

PROGRAM PERSONNEL

James Arceneaux - President ASPCRO,
Louisiana Dept. of Agriculture
Roy Clark - Chief Pesticide & Toxic
Substances Branch, Environmental Pro-
tection Agency
Jack Grimes - Government Affairs,
National Pest Control Association
Jack Hoxie - Sales Representative,
Velsicol Chemical Corp.
Charles Hromada - Service President,
Terminix International
Judy Page - Product Registration
Manager, Dow Chemical Co.
Bob Russell - Government Affairs,
Orkin Pest Control
Dr. Sheldon White - Division of
Technology and Sales, Cooks Pest
Control
Dr. Charles Wright - Dept. of
Entomology, University of North
Carolina State

* * * SPONSORS * * *

TERMINIX INTERNATIONAL INC.

Hospitality Hour - Reception
On The Evening of Sept. 24th

ORKIN EXTERMINATING CO., INC.

Hospitality Hour - Reception
On The Evening of Sept. 25th

Cooks Pest Control Inc.

Dow Chemical Co.

Hill-Smith Exterminating Co.

National Pest Control Asso.

Red Wing Exterminating Co., Inc.

Simmons Pest Control Inc.

Southern Mill Creek

Taylor Enterprises

Velsicol Chemical Co.

River Cruise/Dinner On
The Evening of Sept. 26th

Ciba-Geigy Chemical Co.

Tennessee Valley Exterminating Co.

Refreshment Breaks

Opryland U.S.A.

Tour of Pest Control Program
On The Afternoon of Sept. 26th

ASSOCIATION

OF

STRUCTURAL PEST CONTROL

REGULATORY OFFICIALS

* * * * *

24th

ANNUAL MEETING

SEPT. 25, 26, 27, 1984

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MUSIC CITY ROADWAY INN

BRILEY PARKWAY AT I-40

NASHVILLE, TENNESSEE

* * * * *

1984 ASPCRO OFFICERS

James Arceneaux - President

David Shriver - Vice President

Jim Harron - Secretary

* * * * *

PROGRAM COORDINATORS

David Barnes

Knox Wright

AUG 15 1984

* * * P R O G R A M * * *
 ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS
 24th ANNUAL MEETING
 Sept. 25, 26, 27, 1984
 MUSIC CITY ROADWAY INN
 NASHVILLE, TENNESSEE
 * * *

MONDAY, SEPT. 24, 1984

5:00 P.M. . . . Registration-Registration Fee \$25.00

6:30 P.M. . . . Hospitality Hour
 * * *

TUESDAY, SEPT. 25, 1984

A.M.

8:00 Registration
 8:30 Call to Order - President James A. Arceneaux
 8:45 Welcome - Knox Wright
 9:00 Judy Page - Dow Chemical Co., Product
 Registration Manager - Dursban T.C.
 9:30 Bob Russell - Orkin Pest Control - Industry and
 States Cooperating in the Changing of State
 Pesticide Laws
 10:00 BREAK
 10:30 Roy Clark - EPA - Termiticide Up-Date
 11:00 Charles Hromada - Terminix International
 Aldrin
 11:30 Dr. Sheldon White - Cooks Pest Control
 Pesticide Decontamination
 12:00 LUNCH

P.M.

1:30 Jack Grimes - NPCA - FIFRA Section 2(EE)
 2:00 Jack Hoxie - Velsicol - Chlordane Up-Date
 2:30 BREAK
 3:00 State Reports - (10 Min. Limit)
 4:00 Group Discussion
 1. Registering Service Technicians and
 Apprenticeship Programs
 2. How Reliable is Air Sampling Analysis?
 3. Regulating Wood-Destroying Beetle
 Treatments
 4. Using Pesticides at Less Than Label Rate
 5:00 ADJOURN
 5:00 HOSPITALITY HOUR

WEDNESDAY, SEPT. 26, 1984

A.M.

8:30 Dr. Charles Wright, N.C. State - Residues of
 Termiticides After Standard Treatments on
 Surfaces and in Ambient Air of Houses
 9:30 State Reports
 10:00 BREAK
 10:30 State Reports
 12:00 LUNCH

P.M.

1:30 Activities
 1. Tour of Pest Control Program, Opryland
 USA - Max Dillard - Pest Control Director
 2. Country Music Tour
 5:00 River Cruise and Dinner (Meet in Lobby)

THURSDAY, SEPT. 27, 1984

A.M.

8:30 Committee Meetings
 9:30 Committee Reports
 10:00 BREAK
 10:30 Business Meeting (Asso. Members Only)
 11:00 ADJOURN

Minutes of the 24th Annual Meeting of the Association
of Structural Pest Control Regulatory Officials

The Association of Structural Pest Control Regulatory Officials met for their 24th annual meeting at the Music City Roadway Inn, Nashville Tennessee from September 25 to 27, 1984. Fifty one state regulatory officials from twenty seven state regulatory agencies were represented.

The meeting was called to order on September 25, 1984 at 8:30AM by President James A. Arceneaux. Mr. Knox Wright of the Tennessee Department of Agriculture welcomed the members to Tennessee

Ms. Judy Page of Dow Chemical Company presented information on the efficacy, toxicology, air monitoring and deactivation of Dursban T.C.

Mr. Frank Hackett of Orkin Exterminating Company stated that the scheduled speaker, Mr. Robert Russell, of Orkin Exterminating Company was ill and would not be able to appear.

Ms. Denise Stephens of the New York Department of Environmental Conservation presented information on the termiticide issue in New York State. She gave the history of the problem, the current status and information on proposed regulations.

Mr. Kent Williams of the Environmental Protection Agency spoke for Mr. Roy Clark. Mr. Williams addressed a number of subjects including information on enforcement, product registration, the cluster review of termiticides and the risk/benefit report on the termiticides.

Mr. Charles Hromada of Terminix International welcomed members to Terminix International's home state. He then presented an update on Aldrin including information on ground water contamination, acute toxicity, air monitoring studies, and label changes. He also stated that Terminix International favors the restricting of all termiticides.

Dr. Sheldon White of Cooks Pest Control addressed the members on pesticide decontamination. He cited an actual case in which his company cleaned up a large number of structures that were contaminated with Aldrin. He urged the members to work with the pest control industry in solving problems of this nature.

Mr. Jack Grimes of the National Pest Control Association addressed several issues including application of termiticides at less than label rates, minimum qualification and training requirements for operators and the issue of right to know.

Mr. Jack Hoxie of Velsicol Chemical Corporation presented an update on Chlordane. As a part of this presentation Mr. Rick Blewitt commented on the New York State hearings.

The following states then gave their annual report. Arkansas, Arizona, Maryland, Illinois and West Virginia.

A group discussion was then held on the following topics.

1. Registering service technicians and apprenticeship programs
2. How reliable is air sampling analysis?
3. Regulatory wood destroying beetle treatments

The meeting was then adjourned for the day.

The meeting was called to order again at 8:30AM on September 26, 1984 by President James Arceneaux.

Dr. Charles Wright of North Carolina State University spoke on residues of termiticides in structures after treatment. Included in his presentation was information on methodology and equipment for sampling.

NOTE:

Several members requested that Dr. Wright furnish a list of publications on this subject. The furnished list is attached to the minutes.

The following states then gave their annual report. South Carolina, New Mexico, Kentucky, Virginia, Mississippi, Kansas, Georgia, Tennessee, North Carolina, Alabama, Oklahoma, Texas, New York, Florida and New Jersey.

The meeting was then adjourned for the day. The afternoon was spent at Opryland USA touring their pest control activities.

The meeting was again called to order at 8:30AM on September 27, 1984 by President James Arceneaux.

