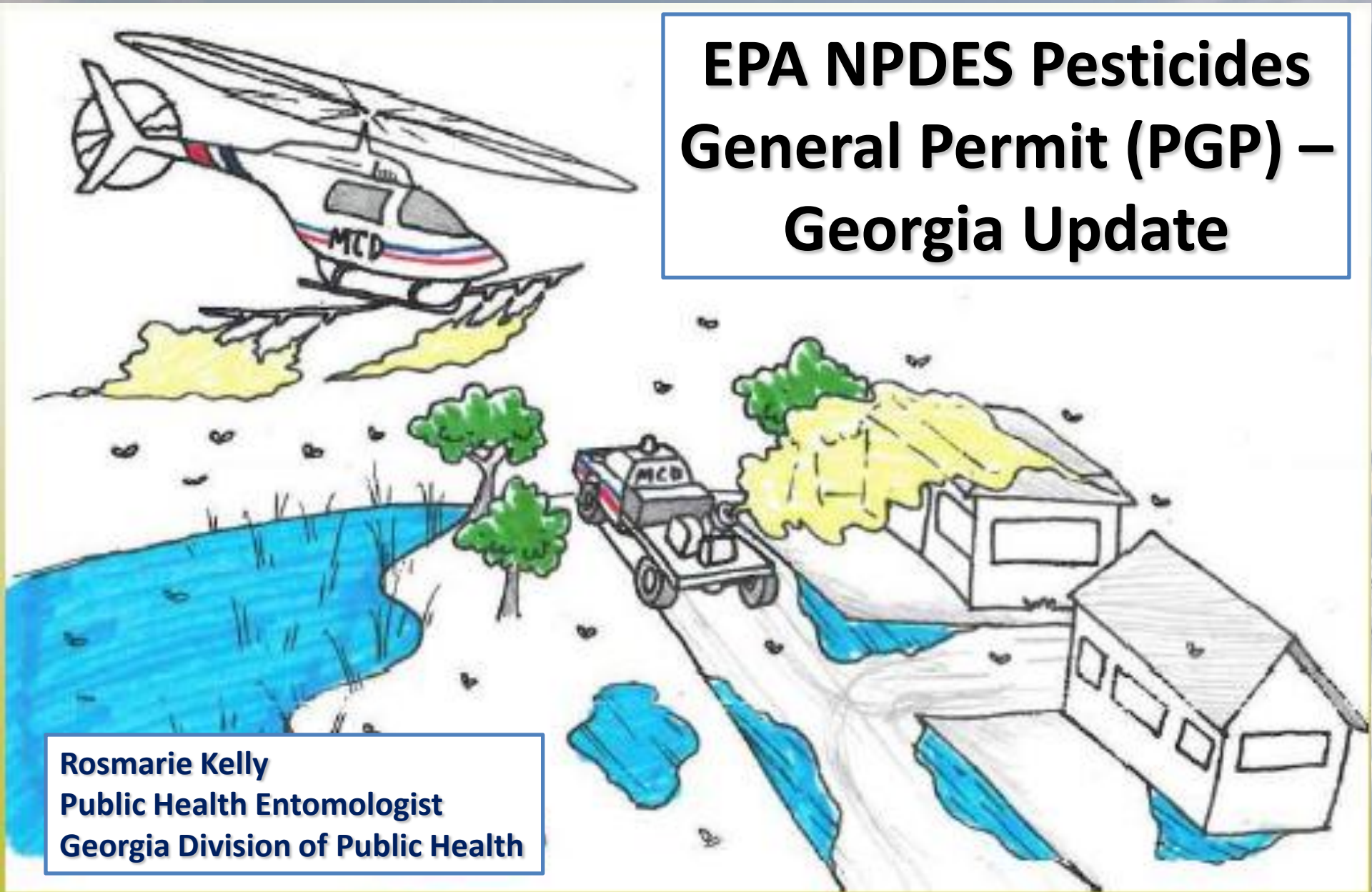
