



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 9, 2012

MEMORANDUM

SUBJECT: Response to Public Comments on the Pesticide Environmental Stewardship Program
Annual Measures Reporting Information Collection Request

FROM: Frank Ellis, Acting Branch Chief
Environmental Stewardship Branch
Biopesticides and Pollution Prevention Division (7511P)

THRU: for Keith A. Matthews, Director
Biopesticides and Pollution Prevention Division (7511P)

TO: Jay Ellenberger, Acting Director
Field and External Affairs Division (7506P)

EPA is seeking an Information Collection Request (ICR) in order to be able to obtain information on membership application and Stewardship Strategy development, as well as annual reporting activities, for use by the Pesticide Environmental Stewardship Program (PESP). EPA announced the opening of a 60 day public comment period on this proposed ICR in the *Federal Register* on October 27, 2010. This comment period ended December 27, 2010. Eight PESP member organizations submitted comments. Approximately one-half of the comments received were in support of the proposed information collection activities while the other half expressed some concern over the collection of specific measurement data. The comments led to the revision of some measures in the proposed ICR. EPA's responses to comments follow.

PEACHTREE PEST CONTROL, INC, Terry Bowen

Company does not currently collect all data EPA is seeking.

Comment: We have just recently completed the Application and Strategy Form for membership in the PESP program. I feel the information requested is critical to the underlying principles of the PESP program. There must be a way for members to report data that would reflect their efforts in promoting the ideals and principles of IPM. However, some of the measurements may not be available for submission or calculation, as the measurement data may not be kept by a PESP member. The omission of information should not reflect poorly on the PESP member or their promotion to a higher level of membership within the PESP program, unless such omission is an indication that the member is not fulfilling the spirit or basic requirements of the PESP program.

EPA Response: Peachtree Pest Control, Inc. is a company that provides pest management services. EPA has worked closely with several third-party certification programs, namely the National Pest Management Association's GreenPro, IPM Institute of North America's Green Shield, and EcoWise Certified, while developing the measures being sought from pest management professionals. It is EPA's understanding that companies certified by any one of the aforementioned programs should be able to report on each of the PESP measures for pest management professionals. For other companies, EPA understands that some may not initially be in a position to collect and submit information for each measure. The Agency expects that those companies may elect to adapt their internal record keeping systems as necessary and feasible over time to be able to provide the data. EPA encourages PESP member companies that are committed to practicing IPM to work with EPA to improve upon the ways of verifying IPM over time.

Suggestion for data that might be more appropriate for EPA to collect.

Comment: There may be other sets of data, other than the set of data requested on the Strategy Form, that would be less burdensome to report or calculate, while still indicating that IPM is still being promoted. I am not sure what this data would be, but I base this comment on the time it took for me to gather the information requested. I would be willing to participate in discussions along the lines of changing the types of data requested.

EPA Response: EPA assembled measures that speak to the information the Agency would like to have in order to be able to accurately evaluate the IPM adoption and risk reduction being achieved by PESP members. In developing this set of measures, EPA began the consultation process during a PESP National Conference in November 2009. During the conference, EPA presented its draft list of performance measures to the PESP members in attendance and engaged them in an extensive, day-and-a-half dialogue. In addition, EPA conducted a pilot exercise in January and February of 2010, in order to assess the burden placed on members by submitting annual performance reports. During this pilot, EPA asked ten PESP members to submit annual reports, addressing the new set of performance measures. Based on the results of the pilot exercise, EPA believes the burden associated with collection and reporting of the requested data to be reasonable.

In cases where companies do not currently collect information on a certain measure, EPA encourages PESP members to work with the Agency to find the most appropriate way to demonstrate their progress with regard IPM and other risk reduction practices.

FISCHER ENVIRONMENTAL SERVICES, Robert Kunst

Pest management companies already collect the data EPA is requesting.