Mr. Dave Shriver made a motion to dispense with the remaining state reports in order to conclude with all necessary Association business. Copies of all remaining reports are to be sent to Secretary for publication with the minutes. This motion was seconded by Mr. Lonnie Mathews and passed by the members.

Committee reports:

By Laws - No report - The president will appoint a new committee at a later date
Industry/Relations - Robert McCarty - No report
Executive Board - No report

Business Meeting:

Mr. Don Alexander made a motion for the Secretary to purchase a tape recorder in order to have a permanent record of each meeting. The motion was seconded by Mr. Robert Mesecher and passed by the members.

President James Arceneaux suggested that the Secretary prepare only brief minutes of the meeting and that only the states that attend the meeting be sent copies of the state reports.

The treasurer report was submitted. Motion was made by Mr. David Ivey to accept the report as submitted. The motion was seconded by Mr. Robert Mesecher and passed by the members.

Resolutions Chairman Mr. Neil Ogg submitted recommended resolutions to the members. (See attached report)

The State of Louisiana has agreed to host the 1985 Association of Structural Pest Control Operators meeting.

The meeting was adjourned at 11AM.

RESOLUTION ADOPTED

AT

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS

NASHVILLE, TENNESSEE

25-27 SEPTEMBER 1984

RESOLUTION I

WHEREAS, the 24th Annual Meeting of The Association of Structural Pest Control Regulatory Officials (ASPCRO) was outstandingly successful, and their success was possible through the diligence and kindness of our hosts, the Environmental Control Section, Division of Plant Industry, Tennessee Department of Agriculture, and its very capable staff, particularly David Barnes, Knox Wright, and John Hammett, Director, in providing excellent facilities, program content, and entertainment; and

WHEREAS, the Music City Rodeway Inn, Nashville, Tennessee provided excellent facilities and hospitality contributing to the success of the meeting; and

WHEREAS Terminix International, Inc., provided the excellent reception-hospitality hour on the evening of September 25th, 1984; and

WHEREAS, Cooks Pest Control, Inc., Dow Chemical Company, Hill-Smith Exterminating Company, National Pest Control Association, Red Wing Exterminating Company, Simmons Pest Control Inc., Southern Mill Creek, Taylor Chemical Company provided the pleasant River Cruise on the evening of September 26, 1984; and

WHEREAS, Ciba-Geigy Chemical Company, and Tennessee Valley Exterminating Company kindly provided the appetizing refreshments during the program breaks;

NOW, THEREFORE, BE IT RESOLVED, That the Association of Structural Pest Control Regulatory Officials, through written and personal appreciation of these individuals and joint contributions to this meeting and through each of its officers and members, express its sincere thanks and gratitude to all those

parties and individuals for an excellent meeting and a very pleasant stay
in the State of Tennessee

Done this 27th day of September 1984.

RESOLUTION ADOPTED

AT

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS

NASHVILLE, TENNESSEE

25-27 SEPTEMBER 1984

RESOLUTION II

WHEREAS, many state laws prohibit the use of pesticides at less than label recommendations, and

WHEREAS, the pesticide using industry supports use of termiticides at less than label rate at the discretion of the applicator, and

WHEREAS, certain manufacturers of termiticides are holding to the recommended label rate and others are supporting a specified rate range;

NOW , THEREFORE, BE IT RESOLVED, that the Association of Structural Pest Control Regulatory Officials supports the concept that the label rate should be followed without exception and that a specific prohibition against use at less than the label rate be stated on the label; and

FURTHER, be it resolved that the Association of Structural Pest Control Regulatory Officials urges the manufacturers of termiticides to implement this concept immediately and Environmental Protection Agency incorporate these requirements in its Label Improvement Registration Standards Programs for termiticides.

Done this 27th day of September 1984.

RESOLUTION ADOPTED

AT

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS

NASHVILLE, TENNESSEE

25-27 SEPTEMBER 1984

RESOLUTION III

WHEREAS, a number of Association of Structural Pest Control Regulatory Officials member states and the National Pest Control Association have implemented or recommended the training, competence verification, and registration of service technicians and sales personal, and

WHEREAS, this training, competence verification, and registration of service techincians and sales personnel will

1. Establish a mechanism to identify individuals in each state who are physically applying the pesticides
2. Place an appropriate measure of education and responsibility on the individuals applying pesticides
3. Further demonstrate knowledge of safe and effective pesticide application
4. Tend to reduce the large percentage of service technician turnover

WHEREAS, Association of Structural Pest Control Regulatory Officials is the principal and only National Association dealing soley with the Structural Pest Control industry, and

NOW, THEREFORE, BE IT RESOLVED, that the Association of Structural Pest Control Regulatory Officials officially endorse and solicit positive action within the philosophical framework of its member states to implement the concept of training, competence verification and registration of service technicians and sales personal.

Done this 27th day of September 1984.

RESOLUTION ADOPTED

AT

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS

NASHVILLE, TENNESSEE

25-27 SEPTEMBER 1984

RESOLUTION IV

WHEREAS, the funding for pesticide applicator certification and enforcement programs has decreased annually and the demands in each of these areas has continued to increase due to additional demands of the public, and the Environmental Protection Agency; and

BE IT RESOLVED, that the Association of Structural Pest Control Regulatory Officials urge the Environmental Protection Agency to increase certification, enforcement and training to allow for the maintenance of a viable program by the state regulatory agencies and the Cooperative Extension training program.

Done this 27th day of September 1984.

RESOLUTION ADOPTED

AT

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS

NASHVILLE, TENNESSEE

25-27 SEPTEMBER 1984

RESOLUTION V

WHEREAS, the pesticide manufacturing and applicator industry, the Association of Structural Pest Control Regulatory Officials and the Environmental Protection Agency are proceeding with development of standard advisory and enforcement language on pesticide labels, and

THEREFORE, BE IT RESOLVED, that the Association of Structural Pest Control Regulatory Officials support the concept of deleting unenforceable, meaningless and confusing language on pesticide labels and supports a movement by the Environmental Protection Agency to require pesticide label terms consistent with terms existing within FIFRA and state laws.

Done this 27th day of September 1984.

RESOLUTION ADOPTED

AT

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS

NASHVILLE, TENNESSEE

25-27 SEPTEMBER 1984

RESOLUTION VI

WHEREAS, the federal and state governments provide adequate regulatory control of the sale and use of pesticides, and

WHEREAS, current governmental programs have in place statues, personnel and facilities available to respond to educational and enforcement needs regarding the sale and use of pesticides, and

WHEREAS it is clearly stated in the congressional record that the House and Senate Agricultural Committees rejected proposals to allow units of government below the state level to regulate pesticides, and

WHEREAS such regulation would provide a duplication of action,

NOW, BE IT THEREFORE RESOLVED, that the Association of Structural Pest Control Regualtory Officials without discouraging cooperation of enforcement does not support regulation of pesticide sale and use by units of government below the state level.

Done this 27th day of September 1984.

RESOLUTION ADOPTED

AT

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS

NASHVILLE, TENNESSEE

25-27 SEPTEMBER 1984

RESOLUTION VII

WHEREAS, Environmental Protection Agency has established its responsibility to insure that the use of federally registered pesticides consistent with label directions will not result in adverse health effects, and

WHEREAS, recent sampling of ambient air levels of certain termiticides after a "by the label" treatment demonstrates the presence of levels exceeding the guidelines established by National Academy of Science (NAS), and

WHEREAS, the National Academy of Science guidelines were established for a three year period while additional toxicological data were developed, and

WHEREAS, this three-year period has expired and some new data has been generated, and

THEREFORE, BE IT RESOLVED, that the Association of Structural Pest Control Regulatory Officials requests Environmental Protection Agency to solicit from National Academy of Science a new study to address guidelines for long-term, and, especially, short-term exposure to ambient air levels of termiticides.
Done this 27th day of September 1984.