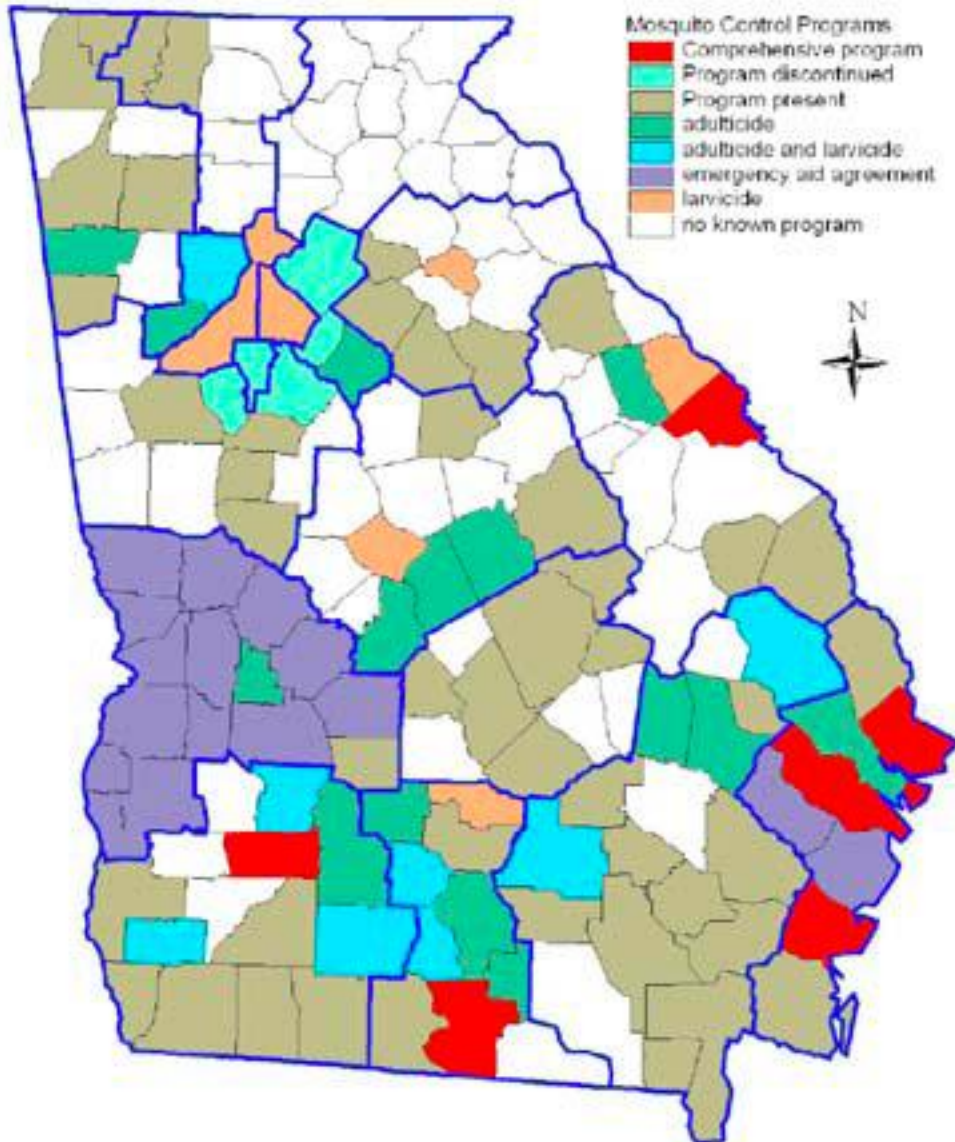


