

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS (ASPCRO)

HISTORICAL RECORD

1979

PRESIDENT:	Richard Carlton, LA
VICE-PRESIDENT:	Barry Patterson, NM
SECRETARY:	F.R. Du Chanois, FL
TREASURER:	None
LOCATION OF ANNUAL MEETING:	Oklahoma City, OK
DATE:	10/23/79 to 10/25/79

HIGHLIGHTS OF MEETING:

- **EPA Enforcement Grants.. A State's viewpoint.
- **EPA Enforcement Grants.. A Region's viewpoint.
- **EPA Activities Update.
- **Chlordane, the California Situation (panel discussion)
- **FHA & VA Closing Certificates and NPCA Activities
- **Structural Pest Control Research Activities - Urban IPM
- **Federal Pesticide Transportation Requirements
- **Structural Pest Control Enforcement Problem (panel discussion)
- **State Reports
- **Business Meeting
- **Field Trip to National Cowboy Hall of Fame

RESOLUTIONS:

- **ASPCRO expressed their appreciation to the Oklahoma Department of Agriculture for hosting the meeting.
- **ASPCRO urges the Administrator of EPA to promulgate Section 26 (FIFRA) implementing regulations with maximum input from the States, private industry, and the public sector.

MISC: Historical records contain the minutes of the meeting. States attending the meeting were: Arizona, Arkansas, Delaware, Florida, Georgia, Illinois, Indiana, Kansas, Louisiana, Mississippi, Missouri, Nevada, New Mexico, North Carolina, Oklahoma, South Carolina, Texas, Virginia and West Virginia. Ontario Ministry of Environment was also present. Michigan and Tennessee were unable to attend but submitted reports.

WHO'S WHO

M. L. "Andy" Anderson, Chief, Pesticide Section, EPA Region VI, Dallas, TX
Richard Carlton, President, ASPCRO, LA Dept. of Agri., Baton Rouge, LA
Robert L. Chada, Supervisor, Certification & Training, Plant Industry Div., Okla. State Dept. of Agri., Okla. City
Jack D. Craig, Commissioner, Okla. State Dept. of Agri., Okla. City, OK
F. R. Du Chanois, Secretary, ASPCRO, Entomologist, Dept. of Health & Rehabilitative Svs., Jacksonville, FL
Ray Elliott, Supervisor, Pesticide Applicator Section, Plant Industry Div., Okla. State Dept. of Agri., Okla. City
Dr. Newton Flora, Asst. State Entomologist, Plant Industry Div., Okla. State Dept. of Agri., Oklahoma City, OK
Lyle Gingrich, Velsicol, Chicago, IL
James L. Igleheart, Inspector, Plant Industry Div., Okla. State Dept. of Agri., Oklahoma City, OK
Kendall Jeffress, Director, Okla. State Dept. of Agri., Laboratory Div., Okla. City, OK
Dale O. Laubach, Director, Plant Industry Div., Okla. State Dept. of Agriculture, Oklahoma City, OK
Barry Patterson, Vice-President, ASCPRO, Chief, Div. of Pesticide Mgmt., New Mexico Dept. of Agri., Las Cruces, NM
Dr. Ken Pinkston, Extension Entomologist, OSU, Stillwater, OK
Dr. Richard Price, Prof. of Entomology, OSU, Stillwater, OK
Dr. George Rambo, Div. of Technical Operations, NPCA, Vienna, VA
Bob Scopel, Redwing Ext. Inc., President, Okla. Pest Control Assn., Durant, OK
Rodney Stein, Department of Food and Agriculture, Sacramento, CA
Ray W. Wilcox, Technical Supervisor, Terminix, Anaheim, CA
Gary Wilson, Safety Hazards Branch, Oklahoma State Dept. of Transportation, Oklahoma City, OK

COURTESIES

OKLAHOMA PEST CONTROL ASSOCIATION

OKLAHOMA CITY, OKLAHOMA

Luncheon on 23rd

ORKIN EXTERMINATING CO.

ATLANTA, GEORGIA

Hospitality Suite

Evening of 22nd

TERMINIX INTERNATIONAL, INC.

MEMPHIS, TENNESSEE

Coffee and Pastries

During Breaks

Hospitality Suite will be available for afternoon of 22nd, evening of 23rd, and evening of 24th courtesy of Oklahoma State Department of Agriculture and Association of Structural Pest Control Regulatory Officials.

ASSOCIATION

OF

STRUCTURAL PEST CONTROL

REGULATORY OFFICIALS

* * *

1979

ANNUAL MEETING

OCTOBER 23, 24, 25, 1979

SKIRVIN PLAZA HOTEL

OKLAHOMA CITY, OKLAHOMA

1979 OFFICERS

Richard Carlton President

Barry Patterson . Vice-President

F. R. Du Chanois Secretary

PROGRAM COMMITTEE

Ray Elliott

P R O G R A M

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS 1979 ANNUAL MEETING OCTOBER 23, 24, 25, 1979 SKIRVIN PLAZA HOTEL - OKLAHOMA CITY, OKLAHOMA

MONDAY, OCTOBER 22, 1979

7:00 p.m. Get Acquainted . . . Hospitality Suite

TUESDAY, OCTOBER 23, 1979

8:00 a.m. Registration
8:45 a.m. Announcements & Introduction
of Members and Guests
9:00 a.m. Introductory Remarks . . Dale O. Laubach
9:15 a.m. Welcome Jack D. Craig
9:45 a.m. Response Bob Scopel
10:15 a.m. Break
10:30 a.m. EPA Enforcement Grants . Dr. Newton Flora
A State's Viewpoint
Pros and Cons - Lessons Learned
11:00 a.m. EPA Enforcement Grants . . Andy Anderson
A Regional Viewpoint
Pros and Cons - Lessons Learned
11:30 a.m. EPA Activities Update . . Andy Anderson
Questions and Answers
12:00 NOON LUNCH - Sponsored By
Oklahoma Pest Control Association
1:15 p.m. Chlordane Panel Discussion
The California Situation
2:15 p.m. Break
2:30 p.m. FHA & VA Closing . . . Dr. Geo. Rambo
Certificates & NPCA Activities Report
3:30 p.m. Structural Pest . . Dr. Richard Price
Control Dr. Ken Pinkston
Research Activities
Urban IPM

WEDNESDAY, OCTOBER 24, 1979

8:30 a.m. Federal Pesticide Gary Wilson
Transportation Requirements
9:30 a.m. Structural Pest Control . Panel Discussion
Enforcement Problem
10:30 a.m. Break
10:45 a.m. Pesticide Sampling . . Kendall Jeffress
Techniques & Equipment
11:45 a.m. LUNCH
1:00 p.m. State Reports . . State Representatives

THURSDAY, OCTOBER 25, 1979

8:30 a.m. State Reports (continued)
Business Meeting
11:00 a.m. ADJOURN

Skirvin Plaza

HOTEL

P.O. Box 1677 • Oklahoma City, Oklahoma 73101

ASPCRO

October 22, 23, 24, 25, 1979

SINGLES:

DOUBLES:

\$19.00

\$27.00

PLEASE RESERVE THE FOLLOWING ACCOMMODATIONS

☒ MR. L. O. Nelson
☐ MR. & MRS. Office of the Indiana State
Chemist and Seed Commissioner
ADDRESS Dept. of Biochemistry
CITY & STATE Purdue University
FIRM West Lafayette, Indiana 47907
ARRIVAL DATE 10-21-79 TIME 8:30 PM
DEPARTURE DATE 10-25-79
REMARKS Please guarantee
AX # 3781 161017 61003

\$8.00 additional per person per room.
Free parking for registered hotel guests.
Please circle accommodations requested.
If not available, next rate will apply.
PLEASE RETURN before October 8, 1979.

Mailed 8-28-79

The Nineteenth Annual Meeting of the Association of Structural Pest Control Regulatory Officials was held in Oklahoma City, Oklahoma on October 23-25, 1979. The meeting was outstanding in all respects and not a single person went home without being better informed for having attended.

The meeting was attended by 19 states and Canada (Ontario Ministry of Environment) represented by 33 regulatory officials. States represented were: Arizona, Arkansas, Delaware, Florida, Georgia, Illinois, Indiana, Kansas, Louisiana, Mississippi, Missouri, Nevada, New Mexico, North Carolina, Oklahoma, South Carolina, Texas, Virginia and West Virginia. The states of Michigan and Tennessee were unable to attend but submitted reports.

Program of the
Nineteenth Annual Meeting
Association of Structural Pest Control Regulatory Officials

Oklahoma City, Oklahoma

October 23-25, 1979

Tuesday Morning, 23 October

Registration and Call to Order

Self Introduction by Members and Guests; Announcements

Introductory Remarks - Dale Laubach, Director, Plant Industry Division, Oklahoma Department of Agriculture

Welcome - Honorable Jack D. Craig, Commissioner of Agriculture, State of Oklahoma

Response - Bob Scopel, President, Oklahoma Pest Control Association

Business Session

EPA Enforcement Grants - A State's Viewpoint, Pros and Cons - Lessons Learned
Dr. Newton W. Flora, Asst. State Entomologist, Oklahoma Dept. of Agriculture

EPA Enforcement Grants - A Regional Viewpoint, Pros and Cons - M. L. Anderson,
Chief, Pesticide Section U.S. EPA, Dallas, Texas

EPA Activities Update, Questions and Answers - Andy Anderson, Region IV, EPA

Tuesday Afternoon, 23 October

Chlordane, The California Situation - Panel Discussion. Panelists: Lyle Gingerich
Olau Messerschmidt, Velsicol Chemical Corp., Chicago, Ill.; Ray W. Wilcox,
Terminix International, Anaheim, California;

FHA and VA (Real Estate) Closings - Certificates and National Pest Control
Association Activities Report. Dr. George Rambo, Director, Technical
Operations, NPCA, Vienna, Virginia.

Structural Pest Control - Urban IPM - Dr. Kenneth N. Pinkston, Extension
Entomologist, Oklahoma State University, Stillwater, OK

Structural Pest Control - Research Activities - Dr. Richard G. Price, Professor
of Entomology, Dept. of Entomology, Oklahoma State University, Stillwater, OK

(Continued)

Wednesday Morning, October 24

Call to Order, Announcements

Federal Pesticide Transportation Requirements - Gary Wilson, Safety Hazards Branch, Oklahoma State Department of Transportation, Oklahoma City, OK

Structural Pest Control Enforcement Problems - Panel Discussion. Panelists: Orin Ray Elliott, Supervisor, Roger Hostenbach, Inspector; James L. Igleheart, Inspector and Dale O Laubach, Director, Plant Industry Division Oklahoma Department of Agriculture.

Pesticide Sampling Techniques and Equipment - Kendall Jeffress, Director, Laboratory Division, Oklahoma Department of Agriculture.

Reports from States: Texas, Charlie Chapman; Arizona, Ms. Betty B. Sisk; Delaware, H. Grier Stayton; New Mexico, Barry Patterson; North Carolina, Rudy E. Howell; Arkansas, Don Alexander;

Adjourn for Field Trip to National Cowboy Hall of Fame, Oklahoma City, OK

Thursday Morning, 25 October

Reports of the States (continued): Florida, F. Robert Du Chanois and Warren T. Frazier; Georgia, James Herron; Indiana, L. O. Nelson; Kansas, H. Dean Garwood; Canada, Murray Wood; Louisiana, Richard Carlton; Illinois, Harvey J. Dominick; Mississippi, Robert H. McCarty; Missouri, John Hagan; Nevada, Lawrence E. Blalock; South Carolina, Neil Ogg; Oklahoma, Orin Ray Elliott; Virginia, Charles G. Rock.

Final Business Meeting

Meeting Adjourned.

MINUTES and NOTES of the 19th ANNUAL MEETING*

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS

Oklahoma City, Oklahoma

23-25 October 1979

Tuesday morning, 23 October

REGISTRATION, 8:00 - 8:30 a.m.

The following 19 states and Canada registered: Arizona, Arkansas, Delaware, Florida, Georgia, Illinois, Indiana, Kansas, Louisiana, Mississippi, Missouri, Nevada, New Mexico, North Carolina, Oklahoma, South Carolina, Texas, Virginia and West Virginia. A roster of state officials (33), guest speakers and panel members, visitors and contributors is appended.

CALL TO ORDER, 8:30 a.m.

The meeting was called to order by President Dick Carlton (Louisiana). After extending his personal greetings, Mr. Carlton reminisced briefly on the history and purpose of ASPCRO. He noted that this was the 19th annual meeting since the first informal founders meeting in Memphis, Tennessee in 1961, and that the Association organized formally in 1975. President Carlton expressed the members' sincere appreciation to the ORKIN EXTERMINATING COMPANY for sponsoring the hospitality hour the previous evening, to TERMINIX INTERNATIONAL for its sponsorship of coffee and Danish during breaks throughout the meeting, and to the OKLAHOMA PEST CONTROL ASSOCIATION for treating the members to noon lunch on Tuesday.

SELF-INTRODUCTION BY MEMBERS AND GUESTS; ANNOUNCEMENTS

INTRODUCTORY REMARKS

Mr. Dale Laubach, Director, Plant Industry Division, Oklahoma Department of Agriculture

Mr. Laubach remarked that his Division administered 18 laws encompassing 35 programs. They work hand-in-hand with Commissioner of Agriculture Jack Craig, to get the job done. He introduced Mr. Craig.

WELCOME

Honorable Jack D. Craig, Commissioner of Agriculture, State of Oklahoma (9:00 a.m.)

Mr. Craig welcomed everyone to Oklahoma and observed that we are all in this together in a partnership-like way and that we should all work together for the common good. He advised that we not rehash vintage things in the interest of getting on with the work at hand, that we keep on the right track. He astutely cautioned us not to be misleading in what we do and say. We should

Minutes and Notes are intended for the information and use of ASPCRO members only; and to reflect as accurately as possible, from hand transcription, proceedings of the meeting. Information presented or opinions expressed by individual members and speakers are their own and not necessarily those of the Association or the views and policies of agencies or firms represented. Neither ASPCRO nor its Secretary assumes any responsibility for errors of omission or commission as they are, if any, unintentional. Corrections will be gladly made in the next issue upon request.

be understanding of the consumer who is often without our knowledge and information. Mr. Craig wisely counseled us to be clear and concise, to communicate clearly and understandably. Finally he recommended that we try to keep rules and regulations down to the necessary minimum.

RESPONSE, (9:20 a.m.)

Mr. Bob Scopel, President, Oklahoma Pest Control Association

Mr. Scopel asked, "How does industry 'respond' to all the new laws, rules and regulations?" At the beginning of FIFRA (amended) the industry was shocked and confused. The states were trying to interpret and evaluate FIFRA with different approaches. Then with clarification and certification much of the confusion was dispelled. Industry enjoyed a new image forced upon it by the new legislation. The pest control industry is still a long way from self-enforcement.

State pest control associations generally are not yet representative of the (entire) industry in their states. (Ed. Note: Non-members far out number members in many states). Communication lines from the (U.S.) EPA down to one-man owner-operators need to be as open as possible at all times. What legislation and reputable industry are trying to accomplish (more often than not) runs parallel and down the same road. Problems can be worked out and we can really get our jobs accomplished by working together rather than at cross-purposes. Mr. Scopel recommended that regulators and industry improve communication, and that we "raise our flag" and let it be known when we weed out a bad actor. (Ed. Note: Commissioner Craig and Messrs Laubach and Scopel were in substantial agreement in expressing optimism that a realization is emerging that problems can be solved and that good communication is a key factor.)

BUSINESS SESSION INTERLUDE

President Carlton interrupted the program briefly to appoint a Resolutions Committee composed of Robert McCarty, Chairman (Mississippi), Don Alexander (Arkansas) and Barry Patterson, Vice President of ASPCRO, (New Mexico).