ARIZONA REPORT
TO THE
ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS
SEPTEMBER 25, 26, 27, 1984
NASHVILLE, TENNESSEE

Betty W. Koff

Since October, 1965, Arizona pest control operators have been licensed under the Structural Pest Control Law. The current law provides for the licensing of an individual who qualifies a business entity to engage in the practice of structural pest control and for the certification of applicators to use or supervise the use of a restricted use pesticide. We presently have 406 licensed companies and 1,266 certified applicators.

The licensee must qualify with two years practical experience or in lieu of that, one year and twelve semester college credits and then must pass an examination to become a licensee for a company. Applicators must pass an examination in order to become certified and then may legally apply or supervise the use of restricted use pesticides.

The Board is composed of five members; three industry and two public. The Board is short one industry member at this time since an industry board member resigned to become an inspector. This was effective April, 1984 and the Governor has not made an appointment to replace him. The public member reappointment was made July 1, 1984 for another five year term.

The office staff has also increased with the addition of another typist and computer operator. A computer/word processor was purchased in October, 1983 and at present, the complete federal program has been programmed, entered, and is on-line working. The computer and addition of personnel have increased the efficiency of the Board.

Several rules were added this past year. In October, 1983, an amendment was approved that requires all termiticides be applied in the specific quantities, strength or dosages designated by the labeling. In March, 1984, the

recordkeeping rule was also amended requiring the company to include "amount of chemical" in their records in addition to the material used.

A rule has been proposed concerning requirements for subterranean termite post-treatment to insure all applications shall be performed in a professional and workmanlike manner. This proposed rule is pending further input from the public and study by the Board.

The sunset review report was submitted to the legislature in September, 1983. The review team determined that the Board had met its objectives and purposes effectively and efficiently, however, they recommended that the Board clarify licensure structure, revise the licensure fee structure to make fees equitable based on company size and allow the Board to issue administrative warnings.

Procedural recommendations were submitted by the review team to strengthen and regulate the industry, strengthen enforcements to better protect the public, and change the fee structure, making it more equitable.

Legislation in the 36th Legislature (S.B. 1297) was passed and will become effective January 1, 1985. Some of the changes effective on that date are a new fee structure, provision for a business license and a qualifying party license, registration of branch offices, training and registration of each employee, continuing education requirement for qualifying parties and applicators and a bond or insurance policy rider in the amount of \$5,000, in addition to the \$200,000 bond or insurance presently required, that must be maintained by all companies licensed for termite control.

Rule amendments are being drafted and studied at the present time to conform to the statutory changes and will be submitted for approval in October.

This has been a very busy and productive year. The Board, after many attempts in the past to address deficiencies in the statutes that prevented it from fulfilling its statutory mandates, has been successful and is now in a better position to respond to the public and regulate the industry.

Commercial Pest Control Section

Don Alexander, Head
Kiven Stewart, Supervisor

Martha Starks, Secretary
Gina King, Clerk Typist

Inspectors
Harold Conklin, John Lansdale, Archie Vaughn, Blake Greenway

The Pest Control Section is charged with carrying out the Arkansas Pest Control Law. Any person engaging in pest control work in Arkansas must be licensed by this section. A person licensed to perform pest control work in Arkansas must have first been fully qualified through reference checks and passing of category and EPA Core examinations. Those persons licensed are then inspected routinely to make sure they are performing properly. The heaviest load of inspection is performed in Structural Pest Control. Other duties are investigations of unlicensed individuals performing pest control. These offenders are prosecuted with the assistance of local law officials. This section has one pest control inspector supervisor, four full time inspectors, one secretary and one clerk typist assigned to it for the purpose of enforcing the Pest Control Law.

Structural pest control work takes up most of our time. The Pest Control Section has set a high goal of routinely inspecting 1/3 of all work performed by the structural pest control industry. A shift in work area such as EPA Enforcement of pesticide application and uses, property owners request for inspection, follow up inspection on substandard work and investigations of unlicensed operators has greatly inhibited accomplishment of this goal. All of the functions performed are equally as important as the 1/3 inspection. We are applying more time and frequency of inspection on companies not performing properly. We have had a substantial increase in properties treated for structural pest this fiscal year. We still have a small number of companies continuing to do the bulk of the substandard work; consequently, they are inspected closer than other companies. Over all the majority of the companies have shown improvement in their work. The same factors contribute to substandard work which is unskilled labor, lack of inhouse company control and supervision by licensed operators.

148 licensed structural pest control companies reported 26,676 termite and other structural pest control jobs performed for the fiscal year ending June 30, 1984. A total of 4,163 properties were inspected by the staff and are broken down as follows:

- 2,976 - Jobs inspected routinely
- 353 - Jobs inspected at homeowners request
- 772 - Reinspections of substandard work
- 57 - Requests for prior approval of substandard work
- 5 - Other inspections (household pest)

616 reports of substandard work were issued on properties inspected routinely. 37 were found infested with termites and reports of substandard work were issued. 156 of the 353 properties inspected on request were found to be substandard. The staff feels that solving the problems associated with property owners requests is one of our most important functions. All infested or substandard work has been corrected at no further expense to the property owner.

Pest Control Hearings: Hearings before the Pest Control Committee of the Plant Board are afforded pest control operators to show cause why their licenses should not be revoked or suspended, or to state their cases in matters of dispute with the staff. 4 companies were called in for license revocation hearings during the year. 2 of these companies licenses were revoked. 2 companies were placed on probation and increased surveillance was ordered by the Pest Control Committee of the staff. The Pest Control Committee invites operators in for a non-adversary review of the record to determine if further action is warranted. 2 pest control companies were invited to such a hearing. These companies have been placed on increased inspections.

Illegal Pest Control Investigations: 26 investigations of alleged unlicensed pest control services were made. 15 warrants were obtained for individuals performing pest control work without a license. Fines ranged from \$50.00 to \$1,000.00. Several other investigations of individuals performing pest control work without a license have been made but not enough evidence was found to prosecute.

EPA Enforcement: The Pest Control Section has increased output reporting under enforcement for all quarters of FY 83 grant. The increased reporting is due to reports of substandard work found through routine inspections of pest control operators. When pesticide application is required on a report of substandard work the reinspection or inspection is considered a use observation. 945 such pesticide use observation inspections have been performed this year, 43 use dilution samples, 81 residual samples, along with 498 record checks and 300 pest control operator visits have been accomplished.

Examinations: 210 examinations were given to 131 prospective pest control operators in one or more of the 12 classifications. Those meeting Plant Board requirements were issued licenses to perform work in the respective classifications.

Kind of Work	Passed Exam	Failed Exam
Basic EPA Certification	47	3
Termite and Other Structural Pest	10	19
Household Pest	19	18
Rodent Control	18	16
General Fumigation	6	6
Ornamental Tree and Turf Pest	8	6
Weed Control	9	7
Golf Course	2	0
Food Mfg. Processing and Storage	7	3
Food Related Fumigation	5	1

At the present time 619 individuals have been certified and/or licensed in the 12 Plant Board categories or classifications. An individual may be certified/licensed in more than one category. Each licensed operator may register agents or solicitors to work under his direct supervision. The licensed operators have registered 972 agents and 81 solicitors.

Although our work increased this year, we are well aware that more planning is needed for the upcoming year. Several areas of our state need more inspections because of shifts in new home construction as well as a considerable increase in work on existing homes in most of the state. We feel the public has again benefited greatly from our efforts as well as the industry serving the public.

