Darrin,

Wanted to make sure you saw the AEM Advisor article and video on the Spray Drift Control Demo Day we held for EPA.

Article and video link

Next week we should have another, longer, video that goes deeper into the technology that was on display. We’ll use that video to push the day’s message out to a broader Washington, DC audience.

Also hoping for continuing conversation with EPA regarding nozzle performance standards. Heard some of their folks talking about a desire to get away from testing individual nozzles for product labels.

Nick Tindall
Senior Director, Government & Industry Relations
Association of Equipment Manufacturers (AEM)
1000 Vermont Ave, NW, Ste 450
Washington, DC 20005
T 202.898.9067
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www.aem.org

America’s future is in your hands. Take action at I Make America today!
Manufacturers’ Cutting-Edge Technology Reduces Spray Drift - Long Version with EPA
https://www.youtube.com/watch?v=yc3v04X4RqI

AEM Hosts EPA Officials for Spray Drift Control Demo – Short Version
https://www.youtube.com/watch?v=3F7sfI-KMV0

**Michael Weber**
Manager, Technical & Safety Services
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Milwaukee, WI 53214
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T 414.298.4149
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C 414.243.7387
www.aem.org
-----Original Message-----
From: KLOTZBACH Karl (CNH Industrial) [mailto:karl.klotzbach@cnhind.com]
Sent: Monday, July 25, 2016 9:10 AM
To: Michael S. Pankonin <MPankonin@AEM.org>
Cc: Nick Tindall <ntindall@AEM.org>
Subject: RE: Nozzle Performance Standard

Mike -
For LAETG agenda please.

KWK

-----Original Message-----
From: Nick Tindall [mailto:ntindall@AEM.org]
Sent: 25 July 2016 08:13
To: KLOTZBACH Karl (CNH Industrial); Michael S. Pankonin
Subject: Fwd: Nozzle Performance Standard

Karl and Mike,

We're good to go for Sept 29 at 10am. Told him we'd probably want longer to continue the discussion.

I'll let you two communicate the meeting time to those who need to know.

Sent via the Samsung Galaxy Note(r) 4, an AT&T 4G LTE smartphone

-------- Original message --------
From: "Eckel, William" <Eckel.William@epa.gov>
Date: 2016/07/25 09:07 (GMT-05:00)
To: Nick Tindall <ntindall@AEM.org>
Subject: RE: Nozzle Performance Standard

Nick:

The meeting time is 9 - 10 AM, but we can arrange to meet afterwards, also, to continue the discussion.

Bill
Great. What time will the meeting run so we can make arrangements?

Will ask around my tech team about the research below, interesting. Thanks

Nick T.

Yes, I think Sept. 29 will work.

By the way, are you aware of Scott Post's work at Lincoln Agritech in New Zealand? He made a presentation to us on 7/21 which included mathematics for relating droplet size to surface tension, density and viscosity of the spray solution.

Bill Eckel

Does Thursday, Sept. 29 work for you guys?

I am thinking we'd like a longer discussion than an hour as we'd also like to hear from you on how you revaluate nozzle, your process etc...

Bill Eckel
Nick:

Please let me know when a good date in September would be. Our calendar is open at this point.

The meeting is one hour, but if you have more to present, we could expand to a brown-bag hour at lunch.

Bill

From: Nick Tindall [mailto:ntindall@AEM.org]
Sent: Wednesday, June 29, 2016 3:04 PM
To: Eckel, William <Eckel.William@epa.gov>
Subject: RE: Nozzle Performance Standard

Bill,

I've circled back with my technical committee to get some of their input.

We'd like to get on your Thursday meeting calendar for some time in mid-sept to give a presentation on our relevant standards and our standard development process thought the American Society of Agricultural and Biological Engineers..

We are very interested to hear EPA's feedback before we dive deeper into the more complex questions you posed below.

Please let me know what the process is for the Thursday meetings. Time allowed, open dates etc...

Thanks!

Nick Tindall, AEM

From: Eckel, William
Sent: Monday, June 20, 2016 3:58 PM
To: Eckel, William <Eckel.William@epa.gov>
Subject: RE: Nozzle Performance Standard

Hi Nick,

Thanks for following up. The demo was very helpful and interesting.

I think we would be very interested in a presentation from the ASABE folks, perhaps during one of our tech team meetings. Our regular meeting time is Thursdays at 9 AM.

To be specific, the topic that would be of interest is the effect of pesticide product formulation (or of
tank mixture) on the droplet size distribution from a nozzle with a particular droplet size rating. What factors would cause an increase in driftable fines? What physical properties of the spray solution (density, viscosity, surface tension, pH, others or a combination) would influence or correlate with an increase in fine spray droplets? Can we develop a workable system to predict this without testing every possible combination?

