replied that all of the applications are the same, do not require a fumigant management plan, and are not part of the phase 2 labels. Application information may not be available because it is not required to be provided. In regards to the smoking gun, there is not one. All of the pesticide use data available is reviewed and a timeframe is selected to see if there are any applications that took place near the site. The five that took place near the location were modeled and the two nearest the site showed the highest concentrations, which was expected because these are the closest to the collection area. Any other possible reasons for high concentrations are unknown.

Walter Mayeda asked if Fresno County conditions for the California Restricted Material Permit including 1,3-D not include a condition of a map of the fumigated area. Walter Mayeda further asked, were the growers of the fields questioned as to where was fumigated. Edgar Vidrio replied because there is no fumigant management plan, that level of information is not normally included. Ruben Arroyo added that unless the suggested permit conditions require a map, then the map in the field will be part of the permit. However, if the application was just a portion of the field, then the conditions would have required that information.

Arthur Lawyer asked what the pesticide plans are for the urban area sites in southern California and the Bay Area. Randy Segawa replied that it is not likely that pesticides will be part of the plan in urban areas, which means they will not monitor for pesticides and these will not be part of the emission reduction plan. There may be one exception, which could be the Wilmington area because there is commodity fumigation conducted at the port of Los Angeles. Karen Morrison added this is a decision made by the steering committees in the areas of interest for their communities and DPR is responding to communities that have expressed interest. DPR is working with CARB to develop plans.

Dave Lawson asked if the five non-attainment areas are all in non-attainment and if there is nomenclature associated with the naming of those areas. Randy Segawa replied, in terms of the VOC inventory, DPR tracks in five non-attainment areas whether they are in compliance or not due to legal requirements. Dave Lawson followed up by stating that "non-attainment" is a residual term. Randy Segawa replied that all five sites comply with the VOC reductions required for pesticides, but do not comply with ozone air quality standards. Dave Lawson then asked how DPR would analyze the active ingredient in products now in comparison to thermographic analysis that was performed 15 years ago Randy Segawa replied DPR has not gotten an answer to that yet, but there is a good start with fumigants because that is based on the current field data. The next step is to determine the emission factors for organophosphates. Dave Lawson then

asked if there were organophosphates going through drip irrigation that would produce a different number for the emission factor. Randy Segawa replied yes, and that the number would also be different for something applied through air blast. Dave Lawson asked if databases that have ppm and ppb will be blended because the data collected by citizen groups is different and will likely not be as accurate. Dave Lawson further asked how the quality of this data be maintained. Randy Segawa replied that if the groups use the drift catcher that is currently available, then if operations and lab analysis is done correctly, then the data will be at the levels DPR needs.

Sum Peirson asked if air monitoring conducted by DPR uses good laboratory practices (GLPs) and GLP certified laboratories, and if the expanded air monitoring will be conducted using GLPs. Randy Segawa replied that DPR contracts with CDFR laboratory to do the analysis, so they may not follow strict GLP requirements but do in terms of data documentation. In regards to the expanded air monitoring under AB 617, the districts will decide whether GLPs will be followed.

Jean-Mari Peltier asked what steps are in place to ensure the data collected are done in compliance with the practices developed by CARB and DPR since there is no formal approval process for the community air monitoring programs. She also asked how data integrity would be ensured. Vernon Hughes replied that monitoring programs conducted under the program would follow the blueprint, which should be high quality data. The objectives are stated and CARB will review their plans. It is in the best interest of the communities to collect quality data. To clarify about the air grants, it is not a requirement that the recipient follow the fourteen steps, but it is in the best interest of the community to follow those steps. Randy Segawa added that with this monitoring data and all other data, DPR would do an independent evaluation if it were submitted to DPR. In the past, registrants and other groups conducting a monitoring study and could provide a protocol to DPR; the department would let them know whether to move forward. Therefore, even if they are following the plan, DPR may or may not use the data at the end because everything depends on the final evaluation of the submitted data.

Emily Marquez commented that she would be doing the air monitoring work with Californians for Pesticide Reform. She also stated that the drift catcher is done to engage communities in the process of collecting data, work with air monitoring, and learn about pesticides that may be drifting in the air. Pesticide Action Network publishes results in technical reports and explain the limitations of the data collected. The data is not at the same level as DPR or other agencies, but a scientific advisory committee reviews the protocol and they use an analytical lab and the same sampling media that the agencies use. There are limitations but Pesticide Action Network tries to explain those and provide information in the data report.

Arthur Lawyer asked if this affects carbon dioxide and other gas versions of these devices. Jill Townzen replied that this does not affect those because they are considered pesticides, whereas as this a device. These are gasoline-powered engines that range in size and are very different from a pesticide.

Anne Katten asked for more information regarding devices. Jill Townzen replied that these are devices that have been issued EPA Establishment Numbers, and are typically gasoline powered. The carbon monoxide in exhaust is used to control the burrowing rodents. Anne Katten asked if the exhaust would be coming from the tailpipe of a tractor or a different engine. Jill Townzen stated that something like that would be difficult to register with U.S. EPA.

**9. Agenda Items for Next Meeting**

The next meeting is scheduled for May 17, 2019 at 10:00 a.m. in the Sierra Hearing Room on the second floor of the CalEPA building, located at 1001 I Street, Sacramento, California.

**10. Adjourn**