DELAWARE STATE REPORT
~~PART II - CERTIFICATION~~ TO ASPRO
1984

I. MANAGEMENT OF THE PROGRAM

- A. The DDA is responsible for certifying applicators that have been determined to be competent in the use of restricted use pesticides.
- B. The enforcement program and certification program is managed by the Pesticide Compliance Supervisor.

Problem areas identified by the priority-setting process are discussed with the Delaware Extension Service for inclusion in pesticide applicator training course material. Also, the DDA participates in training courses and addresses problem areas at these meetings.

II. LEGISLATION

- A. As discussed earlier, the DDA amended the Rules and Regulations on July 1, 1984. These rules require Commercial applicators to pay a \$10.00 annual certification fee. In addition, applicators in Ag Plant (1A), Ornamental and Turf (3), and Structural Pest Control (7), must show evidence of at least 8 hours training in the three years preceding their annual renewal. They have the option of being re-examined.

These regulations should result in more involved and better trained applicators.

- B. Legislation will be introduced in FY85 to designate a "Certification Fund" for pesticide applicator certification fees to be deposited into. This fund will be used to off-set administrative costs and to assist in training costs when needed. Fees presently are deposited into the State General Fund.

Rules and Regulations will be revised sometime in November of 1984 to allow for the categorization of Wood Treatment pesticide applicators. This will require a new sub-category "7B" to permit the use of the recently restricted wood preservatives.

III. QUANTITATIVE PROGRAM PROFILE

- A. Costs for certifying commercial and private pesticide applicators is estimated at \$17,420 per year. These costs are:

Supplies	\$ 500.00
Contractual	
Mail	2,700.00
Computer	5,700.00
Travel	200.00
Personnel	8,320.00
<hr/>	
TOTAL	\$17,420.00

- B. A total of 41 training sessions attended by Delaware pesticide applicators were approved by DDA for recertification credits in FY84.
- C. DDA is required to submit an annual report pursuant to 40 CFR 35.786(b). This report is attached.

IV. QUALITATIVE PROGRAM PROFILE

- A. Historically, the pesticide programs, at both the Federal and State levels, have experienced difficulty in demonstrating that the certification program is increasing the degree of compliance with pesticide control restrictions. Base line data is not available upon which to demonstrate compliance. It is the opinion of pesticide regulatory officials that applicators are more knowledgeable about the safe use of pesticides as a result of certification requirements. However, the data needed to determine a trend in just not available.
- B. Delaware has a well managed, well organized training, certification and recertification program. Applicators are offered good training course material. Standards of competency exceed the minimum requirements of FIFRA and trainee test results reflect the adequacy of the testing.

STATE OF GEORGIA
1984

Structural Pest Control Operations in the State of Georgia are governed by the Georgia Structural Pest Control Act of 1955. This law established the Structural Pest Control Commission, created requirements for licensing and certification, and set treatment standards.

This law is currently undergoing its first complete rewrite since 1955. The first draft was prepared in our office. It was then submitted to the Commission and has now been forwarded to our State Association for their comments. We hope to have the rewrite completed and adopted within the next few months.

We have just completed our first year of the Department of Agriculture handling licensing certification and testing. Previously this function had been handled by the Office of Secretary of State. We have found that one agency can handle the program more effectively than two.

As of June 30, 1984 the State of Georgia had 565 licensed Pest Control Companies, 850 Certified Operators certified in one or more categories of household pest control, wood destroying organisms or fumigation, and 3800 ID cards for employees.

During our fiscal year, 90,777 wood destroying organism jobs were reported along with 34 fumigations. The Department inspected 2,928 of these reported jobs and found 1,429 had one or more violations of the minimum treatment standards.

During this time 826 soil samples were taken and 466 of these fall below the required 100 ppm of insecticide and required retreatment. We have identified low soil samples, especially on pretreats, as our priority enforcement area for 1985. We intend to crack down on inadequate treatments by the pretreat industry.

The use of our State Wood Infestation Inspection Report has been in place since November 1, 1983. This form has cut down on problems caused by clearance letters.

The following regulating actions were taken during the past fiscal year. Sixteen formal hearings where a fine or other penalty was imposed were held. The fines totaled \$7700.00. Other penalties included requiring all service personal of a company to attend an approved training course. Also, 12 informal hearings were held, 24 warning letters were written and 5 illegal operators were investigated.

In January 1984 we received our first air sampling equipment. We have limited its use to cases involving misuses or where a health hazard exists.

STATE OF FLORIDA
ANNUAL REPORT TO ASPCRO

SEPTEMBER 1984

The Structural pest control industry in Florida is regulated by the Florida Department of Health and Rehabilitative Services' Office of Entomology by virtue of the authority granted by Chapter 482 F.S. and Chapter 10D-55 F.A.C..

The Office of Entomology headquartered in Jacksonville does not participate in an EPA enforcement grant and operates solely of fee revenues obtained from licensure and certification of pest control operators. Presently, our annual operating budget approaches half a million dollars.

There are approximately 1620 pest control businesses, 2800 certified operators and 14,500 pest control employees now licensed in Florida.

Seven Entomologist-Inspectors are stationed throughout the state to enforce compliance of the law and regulations. Plans are to add one additional Entomologist-Inspector in the South Florida area beginning in July 1985. More than 25% of all licensed pest control businesses in Florida are located in the two county area which include Miami and Ft. Lauderdale.

During this past fiscal year there was no new state legislation passed which affected the Florida Structural Pest Control Law or the allied Regulations.

It was an active year relative to enforcement. The Department initiated 133 separate enforcement actions consisting of 86 administrative fines ranging from \$25 - \$250, 4 suspensions,

2 revocations, 6 denials of application and 35 cease and desist orders to unlicensed operators. .

As a result of an amended law in 1982 the Department began issuing a quarterly disciplinary action report to the industry. Initially, the report only listed the number and type actions taken. As of January the report has been expanded to include names of individuals and pest control firms whom have had action taken against them. It is hoped that the publishing of names will act as a further deterrent to violations.

Termiticide related complaints, in comparison to last year at this time, have dropped off significantly. Still the leader as to type of consumer complaint are those which involve wood-destroying organism inspection reports issued for real estate sales.

The Office of Entomology is in the process of completing the conversion of pest control records to data processing. It is hoped that computerization will ultimately result in more efficient operation of the office particularly in regard to business license and pest control operator certificate renewals.

Ohio Department Of Agriculture 1984 Report To The
Association of Structural Pest Control Regulatory Officials

1984 was again a busy year for investigation of pesticide use misuse episodes. After a case load increase of nearly 50% from 1982 to 1983, we are pleased to see only a 15% increase in 1984. These increases appear to be influenced by news media attention to pesticides and toxic wastes and a resultant increase in the public awareness of these issues.

Through September 20, 1984, the ODA has received three hundred sixty-eight requests to investigate pesticide related problems. Currently we are using nearly 75% of our field personnel time to handle these investigations. We utilize a three category system which classifies investigations according to the following descriptions: verified pesticide damage or misuse, verified pesticide use without misuse or damage, and no verified pesticide involvement.

Currently the ODA has nearly sixty-five hundred persons licensed in our commercial certification area. The approximate breakdown of licensees among the four largest groups is as follows: agricultural - 1500, industrial vegetation - 1000, turf and ornamental - 2200, and structural pest control - 1200. These numbers are useful when comparing the number of licensed applicators with the number of pesticide use investigations involving each group. If investigations are associated with particular user groups, these numbers result. The numbers are listed as a percentage of total investigations in column one. Column two lists each pesticide user group as a percent of total commercial applicators.

TABLE A

User Group	Column 1	Column 2
Industrial Vegetation	7	15
Turf and Ornamental	12	33
Agricultural	25	23
Structural Pest Control	35	18
Other	21	11

Two additional factors further clarify these numbers. First, the numbers do not identify cases where pesticide damage or misuse is identified. Second, within the agricultural group approximately 25% of the investigations involved pesticide spills. For the turf and ornamental group, the spill total was over 45%, mostly motor vehicle accidents. Spill reports from the other two user groups represented less than 5% of the total investigations for each group.