Please let me know if and when you would like to come in and talk to us.

Bill Eckel

From: Nick Tindall [mailto:ntindall@AEM.org]
Sent: Friday, June 17, 2016 9:50 AM
To: Eckel, William <Eckel.William@epa.gov>
Subject: Nozzle Performance Standard

Bill,

Hope you enjoyed the Spray Drift Demo Day on Wednesday.

I believe you spoke with John Rauber with Deere regarding a desire to have nozzle performance targets on labels as opposed to testing nozzles yourself and listing which ones can be used during that specific products application.

If I have the right Bill, I wanted to make you sure you saw AEM’s comments to the Dicamba proposed label. In them, we state that the American Society of Agricultural and Biological Engineers (ASABE) has developed a standard method (ASABE S572) for classification of nozzles based on the droplet size they produce. This standard enables accountability of nozzle performance claims and can be used to allow the product label to name an acceptable performance for the nozzle when applying the chemical instead of having to test nozzles on your own.

I’ve attached our full comments and would be happy to discuss this approach further. Could even see about bringing in folks from ASABE to discuss their standard.

Thanks again for joining us on the field and hope you’re the right Bill.

Nick Tindall
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www.aem.org/
May 31, 2016

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania, Ave., N.W.
Washington, D.C. 20460

RE: [EPA-HQ-OPP-2016-0187-0461]
Request for Comment on Dicamba: New Use on Herbicide-Tolerant Cotton and Soybean

Dear Administrator McCarthy:

The Association of Equipment Manufacturers (AEM) appreciates the opportunity to comment on Dicamba: New Use on Herbicide-Tolerant Cotton and Soybean.

AEM is the U.S.-based international trade group serving the off-road equipment manufacturing industry. AEM members number over 900 companies that manufacture equipment, products and services used worldwide in the agriculture, construction, forestry, mining and utility fields. Several of our members are leaders in the production of agricultural sprayers and nozzles and have a long history of developing innovative ways to reduce off-target applications.

AEM believes the proposal to list individual manufacturer part numbers of nozzles on the plant protection label, and in this specific case listing one approved nozzle from one manufacturer, is the wrong direction to take. Instead, the label should specify a performance requirement for the nozzle.

The proposed product label only allows the use of one nozzle from one manufacturer for application of the product. By listing only one nozzle the label unnecessarily restricts operator choice of nozzles that perform similarly.

The American Society of Agricultural and Biological Engineers (ASABE) has developed a standard method (ASABE S572) for classification of nozzles based on the droplet size they produce. This standard enables accountability of nozzle performance claims and can be used to allow the product label to name an acceptable performance for the nozzle when applying the chemical.
Other manufacturers may currently or in the future build a nozzle which produces droplets of the ultra-coarse and extremely coarse droplet as measured by ASABE S572. As such, the performance of the nozzle in minimizing spray drift would meet the objective of the standard laid out in ASABE S572 and should be approved for use with the product. ASABE S572 is based on sound science and testing of nozzles to develop the classifications along with an open peer review process.

It is AEM’s recommendation that the specific nozzle manufacturer and part number be removed from the product label and replaced with wording to the effect: “Nozzle Type: Use a nozzle pressure combination which will produce ultra-coarse or extremely coarse droplets as measured by ASABE S572.“

This would allow fair market access to all nozzle manufacturers and encourage them to continue to innovate, bringing a wider variety of drift control options to the market.

If you have any questions, please do not hesitate to contact Nick Tindall, AEM’s Senior Director, Government and Industry Relations at ntindall@aem.org or 202-898-9067.

Sincerely,

Nick Yaksich
Senior Vice President, Government & Industry Relations
## Implementing the U.S. EPA Pesticide Drift Technologies Verification Protocol: An Industry Workshop

September 12 – 15, 2016

Nebraska Innovation Campus
2021 Transformation Drive
Lincoln, Nebraska 68508

### HIGH LEVEL WORKSHOP AGENDA

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<th>Day</th>
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<tr>
<td>Monday</td>
<td>September 12</td>
<td>Evening Mixer:</td>
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<td>6:00 PM – 8:00 PM</td>
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<td>Tuesday</td>
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<td>➢ APVMA “Spray Drift Data Guideline”</td>
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<td>➢ ASABE S572.1 (2009) “Droplet Size Classification”</td>
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<td>Review Draft White Paper, Section 1: Determining Drift Potential</td>
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<td>Industry Segment Breakout Work Sessions: Critique White Paper, Section 1</td>
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<td>Review Draft White Paper, Section 2b: Alternative Buffer Zone Determination Methods and Recommendation</td>
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