EPA NPDES Pesticides General Permit (PGP) – Georgia Update

Rosmarie Kelly
Public Health Entomologist
Georgia Division of Public Health



Counties with Mosquito Control Programs



Data from UGA Extension Service and the Georgia Mosquito Control Association - 2005 (updated 2009)

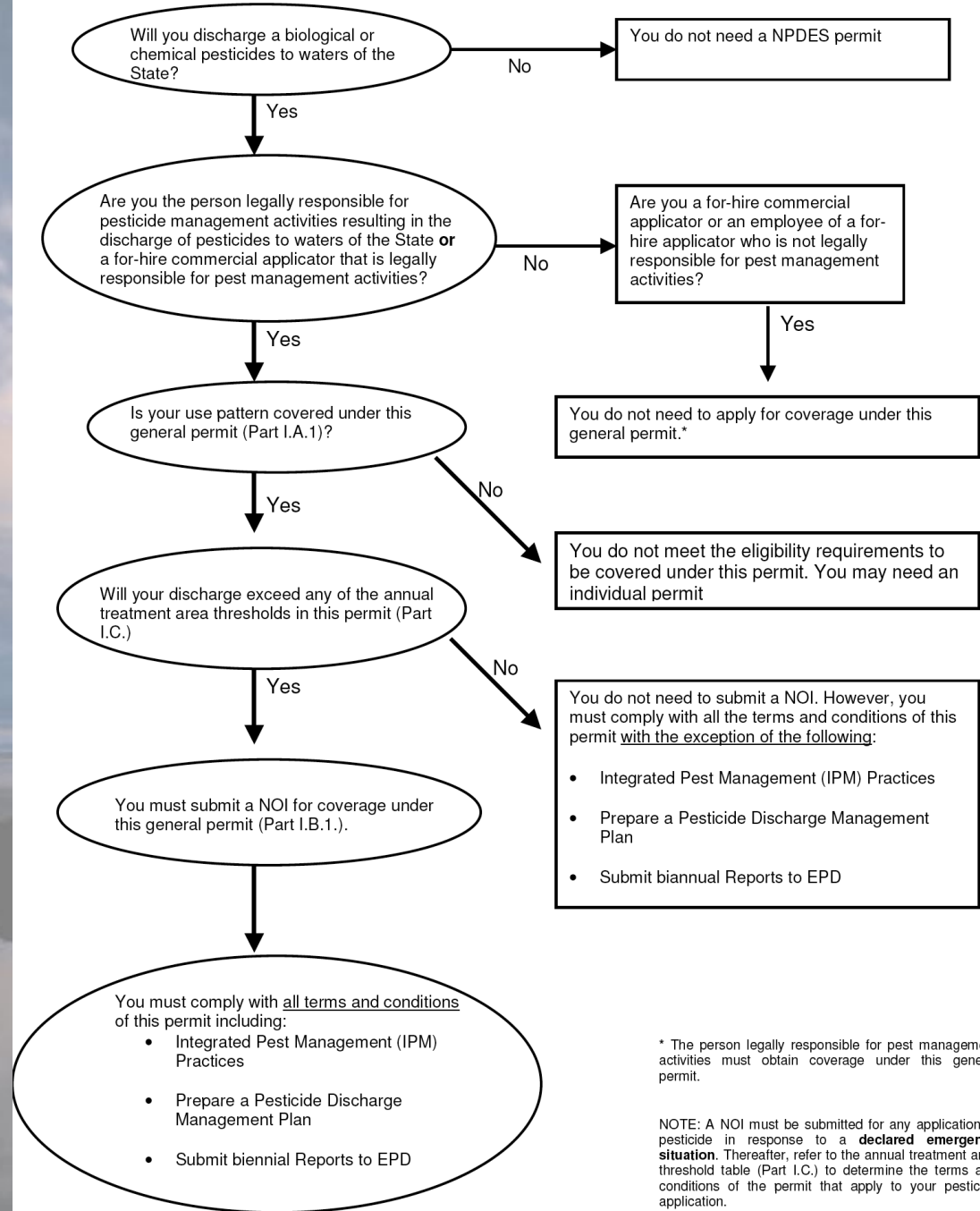
Yes, it is **STILL** only a draft!

HOW TO GET A STATE PERMIT

- Apply for permit through GA EPD online (hopefully)
- Depending on the amount of pesticide discharge a **NOI (Notice of Intent)** may have to be filed (right now EVERYONE must file an NOI)
- The NOI must include information about:
 - What you are doing,
 - Equipment,
 - Pesticide usage,
 - Number of applications,
 - Area of coverage,
 - Receiving waters,
 - Etc