The final step in analysis of our figures is to place the cases into a classification system.

In the following table, each type of investigation is listed as a percentage of total investigations. Investigations involving groups other than those identified are not listed here nor are final figures included for incomplete cases.

TABLE B

User Group	Misuse	Spill	No Misuse
Industrial Vegetation	3	1	4
Turf and Ornamental	3	5	3
Agricultural	8	6	9
Structural Pest Control	20	1	8

There are several new pesticide regulatory activities being handled by the ODA. New bulk pesticide handling regulations have been approved and phased implementation has begun. A migrant labor protection bill was passed by the state legislature and the required pesticide regulations are in the draft stage. New license categories for wood preservation and interior landscaping are in the process of being finalized.

1984 has been a busy year for Ohio groups on both sides of the pesticides and environment issue. Anti-herbicide coalitions have mounted a campaign to stop most roadside and utility right-of-way herbicide application. Some highway spray work was cancelled as a result. There did not appear to be any increase in complaints against industrial vegetation applicators despite the widespread publicity. Groups in several urban areas are attempting to develop local ordinances to regulate the lawn care industry. The news media attention to the lawn service regulation issue has resulted in an increased case load from the areas involved.

Many pesticide user groups are concerned about the increased public attention, but at this point no organized response has been made at the state level to clarify the situation, particularly as it relates to the existing state preemption of local pesticide licensing authority.

1984 REPORT
STRUCTURAL PEST CONTROL DIVISION
NORTH CAROLINA DEPARTMENT OF AGRICULTURE
FOR
PRESENTATION AT THE ANNUAL MEETING OF THE
ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS
SEPTEMBER 25-27, 1984
NASHVILLE, TENNESSEE

I. STRUCTURAL PEST CONTROL LAW AND RULES AND REGULATIONS:

The 1983 General Assembly did not make any changes in the Structural Pest Control Law during its first and second sessions. We do, however, plan to seek changes in the law during the first session of the 1985 General Assembly.

There was a piece of legislation enacted during the first session of the 1983 General Assembly which is expected to have a significant impact on rule-making by state agencies. This new law provides for the repeal of all existing rules and regulations, effective July 1, 1985. It also requires the rule-making agency to justify its rules and regulations before the General Assembly will approve them. In addition, a six-member Administrative Rules Review Commission has been created to review all new rules and regulations made on and after January 1, 1984. Rules and regulations can be delayed or vetoed by this Commission if the rule-making agency has exceeded its authority or if the rule is ambiguous or unnecessary.

II. RECERTIFICATION:

There have not been any changes in the recertification requirements during the past year. Licensed operators and certified applicators must be recertified every five years. Recertification can be accomplished by earning Continuing Certification Units (CCUs) of formal training anytime during the five-year period immediately preceding the expiration date of the individual's certification or by taking and passing a re-examination covering the appropriate phases(s) of structural pest control work. The vast majority of individuals seeking recertification opt for formal training in one or more of the twenty approved programs. During the past year, only about sixty percent of those who chose the re-examination passed on the first try.

III. ENFORCEMENT:

The law places the responsibility for enforcement under the Commissioner of Agriculture and provides for the creation of a Structural Pest Control Division within the Department of Agriculture. It also gives the Commissioner authority to appoint a division director, structural pest control inspectors and other employees and personnel of the division as are necessary to carry out the purpose and intent of the law. The division administers all examinations; issues licenses and certified applicator's identification cards; registers employees of license holders; and initiates legal action against unlicensed operators. The division has a staff of sixteen people consisting of a director, a four-member clerical staff, two field supervisors and nine inspectors.

IV. ACTIVITIES DURING 83-84 FY:

- a. Licensed Operators: 510 operators representing 350 companies
- b. Certified Applicators: 821 applicators (434 with pest control industry and 387 not with pest control industry)
- c. Operator's Identification Card Holders: 1209
- d. Inspections: (6,705 total)
 - (1) WDO Jobs Inspected: 2,722
 - (a) WDO Jobs from which soil samples were tested: 2,061
(5% deficient in toxic chemical)
 - (2) HPC Inspections: 7
 - (3) F Inspections: 17
 - (4) Pesticides, Equipment and Record inspections: 865
- e. Reinspection Fees: (\$5,010.00 total)
 - (1) No. of PCOs charged fees: 180
 - (2) No. of fees charged: 407
- f. Hearings before the Committee: (6 total)

(1) No. of Informal Hearings: 5

(2) No. of Formal Hearings: 1

(a) No. licenses suspended/revoked: 1 WDO license
suspended

(b) No. cards suspended/revoked: 3 cards suspended

(1) Three Operator's Identification Cards in WDO
phases

g. Court Cases: (11 total)

(1) No. of individuals convicted of violating law: 8

(a) No. of individuals given active prison
sentences: 1

One individual given 20-day sentence

Submitted By: Rudolph E. Howes

MISSISSIPPI

JULY 1, 1983-JUNE 30, 1984

TABLE 2A

ACTIVITIES UNDER THE REGULATIONS
OF
PROFESSIONAL SERVICES ACT

LICENSE CATEGORIES

1. Control of Termites and Other Structural Pests
 2. Control of Pests in Homes, Businesses, and Industries
 3. Control of Pests of Ornamental Plants, Shade Trees, and Lawns
 4. Tree Surgery
 5. Control of Pests of Orchards
 6. Control of Pests of Domestic Animals
 7. Landscape Gardening
 8. Control of Pests of Pecan Orchards
 9. Control of Pests by Fumigation
-
- A. Agricultural Weed Control
 - B. Aquatic Weed Control
 - C. Forest and Right-Of-Way Weed Control
 - D. Ornamental and Turf Weed Control
 - E. Industrial Weed Control

LICENSING ACTIVITIES

<u>License Category</u>	<u>Applications Received</u>	<u>Passed Exams</u>	<u>Failed Exams</u>	<u>New Licenses Issued</u>	<u>Licenses Current June 30, 1984</u>
1.	33	20	6	46	311
2.	42	23	10	51	326
3.	21	8	10	21	90
4.	14	13	1	13	94
5.	6	1	2	1	13
6.	1	1	0	2	4
7.	26	16	6	15	122
8.	14	5	5	8	19
9.	0	0	0	3	2
FUMIGATION	1	1	0	1	1
A.	8	2	3	4	13
B.	7	4	0	4	11
C.	11	4	4	5	20
D.	18	12	1	12	39
E.	13	4	4	8	30
TOTALS	215	114	52	194	1,095

Number of new identification cards issued to employees of licensed companies _____541

TABLE 2A

(Continued)

PERMITS

A permit shall mean a document issued by the Division indicating that a person has thorough understanding of the pest or pests that a licensee is licensed to control and is competent to use or supervise the use of a restricted use pesticide under the categories listed on said document at any branch office. A permit is not a license.