COFFEE BREAK, All coffee breaks courtesy of TERMINIX INTERNATIONAL, Memphis, Tennessee (10:00 a.m.)

EPA ENFORCEMENT GRANTS - A State's Viewpoint, Pros and Cons - Lessons Learned (10:15 a.m.)

Dr. Newton W. Flora, Assistant State Entomologist, Oklahoma Department of Agriculture

Dr. Flora related that he had received 30 responses to his questionnaire sent to all the states. Nine of ten EPA Regions were represented by the responses. He reviewed and commented on the results of the questionnaire which information is reported fully in the Association Proceedings. (Ed. Note: Copies may yet be available from Ray Elliott, Oklahoma).

It was noted that it takes 90 to 180 days for EPA to act on grant applications although they are supposed to be acted on within 30 days. Some states felt they could have had better guidance and help from EPA regional personnel; that EPA forms are complicated and unwieldy. Twenty-two states said work quality improved as a result of the grant program which indicates that enforcement grants and certification training programs are closely tied together. Twelve states reported spending over 30 per cent of their time on this one program (law). Some inspectors do not like to work on this program because of the red tape, paper work. Loss of the state's credibility and loss of control were comments made by some states. (This was a very interesting and timely report).

EPA ENFORCEMENT GRANTS - A Regional Viewpoint, Pros and Cons, (10:25 a.m.)

Mr. M. L. (Andy) Anderson, Chief, Pesticide Section, Region IV, U.S. Environmental Protection Agency, Dallas, Texas

Mr. Anderson's presentation complemented the preceeding report nicely. It was well-disposed, instructive and stimulated considerable discussion. It was pointed out that enforcement grant program records require computer support to be kept the way EPA auditors want them to be kept. EPA will expect more enforcement action in the future. The speaker advised that more standardization (criteria) will be applied to all grants. More comprehensive grant program reviews will be made by EPA regional representatives. Also, more assistance will be given to grantees in the area of record-keeping procedures. The speaker opted that more will be expected from everyone in 1980.

Combination Enforcement - Certification Grants will probably not begin until FY 1981, although some may begin as early as 1 October 1980 from carry over funds. EPA's appropriations do not usually come through until 6 to 9 months after beginning of the federal fiscal year. (Ed. Note: A written report submitted by Mr. Anderson is included in the Association Proceedings).

EPA ACTIVITIES UPDATE, Question and Answers

Mr. Andy Anderson, Region IV, EPA

Discussion period:

Mr. Barry Patterson (New Mexico): Remarked that not more than 3 to 6 of the 600 reports filed with Poison Control (Information) Centers in his state are confirmed pesticide poisonings. None of these were farm-worker related. He asked, "Does a problem exist?"

Mr. Anderson (EPA): Replied, saying that he thinks (the extent of) pesticide poisonings are over-emphasized or exaggerated. "Involuntary exposure" of agricultural workers alleged by special interest, farm-worker groups and organizations is probably exaggerated.

With respect to structural pest control related complaints of illness/ odors after reentering homes, and what appears on the label as to reentry period -- how long should occupants stay out after treatment --, Mr. Anderson was of the opinion someone will have to look into this. He believes that it would be better for the states (and EPA) rather than OSHA to look into the question of alleged adverse health effects from too early reentry.

Dr. Newt Flora (Oklahoma): Noted that he foresees increasing complaints from apartment/condominium dwellers from pesticide applications, especially those done by maintenance personnel (rather than by licensed professionals). This point was later stressed by Dr. George Rambo, NPCA.

Mr. L. O. Nelson (Indiana, Secretary of AAPCO): Noting that FIFRA now requires that EPA implement regulations governing pesticide misuse investigations and that EPA is now operating under an interoffice enforcement policy statement of 9 January 1979, asked when EPA will promulgate such pesticide misuse investigation regulations. He added that EPA is now operating under mandate which allowed no input.

Mr. Bob Russell (ORKIN, Atlanta): Remarked that there should be industry/state/public input allowed in the development of these regulations.

Mr. Larry Blalock (Nevada): Commented that he is presently serving on a committee which is working on a revision of the (EPA) Pesticide Inspection Manual -- pesticide misuse investigation manual.

Mr. Bob Russell (ORKIN): Stated that his company supported the principle of state primacy in enforcement because most pertinent knowledge is within the respective states and that the enforcement regulations should reflect this at the state level.

Mr. Neil Ogg (South Carolina): Addressed the issue of states, such as his own, that do not have enforcement grant programs and do not intend to apply for one.

Mr. Dean Garwood (Kansas): Remarked that his state uses state forms rather than EPA forms. He observed that the intent of state primacy was that authority for enforcement actions would be delegated to the states, and therefore with this understanding that is the way they are operating.

Mr. Harvey Dominick (Illinois): Remarked that it was hard for him to see EPA promulgating rules without state/public input.

Mr. Richard Carlton (Louisiana): Noted that if states with grants wish to continue receiving grant funds they will be expected to accept EPA regulations/guidelines.

Mr. Anderson (EPA): Responded that states such as Colorado and Nebraska without EPA approved State Plans could expect drastically expanded EPA enforcement activities/field force where all enforcement activities will be done by EPA. The agency apparently plans to move technical assistance people over into enforcement. At present EPA Region IV has only 4 people and may lose most of them. The agency is experiencing a reduction in field enforcement personnel generally.

ADJOURN FOR LUNCH, Courtesy of the OKLAHOMA PEST CONTROL ASSOCIATION (12:00 noon)

Tuesday afternoon, 23 October

CHLORDANE, THE CALIFORNIA SITUATION (1:25 p.m.)

Panel discussion. Panelists: Mr. Lyle L. Gingerich and Mr. Olav Messerschmidt, Velsicol Chemical Corporation, Chicago, Illinois, Mr. Ray W. Wilcox, Terminix International, Anaheim, California; (Mr. Rodney Stein, California Department of Food and Agriculture, Sacramento, California was unable to attend).

Mr. Wilcox: (By way of background information) Mr. Rodney Stein is Secretary of the California Structural Pest Control Board, now under the California Department of Food and Agriculture (CDFA). The Board's budget of approximately \$2 million is supported entirely by the industry. Besides CDFA, the California Departments of Health Services and Occupational Safety and Health are also involved in the chlordane proposals. The proposals are based on the California Environmental Quality Act. This law requires an impact statement. An Environmental Assessment Team made a 2 year study which was reported in 5 volumes and also including one on pesticide use assessment. All California regulatory bodies were under pressure to respond to recommendations of the Assessment Team.

Mr. Wilcox stated Terminix feels strongly that termiticides should be made available without undue alarm and restrictions.

Mr. Gingerich: Remarked that this is a problem area but a resolvable one. Communication has improved greatly and become more open since the inception. He then read Velsicol's policy statement on the matter. He stated it was a matter of reasonable regulations and asked, "What are reasonable regulations?" Velsicol supports reasonable regulations.

soils texture and

Due to unique character of some/construction in California, (i.e. hard, compact soil composition and low-hung crawl-space clearance) permission (exemption) to make broadcast surface spray applications in crawl-space areas was given (contrary to registered label). Special dispensation was granted by EPA Region IX to California PCO's to spray overall crawl-space area according to traditional California industry practice (Cf. Federal Register Notice, 19 Nov. 1974 ff.).

Velsicol has new label in preparation. The label will now include the National Academy of Science statement relating to carcinogenicity in laboratory animals. Velsicol does not agree entirely (that this is necessary?). The company does not intend to volunteer that chlordane be classified as a restricted-use pesticide.

Mr. Wilcox: Noted that the industry brought some of this situation on itself due to flagrant misuse by some operators. Surface application will still be allowed in California with restrictions. There was a special exemption from EPA (Region IX) to California operators in 1974 to make surface applications. He advised that the chlordane hearings in California are scheduled in November 1979, and proposals targeted for finalization by 1 January 1980. (Ed. Note: The hearings are scheduled for 13 November in San Diego, 14 November in Los Angeles and 16 November 1979 in San Mateo).

Mr. Harvey Dominick (Illinois): Noted that tests in his state reveal that chlordane is showing up in crawl-space areas, water supplies and air ducts under homes.

Mr. Richard Carlton (Louisiana): Commented that apparently the incidence of (human) liver cancer has decreased rather than increased since the days of wholesale, generalized use of chlordane, inside and outside of structures. (Ed. Note: It can at least be hoped that this proves to be a significant plus and that the favorable trend and further research findings continue to augur favorably on chlordane use for termite control).

Mr. Gingerich: Advised that the new Velsicol label to be filed shortly with EPA will disallow treatment of structures with the newer plenum air space systems ("Plenwood" system for heating and air conditioning). In answer to a question, he noted that there are at least 2 ongoing toxicological studies of chlordane to his knowledge.

Mr. Wilcox: Stated he had the impression industry might get a little relief (in finalized California rules) in the area of consumer notification but very little or nothing on applicator protection. There ~~may~~ be some modification of posting notice on structures. He expressed the hope that industry could avoid having to use closed mixing systems.

Ed. Note: Complete details on the California chlordane situation are included in the Association Proceedings. The report consists of:

(1) Comparison of termiticide applications to pesticide exposure incidents reported by physicians (occupational and non-occupational). Source: California Dept. of Food and Agriculture, Structural Pest Control Board, 1979.

(2) Chlordane residue studies, Orange and Los Angeles Counties, July 1979. Source: *ibid.*

(3) Analysis of recommendations offered in the draft, "Report of Environmental Assessment of Pesticide Regulatory Programs", 1979. Source: *ibid.*

(4) California Administrative Code proposals with changes proposed by the Pest Control Operators of California, 1979.

(5) Notice of Hearing on Proposed Changes in the Regulations of the Department of Food and Agriculture Pertaining to Restricted Materials and Environmentally Harmful Materials, with attached Proposed Amendments to California Administrative Code, 26 September 1979. Source: California Dept. of Food and Agriculture, 1220 N Street, Sacramento, CA 95814.

COFFEE BREAK (2:45 p.m.)

FHA and VA (REAL ESTATE) CLOSINGS, Certificates and National Pest Control Association Activities Report (3:00 p.m.)

Dr. George Rambo, Director, Technical Operations, NPCA, Vienna, Virginia

Dr. George Rambo, Director, Technical Operations, NPCA

Dr. Rambo reviewed current NPCA activities and projects with special reference to those of interest to ASPCRO. He reported that NPCA has 11 management and technical committees functioning actively. Review of the revised ARP's (Approved Reference Procedures for Subterranean Termite Control) has been completed and is ready for the printer. Good practice statements in final draft form include: (1) Use of Insecticides in Subterranean Termite Control, (2) Treating Structures with Wells or Cisterns Close to/within Foundation, and (3) Inspecting for and Reporting the Presence of Wood-Destroying Organisms in Structures. Training manuals must be updated before reprinting.

Urban pest management will be the key word for the foreseeable future and NPCA and EPA are taking a valid interest. Urban integrated pest management (IPM) is becoming an important aspect of urban pest control. NPCA membership increased about 650 in 1979 to a total membership of about 2,500. They have monitored the chlordane situation in California. Chlordane labels will differ to some extent in the future. Over-the-counter products will remain unchanged. The Velsicol label will be strict. Other supplier labels may vary from that of Velsicol.

(Discussion (Velsicol officials): The Velsicol label will not provide for annual treatment if there is no infestation and the chemical barrier has not been broken. It will also affirmatively prohibit treatment of "Plenwood" construction. It was reported there is no known way at present to treat "Plenwood" homes).

Dr. Rambo continued, as to "clearance inspections", a form acceptable nationally throughout the United States does not appear to be feasible or attainable. A combined FHA-VA form was accepted in August 1979 and is now being finally reviewed by HUD. This will apparently be implemented in about 3 months. The (combined) form will eliminate some of the problems but not all. Neither FHA nor VA require inspection for or reporting of wood rot (just wood-destroying insects). However, PCO's in Pacific states (especially Pacific northwest) do inspect and report for wood rot because it is a big problem. Regional FHA/VA offices in that area accept such reports.

Both FHA and VA require statements as to: (1) whether there is an infestation or not, (2) if infested, has the property been treated and a guarantee issued, and (3) has damage, if any, been reported. Dr. Rambo stated that it is the PCO's responsibility to find infestation, if any, and note damage, if any. It comes down to a massive program of educating the consumer, industry and technician. He recommends that PCO's get a good, knowledgeable, trial lawyer if it becomes necessary to defend against a law suit.

It used to be that if consumer couldn't smell anything the treatment was no good, now if they smell anything they claim exposure and illness.

The better the WDO inspection is documented the better the PCO's position. The speaker repeated that both FHA and VA require a statement of infestation or no infestation on the day of inspection, but they do not require any guaranty or warranty of the inspection. In answer to a question as to the length of time an inspection is expected to remain "good" (in effect), Dr. Rambo stated that FHA and VA take the position that after 60 days from date of inspection a new inspection must be ordered. This is their policy.

STRUCTURAL PEST CONTROL - Urban IPM (4:20 p.m.)

Dr. Kenneth N. Pinkston, Extension Entomologist, Oklahoma State University, Stillwater, Oklahoma

Dr. Pinkston submitted that urban IPM was more in a talking stage than in an action stage. NPCA has published good practice statements and technical bulletins on the subject, e.g. "Integrated Pest Management in Food Distribution Warehouses" and "Integrated Pest Management in Retail Food Stores", and has others in preparation. This will tend to move the industry in this direction. IPM is a hot issue with USDA and EPA but neither knows as yet how to get it off the ground. We are now seeing the appearance and development of private enterprise as urban pest management consultants. Examples are American Management Company, a division of American Hospital Supply Corporation. This involves primarily what we know as just good sanitation, housekeeping and maintenance procedures and practices. They contract with hospitals for complete housekeeping services including IPM for hospitals under contract.

Our speaker could see urban IPM more at the federal level and a scrambling for federal funds at this time. He does not see any compounding of the regulatory process where IPM is involved at this stage. The consensus of opinion seems to be that there is nothing really new in the area of urban IPM at this stage.

NPCA is emphasizing 6 basic steps as essential to the types of IPM programs for which they have developed releases:

- (1) Inspection of premises
- (2) Identification of existing pests
- (3) Assessment of the extent of pest problems
- (4) Determination of appropriate control procedures (both pesticide and non-pesticide), sanitation, housekeeping
- (5) Evaluation of treatment
- (6) Communication with client

NPCA is currently developing technical releases on IPM for (1) retail food stores, (2) restaurants and cafeterias, (3) bakeries, (4) meat processing plants, and (5) bottling plants.

STRUCTURAL PEST CONTROL - Research Activities (4:50 p.m.)

Dr. Richard G. Price, Professor of Entomology, Department of Entomology, Oklahoma State University, Stillwater, Oklahoma

Dr. Price noted they have been doing very little recently in the way of structural pest control research. In 1971 they worked on the development of nozzles and spray patterns for pest control. In this work they used fluorescent dye sprays on poster board to determine spray pattern, drift and pressure. They found that spraying at the rate of 2 1/2 feet/ second at 20 psi produced the most satisfactory pattern with least amount of drift. Slow speeds and higher pressures resulted in excessive runoff, splatter and drift.

In 1973 the EPA came out with crack and crevice guidelines. To simulate a typical crack and crevice and to evaluate nozzles and nozzle heights, they set up an adjustable crack depth (height) and width with the sprayer mounted on a small movable trolley. Crack and crevice treatment was affected by nozzle type and height held. They found that crack width had very little effect on cockroach mortality. The amount of spray deposited on the inside of the crack and mortality depended upon the height of nozzle (distance from the crack). Increase in height resulted in decreased deposit and mortality. Highest mortality of the German cockroach resulted when using crack and crevice nozzles inserted 4 mm. inside the crack. They tested 2 types of crack and crevice nozzles and a fan-spray nozzle. They found that anytime they got away from the crack (opening) their control went way down. Fan-spray nozzle control was nil. Pressure had little bearing as did width of crack. He recommended placing the crack and crevice nozzle in the crack for best results.