Comment: My company is a member of PESP and as such has acquired data for reporting info to the EPA. The requested forms require very little information that the Pest Control industry does not already keep track of. So NO extra work is necessary for over 95% of the requested info. In other words the vast majority of data is already collected. This is done because it is either needed for the management of the business or a Federal or State regulatory agency already requires us to do it. The only items that are new are the need to know how many buildings and how many people. That is info that our industry does not normally collect. That can be done very easily as our technicians are at the locale between 4 and 20 times per year now. We would need a slightly modified computer program or we could use the census averages for that area in calculating the number of residents. Either way no

big deal. The number of hours needed to do this work is not 35 hours or more as indicated on the introduction it is more like 4 hours per month and that is a stretch. Once again pest control companies are already collecting almost all of the data requested NOW. Therefore, just submitting the data to another agency is really no trouble at all. Believe me, if this was a large or hard task you would hear me squalling, but it just is not.

EPA Response: EPA appreciates the comments submitted by Mr. Kunst.

SARASOTA COUNTY MOSQUITO MANAGEMENT SERVICES, Eric Schreiber

Using best guesses to respond to measures

Comment: We filled out the EPA's Pesticide Environmental Stewardship Program Strategy Form in Summer/Fall 2010 and found it to be cumbersome at times to use. The proposed measures in this form surprised us initially but we came up some "real numbers" we could track. We believe that if the measures proposed remain in a "ballpark" or best educated guess variety, we could measure progress. At times problems arise with timely reporting by contractors and our own operators on amounts applied.

EPA Response: Where exact numbers are not possible, EPA finds it completely acceptable for PESP members to use informed estimates.

EPA should distinguish among pest control strategies.

Comment: The lumping of pests control strategies in generalized terms may misrepresent actual usage trends (especially depending on abiotic and biotic factors out of our immediate control e.g.; treatment for bedbugs in libraries, terminate control in historic or new constructions, new medians in new road constructions). If the measures are reasonable and can be measured in a meaningful way we see this as a worthwhile and exciting program. We suggest that perhaps we should focus on 10 or so pest problems and measure chemical control amounts assiduously on these pests. A regional approach may be best to capture the uniqueness of pest and pest problems (mole crickets, fire ants) in a useful subdivision along with more cosmopolitan pest problems (cockroaches, and rats).

EPA Response: EPA appreciates this comment, and realizes that each PESP member deals with unique pest management situations and conditions. This has made the act of determining a set of measures for PESP members challenging at best. In the past, PESP members have not been required to submit annual reporting information on specific measures, therefore, there was no emphasis on compiling pest management strategies across members. However, it is a necessity for the program to be able to aggregate information from among members moving forward. In an effort to reduce the challenge of doing this, PESP members have been divided into the categories - Live, Work, Play, and Farm.

It should be noted that PESP members will not be required to report on each and every measure, only as many as they are able. The exception to this is pest management professional companies, which are expected to report on each of a separate set of measures that has been developed especially for them.

WESTERN EXTERMINATOR COMPANY, Keith Willingham

Comparing data across companies

Comment: EPA wants a way to measure progress and to accurately compare companies, but some of the data they are asking for is open to different interpretations, leaving them comparing apples to oranges.

EPA Response: EPA is aware of the fact that it can be challenging to compare integrated pest management (IPM) practices across pest management companies. Nonetheless, EPA deems it necessary to work toward this goal as a way to measure progress in the adoption of IPM. The measures in this ICR represent a best effort by EPA to develop a set of measures that will inform the Agency of whether and to what extent a PESP member is practicing IPM. EPA worked closely with three major professional certification organizations in the development of measures that are specific to pest management professionals: National Pest Management Association (GreenPro), IPM Institute of North America (Green Shield), and EcoWise Certified.

EPA understands that some companies may not initially be in a position to collect and submit information related to each measure, but it is the Agency's expectation that those companies that wish to remain in good standing as PESP members will adapt their internal record keeping systems as necessary and feasible over time. EPA encourages PESP member companies that are committed to practicing IPM to work with EPA to improve upon the ways of verifying IPM over time.