PERMIT CATEGORIES

1. Control of Termites and Other Structural Pests
 2. Control of Pests in Homes, Businesses, and Industries
 3. Control of Pests of Ornamental Plants, Shade Trees, and Lawns
 5. Control of Pests of Orchards
 6. Control of Pests of Domestic Animals
 8. Control of Pests of Pecan Orchards
-
- A. Agricultural Weed Control
 - B. Aquatic Weed Control
 - C. Forest and Right-Of-Way Weed Control
 - D. Ornamental and Turf Weed Control
 - E. Industrial Weed Control

PERMITS ISSUED

	<u>New Permits Issued</u>	<u>Permits Current June 30, 1983</u>
Category 1.	16	37
Category 2.	18	43
Category 3.	0	0
Category 5.	1	1
Category 6.	0	0
Category 8.	1	1
Category A.	0	0
Category B.	0	0
Category C.	0	0
Category D.	0	0
Category E.	0	0

TABLE 2A
(Continued)

STRUCTURAL PEST CONTROL TREATMENTS REPORTED BY LICENSED COMPANIES

<u>KIND OF TREATMENT</u>		<u>KIND OF STRUCTURE</u>	
Termite (existing structure)-----	22,039	Crawl Space-----	6,655
Termite (preconstruction)-----	9,817	Slab-----	5,404
Beetle-----	443	Combination Crawl & Slab-----	886
Other-----	215	New Construction-----	9,817
Inspections Made of Properties Treated for Structural Pests -----	1183		
Treatments Found to Be Satisfactory-----	876		
Treatments Found to Be Unsatisfactory-----	189		
Houses Inspected that had not been treated-----	118		
Action Taken Against Persons In Court-----	5		
Court Fines Assessed-----	\$1,900.00 and 105 days of jail(suspended)		

MICHIGAN REPORT TO ASPCRO
September 25-27, 1984
Nashville, Tennessee
By: Robert L. Mesecher

Michigan has 737 applicators currently certified in structural pest control. Our records show an additional 673 applications pending completion of certification requirements. Although our law requires only one certified applicator per licensed location, there has been a trend by the industry to have more of their technicians certified.

Our state issues just over 1,300 applicator licenses annually which encompasses all categories of application. Through the 3rd quarter, we issued a total of 313 licenses for structural pest control which reflects a 25% increase over previous years. The increased number of licenses is due in part to some firms expanding their number of locations, but the majority are new people competing in the industry. This trend is causing concern for members of the Michigan Pest Control Association (MPCA), and they are attempting to introduce legislation which would require an apprenticeship prior to licensing.

Out state has experienced an increase in the number of complaints involving treatment of private homes and apartments. The principle complaint is due to odor involving the use of Dursban. We are finding many instances in which the applicators are stretching the term "spot treatment" instead of concentrating on a more effective "crack and crevice" treatment.

Starting in 1985, Michigan will increase the number of hours training required for recertification. We plan to cooperate with the MPCA which sponsors 3 training sessions annually. Other seminars provided by suppliers, pest control firms and others associated with the industry will be given consideration. All training sessions will need prior joint approval by our department and the pesticide training coordinator.

Michigan is working to develop a regulation for good practices in pesticide applications. We are hoping to have a draft for comment sometime this coming winter. The regulation will address termite treatments in particular, but will also include good practices for both indoor and outdoor types of applications. It is hoped the regulation will provide guidance in application and a basis for better enforcement action involving pesticide misuse incidents.

Michigan has introduced legislation to increase fees for licensing and certification. The bill is still in committee, and no date has been set for action. The proposal will increase the annual license fee from \$20.00 to \$50.00, and proposed certification fees will assess an extra \$5.00 for each additional category of certification up to a maximum of \$20.00. Our present certification fee is a flat \$10.00.

Other legislation pending is a bill introduced by a member of the Senate. The bill would require commercial lawn applicators to give notice of pesticide applications to any lawn, tree or shrub at least 24 hours in advance to all occupants within 1,000 feet of the application site. Our department is opposing this bill. The bill is still in committee and no date has been set for public hearing.

Harry Hughes
Governor
Joseph Curran, Jr.
Lt. Governor



Wayne A. Cawley, Jr.
Secretary
Hugh E. Binks
Deputy Secretary

STATE OF MARYLAND
DEPARTMENT OF AGRICULTURE
PESTICIDE APPLICATORS LAW SECTION

Association of Structural Pest Control Regulatory Officials
Nashville, Tennessee
September 25-27, 1984

Maryland Report
David Shriver, Chief
Pesticide Applicators Law Section

1. REGULATION REVISION

The regulations pertaining to the Maryland Pesticide Applicators Law were revised this year. The attached is a synopsis of those revisions.

2. EXAMINATION REVISION

All examinations administered to commercial applicators are done so under proctored closed book procedures. This year all versions of all examinations are prepared by computerized random question selection. New versions of all examinations are administered at each examination. Attempts are being made to share these examination questions with other states through telephone computer hook ups.

3. CERTIFICATION

We currently have 2,009 certified commercial applicators and 4,198 private applicators. We usually receive 55 applications for certification a month. To accommodate these individuals, we offer exam sessions every other month for 80-100 participants. There is a 50% average passing rate among those taking the exams for the first time. We have rigidized our application screening process. The applicant must provide three references, preferably among the pest control industry, who can verify that the individual has the minimum one year full time experience in pest control.

We currently have written reciprocal agreements with Delaware, the District of Columbia, Virginia, and West Virginia. All other applications for reciprocity between other states are reviewed on a case by case basis.

4. RECERTIFICATION AND TRAINING

For the past four years we have been strictly enforcing the recertification requirement of participating in one training session a year of commercial applicators. The applicators do not have to submit proof that they attended a session but they must list the session on their

TELEPHONE NUMBER (301) 841- 5710
50 HARRY S. TRUMAN PARKWAY, ANNAPOLIS, MARYLAND 21401

renewal application. We keep a file of attendance lists from each session if verification is needed. This year only five applicators had to retake the exams for recertification because they did not participate in a training session.

Private applicators renew their certificates every five years; the first group was recertified October 21, 1982. They must participate in agricultural pesticide conferences in three of five years before renewal. The training sessions are being conducted by county extension agents. Only 2,438 out of 6,500 private applicators renewed last year.

5. ENFORCEMENT

Approximately 87 written consumer complaints were received during the last year. Fifty-six of these involved termite inspection reports and improper treatment procedures. The remaining thirty-one complaints involved drift problems from agricultural applications, right of way applications and a few turf and ornamental pest control applications. Three cases were taken to the State's Attorneys Office on charges of operating a pest control business without a license. A total of six investigational conferences were conducted.

6. SURVEY

In March, 1983 we mailed Pesticide Usage Surveys to all licensed commercial pesticide businesses and public agencies. We asked them to list the trade name, formulation, EPA registration number of each pesticide they applied in 1982 along with total amount of concentrate used and site of application. Survey results should be compiled by December, 1984. We intend to identify the major pesticides being applied commercially in Maryland.

LOUISIANA REPORT

Prepared by:
James A. Arceneaux

The Structural Pest Control Commission in the State of Louisiana is composed of five members. Ex-Officio members are the permanent Chairman, Bob Odom, Commissioner of Agriculture and the permanent Secretary, Dr. John W. Impson, State Entomologist. The Commission is also composed of two industry representatives and one member representing the university. The Commission meets quarterly.

During the past legislative session the Structural Pest Control Law was revised. Changes in the law included:

1. The liability insurance requirements were increased to not less than \$500,000 per accident and not less than \$100,000 property damage.
2. The Commission now has the authority to assess monetary fines to violators of the Structural Pest Control Law and Rules and Regulations.
3. The Commission will now examine all registered pest control technicians.

In the past year, the Structural Pest Control Commission administered 191 examinations, issued 42 licenses and certified 42 individuals. The Commission also issued 711 registration cards, made 3,877 termite inspections of which 339 jobs were found to be substandard and investigated 78 complaints. The Structural Pest Control Commission held four adjudicatory hearings in which they handled 48 violations of the Structural Pest Control Law and Rules and Regulations.

KANSAS REPORT
to the
ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS
September 25, 1984
by
Alex Hawkins

Since October 21, 1977, Kansas pest control operators have been licensed and certified under the Kansas Pesticide Law. This statute replaced the Kansas Pest Control Act under which the ornamental and structural pest control industries had been regulated since 1953. The current law provides for the licensing of pest control businesses and the certification of applicators of restricted use pesticides.