In another series of tests applying sprays to heavily soiled surfaces in unsanitary conditions, they obtained no satisfactory results with any material, although the best results were obtained using "Coca Cola" syrup as a spray additive. The better results probably indicate only that the syrup acted as an attractant bait. Dr. Price presented his interesting report under very adverse circumstances as the projector for his slides failed to show up in time.

Ed. Note: The following published papers are included in the Association Proceedings:

Rogers, R., L. O. Roth and R. G. Price. Mar. 1973. Spray patterns and drift from PCO hand sprayers. Pest Control 41(3): 24, 26 & 28.

Karner, M., R. G. Price and L.A. Roth. Feb. 1978. Jour. Econ. Ent. 71(1): 105-106.

The Session adjourned at 5:05 p.m.

Wednesday morning, 24 October

CALL TO ORDER, ANNOUNCEMENTS, 8:25 a.m.

FEDERAL PESTICIDE TRANSPORTATION REQUIREMENTS,

Mr. Gary Wilson, Safety Hazards Branch, Oklahoma State Department of Transportation, Oklahoma City, Oklahoma

Mr. Wilson's presentation was regretablely and unavoidably cancelled due to an emergency.

STRUCTURAL PEST CONTROL ENFORCEMENT PROBLEMS (8:30 a.m.)

Panel discussion. Panelists: ----- Messrs. Orin Ray Elliott, Supervisor, Roger Hostenbach, Inspector, James L. Igleheart, Inspector, and Dale O. Laubach, Director, Plant Industry Division, Oklahoma Department of Agriculture

Mr. Igleheart related that it has been necessary for their agency to expend considerable law enforcement effort toward investigation, case preparation and prosecution to eliminate fly-by-night, "confidence game" operators particularly in the greater metropolitan areas. They proceed by means of the special investigator's close working relationship with District Attorneys' offices. They have been very successful in bringing about prosecutions and convictions in the District Courts. The key to this success has been the good relations established with prosecuting officials, the District Attorneys, and referring only solid cases to them. Statistical data may be found in Oklahoma's report included in the Association Proceedings.

Mr. Laubach noted that his Division had been able to increase its enforcement staff from 8 to 28 inspectors to cover 15 laws by combining 2 divisions. He attributed their accomplishments in law enforcement to the (1) high rate of coverage and visibility now possible, and (2) Board hearings and license cancellations. He explained that they randomly collect pretreatment tank-mix specimens for chemical analysis as they found the public was getting "ripped-off" on some pretreats. The inspectors make a case by getting all the facts and putting them together. Key factors involve training their people and building a solid case. There is no easy way to do this. They have encountered a problem with false termite (clearance) certificates in real estate transactions. The law provides that a certificate shall not be false. Mr. Laubach lamented that it is difficult for the industry to obtain good employees. Some firms do not provide good, effective first-line supervision.

Their agency uses written warning letters, builds a file. All companies, large or small, receive the same even-handed treatment.

Mr. Igleheart noted that most of their PCO's are good, honest, reputable business men. There is a tendency, that must be avoided by regulatory officials, to look at the pest control industry as a bunch of crooks when you handle complaints day-in and day-out. This is not true. (The crooks are in the minority).

Mr. Carlton (Louisiana) emphasized the difficulty of getting, training and keeping good employees as experienced in his and other states. He decried the business of taking people's money when the operator was unable to field competent, trained service personnel to do the work.

Mr. Laubach noted that they use 30-day warning letters to correct work deficiencies.

Mr. Elliott added that Oklahoma is trying to require that each 10 employees be supervised by a certified operator (applicator). At the present time the law requires only one certified applicator per company for the entire state.

All termite jobs must be reported by name and address of property treated and type of structure. They randomly select a certain number for inspection. Mr. Elliott pointed out that theoretically one should find 550 ppm (active ingredient) in soil samples if applied according to label directions. They have found anywhere from 0 to 2,000 ppm, and have established 100 ppm as the break point below which the treatment is considered to be inadequate. This is the amount which has also been set in Georgia and Mississippi (and North Carolina ?).

Mr. Elliott continued, they use and require filing of a standard complaint form, 491 of which had been received this year as of 23 October 1979. They also use a Consent of Access form to be signed by the property holder in non-complaint cases where the PCO has a problem and requests help. They try to get out and help the company should they request it. There is a statement on their standard complaint form that the complainant will cooperate. (Mr. Laubach commented that this makes the complainant "fish or cut bait").

Mr. Igleheart stated that the DA in Oklahoma County (Oklahoma City) has made it clear he wants only winnable cases -- no hostile witnesses, especially the property owner. He takes this position because it is the property owner who has allegedly been damaged. If the complainant won't come forward and cooperate the case is not handled. They have established good working relationship with the DA's; they bring only good, solid, winnable cases to them. They sometimes find it necessary to use informants in their investigations and it takes time to build confidence. The names of informants are kept strictly confidential and they are referred to only by a code number. It often takes 6 months to a year to build a solid case. In some fraud cases the "con" man doesn't use anything, not even water. Many of these cases call for a well-trained "special investigator".

Mr. Igleheart said that formerly their inspectors were looked upon as nit-pickers on the "good guys" because they were easy to find but that this has changed. They are now respected for impartial across-the-board enforcement. One conviction is worth a 1,000 investigations because the word gets around and they begin to read the label.

Mr. Dean Garwood (Kansas) noted that Kansas law enforcement and prosecuting authorities now welcome and appreciate their help and expertise in prosecuting cases. Therefore, it is essential and has paid off to build good working relationships.

Mr. Igleheart added that they refer certain complaints to local police departments.

Mr. Laubach noted that if investigation or inspection reveals no problem, the company receives a letter to that effect and a statement that no violation was found. He also said they do sit down with a company for informal conferences as this is educational.

Mr. Charlie Chapman (Texas) advised that they follow this procedure -- informal request conferences. (Ed. Note: Florida does likewise).

Mr. Laubach commented that they are without authority under Oklahoma law to require restitution of moneys although they may informally suggest this as a possible alternative the company may wish to consider to resolve the complaint. Further, they do not have power of arrest.

Mr. Elliott advised that they are taking it easy as long as they can to consider the matter of recertification until the overall picture clears. Oklahoma law (or State Plan?) requires recertification every 3 years. Their Board has authority to implement recertification which may include training up to reexamination.

Mr. Barry Patterson (New Mexico) asked for industry comment on EPA's Federal Register Notice on recertification.

Mr. Charlie Hromada (Terminix, Memphis, Tennessee) submitted that it was "horrible". Mr. Patterson agreed, as did others. Mr. Hromada added that the industry was generally opposed to reexamination as such but that continuing education-type training programs were acceptable in-house or out-of-house.

Mr. L. O. Nelson (AAPCO, Indiana) remarked on the continuing certification unit process indicating that the certified individual be given the option (of training or reexamination). It noted that it is a relatively complex issue. He firmly believes that the answer is education and training in the long term. Suggested we give the individual the benefit of the doubt and allow training/education as proof of competence.

We are charged with the responsibility to see that industry has qualified people doing the work. However, this is also a company responsibility. How are you going to do this? Where does the happy medium lie?

Ed Note: That either education or testing should be a state option to be used with discretion appeared to be the consensus of opinion of the members in session.

COFFEE BREAK; 10:45 a.m.

PESTICIDE SAMPLING TECHNIQUES and EQUIPMENT, (10:55 a.m.)

Mr. Kendall Jeffress, Director, Laboratory Division, Oklahoma Department of Agriculture

Mr. Jeffress described and demonstrated a new pesticide sampling-collection procedure which the agency has been using for about 18 months with very satisfactory results. Either 10 or 50 ml. "Vacutainer" tubes (mfd by Becton-Dickinson Company and available from normal suppliers) fitted with rubber stoppers are used, although they are searching for a larger size sample container.

Besides the sample containers, the equipment needed consists of disposable 10 or 18 gauge hypodermic syringe needles and polyethylene tubing. The needle, connected to the tubing of sufficient length (to reach bottom of container or tank being sampled and run into the tank to be sampled), is inserted through the rubber stopper. The vacuum (suction) created pulls the sample through the tubing into the sampling tube(s). The needle is removed and the tubes holding the samples are ready for shipment in Styrofoam shipping boxes supplied with the tubes.

The beauty of the procedure is multiplex: it minimizes spillage and personnel exposure; eliminates cross-contamination; storage, transportation and disposal are no problem. Their laboratory has encountered no problem with PCB contamination from the rubber stoppers. Field inspectors normally sample tank-mixes by happenstance. They also collect concentrate samples. They draw from 1 to 5 samples. Costs of samples thus collected were reported as 35¢ and \$1.15 for small and large collection tubes respectively. They have a turn around time of about 10 days.

Discussion:

L. O. Nelson (AAPCO, Indiana) commented that a 15 per cent variation from label guaranteed active ingredient statement is considered acceptable.

Mr. Jeffress responded that Oklahoma considers a 20 per cent ± variance acceptable by administrative discretion (guidelines).

Mr. Robert McCarty (Mississippi) commented there was a need for standardization of sampling techniques.

Mr. Barry Patterson (New Mexico) noted the inconsistencies in results obtained from tank-mix samples. This is apparently due to such factors as aging, pH of water, time elapsed from collection to analysis, and technique used.

Mr. Igleheart (Oklahoma) reported from the standpoint of the field inspector there was no muss, no fuss and that it was the best field sampling tool their people have ever had. It virtually eliminates health hazards such as spillage, exposure of personnel. He added that a chain of custody record accompanies each sample. The technique appeared to be acceptable to the District Attorney.

Mr. Laubach (Oklahoma) commented that it was the best thing they have come up with. They have run into no problems to date although there have been no court tests to date.

REPORTS FROM STATES, 11:30 a.m.

There being limited time available for State Reports, President Dick Carlton called for such reports to begin at this time. (Ed. Note: The Proceedings of the Association meeting were prepared by Mr. Ray Elliott's office (thanks to his efficient Secretary) and for the first time were distributed at the meeting. The Proceedings include detailed reports from all states attending (except Delaware and West Virginia), as well as reports submitted by states in absentia (Michigan and Tennessee). Therefore, the only State Report included here is that from the State of Delaware which was submitted too late to be included in the Proceedings).

Mr. Charlie Chapman reported for the STATE of TEXAS at this time due to early departure (see the Association Proceedings for details).

ADJOURN FOR LUNCH, 1205 p.m.

Wednesday afternoon, 24 October

REPORTS FROM THE STATES CONTINUED, 1:00 p.m.

The following states reported in order at this time:

ARIZONA - Ms. Betty B. Sisk

DELAWARE - Mr. H. Grier Stayton (see attached report)

NEW MEXICO - Mr. Barry Patterson (Out of order due to early departure)

NORTH CAROLINA - Mr. Rudy E. Howell (Out of order due to early departure)

ARKANSAS - Mr. Don Alexander

ADJOURN for FIELD TRIP to NATIONAL COWBOY HALL OF FAME, Oklahoma City (2:05 p.m.)

All members spent a most enjoyable and educational afternoon visiting this world famed, first-rate attraction.

Thursday morning, 25 October

REPORTS OF THE STATES CONTINUED, 8:15 a.m.

The following states reported in order at this time:

FLORIDA - Messrs. F. Robert Du Chanois and Warren T. Frazier

GEORGIA - Mr. James Herron

INDIANA - Mr. L. O. Nelson, who also represented AAPCO, as that Association's Secretary

KANSAS - Mr. H. Dean Garwood

CANADA - Mr. Murray Wood, Ontario Ministry of Environment

LOUISIANA - Mr. Richard Carlton

ILLINOIS - Mr. Harvey J. Dominick

MISSISSIPPI - Mr. Robert H. McCarty

MISSOURI - Mr. John Hagan

NEVADA - Mr. Lawrence E. Blalock

SOUTH CAROLINA - Mr. Neil Ogg

OKLAHOMA - Mr. Orin Ray Elliott

VIRGINIA - Mr. Charles G. Rock

FINAL BUSINESS MEETING (in the order of consideration)

President Richard Carlton called the Business Meeting to order at 10:00 a.m.

Election of officers: It was moved by Neil Ogg (South Carolina), seconded by John Hagan (Missouri) that the current slate of officers be retained in office for the coming year. Motion passed unanimously.

Officers of ASPCRO for 1979-80: Richard Carlton (Louisiana), President; Barry Patterson (New Mexico), Vice President; and F. R. Du Chanois (Florida), Secretary.

Old business: None

New business:

The following important item of business was taken up during a brief business session interlude on Wednesday afternoon, 24 October, and appears here due to its significance:

Mr. Rudy Howell reaffirmed his cordial invitation to the Association to hold its 20th Annual Meeting in the State of North Carolina in 1980. Mr. Howell's invitation was unanimously and gratefully accepted. The dates and site will be announced.

On behalf of Dr. John A. Mulrennan, Jr., Director, Office of Entomology, Department of Health and Rehabilitative Services, and the agency, F.R. Du Chanois invited the Association to consider meeting in the State of Florida in October 1981.

It was moved by Neil Ogg (South Carolina), seconded by F. R. Du Chanois (Florida) that written State Reports be submitted at the beginning of each annual meeting for inclusion in The Association Proceedings of that meeting, and further that any additional notes or information to be presented orally be included in the written report. Motion passed unanimously.

President Carlton called for a Report of the Resolutions Committee composed of Robert McCarty, Chairman (Mississippi), Don Anderson (Arkansas) and Barry Patterson (New Mexico): The report consisted of two resolutions both of which are appended in final form as adopted. Mr. McCarty then read Resolution I of the report and moved its adoption. Seconded by F. R. Du Chanois (Florida). The motion carried unanimously.

Mr. McCarty then read Resolution II of the report and moved its adoption. The motion carried with it a recommendation that a copy of Resolution II be sent to the Administrator and Assistant Administrator of the U.S. EPA; to the Executive Secretary, NASDA; to the Executive Director, National Pest Control Association; and to the President of the Association of American Pesticide Control Officials. The motion was seconded by F. R. Du Chanois. The motion carried unanimously. (Ed. Note: Resolution II was mailed to all intended recipients by the Secretary on 1 November 1979).

There ensued a discussion of the desirability of initiating Association dues. It was suggested by F. R. Du Chanois (Florida) that in the interest of maintaining the long-standing informality of the organization and the possible problem some states might encounter in budgeting and obtaining approval for funding dues payments that this matter be tabled for further consideration and study should the actual need for dues arise. Mr. Charles Rock (Virginia) concurred in this suggestion. It was decided informally that no action be taken at this time.

On the matter of meeting registration fees, discussion indicated considerable sentiment for advance registration fees. There was no apparent objection to

this suggestion. It was decided without apparent dissent to allow the registration fee to remain flexible and to leave the amount and means of handling to the discretion of the host state.

It was submitted that annual dues would allow the Association to be self-supporting and provide funds to cover operating and meeting expenses and thus ASPCRO would not be dependent on industry for complimentary contributions. The question arose as to the possible conflict of interest from inviting industry to participate and, more specifically, from accepting contributions such as hospitality hours, meals, refreshments and the like. No particular problem was reported to have arisen in this connection. Discussion indicated this was more a matter of the appearance of conflict rather than actual conflict. Since there has been and is no compulsion whatsoever on industry to contribute in any way and it is a matter of voluntary and mutually beneficial cooperation, it could not be concluded from the discussion that the members saw a real problem. Be that as it may, no definitive action was taken at this time.

