REVISED SCHEDULE FOR THE FQPA SCIENCE POLICY PAPERS

(7/21/99)

The Office of Pesticide Programs (OPP) is providing the attached new schedule for issuance of its initial and revised science policy documents under the Food Quality Protection Act (FQPA).

Schedule for Initial Science Policy Documents. OPP has issued 14 of the originally planned 19 science policy papers. These papers address eight of the nine science policy areas identified by the Tolerance Reassessment Advisory Committee (TRAC) as critical to the implementation of FQPA. OPP has decided to merge two of the remaining papers (## 18, 19), concerning techniques for estimating drinking water exposure, into the paper already issued on that subject (# 8), before that paper is issued in revised form this fall. (See Drinking Water Exposure discussion below.) Of the 19 original papers, there are three remaining (## 14, 15, and 17) to be issued for public comment. These three are now scheduled to be released by the end of the calendar year. OPP has completed the notice and comment process and has issued one paper in revised form (# 1).

Additional Science Policy Documents Being Made Available For Public Comment. OPP has decided to expand the original scope of the public comment process to include eight additional science policy papers. Two papers contain guidance on generating data to quantify the impact of risk mitigation measures such as reduced application rates and longer pre-harvest intervals (# 20) and information on the role of use-related information in the risk assessment and risk management processes (#22) have already been issued for comment. The additional policy documents to be issued include papers on techniques for estimating drinking water exposures.

Schedules for Revised Science Policy Documents. Following public comment, EPA intends to revise the draft science policy papers to incorporate and address the comments received from the public. Revising the science policy papers is taking longer than OPP originally determined. Comments from the public have been extensive and the sheer volume and detail of those comments requires careful examination and consideration by OPP staff. The public input on these issues will be invaluable in assuring the ultimate development of sound and consistent science policies that will guide and inform pesticide regulation in the coming years.

OPP has also determined that several of the science policies would benefit significantly from review by the Scientific Advisory Panel (SAP), either for consultation or full review. Scientific peer review greatly contributes to assuring that OPP's science policies rest on a sound scientific foundation. In a number of instances, the SAP's early reviews have identified important issues or have indicated steps needed to strengthen a policy document.

Consequently, OPP is updating the schedule for issuing its revised science policy documents to reflect the additional time required to assure careful consideration of all public comments and to allow for SAP review of selected papers.

Science Policy Documents On Estimating Drinking Water Exposure. In addition to changing its schedules for revising the science policy papers, OPP has also decided to reconfigure the content of the group of science policy papers that address drinking water exposure. OPP originally planned to issue three documents (## 8, 18, and 19) regarding its approach to addressing drinking water exposure in its aggregate human health risk assessment process. OPP issued the first paper (# 8) – a general overview of its interim approach and a discussion of its plans to improve the initial screening process – for public comment in January 1999. Among other topics, this paper described two specific planned improvements: (1) substituting a small drinking water reservoir for a farm pond in the model currently used to estimate pesticide residues in water; and (2) adjusting screening level estimates from the model to account for the percentage of cropped land surrounding the drinking water source. These two planned improvements were developed to provide more realistic screening level estimates of pesticide concentrations in surface water. In its January 1999 paper, OPP explained that it was planning to present to the SAP information useful to assess these two changes.

OPP intended to describe specifically how these particular changes were being implemented in the two subsequent papers regarding drinking water (## 18, 19) and to issue them for comment in late summer this year. In paper # 18, OPP intended to present its decisions regarding the implementation of these two planned modifications, along with a revised policy statement and process description. Finally, in the last document on drinking water (# 19), OPP intended to present its revised internal standard operating procedure for the implementation of these improvements.

Based on the public comments received on paper # 8 and on the reactions to its May presentation to the SAP, OPP has decided to revise its approach to the drinking water papers. As planned, OPP presented to the SAP in May its approach for incorporating percent cropped area, coupled with a drinking water reservoir scenario, into its screening level drinking water assessments, where they were extensively discussed and commented upon. Since comments were supportive of the general direction of these two changes, OPP has decided to summarize these changes when it revises and reissues the January 1999 drinking water paper (# 8), rather than delay or confuse the public regarding implementation of these improvements pending public comment on papers ## 18 and 19.

At the same time, OPP has identified two new science policy papers (## 25 - 26) to be written regarding drinking water. EPA plans to issue the following: (1) a proposal (paper # 25) for utilizing available data and models to develop quantitative estimates of pesticide concentrations in drinking water for certain pesticides and estimates of the potential size of the population exposed to these levels; and (2) a paper (# 26) on the effectiveness of water treatment in reducing pesticide levels in drinking water and a proposal for addressing treatment issues in the assessment process. OPP expects to propose that it begin to use the estimates developed in accordance with the methodologies described in these two papers in certain cases in quantitative, aggregate human health risk assessments.