Total Acres Under Management and Total Square Feet Under Management

Comment: *Total Acres Under Management* and *Total Square Feet Under Management* are not commonly collected, and with over 100,000 customers, are not practical for us to get. Other companies will have the same issue of not having this information, leading to guesses on these numbers. One company will guess at the average size for residential homes as being 2,000 square feet, while another company may use 2,200 square feet, and a third company 1,800 square feet. Commercial accounts will even be more difficult, due the market average 20,000 or 45,000 square feet. Total acres will have even more variance. We have over 10,000 apartment/HOA complexes on service. How will we come up with total acres and will the other companies use a similar approach?

We recommend that EPA allow companies to collect the number of accounts by business type and then use a conversion factor, or that EPA supplies the conversion factor. Don't ask for a large number of business types. Keep it simple, about 10 types.

EPA Response: In asking pest management companies to report on the total area, both indoor and outdoor, being treated under an IPM program, EPA's intention was to be able to determine trends in IPM adoption over time. We have been informed that the majority of pest management companies do not collect these data because it is not critical to their business models. The Agency would, therefore, like the reporting of these area data to be optional. Those companies that have the data could provide it as an important measure of the area IPM impacts but those companies without the data would not be required to collect or report on it. EPA encourages PESP member companies that are committed to practicing IPM to work with EPA to improve upon the ways of verifying IPM over time.

Total Number of People in Accounts Under Management

Comment: Total Number People in Accounts Under Management will vary with the company's "guess" as to how many people will be found at an account. If company A services 100 schools and assumes 500 people per school, company A impacts 50,000 people. Company B with its 100 schools includes student parents and siblings, so assumes 2,000 people per school. Their number of people impacted is 200,000. Whatever number of people I assume per account type is a guess and cannot be compared to any other company.

We recommend that EPA collect the number of accounts by business type and use or supply a conversion factor to come up with the number of people.

EPA Response: In asking pest management companies to report on the total number of people in their accounts that are being managed under IPM, EPA's intention is to be able to determine trends in IPM adoption over time. Because of the positive health impacts associated with occupying buildings managed under IPM versus a traditional routine spraying schedule, it is important for EPA to have a sense of the number of people occupying buildings managed under IPM. EPA understands that some companies may not be in a position to collect and submit information related to each measure, such as the number of people in accounts under management. It is the Agency's expectation that those companies and organizations that have these data will elect to report on it. The Agency will make reporting on this optional. EPA encourages PESP member companies that are committed to practicing IPM to work with EPA to improve upon the ways of verifying IPM over time. EPA agrees with the commentor and will collect the total number of accounts for each pest management member company.

Defining IPM

Comment: Until EPA endorses a particular definition of IPM, it's going to be impossible to compare responses from different companies. EPA wants to know number of accounts "under IPM", but what is the standard we are using for IPM? For example, we visit thousands of homes each month. The technician calls each customer asking about any pest concerns (in a sense checking a monitor), when he/she arrives at the account and the customer is home they ask once more about any concerns. Next using a Webster the tech removes webs and spiders from under first story eaves and while walking the property looks for pests and for conditions that could support pests. Any conducive conditions found are reported on paperwork left with the customer and verbally if the customer is home or in a post service phone call left on the customer's answering machine. The technician may treat for a pest found, make a preventive treatment, or make no treatment. Information about what the customer can do (fix vent, cut tree back) was given to the customer; does this mean the account was serviced under IPM? We also have over 3,000 schools, food plants, and food warehouses where, except for rodent bait, it's rare a preventive treatment is made. Are these accounts "under IPM"?

We recommend that instead of the generic IPM, EPA should ask for accounts, by business type, serviced under Green Pro, Green Shield, or EcoWise programs. Each of these programs has a built in audit program and the service specifications are very clear.