Mr. Ray Elliott (Oklahoma) recommended that the host state announce the dates and sites of the annual meeting and distribute program (or preliminary programs) as far in advance as reasonably possible to permit states to plan ahead and have sufficient time to obtain travel approval to attend. Mr. Elliott stated that he had thoroughly enjoyed having each and everyone at the meeting and invited all to visit their fair State of Oklahoma again soon (or maybe it was "Sooner").

Mr. McCarty (Mississippi) suggested a timely and important topic for next year's meeting would be a presentation and discussion of (preconstruction) soil treatment poison sampling practices and standards.

President Dick Carlton expressed his sincere appreciation to Mr. Elliott and his associates, on behalf of all the members, for all they had done to make the meeting such an enjoyable and outstanding success.

There being no further business the meeting was adjourned at 11:07 p.m.

7 November 1979 Respectfully submitted FRDC, Secretary

RESOLUTION ADOPTED

AT

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS ANNUAL MEETING

OKLAHOMA CITY, OKLAHOMA

23-25 October 1979

RESOLUTION I

WHEREAS, the 19th Annual Meeting of the Association of Structural Pest Control Regulatory Officials was a tremendous success, and

WHEREAS, the site of this meeting was in the most pleasant and hospitable State of Oklahoma, and

WHEREAS, the organization and substance of this meeting was most useful and informative,

NOW, THEREFORE, BE IT RESOLVED, that the members of the Association of Structural Pest Control Regulatory Officials in annual session at Oklahoma City, Oklahoma, on October 25, 1979, express and extend their most hearty appreciation to the Host State of Oklahoma, to the host officials of the Oklahoma Department of Agriculture, Commissioner Jack D. Craig, Plant Industry Division Director Dale O. Laubach, Plant Industry Division Supervisor Ray Elliott and all members of his staff, all guest speakers, industry hospitality sponsors and the Management of the Skirvin Plaza Hotel.

RESOLUTION ADOPTED

AT

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS ANNUAL MEETING

OKLAHOMA CITY, OKLAHOMA

23-25 October 1979

RESOLUTION II

WHEREAS, Section 26 of the Federal Insecticides, Fungicide and Rodenticide Act (FIFRA) provides that States meeting certain criteria shall have primary enforcement responsibility, and

WHEREAS, Section 26 of FIFRA provides for regulations implementing these provisions, and

WHEREAS, the U.S. Environmental Protection Agency (EPA) has been operating under a January 9, 1979 enforcement policy letter developed without public input,

NOW, THEREFORE, BE IT RESOLVED, that in annual session at Oklahoma City, Oklahoma, on October 25, 1979, the Association of Structural Pest Control Regulatory Officials urges the Administrator of EPA to promulgate Section 26 implementing regulations with maximum input from the States, private industry and the public sector.

DELAWARE STATE REPORT

TO THE ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS

SUBMITTED BY: H. Grier Stayton, Pesticide Compliance Supervisor

Delaware passed its first version of a Pesticide Law in 1971 and a revised version in 1976. The 1976 amendments and revisions required certification of applicators of restricted use pesticides, licensing of commercial pesticide businesses, record keeping requirements, etc.

The Department's pesticide section is staffed with my supervisor, Robert C. Berry, Director, one inspector, one secretary and myself, Compliance Supervisor.

Since the summer of 1977 the Department has certified 1,950 private applicators and 822 commercial applicators.

With their foresight the writers of the Law did not require recertification of applicators - with the following exceptions:

1. An applicator's license was revoked
2. E.P.A. required additional standards
3. Significant technological advances have occurred

At this time there are no immediate plans for recertification in Delaware.

The registration of pesticide products was initiated under the 1971 Pesticide Law and has remained unchanged with the exception of an increase in fees. The Department currently has 4200 products registered at the rate of \$15.00/ product.

For 1979 the Department has requested and received twenty (20) 24(c) Special Local Need registrations, with one related to structural pest control: Residex Lindane 20% Emulsifiable for powder post beetle.

Five (5) Section 18 Crisis Exemptions have been issued - all on agricultural related commodities.

Licensing of commercial Pesticide Businesses has progressed from April 1978 to the point we now have 140 licensed businesses in the state. Approximately 50% of these are structural pest control companies.

Most of the problems faced by the pesticide section at this time, involve the ability to readily enforce the law. This problem stems from the section of the law granting exclusive jurisdiction to the Superior Court. This is a problem because:

1. Superior Court has an extensive backlog
2. The Department's assigned Attorney is shared with several other large agencies and cannot devote time to the minor violations encountered

3. As a result of this, and the fact that all violations under the Act are misdemeanors, it is difficult to attract the Attorney General's office to these cases, unless there may be an underlying motivation.

The matter has been discussed with the Attorney General's office and there should be some revisions in the making. When the revisions are added there is a willing sponsor in the State Legislature to introduce the measures and hopefully by 1980 we'll have some teeth in the Law.

There has been one enforcement action prosecuted under the Pesticide Law in 1979. A guilty plea was entered by a chemical distributor for the sale of adulterated, misbranded, and non-registered pesticides. They were fined \$2,000.

Other enforcement actions under the Law include a total of 21 Notices of Warning, 2 letters of Reprimand, and 2 Stop Sale, Use and Removal Orders.

Under State Law inspection activities our section is beginning the use of two new report forms. They are the Pesticide Business License report and Restricted Use Pesticide Dealer report.

Dealers of restricted use pesticides are required to report monthly on sales of these chemicals to the attention of our office, showing the date of sale, applicator name and certification number, quantity and formulation of the pesticide.

EPA

Under EPA guidance and funding for 2 years, Delaware has been committed to the following annual outputs:

1. A total of 55 samples
2. 3 producer establishment E.I.'s and samples
3. 35 market place inspections/ 25 samples
4. 15 Ag Use Observations/ 10 samples
5. 20 Non Ag Use Observations/ 20 samples
6. 2 Experimental Use Permit Monitorings/ 2 samples
7. 20 applicator licensing inspections
8. 35 Dealer/Applicator record inspections

The Department has had no problem with meeting and/or exceeding these commitments with the exception of producer establishment samples. Delaware has 12 registered producer establishments; however, only 3 actually produce any pesticide.

Regarding EPA grant reporting, we submit monthly, quarterly, mid-year and final evaluation reports.

Under the grant we have been able to remodel and equip our State Lab. The lab is not quite complete at this time - the chemist position is not filled and training is needed before samples can actually be run. The Virginia State Lab is currently supplying us with sample analyses and have been doing an excellent job.

Funding from the grant has also permitted the purchase of 2 cars, office equipment and a microfiche reader/printer which has been of great value.

The administration at our Department is also looking at the purchase of a mini-computer for various department uses - among them programming of pesticide applicators, registrants and licensed commercial businesses.

STATE OF DELAWARE
Department of Agriculture
P.O. Drawer D
Dover, Delaware 19901
24 October 1979

October 23, 1979

TO: STRUCTURAL PEST CONTROL REGULATORY OFFICIALS
FROM: RAY ELLIOTT, PROGRAM CHAIRMAN

A meeting of the Structural Pest Control Regulatory Officials was held in the Crystal Room of the Skirvin Plaza Hotel, Oklahoma City, Oklahoma October 23, 1979 with the following people present:

<u>NAME</u>	<u>REPRESENTING</u>	<u>ADDRESS</u>
Don Alexander	Arkansas State Plant Board	Little Rock, Arkansas
M. L. "Andy" Anderson	U. S. Env. Protection Agency	Dallas, Texas
William J. Arnold	Dow Chemical Company	Pasadena, California
Jerry Barker	Okla. Dept. of Agriculture	Oklahoma City, OK
Lawrence E. Blalock	Nevada Department of Agri.	Reno, Nevada
Lucien "Skip" Capone III	North Carolina Attorney General	Raleigh, NC
Richard Carlton	State Dept. of Agriculture	Baron Rouge, Louisiana
Robert Chada	State Dept. of Agriculture	Oklahoma City, OK
Charlie Chapman	Texas Pest Control Board	Austin, Texas
Jack D. Craig	State Dept. of Agriculture	Oklahoma City, OK
Harvey J. Dominick	Illinois Department of Public Health	Springfield, Illinois
F. R. Du Chanois	Florida Dept. of HRS	Jacksonville, FL
Ray Elliott	Dept. of Agriculture	Oklahoma City, OK
Dr. Newton W. Flora	Dept. of Agriculture	Oklahoma City, OK
Warren T. Frazier	Florida Dept. of HRS	Jacksonville, FL
H. Dean Garwood	Kansas Board of Agriculture	Topeka, Kansas
Lyle Gingerich	Velsicol	Chicago, Illinois
John Hagan	Dept. of Agriculture	Jefferson City, MO
James Harron	Dept. of Agriculture	Atlanta, Georgia
Jim Haskins	MDAC-DPI Mississippi	Miss. State, MS
Bill Howell	Howell's Pest Control	Yukon, Oklahoma
Rudolph E. Howell	Dept. of Agriculture	Raleigh, N. Carolina
Charles Hromada	Terminix International	Memphis, Tennessee
James Igleheart	Dept. of Agriculture	Oklahoma City, OK
Roger Hoestenbach	Dept. of Agriculture	Oklahoma City, OK

<u>NAME</u>	<u>REPRESENTING</u>	<u>ADDRESS</u>
Kendall Jeffress	State Dept. of Agriculture	Oklahoma City, OK
Larry Klinke	Orkin Exterminating	Dallas, Texas
Dale O. Laubach	State Dept. of Agriculture	Oklahoma City, OK
Jim Lea	Dept. of Agriculture	Jefferson City, MO
Robert McCarty	Dept. of Agriculture	Mississippi State, MS
Jack Murphy	Orkin Exterminating	Oklahoma City, OK
L. O. Nelson	AAPCO	West Lafayette, IN
Neil Ogg	Plant Pest Reg. Service	Clemson, S. Carolina
Barry Patterson	Dept. of Agriculture	Las Cruces, NM
John Perdue	Dept. of Agriculture	Charleston, W. Virginia
Ken Pinkston	Oklahoma State University	Stillwater, OK
Richard Price	Oklahoma State University	Stillwater, OK
George W. Rambo	National Pest Control Assn.	Vienna, VA
Charles G. Rock	Dept. of Agriculture	Richmond, VA
R. M. Russell	Orkin Exterminating	Atlanta, GA
Bob Scopel	Oklahoma Pest Control Assn.	Oklahoma City, OK
Betty B. Sisk	State of Arizona	Tempe, Arizona
H. Grier Stayton	Dept. of Agriculture	Dover, DE
Dean B. Swiney	Redwing Exterminating	Durant, OK
Ray Willcox	Terminix International	Anaheim, California
Murray Wood	Ontario Ministry of Environment	Toronto, Canada
A. Jack Grimes	National Pest Control Assn.	Vienna, VA

State Reports were submitted by the following and copies are attached for your convenience: Arizona, Arkansas, California, Canada, Florida, Georgia, Illinois, Indiana, Kansas, Louisiana, Michigan, Mississippi, Missouri, Nevada, New Mexico, North Carolina, Oklahoma, South Carolina, Tennessee, Texas, and Virginia.

It has been a pleasure being your program chairman this year and I hope your visit has been an enjoyable one. I look forward to seeing you at our next annual meeting.

6 November 1979

MEMORANDUM

TO: All Members, Association of Structural Pest Control Regulatory Officials (ASPCRO)

FROM: F. R. Du Chanois, Secretary (Florida)

SUBJ: Minutes and Notes of Annual Meeting in Oklahoma City, Oklahoma, 23-25 October 1979

The annual Meeting of ASPCRO was held in the Crystal Room of the SKIRVIN PLAZA HOTEL, 1 Park Avenue, (P.O. Box 1677), Oklahoma City, Oklahoma 73101, 23-25 October 1979. This was the 19th consecutive annual meeting of the Association which organized formally in 1975. Representatives of the Oklahoma Department of Agriculture, Plant Industry Division, of the host State of Oklahoma deserve special commendation and thanks for producing an outstanding meeting in all respects. The degree of excellence of the meeting was exceeded only by the friendly hospitality of its organizers. Judging from the many favorable comments, not a single person went home feeling disappointed or unrewarded, or without being better informed for having attended.

The meeting was attended by 19 states and Canada (Ontario Ministry of Environment) represented by 33 regulatory officials. States represented were: Arizona, Arkansas, Delaware, Florida, Georgia, Illinois, Indiana, Kansas, Louisiana, Mississippi, Missouri, Nevada, New Mexico, North Carolina, Oklahoma, South Carolina, Texas, Virginia and West Virginia. The states of Michigan and Tennessee were unable to attend but submitted reports.

All aspects of the meeting were remarkably well planned and organized for the advantage and convenience of the members; and were highly beneficial in terms of information presented and exchanged, program and speaker quality and objectives accomplished.

Educational and business sessions, scheduled and informal discussions, reports from the states, and social events were complementary, instructive and stimulating. The success of the meeting stands as a tribute to the host State of Oklahoma and its warmly hospitable officials and residents, and to the credit of participating association, federal, industry and university personnel. Without downgrading previous meetings there can be no doubt this was one of the most progressive and mutually effectual yet held.

The meeting sessions were presided over by ASPCRO President Richard (Dick) Carlton in his uniquely informal and pleasing style, ably assisted by Ray Elliott, host state coordinator, who, together with his staff, merits special praise for all arrangements and a job well done. The members of ASPCRO are most appreciative to the Host State of Oklahoma, to our hard-working, accommodating host, Ray Elliott, and to all those who helped make the meeting such a memorable experience.

Copies of the program, list of attendees and resolutions passed are appended to the attached Minutes and Notes. Proceedings of the meeting (not included herein) consisting of individual state reports and scheduled program presentations were distributed by Ray Elliott at the meeting. This was an extremely well-received and helpful innovation.

MINUTES and NOTES of the 19th ANNUAL MEETING*

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS

Oklahoma City, Oklahoma

23-25 October 1979

Tuesday morning, 23 October

REGISTRATION, 8:00 - 8:30 a.m.

The following 19 states and Canada registered: Arizona, Arkansas, Delaware, Florida, Georgia, Illinois, Indiana, Kansas, Louisiana, Mississippi, Missouri, Nevada, New Mexico, North Carolina, Oklahoma, South Carolina, Texas, Virginia and West Virginia. A roster of state officials (33), guest speakers and panel members, visitors and contributors is appended.

CALL TO ORDER, 8:30 a.m.

The meeting was called to order by President Dick Carlton (Louisiana). After extending his personal greetings, Mr. Carlton reminisced briefly on the history and purpose of ASPCRO. He noted that this was the 19th annual meeting since the first informal founders meeting in Memphis, Tennessee in 1961, and that the Association organized formally in 1975. President Carlton expressed the members' sincere appreciation to the ORKIN EXTERMINATING COMPANY for sponsoring the hospitality hour the previous evening, to TERMINIX INTERNATIONAL for its sponsorship of coffee and Danish during breaks throughout the meeting, and to the OKLAHOMA PEST CONTROL ASSOCIATION for treating the members to noon lunch on Tuesday.

SELF-INTRODUCTION BY MEMBERS AND GUESTS; ANNOUNCEMENTS

INTRODUCTORY REMARKS

Mr. Dale Laubach, Director, Plant Industry Division, Oklahoma Department of Agriculture

Mr. Laubach remarked that his Division administered 18 laws encompassing 35 programs. They work hand-in-hand with Commissioner of Agriculture Jack Craig, to get the job done. He introduced Mr. Craig.

WELCOME

Honorable Jack D. Craig, Commissioner of Agriculture, State of Oklahoma (9:00 a.m.)