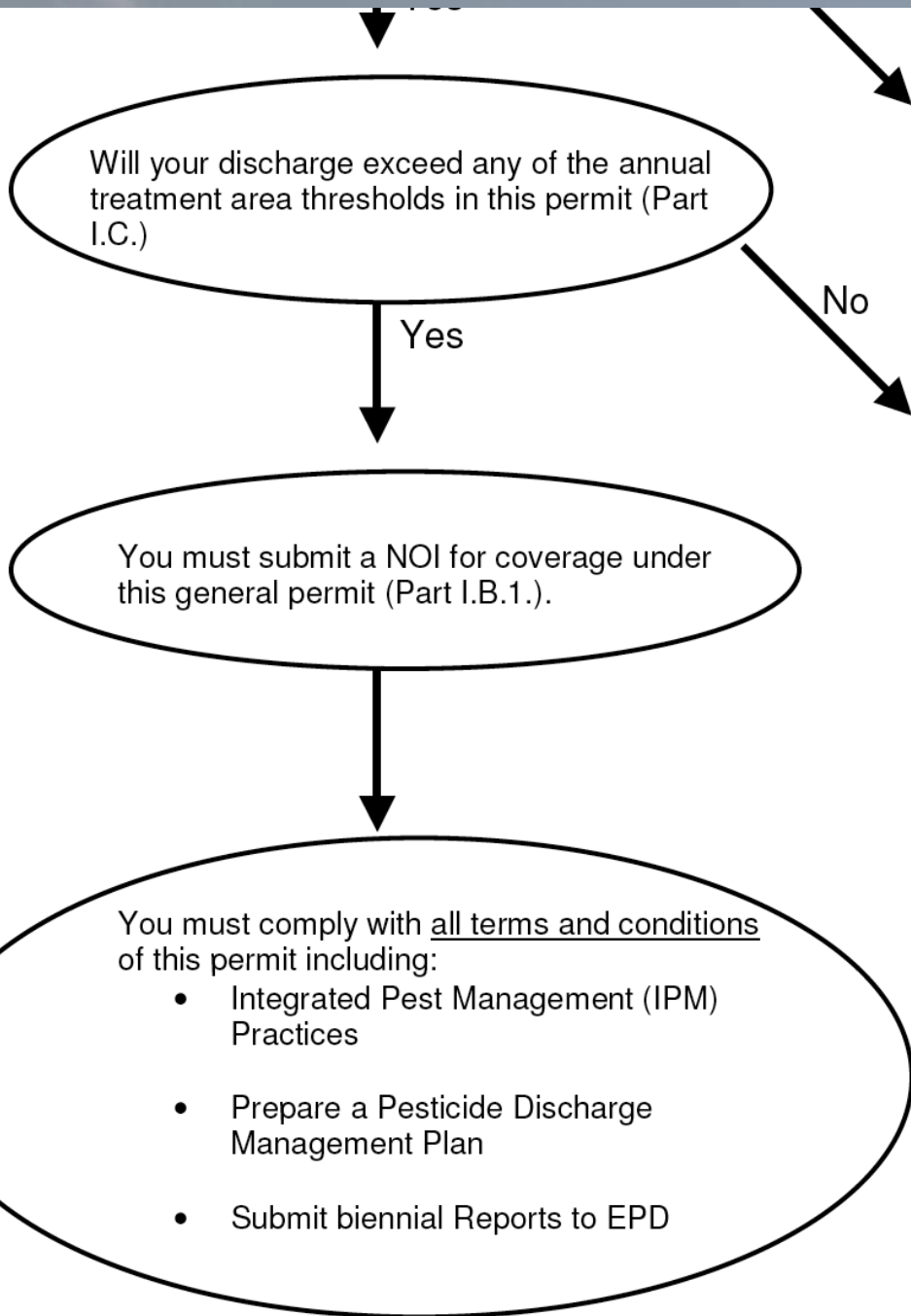
GA EPD Pesticide General Permit GA820000 – Coverage Eligibility and Requirements.

PGP
Flowchart



* The person legally responsible for pest management activities must obtain coverage under this general permit.

NOTE: A NOI must be submitted for any application of pesticide in response to a **declared emergency situation**. Thereafter, refer to the annual treatment area threshold table (Part I.C.) to determine the terms and conditions of the permit that apply to your pesticide application.



You do not meet the eligibility requirements to be covered under this permit. You may need an individual permit

You do not need to submit a NOI. However, you must comply with all the terms and conditions of this permit with the exception of the following:

- Integrated Pest Management (IPM) Practices
- Prepare a Pesticide Discharge Management Plan
- Submit biannual Reports to EPD

* The person legally responsible for pest management activities must obtain coverage under this general permit.

NOTE: A NOI must be submitted for any application of pesticide in response to a **declared emergency situation**. Thereafter, refer to the annual treatment area threshold table (Part I.C.) to determine the terms and conditions of the permit that apply to your pesticide application.