EPA Response: The Food Quality Protection Act defines Integrated Pest Management as, "a sustainable approach to managing pests by combining biological, cultural, physical, and chemical tools in a way that minimizes economic, health, and environmental risks. " IPM relies on a combination of

common-sense practices and science-based strategies for managing pests in an effective and environmentally sensitive manner. IPM is not a one size fits all approach to pest management. Therefore, EPA does not propose that there is any one set of practices that PESP members should employ when practicing IPM. However, any and every IPM plan should be based on the following principles: 1) set action thresholds, 2) monitor and identify pests, 3) prevent pest conducive conditions, and 4) control - taking intervention actions that may include the use of pesticides.

It is EPA's expectation that PESP members employ all four of these tactics at any given site in order to be able to claim that the area is being managed under IPM. Using rodent or cockroach baits at a food processing facility does not by itself constitute IPM. Visiting a site only to monitor and prevent, without making a treatment, does. EPA worked closely with the National Pest Management Association (Green Pro), IPM Institute of North America (Green Shield), and EcoWise Certified in developing the set of measures specific to pest management professionals. Therefore, if a pest management professional practices IPM to the extent that they can pass the auditing requirements of any of those three certification programs, then that pest management professional can certainly report on all of the PESP measures.

Total Preventive Treatments

Comment: This comment is in regard to the measure *Total Preventive Treatments*. Suppose our technician finds a trail of ants and treats it with a pesticide, and at the same time he/she is putting down a residual for other ants that will/may come into the area. In a broad view this is a preventive treatment. Is this the same definition the other companies are using? Does preventive treatments include a treatment made when no pest is present and is made only to stop a future pest? Is putting rodent bait in a bait station a preventive treatment? If bait is placed in 20 stations at one account, was one or 20 preventive treatments made? Every company must have the same protocol or you cannot compare the numbers.

Another issue is how would you collect this information? Unless you have a system for the service person to say this is a preventive treatment, you would have no way to collect this information. This would need to be set up in advance and all the service personnel would need to be trained and all the companies would need to be using same protocol, and most (all?) companies would need to change forms or other reporting methods. This can get very expensive and would take time to implement. We recommend that EPA drop this measure.

EPA Response: EPA appreciates this comment. In the context of IPM, EPA considers "prevention" to mean removing conditions that are conducive to pests. Prevention includes taking steps to ensure that pest populations cannot increase to unacceptable levels. In an agricultural setting, prevention might mean rotating between different crops, planting pest-free rootstock, or regularly aerating soils. In a non-agricultural setting, prevention might mean reducing clutter, avoiding standing water, or sealing gaps in the exterior of a building. (See EPA's IPM Fact Sheet at http://www.epa.gov/pestwise/htmlpublications/ipm_fact_sheet.html.) EPA does not consider applying a pesticide today to combat pests that might appear tomorrow an IPM practice.

The commenter raises a good point, however, which is that the phrasing of this particular measure is misleading. In response, EPA has removed the *Total Preventative Treatments* measure. The subsequent measure was modified to request *Total Non-Chemical Treatments ONLY* to capture information on the prevention of pest conducive conditions.

Total Number of Spot Treatments

Comment: This comment is in regard to the measure *Total Number of Spot Treatments*. There is no way to collect this data unless you set up a system for the service person to indicate the treatment was a spot treatment. This means changing forms and programs. What if he/she makes two spot treatments, do you also need to collect number of spots? This will be expensive and time consuming. Therefore, we recommend that EPA drop this measure.

EPA Response: In response to this comment, EPA will modify the information being requested and change the question from the *Total Number of Spot Treatments* to a yes/no question that asks whether the member is utilizing spot treatments for pests as opposed to large area applications.

Total Pounds AI Applied in Interior and Exterior Spaces

Comment: This comment is in regard to the measure *Total Pounds AI Applied in Interior Space and Total Pounds AI Applied on Exterior Grounds*. How many companies are going to know how to convert gallons of liquids to pounds? Will every company report the totals of all the actives on the labels? Many products containing Pyrethrins, also contain Piperonyl Butoxide and N-Octyl bicycloheptene dicarboximide. Will all companies report all the actives or just the "main" active, Pyrethrin? Amounts reported by the technicians will often have small errors, for example 2 ounces, when it should have been 2.1 ounces. Amounts reported for a few services are not an issue, but times 100,000 plus services over a year, the error grows.

