



Pesticide Discharge Management Plan Checklist

Pesticide NPDES Permit Program National Pollutant Discharge Elimination System (NPDES)

Doc Type: Permitting Checklist

Instructions: If you are required to submit a Notice of Intent and are considered a Large Entity, you must prepare a Pesticide Discharge Management Plan (PDMP). One PDMP may include multiple treatment areas, but separate PDMPs must be prepared for each type of pesticide application activity (for example, separate plans are required if you are treating for mosquitoes and forest canopy pests). Large entities are: a) public entities that serve a population of greater than 10,000, or b) private enterprises that exceed the Small Business Administration size standard as identified at 13 CFR § 122.201.

Purpose: The PDMP is where you document the evaluation and selection of control measures and record the implementation of permit requirements. In your PDMP, you may refer to procedures in other documents that meet the requirements of this permit. Keep a copy of relevant portions of those documents with your PDMP and make them available for review if requested.

Timing: If you know before starting pesticide applications that you will exceed a threshold, you must develop a PDMP before the first pesticide application. If you did not know until after starting pesticide applications that you would exceed a threshold, you must develop a PDMP before exceeding the threshold. If you are applying pesticides in response to a declared pest emergency situation that will cause you to exceed a threshold, you must develop a PDMP within 90 days of responding to the declared pest emergency. These timelines are the same as the timelines for submitting your Notice of Intent [refer to Step 2 on the Minnesota Pollution Control Agency (MPCA) website at <http://www.pca.state.mn.us/mvric7f>].

The U.S. Environmental Protection Agency (EPA) has developed a PDMP template [refer to EPA website at http://www.epa.gov/npdes/pubs/pgp_pdmp_template.doc] that you may use, or you may write your own plan based on the requirements in Section 4 of the permit, which have been summarized below. Note that the EPA's PDMP requirements differ. Therefore, if using the EPA template, make sure to verify that you are complying with MPCA's permit.

Required Contents of the Pesticide Discharge Management Plan (PDMP)

PDMP - Team

- 1. Identify the persons (by name or title) that comprise the team and their responsibilities, including:
 - a. Persons responsible for managing pests in the treatment area.
 - b. Persons responsible for developing and revising the PDMP.
 - c. Persons responsible for taking corrective actions.
 - d. Persons responsible for pesticide applications. If the pesticide applicator is unknown at the time of plan development, indicate whether or not a for-hire applicator will be used.
- 2. Include any written agreements, such as a contract with a for-hire pesticide applicator, that specify which activities required by the permit will be performed by you and which will be performed by the for-hire applicator. Permit requirements are summarized in Steps to Compliance 4a-4d on the MPCA website at <http://www.pca.state.mn.us/aj0rc7a>.

PDMP - Problem and Pest Management Area Description

- 3. Document the pest problem in your pest management area, including identification of the target pest(s), the source of the pest problem, the source of the data used to identify the pest problem, action thresholds, and how action thresholds were determined.
- 4. Include a general location map (such as a USGS quadrangle map or a portion of a city or county map) that identifies the geographic area the plan applies to and the waters bodies in that area. The MPCA will accept a map that utilizes the National Wetlands Inventory as a basis for water bodies in the area.
- 5. Document the water quality standards found on the MPCA website at <http://www.pca.state.mn.us/gp0r909> that apply to waters you will discharge to, including a list of pesticides or pesticide degradates for which the water is impaired.
 - a. Are any of the waters you plan to apply your product on or over listed in Minn. R. 7050.0180 (found on the Minnesota Office of the Revisor of Statutes website at <https://www.revisor.mn.gov/rules/?id=7050.0180>) as Outstanding Resource Value Waters?
 - b. Is the active ingredient (s) in the product(s) you are applying listed in Minn. R. 7050.0220 (found on the Minnesota Office of the Revisor of Statutes website at <https://www.revisor.mn.gov/rules/?id=7050.0220>) or Minn. R. 7052.0100 if applying in the Lake Superior Basin at <https://www.revisor.mn.gov/rules/?id=7052.0010>)?

- c. Do the products specifically list any other ingredients that are listed in Minn. R. 7050.0220 (found on the Minnesota Office of the Revisor of Statutes website at <https://www.revisor.mn.gov/rules/?id=7050.0220>) or Minn. R. 7052.0100 (at <https://www.revisor.mn.gov/rules/?id=7052.0010>) if applying in the Lake Superior Basin?
- d. If yes to b or c, are any of these chemicals or degradates (identified as such) listed on the MPCA's current list of impairments website at <http://www.pca.state.mn.us/enzq94b?>
- e. If yes to a or d, an individual permit is needed.
- f. Otherwise, the permittee agrees that based on available product information, they do not require an individual permit and will comply with water quality standards by adhering to the conditions of the permit.

The permit is not available for the discharge of any pesticide to water that is impaired for the specific pesticide or degradates of that pesticide. For example, application of the pesticide copper sulfate to a waterbody impaired for either copper or sulfates would not be eligible for coverage under this permit, because copper sulfate can degrade into these two substances. In this instance, the Permittee would have to choose between obtaining coverage under an individual permit for such a discharge or selecting some other means of pest management, e.g., using mechanical means or some other pesticide product. As of 2010, there are no impairments for pesticides that would be covered by this permit. There are impairments for 'legacy' pesticides, but these chemicals no longer have registered uses or their registration as a pesticide has been cancelled.

PDMP - Control Measure Description

- 6. Document your evaluation and implementation of control measures for the pest management area. Include in the description the active ingredient(s) evaluated.

PDMP - Schedules and Procedures for Control Measures and Pest Management

- 7. Document timing and procedures for:
 - a. Spill prevention and response procedures. Include procedures for quickly stopping, containing, and cleaning up leaks, spills, and other releases, and for notifying appropriate facility personnel, emergency response agencies, and regulatory agencies. Employees who may cause, detect, or respond to a release must be trained in spill prevention and response procedures and have necessary spill response equipment available. If possible, one of these individuals should be a member of your PDMP team.
 - b. Adverse Incident response procedures. Include procedures for responding to any incident resulting from pesticide applications and procedures for notification of the incident, both internal to your organization and external. You must keep contact information for state/federal permitting agency, nearest emergency medical facility, and nearest hazardous chemical responder in locations that are readily accessible and available.

PDMP - Signature and Modifications

- 8. Sign, date, and certify your PDMP using the following language "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete."
- 9. Modify your PDMP when necessary.
- 10. Make changes to your PDMP before the next pesticide application that results in a discharge, or as soon as possible thereafter. The revised PDMP must be signed and dated.
- 11. Review your PDMP at a least once each calendar year.

PDMP - Availability

- 12. Keep a copy of your current PDMP, along with all supporting maps and documents, at the address submitted on the Notice of Intent. The PDMP and all supporting maps and documents must be readily available upon request.
- 13. The MPCA may provide copies of your PDMP or other permit information that is in its possession to members of the public. Any Confidential Business Information (CBI), as defined in Minn. Stat. § 116.075 (40 CFR pt. 2) (found on the Minnesota Office of the Revisor of Statutes website at <https://www.revisor.mn.gov/statutes/?id=116.075>), may be withheld from the public if a claim of confidentiality is properly asserted and documented. However, CBI must be submitted to the MPCA if requested, and may not be withheld from those staff within the MPCA or local/federal agencies cleared for CBI review.