TABLE 1 Annual Treatment Area Thresholds¹		
PGP Part	Pesticide Use	Annual Threshold
I.A.1.a.	Mosquitoes and Other Nuisance Insect Pests	6400 acres of treatment area
I.A.1.b.	Aquatic Weed and Algae Control:	
	- In Waters of the State	60 acres of treatment area^{2,4}
	- At Water's Edge:	60 linear miles of treatment area at water's edge^{3,4}
I.A.1.c.	Aquatic Nuisance Animal Control:	
	- In Waters of the State	60 acres of treatment area ^{2,4}
	- At Water's Edge	60 linear miles of treatment area at water's edge ^{3,4}
I.A.1.d.	Forest Canopy Pest Control Area-Wide Pest Control	6400 acres of treatment area

¹. Treatment area is defined as the area of land including any waters or linear distance along water's edge, to which pesticides are being applied. Multiple treatment areas may be located within a single "pest management area." (Refer to Part VI)

² Calculations should include the area of the applications made to waters of the State.

³ Calculations should include the linear extent of the application made at water's edge adjacent to waters of the State.

We have asked for an increase in acreage for the annual threshold.

Determining Treatment Area

ADULTICIDING

Truck spray:

178 miles with a 300' swath =
~6400 acres



Aerial spray

just the acreage sprayed

Determining Treatment Area

LARVICIDING

Right now larviciding acres are counted as part of the 6400 acres threshold (get out your calculators).

EPD hopes to only use aduaticiding acres to determine thresholds

- Larvicide only programs – automatically covered by permit

All Applicators Must:

- Comply with effluent limits
 - Technology-based: use the lowest amount of pesticides to minimize discharges
 - Apply according to label
 - Calibrate
 - Equipment maintenance
 - Water-Quality based:
 - Apply according to label
 - Must meet applicable numeric and narrative State Water Quality standards 391-3-6-.03
 - No waters of Georgia are impaired because of any pesticide used by mosquito control

Site Monitoring

- Corrective action – use best professional judgment
- Adverse incident report – must be in or near state waters - includes:
 - Fish kill
 - Other non-target effects
 - Citizen complaints
- Report to District EPD office
(Already report spills of any significance to GA Dept of Agriculture)

KEEP GOOD RECORDS

- Copy of all paperwork
- Copy of permit
- Equipment maintenance records
- Calibration information
- Adverse incidence reports



Programs exceeding the annual threshold are also required to have a Pesticide Discharge Management Plan.

MUST INCLUDE:

- Pesticide Discharge Management Team.
- Pest Management Area Description.
- Control Measure Description.
- Schedules and Procedures.

Above the threshold?

ADDITIONAL PERMIT REQUIREMENTS

Beside filing a NOI there are other requirements that are mandatory.

- I. Use of IMM methods in mosquito control is stressed.
 - 1. ID or access the pest problem using an action threshold
 - 2. Source reduction of standing water, use biological control, eliminate vegetation harboring mosquitoes
 - 3. Follow appropriate procedures (calibration, maintenance)
 - 4. Education

PERMIT REQUIREMENTS (CONT.)

II. Reporting. An biennial report will be required

We have asked that reporting be removed as a requirement.

Conclusions

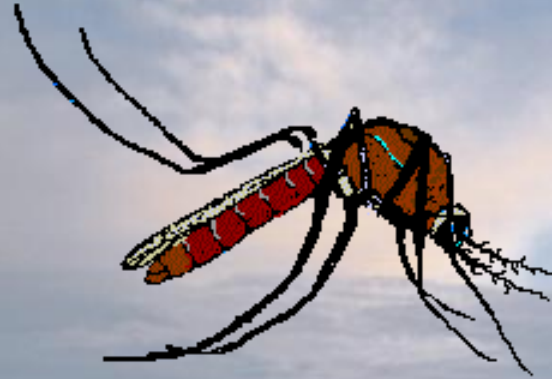
GA EPD has shown a willingness to work with mosquito control in Georgia and with the GMCA

GA EPD is very ignorant about mosquito control practices and they are quite comfortable with their ignorance

A whole lot of programs in Georgia are totally clueless that there is an upcoming permit requirement

April is going to be interesting

<http://www.GAmosquito.org>



ANY QUESTIONS?