

12/10/93

In Reply Refer To:
FWS/DEC

Memorandum

To: Director, Office of Environmental Affairs

From: Chair, Pesticide Review Work Group 12/10/93 L. J. J.

Subject: Updated Requirements for Pesticide Use

The Department of the Interior (Department) Pesticide Review Work Group (Work Group) met on September 2, 1993, to discuss topics including (1) the role and responsibilities of the Work Group, and (2) updates and clarifications for pesticide uses requiring approval by Bureaus' Pesticide Coordinators and reporting to the Department. This memorandum details our recommendations. The entire Work Group reviewed a draft of this memorandum and all members concurred on the contents. Our recommendations are discussed below.

Work Group structure and function

If we are to meet the mandates of the Department's Pesticide Use Policy (DM Part 517), it is critical that we restructure our activities from emphasis on excessive oversight of individual Pesticide Use Proposals (PUPs) to program development, management, and accountability. The principal benefit of Work Group review is the opportunity to include the collective expertise of other Work Group members. However, the mechanics of operation (i.e., processing PUPs submitted for Department review) are very time-consuming and generally do not result in a finding different from that of the Bureau that submitted a given PUP. The Work Group recommends that we reallocate the time that has been allotted for PUP review and instead focus on education and oversight activities. We propose the following process:

1. Each Bureau Director will be responsible for designating a pesticide expert to represent the Bureau on the Department Work Group. This Bureau representative will be responsible for evaluating the Bureau's PUPs that must be reported to the Department to ascertain that the PUPs are in compliance with DM Part 517.
2. The Bureau representative will have the authority to approve or deny PUPs.
3. The Bureau representative may consult with other Work Group members who have applicable expertise.

4. If the Bureau representative finds that the review would benefit by the more comprehensive review of the full Work Group, the Bureau representative will submit the PUP to the Work Group.
5. At the end of the calendar year, the Bureaus will compile data regarding pesticide uses that meet the requirements for Department oversight. This report will be due to the Work Group Chair by March 1 of each year. The Chair will compile these reports and submit them to the Office of Environmental Affairs (OEA).
5. The Work Group and OEA will then review this compilation and determine whether the Bureaus' programs are consistent with Department policy. OEA will apprise the Work Group appropriately.

It is the Work Group's intent that relief from some of the administrative burden associated with processing PUPs will allow us to better focus on our critical needs in training, program direction, and oversight. We have far more to gain toward achieving full implementation of the Department policy by adopting the proposed approach than by retaining the current procedures. In addition, adopting a more efficient approval process will improve the turn-around time of PUPs and probably increase field level compliance with the Department policy.

We propose that part of the Work Group's shifting role also include annual field audits. These audits could focus on a given facility or related facilities, preferably in a location where more than one Bureau is engaged in activities subject to the Department's pesticide policy

Pesticide use subject to Department reporting

In reviewing the criteria and exceptions in "Guidance for Pesticide Use", the Work Group's objectives include the following:

1. Establish these criteria as "Policy Requirements" rather than "Guidance"
2. Eliminate references to pesticides that are no longer registered.
3. Update criteria and exceptions to take into account new pesticides, new uses for previously registered pesticides, and new data concerning hazards and benefits associated with pesticides.
4. Standardize the exceptions across the Bureaus. If a Bureau opts to have more restrictive criteria, that is the Bureau's prerogative.
5. Include pesticides having realistic potential for their use to result in adverse environmental effects. This includes pesticides implicated in fish or wildlife, pesticides with reasonable potential to cause die-offs, and pesticides with high potential to contaminate groundwater.
6. Exempt pesticides or specific uses of pesticides that are not likely to cause significant adverse environmental effects.
7. Expand the role of the Work Group to more fully address Integrated Pest Management (IPM).

The requirements for projects requiring Bureau review and reporting to the Department should help the Bureaus to select the least hazardous material when chemical control measures are warranted (Attachment 1).

This proposal for overall Work Group function is substantially similar to a proposal that we submitted last year. Based on discussions between the Work Group Chair and OEA, we assume that this proposal will be adopted. As Calendar Year 1994 pesticide planning is already beginning at our field installations, it is imperative that we soon apprise our Regional and Field personnel of the revised process. Unless we hear otherwise by October 22, we will assume that OEA concurs with this proposal.

Please contact me at (703) 358-2148 with your questions.

Attachment