

Subject: FW: Information missing from Spanish translation guide
Date: Tuesday, November 18, 2025 at 6:42:28 AM Pacific Standard Time
From: Ray McAllister
To: Ray McAllister
Attachments: image001.png

BCC: CPDA – EPA Working Group

FROM: Ray S. McAllister, PhD

RSM Consulting LLC

Rsm6consulting@gmail.com

+1(202)577-6657

****My “office hours” are irregular. For prompt attention, please send a text message.****

Two months ago we posed to EPA some questions from you folks regarding the Spanish Translation Guide for Pesticide Labeling (STPGL). Late last week they replied with the following information. Let me know (reply to all) if this raises any additional questions that we need to explore further.

From: OPPBilingualLabels <OPPBilingualLabels@epa.gov>

Sent: Thursday, November 13, 2025 4:33 PM

To: Ray McAllister <rsm6consulting@gmail.com>

Cc: Gross, Isabel <Gross.Isabel@epa.gov>; Bartow, Susan <Bartow.Susan@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>

Subject: RE: Information missing from Spanish translation guide

Dear Ray,

Thank you for your email regarding the Spanish Translation Guide for Pesticide Labeling (STPGL). Please find our responses to your questions below:

1. Questions on untranslated label language:

1. No translation is provided for the initial Engineering Controls statement on page 10-16 of the Label review manual:

“When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240(d)(4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS”.

3. “There is no translation for the phrase “Environmental Hazards” on page 28 in section 6.8”
4. Storage and Disposal Statements, Table 6.20.2: Add Spanish translations for:
 - i. “Keep containers tightly closed when not in use.”
 - ii. “Keep away from heat and open flame.”
 - iii. “EQUAL TO OR LESS THAN 5 GALLONS”
 - iv. “GREATER THAN 5 GALLONS”

- **Response:** Note that while the Spanish Translation Guide for Pesticide Labeling (STGPL) defines which parts of a label must be translated (and provides a set of useful and common example

translations for those parts), it is not intended to include a translation for every possible statement that could be found on pesticide product labeling. Every part of a pesticide product's labeling that has a corresponding section in the STGPL must be translated in its entirety, even if it contains specific statements that do not have translations provided in the STGPL. Registrants retain the flexibility to develop their own Spanish translations best suited to their product labeling as long as the translations are "true and accurate," as noted in [PRN 98-10 \(Section IV.I: "Bilingual Labeling" on page 13\)](#). While the next update to the STGPL is not currently contemplated, we appreciate this feedback and continue looking into ways in which EPA can support registrants in their ongoing translation efforts.

2. **Question on pdf text flow issue:** "In general, text within individual table cells in the Guide can be separately copied for ease of transfer to a label translation. However, some cells in the following tables only allow blocking of text for rows across cells within the table. Can formatting of the PDF document be upgraded to facilitate full cell copying of text in all tables?"
 - **Response:** Thank you for bringing this to our attention. We reviewed the pdf and confirmed the text flow issue in the tables you cited, which impeded the user from copying and pasting text. We have corrected the pdf of the STGPL, which can be accessed at the same link as before: https://www.epa.gov/system/files/documents/2024-12/spanish-translation-guide-second-edition_dec2024.pdf

Thank you again for reaching out, and please respond by email if you have any additional questions.

Best wishes,
Theo Varns

Theodore Varns
Chemical Review Manager
Risk Management and Implementation Branch II
Pesticide Re-Evaluation Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
Phone (202) 566-2241
Email varns.theodore@epa.gov

From: pesticidequestions <pesticidequestions@epa.gov>

Sent: Friday, September 12, 2025 2:02 PM

To: Ray McAllister <rsm6consulting@gmail.com>; pesticidequestions <pesticidequestions@epa.gov>;
OPPBilingualLabels <OPPBilingualLabels@epa.gov>

Cc: Terry Kippley <tkippley@cpda.com>

Subject: RE: Information missing from Spanish translation guide

Ray,

Thank you for reaching out. I've forwarded your comments to the workgroup. They will take them into consideration.

Aline

Aline Heffernan
Ombudsperson
Office of Pesticide Programs

From: rsm6consulting@gmail.com <rsm6consulting@gmail.com>
Sent: Wednesday, September 10, 2025 1:30 PM
To: pesticidequestions <pesticidequestions@epa.gov>; OPPBilingualLabels <OPPBilingualLabels@epa.gov>
Cc: Terry Kippley <tkippley@cpda.com>
Subject: Information missing from Spanish translation guide

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

A CPDA member has pointed out the following information missing and minor problems in the updated Spanish Translation Guide:

- No translation is provided for the initial Engineering Controls statement on page 10-16 of the Label review manual:
“When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240(d)(4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS”.
- In general, text within individual table cells in the Guide can be separately copied for ease of transfer to a label translation. However, some cells in the following tables only allow blocking of text for rows across cells within the table. Can formatting of the PDF document be upgraded to facilitate full cell copying of text in all tables?
 - Table 6.5.7, p. 15
 - Table 6.7.1, p. 21
 - Table 6.7.2, p. 25
 - Table 6.8, p. 30 only
 - Table 6.9, p. 32
 - Table 6.10.1, p. 34 only
 - Table 6.10.2, p. 35
 - Table 6.10.3, p. 38, 40
 - There may be more
- -There is no translation for the phrase “Environmental Hazards” on page 28 in section 6.8
- -Storage and Disposal Statements, Table 6.20.2: Add Spanish translations for:
 - “Keep containers tightly closed when not in use.”
 - “Keep away from heat and open flame.”
 - “EQUAL TO OR LESS THAN 5 GALLONS”
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