Mr. Craig welcomed everyone to Oklahoma and observed that we are all in this together in a partnership-like way and that we should all work together for the common good. He advised that we not rehash vintage things in the interest of getting on with the work at hand, that we keep on the right track. He astutely cautioned us not to be misleading in what we do and say. We should

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be understanding of the consumer who is often without our knowledge and information. Mr. Craig wisely counseled us to be clear and concise, to communicate clearly and understandably. Finally he recommended that we try to keep rules and regulations down to the necessary minimum.

RESPONSE, (9:20 a.m.)

Mr. Bob Scopel, President, Oklahoma Pest Control Association

Mr. Scopel asked, "How does industry 'respond' to all the new laws, rules and regulations?" At the beginning of FIFRA (amended) the industry was shocked and confused. The states were trying to interpret and evaluate FIFRA with different approaches. Then with clarification and certification much of the confusion was dispelled. Industry enjoyed a new image forced upon it by the new legislation. The pest control industry is still a long way from self-enforcement.

State pest control associations generally are not yet representative of the (entire) industry in their states. (Ed. Note: Non-members far out number members in many states). Communication lines from the (U.S.) EPA down to one-man owner-operators need to be as open as possible at all times. What legislation and reputable industry are trying to accomplish (more often than not) runs parallel and down the same road. Problems can be worked out and we can really get our jobs accomplished by working together rather than at cross-purposes. Mr. Scopel recommended that regulators and industry improve communication, and that we "raise our flag" and let it be known when we weed out a bad actor. (Ed. Note: Commissioner Craig and Messrs Laubach and Scopel were in substantial agreement in expressing optimism that a realization is emerging that problems can be solved and that good communication is a key factor.)

BUSINESS SESSION INTERLUDE

President Carlton interrupted the program briefly to appoint a Resolutions Committee composed of Robert McCarty, Chairman (Mississippi), Don Alexander (Arkansas) and Barry Patterson, Vice President of ASPCRO, (New Mexico).

COFFEE BREAK, All coffee breaks courtesy of TERMINIX INTERNATIONAL, Memphis, Tennessee (10:00 a.m.)

EPA ENFORCEMENT GRANTS - A State's Viewpoint, Pros and Cons - Lessons Learned (10:15 a.m.)

Dr. Newton W. Flora, Assistant State Entomologist, Oklahoma Department of Agriculture

Dr. Flora related that he had received 30 responses to his questionnaire sent to all the states. Nine of ten EPA Regions were represented by the responses. He reviewed and commented on the results of the questionnaire which information is reported fully in the Association Proceedings. (Ed. Note: Copies may yet be available from Ray Elliott, Oklahoma).

It was noted that it takes 90 to 180 days for EPA to act on grant applications although they are supposed to be acted on within 30 days. Some states felt they could have had better guidance and help from EPA regional personnel; that EPA forms are complicated and unwieldy. Twenty-two states said work quality improved as a result of the grant program which indicates that enforcement grants and certification training programs are closely tied together. Twelve states reported spending over 30 per cent of their time on this one program (law). Some inspectors do not like to work on this program because of the red tape, paper work. Loss of the state's credibility and loss of control were comments made by some states. (This was a very interesting and timely report).

EPA ENFORCEMENT GRANTS - A Regional Viewpoint, Pros and Cons, (10:25 a.m.)

Mr. M. L. (Andy) Anderson, Chief, Pesticide Section, Region IV, U.S. Environmental Protection Agency, Dallas, Texas

Mr. Anderson's presentation complemented the preceeding report nicely. It was well-disposed, instructive and stimulated considerable discussion. It was pointed out that enforcement grant program records require computer support to be kept the way EPA auditors want them to be kept. EPA will expect more enforcement action in the future. The speaker advised that more standardization (criteria) will be applied to all grants. More comprehensive grant program reviews will be made by EPA regional representatives. Also, more assistance will be given to grantees in the area of record-keeping procedures. The speaker opted that more will be expected from everyone in 1980.

Combination Enforcement - Certification Grants will probably not begin until FY 1981, although some may begin as early as 1 October 1980 from carry over funds. EPA's appropriations do not usually come through until 6 to 9 months after beginning of the federal fiscal year. (Ed. Note: A written report submitted by Mr. Anderson is included in the Association Proceedings).

EPA ACTIVITIES UPDATE, Question and Answers

Mr. Andy Anderson, Region IV, EPA

Discussion period:

Mr. Barry Patterson (New Mexico): Remarked that not more than 3 to 6 of the 600 reports filed with Poison Control (Information) Centers in his state are confirmed pesticide poisonings. None of these were farm-worker related. He asked, "Does a problem exist?"

Mr. Anderson (EPA): Replied, saying that he thinks (the extent of) pesticide poisonings are over-emphasized or exaggerated. "Involuntary exposure" of agricultural workers alleged by special interest, farm-worker groups and organizations is probably exaggerated.

With respect to structural pest control related complaints of illness/ odors after reentering homes, and what appears on the label as to reentry period -- how long should occupants stay out after treatment --, Mr. Anderson was of the opinion someone will have to look into this. He believes that it would be better for the states (and EPA) rather than OSHA to look into the question of alleged adverse health effects from too early reentry.

Dr. Newt Flora (Oklahoma): Noted that he foresees increasing complaints from apartment/condominium dwellers from pesticide applications, especially those done by maintenance personnel (rather than by licensed professionals). This point was later stressed by Dr. George Rambo, NPCA.

Mr. L. O. Nelson (Indiana, Secretary of AAPCO): Noting that FIFRA now requires that EPA implement regulations governing pesticide misuse investigations and that EPA is now operating under an interoffice enforcement policy statement of 9 January 1979, asked when EPA will promulgate such pesticide misuse investigation regulations. He added that EPA is now operating under mandate which allowed no input.

Mr. Bob Russell (ORKIN, Atlanta): Remarked that there should be industry/state/public input allowed in the development of these regulations.

Mr. Larry Blalock (Nevada): Commented that he is presently serving on a committee which is working on a revision of the (EPA) Pesticide Inspection Manual -- pesticide misuse investigation manual.

Mr. Bob Russell (ORKIN): Stated that his company supported the principle of state primacy in enforcement because most pertinent knowledge is within the respective states and that the enforcement regulations should reflect this at the state level.

Mr. Neil Ogg (South Carolina): Addressed the issue of states, such as his own, that do not have enforcement grant programs and do not intend to apply for one.

Mr. Dean Garwood (Kansas): Remarked that his state uses state forms rather than EPA forms. He observed that the intent of state primacy was that authority for enforcement actions would be delegated to the states, and therefore with this understanding that is the way they are operating.

Mr. Harvey Dominick (Illinois): Remarked that it was hard for him to see EPA promulgating rules without state/public input.

Mr. Richard Carlton (Louisiana): Noted that if states with grants wish to continue receiving grant funds they will be expected to accept EPA regulations/guidelines.

Mr. Anderson (EPA): Responded that states such as Colorado and Nebraska without EPA approved State Plans could expect drastically expanded EPA enforcement activities/field force where all enforcement activities will be done by EPA. The agency apparently plans to move technical assistance people over into enforcement. At present EPA Region IV has only 4 people and may lose most of them. The agency is experiencing a reduction in field enforcement personnel generally.

ADJOURN FOR LUNCH, Courtesy of the OKLAHOMA PEST CONTROL ASSOCIATION (12:00 noon)

Tuesday afternoon, 23 October

CHLORDANE, THE CALIFORNIA SITUATION (1:25 p.m.)

Panel discussion. Panelists: Mr. Lyle L. Gingerich and Mr. Olav Messerschmidt, Velsicol Chemical Corporation, Chicago, Illinois, Mr. Ray W. Wilcox, Terminix International, Anaheim, California; (Mr. Rodney Stein, California Department of Food and Agriculture, Sacramento, California was unable to attend).

Mr. Wilcox: (By way of background information) Mr. Rodney Stein is Secretary of the California Structural Pest Control Board, now under the California Department of Food and Agriculture (CDFA). The Board's budget of approximately \$2 million is supported entirely by the industry. Besides CDFA, the California Departments of Health Services and Occupational Safety and Health are also involved in the chlordane proposals. The proposals are based on the California Environmental Quality Act. This law requires an impact statement. An Environmental Assessment Team made a 2 year study which was reported in 5 volumes and also including one on pesticide use assessment. All California regulatory bodies were under pressure to respond to recommendations of the Assessment Team.

Mr. Wilcox stated Terminix feels strongly that termiticides should be made available without undue alarm and restrictions.

Mr. Gingerich: Remarked that this is a problem area but a resolvable one. Communication has improved greatly and become more open since the inception. He then read Velsicol's policy statement on the matter. He stated it was a matter of reasonable regulations and asked, "What are reasonable regulations?" Velsicol supports reasonable regulations.

soils texture and

Due to unique character of some/construction in California, (i.e. hard, compact soil composition and low-hung crawl-space clearance) permission (exemption) to make broadcast surface spray applications in crawl-space areas was given (contrary to registered label). Special dispensation was granted by EPA Region IX to California PCO's to spray overall crawl-space area according to traditional California industry practice (Cf. Federal Register Notice, 19 Nov. 1974 ff.).

Velsicol has new label in preparation. The label will now include the National Academy of Science statement relating to carcinogenicity in laboratory animals. Velsicol does not agree entirely (that this is necessary?). The company does not intend to volunteer that chlordane be classified as a restricted-use pesticide.

Mr. Wilcox: Noted that the industry brought some of this situation on itself due to flagrant misuse by some operators. Surface application will still be allowed in California with restrictions. There was a special exemption from EPA (Region IX) to California operators in 1974 to make surface applications. He advised that the chlordane hearings in California are scheduled in November 1979, and proposals targeted for finalization by 1 January 1980. (Ed. Note: The hearings are scheduled for 13 November in San Diego, 14 November in Los Angeles and 16 November 1979 in San Mateo).

Mr. Harvey Dominick (Illinois): Noted that tests in his state reveal that chlordane is showing up in crawl-space areas, water supplies and air ducts under homes.

Mr. Richard Carlton (Louisiana): Commented that apparently the incidence of (human) liver cancer has decreased rather than increased since the days of wholesale, generalized use of chlordane, inside and outside of structures. (Ed. Note: It can at least be hoped that this proves to be a significant plus and that the favorable trend and further research findings continue to augur favorably on chlordane use for termite control).

Mr. Gingerich: Advised that the new Velsicol label to be filed shortly with EPA will disallow treatment of structures with the newer plenum air space systems ("Plenwood" system for heating and air conditioning). In answer to a question, he noted that there are at least 2 ongoing toxicological studies of chlordane to his knowledge.

Mr. Wilcox: Stated he had the impression industry might get a little relief (in finalized California rules) in the area of consumer notification but very little or nothing on applicator protection. There ~~may~~ be some modification of posting notice on structures. He expressed the hope that industry could avoid having to use closed mixing systems.

Ed. Note: Complete details on the California chlordane situation are included in the Association Proceedings. The report consists of:

(1) Comparison of termiticide applications to pesticide exposure incidents reported by physicians (occupational and non-occupational). Source: California Dept. of Food and Agriculture, Structural Pest Control Board, 1979.

(2) Chlordane residue studies, Orange and Los Angeles Counties, July 1979. Source: *ibid.*

(3) Analysis of recommendations offered in the draft, "Report of Environmental Assessment of Pesticide Regulatory Programs", 1979. Source: *ibid.*

(4) California Administrative Code proposals with changes proposed by the Pest Control Operators of California, 1979.

(5) Notice of Hearing on Proposed Changes in the Regulations of the Department of Food and Agriculture Pertaining to Restricted Materials and Environmentally Harmful Materials, with attached Proposed Amendments to California Administrative Code, 26 September 1979. Source: California Dept. of Food and Agriculture, 1220 N Street, Sacramento, CA 95814.

COFFEE BREAK (2:45 p.m.)

FHA and VA (REAL ESTATE) CLOSINGS, Certificates and National Pest Control Association Activities Report (3:00 p.m.)

Dr. George Rambo, Director, Technical Operations, NPCA, Vienna, Virginia

Dr. George Rambo, Director, Technical Operations, NPCA

Dr. Rambo reviewed current NPCA activities and projects with special reference to those of interest to ASPCRO. He reported that NPCA has 11 management and technical committees functioning actively. Review of the revised ARP's (Approved Reference Procedures for Subterranean Termite Control) has been completed and is ready for the printer. Good practice statements in final draft form include: (1) Use of Insecticides in Subterranean Termite Control, (2) Treating Structures with Wells or Cisterns Close to/within Foundation, and (3) Inspecting for and Reporting the Presence of Wood-Destroying Organisms in Structures. Training manuals must be updated before reprinting.

Urban pest management will be the key word for the foreseeable future and NPCA and EPA are taking a valid interest. Urban integrated pest management (IPM) is becoming an important aspect of urban pest control. NPCA membership increased about 650 in 1979 to a total membership of about 2,500. They have monitored the chlordane situation in California. Chlordane labels will differ to some extent in the future. Over-the-counter products will remain unchanged. The Velsicol label will be strict. Other supplier labels may vary from that of Velsicol.

(Discussion (Velsicol officials): The Velsicol label will not provide for annual treatment if there is no infestation and the chemical barrier has not been broken. It will also affirmatively prohibit treatment of "Plenwood" construction. It was reported there is no known way at present to treat "Plenwood" homes).

Dr. Rambo continued, as to "clearance inspections", a form acceptable nationally throughout the United States does not appear to be feasible or attainable. A combined FHA-VA form was accepted in August 1979 and is now being finally reviewed by HUD. This will apparently be implemented in about 3 months. The (combined) form will eliminate some of the problems but not all. Neither FHA nor VA require inspection for or reporting of wood rot (just wood-destroying insects). However, PCO's in Pacific states (especially Pacific northwest) do inspect and report for wood rot because it is a big problem. Regional FHA/VA offices in that area accept such reports.

Both FHA and VA require statements as to: (1) whether there is an infestation or not, (2) if infested, has the property been treated and a guarantee issued, and (3) has damage, if any, been reported. Dr. Rambo stated that it is the PCO's responsibility to find infestation, if any, and note damage, if any. It comes down to a massive program of educating the consumer, industry and technician. He recommends that PCO's get a good, knowledgeable, trial lawyer if it becomes necessary to defend against a law suit.

It used to be that if consumer couldn't smell anything the treatment was no good, now if they smell anything they claim exposure and illness.

The better the WDO inspection is documented the better the PCO's position. The speaker repeated that both FHA and VA require a statement of infestation or no infestation on the day of inspection, but they do not require any guaranty or warranty of the inspection. In answer to a question as to the length of time an inspection is expected to remain "good" (in effect), Dr. Rambo stated that FHA and VA take the position that after 60 days from date of inspection a new inspection must be ordered. This is their policy.

STRUCTURAL PEST CONTROL - Urban IPM (4:20 p.m.)

Dr. Kenneth N. Pinkston, Extension Entomologist, Oklahoma State University, Stillwater, Oklahoma

Dr. Pinkston submitted that urban IPM was more in a talking stage than in an action stage. NPCA has published good practice statements and technical bulletins on the subject, e.g. "Integrated Pest Management in Food Distribution Warehouses" and "Integrated Pest Management in Retail Food Stores", and has others in preparation. This will tend to move the industry in this direction. IPM is a hot issue with USDA and EPA but neither knows as yet how to get it off the ground. We are now seeing the appearance and development of private enterprise as urban pest management consultants. Examples are American Management Company, a division of American Hospital Supply Corporation. This involves primarily what we know as just good sanitation, housekeeping and maintenance procedures and practices. They contract with hospitals for complete housekeeping services including IPM for hospitals under contract.