Applicators must pass an examination in order to become certified and then may legally purchase and apply restricted use pesticides. Kansas currently has reciprocal agreements with Missouri and Nebraska. Under these agreements, certified applicators from either state may become certified in Kansas without taking the examination. They are still required to submit an application and pay an application fee.

In addition to certification, a business license is required before commercial applications of pesticides can be made. In order to receive a license, a pesticide applicator business must pay an application fee of \$75 for each category

in which it intends to operate. It must show that it employs at least one certified applicator, and it must submit proof that it carries a minimal amount of liability insurance (or a surety bond). There are no reciprocal agreements with other states concerning the business license. In 1984, 257 licenses have been issued in Ornamental and Turf Pest Control, and 391 have been issued in Industrial, Institutional, Structural and Health Related Pest Control.

The Division of Entomology is responsible for enforcing the state law and regulations as they pertain to these categories. Three administrative tools are used to effect compliance: warning letters for relatively minor violations, informal hearings or conferences for more serious and/or multiple violations, and formal hearings for serious offenses. The latter are held with the intent of suspending or revoking the offender's business license. Informal hearings have proven to be an extremely useful means of emphasizing to the licensee the importance of following label directions and otherwise operating within the limits of the law.

Following several years in which numerous consumer complaints were received, 1984 has been a pleasant surprise. To date, only 71 complaints have been received - the majority of which were related to termite control. The low numbers may be related to the criminal convictions of four persons

State Chemist and Seed Commissioner
A.R. HANKS

INDIANA STATE CHEMIST AND SEED COMMISSIONER
Department of Biochemistry • Purdue University
West Lafayette, Indiana 47907
(317) 494-1492

Administrative Staff
J.G. EIKENBERRY
R.G. LOFLAND
L.W. NEES
I.O. NELSON
R.J. NOEL
C.R. PAUL
R.C. RUND

INDIANA REPORT
to the
Association of Structural Pest Control Regulatory Officials
Nashville, Tennessee
September 25-27, 1984

Proposed Regulation Changes

Revision of Regulation 1. Categorization of Licenses and Certificates

Significant Changes:

- Clarifies definitions of applicators
- Strikes most of the restricted use pesticide language as it applies to for hire applicators
- Defines certification requirements to include the passing of written certification exams, scoring a minimum of 75% (70% was previously considered passing).
- Defines exams as divided into core material and subject matter and category specific subject matter.
- Requires that core exams must be successfully passed before the category specific exams are attempted.
- Sets a two failure limit on any one exam. Formal training must precede a third attempt.
- Provides for a \$10.00 exam fee after the first unsuccessful exam attempt.
- Establishes specific fumigation certification and licensing categories. Splits them out of existing subcategories.
- Establishes specific aerial application categories. Splits them out of existing subcategories.
- Specifically includes wood destroying organism inspectors into the structural licensing category.
- Creates a fumigation category for private applicators.

Certification

March 1985 is the end of a five (5) year certification period for a major group of commercial applicators. Recertification may be achieved through reexamination or accumulation of continuing certification hours. Of those presently licensed 847 (28%) have fulfilled the CCH requirements, 948 (31%) have accumulated some credits, and 1266 (41%) have no CCH's.

Certification Exams (October 1, 1983 - September 30, 1984)

Category	#Examined With Training	%Pass	#Examined In-Office	%Pass
Core/General	596	77	369	37
7A	57	77	87	58
7B	30	73	79	52
7C	29	70	31	42
7C2	7	86	11	55
7A1	0	NA	9	77

Licenses

Category	Applicators (for hire)	Applicators (not for hire)	Public Applicators
7A	616	42	38
7B	597	23	25
7C	210	143	4
7C2	114	21	0
7A1	49	5	4

New Business Licenses Issued (October 1, 1983 - September 30, 1984)

<u>Category</u>	<u>#</u>	<u>%</u>
Structural (7)	50	33
Turf & Ornamental (3)	60	39
All Others	45	28

Enforcement

All ultrasonic pest control devices are still under statewide Stop Sale Use and Removal for failure to register.

ISCO has contacted all insect electrocution device manufacturers with the notification of the need to register their devices. Their claims must be supported by efficacy data for registration.

<u>Enforcement Action</u>	<u>Category 7</u>	<u>Total</u>
Warning/Citation	12 (50%)	24
License Suspension	3 (75%)	4
License Denial	2 (100%)	2
*Administrative Hearing	1 (100%)	1

*Three additional requests for administrative hearings have been received. All are for proposed enforcement actions in the structural pest control categories.

Proposed Steps to Certification of 7B Applicators

- 1) Registration of all non-certified applicators. They must complete minimum prescribed training.
- 2) Apprenticeship Phase. One year of on the job training and experience and must complete a minimum number of different job types.
- 3) Training session and exams.

STATE OF TENNESSEE
1983-84 ASPCRO REPORT

The state of Tennessee Structural Pest Control Section is a part of the Tennessee Department Of Agriculture operating under the auspice of the Division Of Plant Industries, Mr. John Hammett, Director.

The staff consist of: five inspectors
three investigators
one secretary
one supervisor

We are headquartered in Nashville, Tennessee with inspectors and investigators strategically positioned around the state.

The structural pest control board consist of seven (7) members with the commissioner of agriculture and the director of the division of plant industries being a member. The members are appointed by the commissioner of agriculture and serve a four (4) year term.

The board has the power and duty to advise the commissioner on rule and regulation changes, determine catagories which require charters and licenses, devise and approve examination procedures and changes, certify qualifications of applicants and forward these to the commissioner for approval.

Our reporting data is based on the fiscal year, FY, from July 1 to June 30.

The fiscal year 1983-1984 ending June 30, 1984 we had the following:

Routine inspections -----	3608	up 47 %
Sub Standards-----	319	up 68 %
Investigations--of complaints-----	1346	up 56 %
Charters issued-----	565	up 15 %
Licenses issued-----	868	up 13 %
Solicitors cards issued-----	1545	up 10 %

Warrants issued for violations-----	6
decision for department -----	5
decision pest control company-----	1
Administrative hearings-----	3
Stop work orders-----	24
various things--ins.bond,etc.	

Complaints:

most complaints arise from dispute over contracts, pesticide odors, and many minor infractions.

We require a written contract for any wood destroying organism treatment, with a 1 year warranty given.

Pest control companies pay a three (3.00) fee to the pest control section and the state for each WDO Contract issued. The fees collected from contracts, charters, licenses are earmarked toward the operation of the pest control section, there-by reducing the tax burden on the taxpayer.

In addition, we currently have ⁵⁴ ~~twenty~~ four (54) aerial applicators licensed and ~~twenty one~~ ²⁴ (24) aircraft .

We are always trying to improve the quality of our inspections and investigations, as well as our methods.

We currently use soil sampling and sampling of the diluted mix to obtain treatment results and verify state standards.

We have good cooperation from the pesticide and laboratory section to verify results of samples.

This year, we re-evaluated our laws and regulations pertaining to Wood Destroying Organisms. Up until this year, we had no laws pertaining to powder post beetle, carpenter ant, old house borer, and carpenter bee.

The criteria for such treatments now are, the agent must find the live insect, or new frass the color of new wood. Without this, no treatment may be done.

David L. Barnes
Pest Control Inspections Supv.

I. PEST CONTROL SECTION :

Part Of Division Plant Industries

Director, John Hammett Asst. Dir. S. David

2. STAFF: 5 inspectors
 3 investigators
 1 secretary
 1 supervisor

3. HEADQUARTERS : Nashville
 Insp. & Invest. Located Throughout State. Uniformity

4. PEST CONTROL BOARD: 7 members. Appointed By Commissioner
 Director, J. Hammett is I Member

TERM--- 4 yrs each

5. POWERS: Advise On Rules & Regulations To Commissioner.
 Write & Approve Exams.
 Determine Categories For License, Charters ETC.
 Certify Applications.