A more accurate approach is to take all the purchases made over the year and convert this to pounds active. Supply companies with an excel spreadsheet they can use to input pounds/gallons of products purchased or have the numbers sent to EPA for inputting. A disadvantage of this approach is that you lose the ability to distinguish between amount applied inside verses outside, but a work around would be for the company to supply a percentage of products applied, taken from service slips, of in versus out.

EPA Response: EPA appreciates this comment. It is probable that not all companies will know how to convert pesticide product measures into pounds of active ingredient (AI) and that calculation errors will occur. In response, EPA has simplified the pesticide reporting measure so members need only report details on actual pesticide applied (or purchased) by EPA registration number. EPA will be responsible for all conversions and calculations related to this measure.

Total People Reached by Educational Materials

Comment: This comment is in regard to the measure *Total People Reached by IPM/PESP Educational Materials*. This number will vary with the company's "guess" as to how many people will be found at an account. I send a flier to each resident we have on service; do I multiply by 1 per home, or 2.3 per home, and will the other companies use the same number? Back to the same example used in the discussion of total people in accounts, if company A puts out IPM/PESP educational materials at 100 schools and assumes 500 people per school, company A impacts 50,000 people. Company B with its

100 schools includes student parents and siblings, so assumes 2,000 people per school. There the number of people reached is 200,000. Whatever number of people I assume per account type is a guess and cannot be compared to any other company.

For information on a company website, is the number of people based on counts of views or on number of downloads?

We recommend that EPA collect data on educational materials sent/taken to accounts based on business type. If two educational fliers were given to 2000 homes, this would be reported as 4000 educational opportunities. Also have the educational materials reported as a ratio of the accounts, by business type. 4000 educational fliers were given to 2000 homes, but 3000 homes are on service, the ratio would be 1.33. Also have the data reported for website materials be based on number of downloads of materials.

EPA Response: EPA agrees with the commenter on the fact that this measure is broad, and appreciates the recommendations given. Therefore, EPA will remove the measure, *Total People Reached by IPM/PESP Educational Materials*, but retain a measure to capture the *Total Number of People Reached by IPM Training/Educational Events*.

Suggestions for additional measures

Comment: Here are some suggestions for other data points EPA could collect:

Reducing Pounds of Pyrethroids Used - Based on each year's purchases of products, determine the reduction of total pounds of Pyrethroids as a percentage of all actives. EPA would supply an Excel spreadsheet for companies to input pounds or gallons of materials purchased or send the data to the EPA for inputting.

The Revenue from GreenPro, EcoWise, or Green Shield Certified Accounts - Each of these programs has a built in audit program and the service specifications are very clear. This data should be collected as a ratio of total pest revenue.

The Number of GreenPro, EcoWise, or Green Shield Certified Accounts - Each of these programs has a built in audit program and the service specifications are very clear. This data should be collected as a ratio of total accounts or better yet by total accounts within business types.

The Number of Monitors Purchased - The word monitors would need to be clearly defined, for example would rodent bait stations be counted as a monitor? Ask for numbers, by type of monitor, and to standardize the data for comparison across companies, have the data reported as a ratio of total number of services made.

Percentage of Employees GreenPro Certified - Ask for the percentage of total employee that have taken and passed the NPMA GreenPro exam.

EPA Response: While EPA appreciates the suggestions for additional data points made by this commenter, these data points are not the most appropriate for the federal government to collect. EPA is interested in information on how IPM is being practiced by all pest management professionals, not

only those who are certified under GreenPro, Green Shield, or EcoWise. With regard the suggested measure on use of pyrethroids, PESP is not attempting to measure reductions in the use of any particular pesticidal active ingredient at this time.