Our speaker could see urban IPM more at the federal level and a scrambling for federal funds at this time. He does not see any compounding of the regulatory process where IPM is involved at this stage. The consensus of opinion seems to be that there is nothing really new in the area of urban IPM at this stage.

NPCA is emphasizing 6 basic steps as essential to the types of IPM programs for which they have developed releases:

- (1) Inspection of premises
- (2) Identification of existing pests
- (3) Assessment of the extent of pest problems
- (4) Determination of appropriate control procedures (both pesticide and non-pesticide), sanitation, housekeeping
- (5) Evaluation of treatment
- (6) Communication with client

NPCA is currently developing technical releases on IPM for (1) retail food stores, (2) restaurants and cafeterias, (3) bakeries, (4) meat processing plants, and (5) bottling plants.

STRUCTURAL PEST CONTROL - Research Activities (4:50 p.m.)

Dr. Richard G. Price, Professor of Entomology, Department of Entomology, Oklahoma State University, Stillwater, Oklahoma

Dr. Price noted they have been doing very little recently in the way of structural pest control research. In 1971 they worked on the development of nozzles and spray patterns for pest control. In this work they used fluorescent dye sprays on poster board to determine spray pattern, drift and pressure. They found that spraying at the rate of 2 1/2 feet/ second at 20 psi produced the most satisfactory pattern with least amount of drift. Slow speeds and higher pressures resulted in excessive runoff, splatter and drift.

In 1973 the EPA came out with crack and crevice guidelines. To simulate a typical crack and crevice and to evaluate nozzles and nozzle heights, they set up an adjustable crack depth (height) and width with the sprayer mounted on a small movable trolley. Crack and crevice treatment was affected by nozzle type and height held. They found that crack width had very little effect on cockroach mortality. The amount of spray deposited on the inside of the crack and mortality depended upon the height of nozzle (distance from the crack). Increase in height resulted in decreased deposit and mortality. Highest mortality of the German cockroach resulted when using crack and crevice nozzles inserted 4 mm. inside the crack. They tested 2 types of crack and crevice nozzles and a fan-spray nozzle. They found that anytime they got away from the crack (opening) their control went way down. Fan-spray nozzle control was nil. Pressure had little bearing as did width of crack. He recommended placing the crack and crevice nozzle in the crack for best results.

In another series of tests applying sprays to heavily soiled surfaces in unsanitary conditions, they obtained no satisfactory results with any material, although the best results were obtained using "Coca Cola" syrup as a spray additive. The better results probably indicate only that the syrup acted as an attractant bait. Dr. Price presented his interesting report under very adverse circumstances as the projector for his slides failed to show up in time.

Ed. Note: The following published papers are included in the Association Proceedings:

Rogers, R., L. O. Roth and R. G. Price. Mar. 1973. Spray patterns and drift from PCO hand sprayers. Pest Control 41(3): 24, 26 & 28.

Karner, M., R. G. Price and L.A. Roth. Feb. 1978.* Jour. Econ. Ent. 71(1): 105-106. * Laboratory evaluation of crack and crevice treatment for control of Blattella germanica by using various nozzle types, nozzle heights and crack widths.

The Session adjourned at 5:05 p.m.

Wednesday morning, 24 October

CALL TO ORDER, ANNOUNCEMENTS, 8:25 a.m.

FEDERAL PESTICIDE TRANSPORTATION REQUIREMENTS,

Mr. Gary Wilson, Safety Hazards Branch, Oklahoma State Department of Transportation, Oklahoma City, Oklahoma

Mr. Wilson's presentation was regretably and unavoidably cancelled due to an emergency.

STRUCTURAL PEST CONTROL ENFORCEMENT PROBLEMS (8:30 a.m.)

Panel discussion. Panelists: _____ Messrs. Orin Ray Elliott, Supervisor, Roger Hostenbach, Inspector, James L. Igleheart, Inspector, and Dale O. Laubach, Director, Plant Industry Division, Oklahoma Department of Agriculture

Mr. Igleheart related that it has been necessary for their agency to expend considerable law enforcement effort toward investigation, case preparation and prosecution to eliminate fly-by-night, "confidence game" operators particularly in the greater metropolitan areas. They proceed by means of the special investigator's close working relationship with District Attorneys' offices. They have been very successful in bringing about prosecutions and convictions in the District Courts. The key to this success has been the good relations established with prosecuting officials, the District Attorneys, and referring only solid cases to them. Statistical data may be found in Oklahoma's report included in the Association Proceedings.

Mr. Laubach noted that his Division had been able to increase its enforcement staff from 8 to 28 inspectors to cover 15 laws by combining 2 divisions. He attributed their accomplishments in law enforcement to the (1) high rate of coverage and visibility now possible, and (2) Board hearings and license cancellations. He explained that they randomly collect pretreatment tank-mix specimens for chemical analysis as they found the public was getting "ripped-off" on some pretreats. The inspectors make a case by getting all the facts and putting them together. Key factors involve training their people and building a solid case. There is no easy way to do this. They have encountered a problem with false termite (clearance) certificates in real estate transactions. The law provides that a certificate shall not be false. Mr. Laubach lamented that it is difficult for the industry to obtain good employees. Some firms do not provide good, effective first-line supervision.

Their agency uses written warning letters, builds a file. All companies, large or small, receive the same even-handed treatment.

Mr. Igleheart noted that most of their PCO's are good, honest, reputable business men. There is a tendency, that must be avoided by regulatory officials, to look at the pest control industry as a bunch of crooks when you handle complaints day-in and day-out. This is not true. (The crooks are in the minority).

Mr. Carlton (Louisiana) emphasized the difficulty of getting, training and keeping good employees as experienced in his and other states. He decried the business of taking people's money when the operator was unable to field competent, trained service personnel to do the work.

Mr. Laubach noted that they use 30-day warning letters to correct work deficiencies.

Mr. Elliott added that Oklahoma is trying to require that each 10 employees be supervised by a certified operator (applicator). At the present time the law requires only one certified applicator per company for the entire state.

All termite jobs must be reported by name and address of property treated and type of structure. They randomly select a certain number for inspection. Mr. Elliott pointed out that theoretically one should find 550 ppm (active ingredient) in soil samples if applied according to label directions. They have found anywhere from 0 to 2,000 ppm, and have established 100 ppm as the break point below which the treatment is considered to be inadequate. This is the amount which has also been set in Georgia and Mississippi (and North Carolina?).

Mr. Elliott continued, they use and require filing of a standard complaint form, 491 of which had been received this year as of 23 October 1979. They also use a Consent of Access form to be signed by the property holder in non-complaint cases where the PCO has a problem and requests help. They try to get out and help the company should they request it. There is a statement on their standard complaint form that the complainant will cooperate. (Mr. Laubach commented that this makes the complainant "fish or cut bait").

Mr. Igleheart stated that the DA in Oklahoma County (Oklahoma City) has made it clear he wants only winnable cases -- no hostile witnesses, especially the property owner. He takes this position because it is the property owner who has allegedly been damaged. If the complainant won't come forward and cooperate the case is not handled. They have established good working relationship with the DA's; they bring only good, solid, winnable cases to them. They sometimes find it necessary to use informants in their investigations and it takes time to build confidence. The names of informants are kept strictly confidential and they are referred to only by a code number. It often takes 6 months to a year to build a solid case. In some fraud cases the "con" man doesn't use anything, not even water. Many of these cases call for a well-trained "special investigator".

Mr. Igleheart said that formerly their inspectors were looked upon as nit-pickers on the "good guys" because they were easy to find but that this has changed. They are now respected for impartial across-the-board enforcement. One conviction is worth a 1,000 investigations because the word gets around and they begin to read the label.

Mr. Dean Garwood (Kansas) noted that Kansas law enforcement and prosecuting authorities now welcome and appreciate their help and expertise in prosecuting cases. Therefore, it is essential and has paid off to build good working relationships.

Mr. Igleheart added that they refer certain complaints to local police departments.

Mr. Laubach noted that if investigation or inspection reveals no problem, the company receives a letter to that effect and a statement that no violation was found. He also said they do sit down with a company for informal conferences as this is educational.

Mr. Charlie Chapman (Texas) advised that they follow this procedure -- informal request conferences. (Ed. Note: Florida does likewise).

Mr. Laubach commented that they are without authority under Oklahoma law to require restitution of moneys although they may informally suggest this as a possible alternative the company may wish to consider to resolve the complaint. Further, they do not have power of arrest.

Mr. Elliott advised that they are taking it easy as long as they can to consider the matter of recertification until the overall picture clears. Oklahoma law (or State Plan?) requires recertification every 3 years. Their Board has authority to implement recertification which may include training up to reexamination.

Mr. Barry Patterson (New Mexico) asked for industry comment on EPA's Federal Register Notice on recertification.

Mr. Charlie Hromada (Terminix, Memphis, Tennessee) submitted that it was "horrible". Mr. Patterson agreed, as did others. Mr. Hromada added that the industry was generally opposed to reexamination as such but that continuing education-type training programs were acceptable in-house or out-of-house.

Mr. L. O. Nelson (AAPCO, Indiana) remarked on the continuing certification unit process indicating that the certified individual be given the option (of training or reexamination). It noted that it is a relatively complex issue. He firmly believes that the answer is education and training in the long term. Suggested we give the individual the benefit of the doubt and allow training/education as proof of competence.

We are charged with the responsibility to see that industry has qualified people doing the work. However, this is also a company responsibility. How are you going to do this? Where does the happy medium lie?

Ed Note: That either education or testing should be a state option to be used with discretion appeared to be the consensus of opinion of the members in session.

COFFEE BREAK; 10:45 a.m.

PESTICIDE SAMPLING TECHNIQUES and EQUIPMENT, (10:55 a.m.)

Mr. Kendall Jeffress, Director, Laboratory Division, Oklahoma Department of Agriculture

Mr. Jeffress described and demonstrated a new pesticide sampling-collection procedure which the agency has been using for about 18 months with very satisfactory results. Either 10 or 50 ml. "Vacutainer" tubes (mfd by Becton-Dickinson Company and available from normal suppliers) fitted with rubber stoppers are used, although they are searching for a larger size sample container.

Besides the sample containers, the equipment needed consists of disposable 10 or 18 gauge hypodermic syringe needles and polyethylene tubing. The needle, connected to the tubing of sufficient length (to reach bottom of container or tank being sampled and run into the tank to be sampled), is inserted through the rubber stopper. The vacuum (suction) created pulls the sample through the tubing into the sampling tube(s). The needle is removed and the tubes holding the samples are ready for shipment in Styrofoam shipping boxes supplied with the tubes.

The beauty of the procedure is multiplex: it minimizes spillage and personnel exposure; eliminates cross-contamination; storage, transportation and disposal are no problem. Their laboratory has encountered no problem with PCB contamination from the rubber stoppers. Field inspectors normally sample tank-mixes by happenstance. They also collect concentrate samples. They draw from 1 to 5 samples. Costs of samples thus collected were reported as 35¢ and \$1.15 for small and large collection tubes respectively. They have a turn around time of about 10 days.

Discussion:

L. O. Nelson (AAPCO, Indiana) commented that a 15 per cent variation from label guaranteed active ingredient statement is considered acceptable.

Mr. Jeffress responded that Oklahoma considers a 20 per cent ± variance acceptable by administrative discretion (guidelines).

Mr. Robert McCarty (Mississippi) commented there was a need for standardization of sampling techniques.

Mr. Barry Patterson (New Mexico) noted the inconsistencies in results obtained from tank-mix samples. This is apparently due to such factors as aging, pH of water, time elapsed from collection to analysis, and technique used.

Mr. Igleheart (Oklahoma) reported from the standpoint of the field inspector there was no muss, no fuss and that it was the best field sampling tool their people have ever had. It virtually eliminates health hazards such as spillage, exposure of personnel. He added that a chain of custody record accompanies each sample. The technique appeared to be acceptable to the District Attorney.

Mr. Laubach (Oklahoma) commented that it was the best thing they have come up with. They have run into no problems to date although there have been no court tests to date.

REPORTS FROM STATES, 11:30 a.m.

There being limited time available for State Reports, President Dick Carlton called for such reports to begin at this time. (Ed. Note: The Proceedings of the Association meeting were prepared by Mr. Ray Elliott's office (thanks to his efficient Secretary) and for the first time were distributed at the meeting. The Proceedings include detailed reports from all states attending (except Delaware and West Virginia), as well as reports submitted by states in absentia (Michigan and Tennessee). Therefore, the only State Report included here is that from the State of Delaware which was submitted too late to be included in the Proceedings).

Mr. Charlie Chapman reported for the STATE of TEXAS at this time due to early departure (see the Association Proceedings for details).

ADJOURN FOR LUNCH, 1205 p.m.

Wednesday afternoon, 24 October

REPORTS FROM THE STATES CONTINUED, 1:00 p.m.

The following states reported in order at this time:

ARIZONA - Ms. Betty B. Sisk
DELAWARE - Mr. H. Grier Stayton (see attached report)
NEW MEXICO - Mr. Barry Patterson (Out of order due to early departure)
NORTH CAROLINA - Mr. Rudy E. Howell (Out of order due to early departure)
ARKANSAS - Mr. Don Alexander

ADJOURN for FIELD TRIP to NATIONAL COWBOY HALL OF FAME, Oklahoma City (2:05 p.m.)

All members spent a most enjoyable and educational afternoon visiting this world famed, first-rate attraction.

Thursday morning, 25 October

REPORTS OF THE STATES CONTINUED, 8:15 a.m.

The following states reported in order at this time:

FLORIDA - Messrs. F. Robert Du Chanois and Warren T. Frazier
GEORGIA - Mr. James Herron
INDIANA - Mr. L. O. Nelson, who also represented AAPCO, as that Association's Secretary
KANSAS - Mr. H. Dean Garwood
CANADA - Mr. Murray Wood, Ontario Ministry of Environment
LOUISIANA - Mr. Richard Carlton
ILLINOIS - Mr. Harvey J. Dominick
MISSISSIPPI - Mr. Robert H. McCarty
MISSOURI - Mr. John Hagan
NEVADA - Mr. Lawrence E. Blalock
SOUTH CAROLINA - Mr. Neil Ogg
OKLAHOMA - Mr. Orin Ray Elliott
VIRGINIA - Mr. Charles G. Rock

FINAL BUSINESS MEETING (in the order of consideration)

President Richard Carlton called the Business Meeting to order at 10:00 a.m.

Election of officers: It was moved by Neil Ogg (South Carolina), seconded by John Hagan (Missouri) that the current slate of officers be retained in office for the coming year. Motion passed unanimously.

Officers of ASPCRO for 1979-80: Richard Carlton (Louisiana), President; Barry Patterson (New Mexico), Vice President; and F. R. Du Chanois (Florida), Secretary.

Old business: None

New business:

The following important item of business was taken up during a brief business session interlude on Wednesday afternoon, 24 October, and appears here due to its significance:

Mr. Rudy Howell reaffirmed his cordial invitation to the Association to hold its 20th Annual Meeting in the State of North Carolina in 1980. Mr. Howell's invitation was unanimously and gratefully accepted. The dates and site will be announced.

On behalf of Dr. John A. Mulrennan, Jr., Director, Office of Entomology, Department of Health and Rehabilitative Services, and the agency, F.R. Du Chanois invited the Association to consider meeting in the State of Florida in October 1981.

It was moved by Neil Ogg (South Carolina), seconded by F. R. Du Chanois (Florida) that written State Reports be submitted at the beginning of each annual meeting for inclusion in The Association Proceedings of that meeting, and further that any additional notes or information to be presented orally be included in the written report. Motion passed unanimously.

