

Gerry Raymond's Responses to Critical Pesticide Control Area Questions From BPC

(Q). Chapter 60, Sec. 2 (B) – The request asks for a “total ban on the use of pesticide and herbicide within this area.” For clarification, is the intent to ban the use of all pesticide chemistries including minimal risk pesticides that are exempt from EPA registration (FIFRA, Section 25b).

Chapter 60, Sec. 2 (D) – The map provided depicts the 200-Day and 2,500-Day Travel Zones. Please clarify if the proposed control area is the 200-Day Travel Zone, 2,500-Day Travel Zone or the 300-foot radius well recharge zone.

(A). We want the proposed zone to cover the 500 ft radius of the well recharge zone.

Justification:

- The purpose of extending the 300 ft radius to 500 ft radius is to cover the entire residential infrastructure which could effect our well recharge zone.
- For reference the recharge zone wells are shallow gravel pack (approx. 40 ft. deep).
- It is unknown if the half-life for the products utilized would allow contaminants it to leach into the well's recharge zone.
- In this sensitive area, it is impossible to monitor pesticide/herbicide application activities.
- Residents or applicators are not forthcoming in notifying our organization when they will occur.
- Applicators do not voluntarily supply SDS (MSDS) information prior to application for our approval.
- Normally, we only witness applicators after they have applied products.
- One of the residents has a perimeter drain around foundation that discharges in the well recharge zone. It is unknown if contaminants are being discharged into the well recharge zone.
- If this pesticide/herbicide restriction is not approved, the Maine Drinking Water Program will require us to conduct pesticide monitoring/sampling.
 - This would be very costly for our organization and would not guarantee contamination to our wells/groundwater.
 - It is more significantly more expensive after contamination than prevention (moving wells or cleanup).
 - Potential for legal action from contamination or sickness in the future.
 - This preventative measure would better protect the town citizens/customers from contamination.

(Q). Chapter 60, Sec. 2 (E) – The request acknowledges abutting landowners use of herbicides and pesticides. Can you elaborate on the purpose for the use of those pesticides, i.e. lawncare, tick & mosquito control, structural pest control, etc.?

(A). The purposes for the applications were for infrastructure pest control (ants/earwigs), herbicide lawncare (weeds), invasive wildlife control (Canada Geese).

Further information:

- We will provide the SDS' for products we were provided and what we know was applied
- It is unknown if further applications are conducted besides the activities witnessed, we are not voluntarily provided with this information.

(Q). Chapter 60, Sec. 2 (G) – The request provides evidence establishing the impacts of “agricultural” pesticides on ground and surface waters and potential risks to human health. Can information be provided regarding the use of pesticides in “residential” settings and their potential impact on ground and surface waters and the potential for adverse effects on human health?

(A). Commercial agriculture is not conducted in the zone and no residential agriculture has been witnessed

- If residential agricultural (gardens) activities are conducted, there is potential for herbicide/pesticide application in these zones.

(Q). Chapter 60, Sec. 2 (J) –Please provide a more detailed description of the proposed restrictions on the use of pesticide(s) within the proposed critical area.

(A). We are requesting that no pesticide or herbicides be applied in the 500 ft radius of our well recharge area. Also, we are requesting that no intentional activities or infrastructure be allowed to be discharged in this zone (i.e. stormwater drains, industrial activities, agricultural activities, construction activities, fueling activities, unnecessary vehicle traffic, equipment fueling, residential drainage, etc.)

Please feel free to reach out with any questions regarding this request. Staff does plan to include the pesticide use inspection report completed in September of 2022 with your request for consideration by the Board.

Clarification is requested by the close of business on Tuesday, March 26, 2024, for proper submission to the Board. A copy of Chapter 60 has been attached.

We look forward to working with you on this matter.

Wellhead Protection Area
Eagle Lake Water District
Leboeuf Wells