President Carlton called for a Report of the Resolutions Committee composed of Robert McCarty, Chairman (Mississippi), Don Anderson (Arkansas) and Barry Patterson (New Mexico): The report consisted of two resolutions both of which are appended in final form as adopted. Mr. McCarty then read Resolution I of the report and moved its adoption. Seconded by F. R. Du Chanois (Florida). The motion carried unanimously.

Mr. McCarty then read Resolution II of the report and moved its adoption. The motion carried with it a recommendation that a copy of Resolution II be sent to the Administrator and Assistant Administrator of the U.S. EPA; to the Executive Secretary, NASDA; to the Executive Director, National Pest Control Association; and to the President of the Association of American Pesticide Control Officials. The motion was seconded by F. R. Du Chanois. The motion carried unanimously. (Ed. Note: Resolution II was mailed to all intended recipients by the Secretary on 1 November 1979).

There ensued a discussion of the desirability of initiating Association dues. It was suggested by F. R. Du Chanois (Florida) that in the interest of maintaining the long-standing informality of the organization and the possible problem some states might encounter in budgeting and obtaining approval for funding dues payments that this matter be tabled for further consideration and study should the actual need for dues arise. Mr. Charles Rock (Virginia) concurred in this suggestion. It was decided informally that no action be taken at this time.

On the matter of meeting registration fees, discussion indicated considerable sentiment for advance registration fees. There was no apparent objection to

this suggestion. It was decided without apparent dissent to allow the registration fee to remain flexible and to leave the amount and means of handling to the discretion of the host state.

It was submitted that annual dues would allow the Association to be self-supporting and provide funds to cover operating and meeting expenses and thus ASPCRO would not be dependent on industry for complimentary contributions. The question arose as to the possible conflict of interest from inviting industry to participate and, more specifically, from accepting contributions such as hospitality hours, meals, refreshments and the like. No particular problem was reported to have arisen in this connection. Discussion indicated this was more a matter of the appearance of conflict rather than actual conflict. Since there has been and is no compulsion whatsoever on industry to contribute in any way and it is a matter of voluntary and mutually beneficial cooperation, it could not be concluded from the discussion that the members saw a real problem. Be that as it may, no definitive action was taken at this time.

Mr. Ray Elliott (Oklahoma) recommended that the host state announce the dates and sites of the annual meeting and distribute program (or preliminary programs) as far in advance as reasonably possible to permit states to plan ahead and have sufficient time to obtain travel approval to attend. Mr. Elliott stated that he had thoroughly enjoyed having each and everyone at the meeting and invited all to visit their fair State of Oklahoma again soon (or maybe it was "Sooner").

Mr. McCarty (Mississippi) suggested a timely and important topic for next year's meeting would be a presentation and discussion of (preconstruction) soil treatment poison sampling practices and standards.

President Dick Carlton expressed his sincere appreciation to Mr. Elliott and his associates, on behalf of all the members, for all they had done to make the meeting such an enjoyable and outstanding success.

There being no further business the meeting was adjourned at 11:07 p.m.

7 November 1979 Respectfully submitted FRDC, Secretary

RESOLUTION ADOPTED

AT

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS ANNUAL MEETING

OKLAHOMA CITY, OKLAHOMA

23-25 October 1979

RESOLUTION I

WHEREAS, the 19th Annual Meeting of the Association of Structural Pest Control Regulatory Officials was a tremendous success, and

WHEREAS, the site of this meeting was in the most pleasant and hospitable State of Oklahoma, and

WHEREAS, the organization and substance of this meeting was most useful and informative,

NOW, THEREFORE, BE IT RESOLVED, that the members of the Association of Structural Pest Control Regulatory Officials in annual session at Oklahoma City, Oklahoma, on October 25, 1979, express and extend their most hearty appreciation to the Host State of Oklahoma, to the host officials of the Oklahoma Department of Agriculture, Commissioner Jack D. Craig, Plant Industry Division Director Dale O. Laubach, Plant Industry Division Supervisor Ray Elliott and all members of his staff, all guest speakers, industry hospitality sponsors and the Management of the Skirvin Plaza Hotel.

RESOLUTION ADOPTED

AT

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS ANNUAL MEETING

OKLAHOMA CITY, OKLAHOMA

23-25 October 1979

RESOLUTION II

WHEREAS, Section 26 of the Federal Insecticides, Fungicide and Rodenticide Act (FIFRA) provides that States meeting certain criteria shall have primary enforcement responsibility, and

WHEREAS, Section 26 of FIFRA provides for regulations implementing these provisions, and

WHEREAS, the U.S. Environmental Protection Agency (EPA) has been operating under a January 9, 1979 enforcement policy letter developed without public input,

NOW, THEREFORE, BE IT RESOLVED, that in annual session at Oklahoma City, Oklahoma, on October 25, 1979, the Association of Structural Pest Control Regulatory Officials urges the Administrator of EPA to promulgate Section 26 implementing regulations with maximum input from the States, private industry and the public sector.

DELAWARE STATE REPORT

TO THE ASSOCIATION OF STRUCTURAL
PEST CONTROL REGULATORY OFFICIALS

SUBMITTED BY: H. Grier Stayton, Pesticide Compliance Supervisor

Delaware passed its first version of a Pesticide Law in 1971 and a revised version in 1976. The 1976 amendments and revisions required certification of applicators of restricted use pesticides, licensing of commercial pesticide businesses, record keeping requirements, etc.

The Department's pesticide section is staffed with my supervisor, Robert C. Berry, Director, one inspector, one secretary and myself, Compliance Supervisor.

Since the summer of 1977 the Department has certified 1,950 private applicators and 822 commercial applicators.

With their foresight the writers of the Law did not require recertification of applicators - with the following exceptions:

1. An applicator's license was revoked
2. E.P.A. required additional standards
3. Significant technological advances have occurred

At this time there are no immediate plans for recertification in Delaware.

The registration of pesticide products was initiated under the 1971 Pesticide Law and has remained unchanged with the exception of an increase in fees. The Department currently has 4200 products registered at the rate of \$15.00/ product.

For 1979 the Department has requested and received twenty (20) 24(c) Special Local Need registrations, with one related to structural pest control: Residex Lindane 20% Emulsifiable for powder post beetle.

Five (5) Section 18 Crisis Exemptions have been issued - all on agricultural related commodities.

Licensing of commercial Pesticide Businesses has progressed from April 1978 to the point we now have 140 licensed businesses in the state. Approximately 50% of these are structural pest control companies.

Most of the problems faced by the pesticide section at this time, involve the ability to readily enforce the law. This problem stems from the section of the law granting exclusive jurisdiction to the Superior Court. This is a problem because:

1. Superior Court has an extensive backlog
2. The Department's assigned Attorney is shared with several other large agencies and cannot devote time to the minor violations encountered

3. As a result of this, and the fact that all violations under the Act are misdemeanors, it is difficult to attract the Attorney General's office to these cases, unless there may be an underlying motivation.

The matter has been discussed with the Attorney General's office and there should be some revisions in the making. When the revisions are added there is a willing sponsor in the State Legislature to introduce the measures and hopefully by 1980 we'll have some teeth in the Law.

There has been one enforcement action prosecuted under the Pesticide Law in 1979. A guilty plea was entered by a chemical distributor for the sale of adulterated, misbranded, and non-registered pesticides. They were fined \$2,000.

Other enforcement actions under the Law include a total of 21 Notices of Warning, 2 letters of Reprimand, and 2 Stop Sale, Use and Removal Orders.

Under State Law inspection activities our section is beginning the use of two new report forms. They are the Pesticide Business License report and Restricted Use Pesticide Dealer report.

Dealers of restricted use pesticides are required to report monthly on sales of these chemicals to the attention of our office, showing the date of sale, applicator name and certification number, quantity and formulation of the pesticide.

EPA

Under EPA guidance and funding for 2 years, Delaware has been committed to the following annual outputs:

1. A total of 55 samples
2. 3 producer establishment E.I.'s and samples
3. 35 market place inspections/ 25 samples
4. 15 Ag Use Observations/ 10 samples
5. 20 Non Ag Use Observations/ 20 samples
6. 2 Experimental Use Permit Monitorings/ 2 samples
7. 20 applicator licensing inspections
8. 35 Dealer/Applicator record inspections

The Department has had no problem with meeting and/or exceeding these commitments with the exception of producer establishment samples. Delaware has 12 registered producer establishments; however, only 3 actually produce any pesticide.

Regarding EPA grant reporting, we submit monthly, quarterly, mid-year and final evaluation reports.

Under the grant we have been able to remodel and equip our State Lab. The lab is not quite complete at this time - the chemist position is not filled and training is needed before samples can actually be run. The Virginia State Lab is currently supplying us with sample analyses and have been doing an excellent job.

Funding from the grant has also permitted the purchase of 2 cars, office equipment and a microfiche reader/printer which has been of great value.

The administration at our Department is also looking at the purchase of a mini-computer for various department uses - among them programming of pesticide applicators, registrants and licensed commercial businesses.

STATE OF DELAWARE
Department of Agriculture
P.O. Drawer D
Dover, Delaware 19901
24 October 1979

October 23, 1979

TO: STRUCTURAL PEST CONTROL REGULATORY OFFICIALS
FROM: RAY ELLIOTT, PROGRAM CHAIRMAN

A meeting of the Structural Pest Control Regulatory Officials was held in the Crystal Room of the Skirvin Plaza Hotel, Oklahoma City, Oklahoma October 23, 1979 with the following people present:

<u>NAME</u>	<u>REPRESENTING</u>	<u>ADDRESS</u>
Don Alexander	Arkansas State Plant Board	Little Rock, Arkansas
M. L. "Andy" Anderson	U. S. Env. Protection Agency	Dallas, Texas
William J. Arnold	Dow Chemical Company	Pasadena, California
Jerry Barker	Okla. Dept. of Agriculture	Oklahoma City, OK
Lawrence E. Blalock	Nevada Department of Agri.	Reno, Nevada
Lucien "Skip" Capone III	North Carolina Attorney General	Raleigh, NC
Richard Carlton	State Dept. of Agriculture	Baton Rouge, Louisiana
Robert Chada	State Dept. of Agriculture	Oklahoma City, OK
Charlie Chapman	Texas Pest Control Board	Austin, Texas
Jack D. Craig	State Dept. of Agriculture	Oklahoma City, OK
Harvey J. Dominick	Illinois Department of Public Health	Springfield, Illinois
F. R. Du Chanois	Florida Dept. of HRS	Jacksonville, FL
Ray Elliott	Dept. of Agriculture	Oklahoma City, OK
Dr. Newton W. Flora	Dept. of Agriculture	Oklahoma City, OK
Warren T. Frazier	Florida Dept. of HRS	Jacksonville, FL
H. Dean Garwood	Kansas Board of Agriculture	Topeka, Kansas
Lyle Gingerich	Velsicol	Chicago, Illinois
John Hagan	Dept. of Agriculture	Jefferson City, MO
James Harron	Dept. of Agriculture	Atlanta, Georgia
Jim Haskins	MDAC-DPI Mississippi	Miss. State, MS
Bill Howell	Howell's Pest Control	Yukon, Oklahoma
Rudolph E. Howell	Dept. of Agriculture	Raleigh, N. Carolina
Charles Hromada	Terminix International	Memphis, Tennessee
James Igleheart	Dept. of Agriculture	Oklahoma City, OK
Roger Hoestenbach	Dept. of Agriculture	Oklahoma City, OK

<u>NAME</u>	<u>REPRESENTING</u>	<u>ADDRESS</u>
Kendall Jeffress	State Dept. of Agriculture	Oklahoma City, OK
Larry Klinke	Orkin Exterminating	Dallas, Texas
Dale O. Laubach	State Dept. of Agriculture	Oklahoma City, OK
Jim Lea	Dept. of Agriculture	Jefferson City, MO
Robert McCarty	Dept. of Agriculture	Mississippi State, MS
Jack Murphy	Orkin Exterminating	Oklahoma City, OK
L. O. Nelson	AAPCO	West Lafayette, IN
Neil Ogg	Plant Pest Reg. Service	Clemson, S. Carolina
Barry Patterson	Dept. of Agriculture	Las Cruces, NM
John Perdue	Dept. of Agriculture	Charleston, W. Virginia
Ken Pinkston	Oklahoma State University	Stillwater, OK
Richard Price	Oklahoma State University	Stillwater, OK
George W. Rambo	National Pest Control Assn.	Vienna, VA
Charles G. Rock	Dept. of Agriculture	Richmond, VA
R. M. Russell	Orkin Exterminating	Atlanta, GA
Bob Scopel	Oklahoma Pest Control Assn.	Oklahoma City, OK
Betty B. Sisk	State of Arizona	Tempe, Arizona
H. Grier Stayton	Dept. of Agriculture	Dover, DE
Dean B. Swiney	Redwing Exterminating	Durant, OK
Ray Willcox	Terminix International	Anaheim, California
Murray Wood	Ontario Ministry of Environment	Toronto, Canada
A. Jack Grimes	National Pest Control Assn.	Vienna, VA

State Reports were submitted by the following and copies are attached for your convenience: Arizona, Arkansas, California, Canada, Florida, Georgia, Illinois, Indiana, Kansas, Louisiana, Michigan, Mississippi, Missouri, Nevada, New Mexico, North Carolina, Oklahoma, South Carolina, Tennessee, Texas, and Virginia.

It has been a pleasure being your program chairman this year and I hope your visit has been an enjoyable one. I look forward to seeing you at our next annual meeting.

DRAFT AGENDA

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS

1979 ANNUAL MEETING

TUESDAY

OCTOBER 23, 1979

0800 - 0900	Registration	
0900 - 0915	Announcements & Introduction of Members and Guests	
0915 - 0945	Welcome	Jack D. Craig Commissioner, OSDA
0945 - 1015	Response	Bob Scopel, Owner, Redwing Ext. Inc., President, Oklahoma Pest Control Assn.
1015 - 1030	Break	
1030 - 1100	<u>EPA Enforcement Grants</u> <u>A States' Viewpoint -</u> Pros and Cons - Lessons Learned	Dr. Newton W. Flora Asst. State Entomologist, OSDA
1100 - 1130	<u>EPA Enforcement Grants</u> <u>A Regional Viewpoint -</u> Pros and Cons - Lessons Learned	
1130 - 1200	<u>EPA Activities Update</u> <u>Questions and Answers</u>	EPA Region VI
1200 - 1315	Lunch	
1315 - 1415	Chlordane - The California Situation (Panel Discussion)	Lyle Gingrich, Velsicol, 341 E. Ohio St., Chicago, IL 64141 Ray W. Wilcox, Technical Supervisor, Terminix California, Suite 128, 421 N. Brookhurst, Anaheim, CA 92801 Rodney Stein, Dept. of Food & Agri., State of California

1415 - 1430	Break	
1430 - 1530	FHA & VA Closing Certificates and NPCA Activities Report	Dr. Geo. Rambo Div. Tech. Opns. NPCA, 8150 Leesburg Pike, Vienna, VA 22180
1530 - 1630	Structural Pest Control Research Activities - Urban IPM	Dr. Richard Price Prof. of Ento OSU Dr. Ken Pinkston, Extension Entomologist, OSU

WEDNESDAY

OCTOBER 24, 1979

0830 - 0930	Federal Pesticide Transportation Requirements	Gary Wilson Safety Hazards Br. Okla. St. Dept. of Trans
0930 - 1030	Structural Pest Control Enforcement Problem (Panel Discussion)	Okla. State Dept. of Agriculture Plant Industry Staff
1030 - 1130	TBA	
1300 - 1700	State Reports	State Representatives

THURSDAY

OCTOBER 25, 1979

0830 - 1100	State Reports Continued Business Meeting
1100	Adjourn



STATE DEPARTMENT OF AGRICULTURE
PLANT INDUSTRY DIVISION

DALE O. LAUBACH
DIRECTOR

July 18, 1979

JACK D. CRAIG
COMMISSIONER

Melvin Tucker, Director
Plant Industry Division
P.O. Box 1069
Little Rock, AR 72203

Oklahoma is hosting the 1979 annual meeting of the Association of Structural Pest Control Regulatory Officials, October 22, 23, 24, and 25, 1979.

Facilities for this meeting have been reserved with the Skirvin Plaza Hotel, Number One Park Avenue, Oklahoma City, Oklahoma 73101. A block of fifty rooms have been set aside for our use during this meeting. The schedule of rates is as follows:

Government Employees: Singles \$19.00 Doubles \$27.00
Each additional person \$8.00

Industry Representatives Wishing to Attend:

Singles	\$28.00	\$31.00	\$35.00	\$42.00
Doubles	\$36.00	\$39.00	\$43.00	\$49.00

Reservations must be received by the Hotel at least fourteen (14) days prior to the meeting to guarantee room availability.

A reservation card is enclosed for your convenience. Also enclosed for your information are some brochures of things to see and do in the area.

A program will be coming approximately September 1, 1979. Plan on attending the meeting so that we may share our interests, problems, solutions, and expertise. If possible bring the family, we would love to see them. I hope to see you here in October.

Sincerely,

Ray Elliott, Supervisor
Plant Industry Division
(405) 521-3883

slw
enclosures

Leave 10:16 A m

10-22

Return 5:15 P m

10-25-79

Oklahoma City Convention
and Tourism Commission
Three Santa Fe Plaza
Oklahoma City, Oklahoma 73102
For 24 Hour Information
Dial 232-2211

Places of Interest



try our brand
of western
hospitality

NATIONAL COWBOY HALL OF FAME AND WESTERN HERITAGE CENTER, 1700 N.E. 63rd, 73111 478-2250

Admission: \$2.00 Adults, \$1.00 Children under 12. Group rates available with prior arrangements. Open summer 8:30 a.m. - 6 p.m. September-May 9:30 a.m. - 5:30 p.m.

OKLAHOMA ART CENTER, 3113 Pershing Blvd. (State Fairgrounds) 73107, 946-4477

Admission: \$1.00. Open Tuesday thru Saturday 10 a.m. - 5 p.m.; 1 p.m. - 5 p.m. Sunday. Art and craft exhibitions.

OKLAHOMA CITY ZOO, N.E. 50th and Eastern, 73111, 424-3344

Admission: \$1.00 Adults, 50¢ Children under 12. Group rates available with prior arrangements. Open daily 9 a.m. - 6 p.m.; 9 a.m. - 8 p.m. Saturday and Sunday. For "Sunset Safari" information and special programs available, write: Oklahoma City Zoo, Educational Department, Rt. 1, Box 478, Oklahoma City, OK 73111.

NATIONAL SOFTBALL HALL OF FAME, 2801 N.E. 50th, 73111, 424-5266

Admission: 50¢ Adults, 25¢ Children. Open daily 9 a.m. - 5 p.m.; 12 noon - 5 p.m. Saturday and Sunday. Houses the National Headquarters of the Amateur Softball Association.

OKLAHOMA HERITAGE CENTER, 201 N.W. 14th, 73103, 235-4458

Admission: \$1.50 Adults, \$1.00 Children under 12. Open 9 a.m. - 5 p.m. Monday thru Saturday, 1 p.m. - 5 p.m. Sunday and holidays. Elegant early-day mansion, completely restored, containing its original furnishings. Includes galleries of the Oklahoma Hall of Fame.

OKLAHOMA FIREFIGHTERS MUSEUM, 2716 N.E. 50th, 73111, 424-3440

Admission: \$1.00 Adults, 50¢ Children 6-12. Under 6 free with adult. Open seven days a week 10 a.m. - 5 p.m. Features samples of restored antique firefighting equipment of the State of Oklahoma. Group rates available with prior arrangements.

OKLAHOMA HISTORICAL SOCIETY, 2100 N. Lincoln Blvd., Wiley Post Building, 73105 521-2491

Admission: Free. Open 8 a.m. - 9 p.m. Monday thru Friday; 8 a.m. - 6 p.m. Saturday; 1:30 - 4:30 p.m. Sunday. Indian archives open every other Saturday, 8 a.m. - 12 noon. Groups must have appointments. Museum is on third floor.

OKLAHOMA STATE CAPITOL, N.E. 23rd and Lincoln Blvd., 73105, 521-3356

Admission: Free. Open daily 8 a.m. - 4:30 p.m. Tours hourly or by appointment. Contact Hank Wade at the Capitol Information Center.

OMNIPLEX & PLANETARIUM (Kirkpatrick Center) N.E. 52nd and Eastern, 73111, 424-5561

Admission: Omniplex, \$1.50 Adults, 75¢ Children thru age 12. Open 10 a.m. - 5 p.m. Monday thru Saturday; 12 noon - 6 p.m. Sunday. The Southwest's largest "hands-on" science and arts museum. Planetarium rates: \$3.00 Adults; \$1.50 Children thru age 12. Rates for Planetarium include admission to Omniplex.

OKLAHOMA MUSEUM OF ART, 7316 Nichols Road, 73120, 840-2759

Admission: \$1.00 Adults, under 18 free. Open Tuesday thru Saturday 10 a.m. - 5 p.m.; 1 p.m. - 5 p.m. Sunday. A renovated early-day mansion on a beautiful estate in prestigious Nichols Hills. Changing exhibits and art classes.

45th INFANTRY DIVISION MUSEUM, 2145 N.E. 36th, 73112, 424-5313

Admission: Free. Open Tuesday thru Friday 9 a.m. - 5 p.m.; 1 p.m. - 5 p.m. Saturday and Sunday. Displays of old and modern artillery. Tells the story of the Oklahoma Militia, the Oklahoma National Guard and the 45th's participation in World Wars I and II and the Korean War. Items taken from Hitler's apartment on display.

FRONTIER CITY, U.S.A., 11601 N.E. Expressway (I-35 North), 73111, 478-2412

Admission: \$2.50 general admission, or \$5.00 for all rides. Summer hours: 10 a.m. - 10 p.m. Shops, museums, train, stage and pony rides, gunfights, relics. Picnic area for tourists. Children's prices available. Open daily Memorial Day - Labor Day.

SPRINGLAKE FAMILY FUN PARK, 1800 Springlake Drive, 73111, 424-1405 (call for hours open)

Admission: \$5.75 pay one price including rides and shows, \$1.00 general admission, 5 years and under free admission, pay as you ride. Open Memorial Day thru Labor Day Thursday thru Monday. Closed Tuesday and Wednesday. Group catering, arcade, gift shop, miniature golf course, rides, picnic pavilion. Special family rates Monday and Thursday.

OKLAHOMA SYMPHONY ORCHESTRA, Civic Center Music Hall, 200 N. Dewey, 73102, 232-4292

Series of concerts from October thru April each year in the Civic Center Music Hall in downtown Oklahoma City. Call for current schedule. Pop series also staged.

GASLIGHT DINNER THEATRE, 2804 N.W. 122nd, 73120, 751-4343

Dinner theatre plays Tuesday thru Sunday. Doors open 6:30 p.m. Dinner 7 p.m. - 8 p.m. Show time 8:30 p.m. Sunday show is two hours earlier. Call for reservations.

LYRIC SUMMER THEATRE, Oklahoma City University, 2501 N. Blackwelder, 73112, 525-5411

Summer season of top musicals performed nightly, 8 p.m. Call for reservations.

OKLAHOMA THEATER CENTER, 400 W. Sheridan, 73102, 239-7333

A series of plays October thru April at the center. Two auditoriums. Call for current run and prices.

SPORTS. Oklahoma City 89ers Baseball, Oklahoma City Stars Hockey, Oklahoma City University and Oklahoma Christian College Basketball, National Finals Rodeo and other events throughout the year.

OKLAHOMA CITY TOUR O' THE TOWN. A motor coach tour of points of interest in Oklahoma City leaves Monday thru Friday at 1 p.m. from the Oklahoma City Convention and Tourism Center at the corner of Main and E.K. Gaylord. Free parking is available under the Myriad Convention Center for tour patrons. Passengers are also picked up at I-40 and Meridian at the Hilton Inn West at 12:20 p.m., and at the Holiday Inn West and Ramada Inn West at 12:30 p.m. The three-hour tour includes the State Capitol complex, the National Cowboy Hall of Fame and Western Heritage Center, Heritage Hills and many other points of interest. \$6.50 per person adult, \$4.00 for children and senior citizens. For further details call 232-2211, or contact the COPTA offices for group rates, 2 Santa Fe Plaza, 73102, 235-7433.

PLEASE NOTE: ALL PRICES AND HOURS ARE SUBJECT TO CHANGE.



STATE DEPARTMENT OF AGRICULTURE
PLANT INDUSTRY DIVISION

August 31, 1979

DALE O. LAUBACH
DIRECTOR

JACK D. CRAIG
COMMISSIONER

Dear Sir:

Recently Ray Elliott asked me to present a short paper on the pro's and con's of the EPA Pesticide Enforcement Grant program as seen from the states' viewpoint.

We have some ideas of our own but believe a more valuable report could be presented by summarizing the views of several states.

It will be very helpful if you would complete the enclosed questionnaire and return to us as soon as possible.

Sincerely,

A handwritten signature in cursive script that reads "Newton W. Flora".

Newton W. Flora
Oklahoma State Department of Agriculture
310 N. E. 28th
Oklahoma City, Oklahoma 73105

NWF/slw
enclosure

EPA PESTICIDE ENFORCEMENT GRANT QUESTIONNAIRE

NAME _____

STATE _____

1. Number of years you have had your grant. 1 _____ 2 _____ 3 _____
2. Have you had any problems fulfilling proposed outputs? Yes _____ No _____
If yes, list these. _____
3. Has grant proposal review by EPA been completed on time? Yes _____ No _____
4. Have EPA payments for work completed been (1) on schedule _____ (2) late _____
5. Have you had (1) excellent _____ (2) good _____ (3) poor _____ support from the EPA regional personnel.
6. Do you use (1) state forms _____ (2) federal forms _____ (3) combination of both _____ in carrying out this program.
7. Have you computerized your pesticide registration: Yes _____ No _____
Sampling: Yes _____ No _____ Misuse Investigations: Yes _____ No _____
Pesticide Classification: Yes _____ No _____
8. Can you determine whether misuse of pesticides have (1) declined _____ (2) remained same _____ (3) increased _____ as a result of this grant.
9. Has certification and training of pesticide applicators improved the work quality in your state? Yes _____ No _____
10. Estimate the increase in workload of the inspector as a result of this program. (1) 10% _____ (2) 20% _____ (3) 30% _____ (4) More than 30% _____
11. Has the grant improved the pesticide enforcement program in your state? Yes _____ No _____
12. How many additional laws and/or programs do your inspectors work? _____
13. Has the quality of inspections (1) improved _____ (2) declined _____ as a result of the enforcement grant?
14. Do you license dealers in your state? Yes _____ No _____
15. Rate the attitude of your inspectors toward the federal grant.
(1) Excellent _____ (2) Good _____ (3) Fair _____ (4) Poor _____
16. How many years has your state had regulatory laws relative to the pesticide registration and use? _____
17. What aspects of your program would suffer most if the federal grant funds were lost? _____
18. List any shortcomings of the federal grant program as you see it. _____

INFORMATION FOR PRESENTATION AT

ANNUAL MEETING OF ASPCRO

OKLAHOMA CITY, OKLAHOMA

OCTOBER 23 - 25, 1979

REPORT OF ACTIVITIES UNDER THE NORTH CAROLINA STRUCTURAL PEST CONTROL
LAW AND RULES AND REGULATIONS DURING THE PERIOD FROM JULY 1, 1978 TO
JUNE 30, 1979.

I. Licensees, I.D. Card Holders and Certified Applicators:

A. Licenses - 3 types (P - household pests, W - wood-destroying
organisms, and F - fumigation)

(1) Number of license exams given: 315

90 (29%) Exams passed
225 (71%) Exams failed
Total: 315

(2) Number of operators licensed: 425

<u>Operators</u>	<u>License Phase</u>
28	P
24	W
2	F
311	PW
59	PWF
<u>1</u>	PF
Total: 425	

(3) Number of Companies represented by licensees: 288

<u>No. of Companies</u>	<u>Company Name</u>	<u>No. of Licensees</u>
1	Orkin Ext. Co., Inc.	49
1	Terminix Co.	29
1	Southern Pest Control, Inc.	10
1	Dodson Bros. Ext. Co., Inc.	7
2	Companies w/ 4 licensees/ea.	8
7	Companies w/ 3 licensees/ea.	21
26	Companies w/ 2 licensees/ea.	52
<u>249</u>	Companies w/ 1 licensees/ea.	<u>249</u>
Totals: 288		425

(4) Number of female license holders: 5

(5) Number of operators who did not renew their license(s):
17

<u>Operators</u>	<u>License Phase</u>
1	P
1	W
14	PW
1	PWF
Total: <u>17</u>	

B. Number of Operator's Identification Card holders (Registered employees of licensees): 1,389

C. Certified Applicators (Certification phases same as license phases):

(1) Number of certification exams given: 1,314

778 (59%) Exams passed
536 (41%) Exams failed
 Total: 1,314

(2) Number of applicators certified: 517

<u>Applicators</u>	<u>Certification Phase</u>
127	P
19	W
27	F
206	PW
92	PWF
45	PF
1	WF
Total: <u>517</u>	

(a) Number of applicators with commercial pest control industry (Employees of licensees): 237

<u>Applicators</u>	<u>Certification Phase</u>
34	P
9	W
5	F
153	PW
33	PWF
3	PF
Total: <u>237</u>	

(b) Number of applicators not with commercial pest control industry: 280

<u>Applicators</u>	<u>Certification Phase</u>
93	P
10	W
22	F
53	PW
59	PWF
42	PF
1	WF
Total: <u>280</u>	

1. Employers of applicators not with commercial pest control industry:

<u>Employer</u>	<u>No. of Applicators</u>
Government	115
Private Industry	156
Self-Employed	9
Total:	<u>280</u>

(3) Number of female certified applicators: 22

II. Inspections:

A. Termite Jobs

(1) Number of jobs inspected:	<u>1,917</u>	
(2) Number of jobs substandard:	<u>508</u>	(26%)
(3) Number of jobs from which soil samples were taken and tested:	<u>1,631</u>	
(4) Number of jobs deficient in toxic chemical:	<u>129</u>	(8%)
(5) Number of licensees whose jobs were sampled and tested:	<u>277</u>	
(6) Number of licensees whose jobs were deficient in toxic chemical:	<u>69</u>	(25%)

B. Chemical, Records, and Equipment

(1) Number of inspections made:	<u>488</u>	
(2) Number of inspections substandard:	<u>78</u>	(16%)
(3) Number of operators inspected:	<u>308</u>	
(4) Number of operators substandard:	<u>60</u>	(19%)

III. Reinspection Fees (\$10.00 for 1st reinspection; \$25.00 for 2nd reinspection; \$50.00 for 3rd and each additional reinspection):

Number of reinspection fees charged:	<u>584</u>
Number of licensees charged reinspection fees:	<u>193</u>

IV. Action taken against Violators:

A. Number of licensees who appeared at a hearing before the N. C. Structural Pest Control Committee:	<u>18</u>
(1) Number of operators whose licenses were suspended:	<u>2</u>
(2) Number of operators whose licenses were revoked:	<u>0</u>
B. Number of unlicensed operators tried in court:	<u>14</u>
(1) Number of operators convicted:	<u>13</u>
(2) Number of operators who received active prison sentences:	<u>3</u>