6. REQUIREMENTS: PERSONS STARTING A COMPANY,
 Have License or Licensed Applicator For Charter.
 Supply Bond
 Supply Insurance

7. DATA: ----- Inspections--- 3608
 Investigations-1346 (complaints)
 Charters----- 612
 Licensed Oppr. 868
 Warrants----- 6
 Decissions---- 5 for dept. --- 1 for pest co.
 Admin. Hearings-- 3
 Stop Work Order 24

8. Aerial License---- 54
 Plane Decals 44

9. RESULTS VERIFIED: 1. soil samples
 wood samples
 sample of diluted mis

10. We Require 100 PPM As Standard Treatment.

11. Powder Post Beetle--Carpenter Ant--Old House Borer--Carpenter Bee.

This Year Laws Were Revised To Include All The Above.
Before Treatment May Be Done, Frass, Color Of New Wood or Live Insect
must be found.

12. FORMOSAN TERMITE: 3 infestations--- all in Memphis, Shelby Co.

Emergence Regulations Adopted & All 3 Are Now Treated.

We Require All Formosan Infestations Be Reported To Pest Control Section,
and that these finds be treated.

ppb: stored 2 yrs or more = hardwoods

WEST VIRGINIA REPORT TO ASPCRO
SEPTEMBER 25-27, 1984
NASHVILLE, TENNESSEE

The West Virginia Department of Agriculture operates a certification program for users of restricted use pesticides and licensed persons in the business of applying any pesticide for hire. Pesticide Enforcement work is conducted under the states statutes and under FIFRA through a cooperative EPA Enforcement Grant.

At present, there are 13,724 private applicators, 1,292 commercial applicators, 211 dealers of restricted use pesticides and 240 companies licensed to apply pesticides. In the area of structural pest control, there are 420 commercial applicators certified and 159 companies licensed. A total of 536 companies have registered 5,056 products for sale in the state.

The West Virginia Pesticide Program operates with a staff of 1 program leader, 2 clerical people, 3 inspectors and 1 registrations officer. During the year, staff participated in a total of 325 inspections and collected 338 samples for analysis. Enforcement actions resulted in 14 warrants filed for prosecution in magistrates court, 1 administrative hearing and 23 letters of warning.

Major areas of problems in structural pest control are clearance letters, proper records, improper use of termiticides and a recent influx of "fly-by-night" operators.

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS

1984 VIRGINIA REPORT

WILLIAM E. WALLS

VIRGINIA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES

The Bureau of Plant Protection and Pesticide Regulation was created on January 1, 1984 by the consolidation of the Plant Pest Control Section and the Pesticide, Paint and Hazardous Substances Section within the Division of Product and Industry Regulation. The State Entomologist serves as Bureau Chief. Within the Bureau there are three operating units (1) Program Development and Evaluation; (2) Office of Pesticide Regulation; (3) Field Operations.

The Office of Pesticide Regulation is responsible for the administration and enforcement of the Virginia Pesticide Law. The activities associated with these responsibilities include the regulation of pesticide products, certification and licensing of pesticide applicators, and investigations and inspections involving pesticide use/misuse. In addition, similar responsibilities involving the Hazardous Household Substances Law have been administered by this office. These two laws have been repealed by the General Assembly and all program activities were terminated on June 30, 1984.

The Virginia Pesticide Law was amended in the 1984 General Assembly to include a much needed civil penalty provision. This provision authorized assessment of a monetary penalty (up to \$1,000) for serious violations. It provides an enforcement option short of suspending and/or revocation of an applicator's permit.

College of Agricultural Sciences

S.C. CROP PEST COMMISSION
PLANT PEST REGULATORY SERVICE



February 21, 1984

Mr. James A. Arceneaux
Bureau of Entomology & Plant Industry
Department of Agriculture
P.O. Box 44153, Capitol Station
Baton Rouge, LA 70804

Dear Jim:

I could not remember if I ever sent you the list of committees, etc. for ASPCRO. Therefore, please forgive me if I have not. The following will give you this information:

Executive Committee	Also serves as a standing resolution committee.
L. O. Nelson	(see bylaws for additional responsibility)
Betty Wyckoff	
Rudolph E. Howell	
Robert McCarty	
Standing Uniform Policies Committee	Attendance/Publicity Committee
Larry Blalock, Chairman	Jim Harron, Chairman
Charlie Chapman	
John Hagan	
Betty Wyckoff	
David Shriver	
State Industry Relations Committee	Revision of ByLaws Committee
Robert McCarty	Norm Bazinet, Chairman
Robert Russell	Ed McCoy
	Murray McKay

The only other information I wanted to mention was to be sure to include the District of Columbia people on our list of ASPCRO members. I hope Jim Harron or Don Alexander has their name and address.

Sincerely,

NO/jf

cc: David Shriver
Jim Harron ✓

Neil
Neil Ogg

FEB 24 1984



VELSICOL CHEMICAL CORPORATION

WORLD HEADQUARTERS
341 EAST OHIO STREET
CHICAGO ILLINOIS 60611
13121 670 4500

QUESTIONNAIRE

To ASPCRO Members:

In 1982 a Label Improvement Program for the termiticides carefully worked out the basic text of our termiticide labels. Subsequently, however, there have been various and sometimes conflicting interpretations of specific statements on the label. We would like to determine whether revisions may be possible to unify the interpretation of the label. Your views on the questions below will help us.

Please read each question and circle the response that reflects the way you believe your state officials would enforce the label. If you have additional comments, please add them.

When completed, please return the questionnaire in the envelope provided.

Thanks for your help.

John M. Bergman
Regulatory Coordinator
Velsicol Chemical Corporation

JMB:cls

DAVID E. SCOTT
INDIANA

Questions:

1. In the section on environmental precautions, the label states, "Apply this product only as specified on this label." While restricting the sites and pests that may be treated, does this still permit special techniques of application which are not specifically described on the label.

a. yes

b. no

2. The label states, "Do not treat soil beneath structures which contain cisterns or wells." Does this still permit treatment of the outside perimeter soil?

a. yes

b. no

3. The label recommends the use of a 2 x rate for Coptotermes species, "where necessary." Does this require the use of the double rate when Coptotermes are found in the area?

a. yes

b. no

4. Because the preconstruction directions state that "Application shall be made by low pressure spray for horizontal barriers over areas intended for covering floors, porches ...", must a pretreatment include a horizontal barrier under the entire porch or floor? Or is the label only requiring that low pressure must be used when applying horizontal barriers?

a. Entire coverage required.

b. Barriers at only the joints and walls perimeter permissable.

5. Does the label statement, "Rodding and/or trenching applications should not be made below the top of the footing", preclude a pretreatment application in the footing trench before the footing is poured:

a. yes

b. no

6. Although the label contains instructions only for rodding or trenching the perimeter of crawlspace, may an overall grid-pattern, subsoil injection of termite infested crawlspaces be done? (See also Q.1)

a. yes

b. no

7. Because the label states "When rodding, it is important that the emulsion reaches the footing ...", is it required that the rod holes or injector tip actually hit the footing?

a. yes

b. no

8. The label states, "Do not apply this product to the soil beneath a plenum air space." Does this still permit treatment of the outside perimeter of the structure and areas where the plenum does not extend? (See also Q.2)

a. yes

b. no

We have few or no plenum air space constructions in Indiana. However, the site restrictions referred to in Q.2 and Q.8 were obviously intended to prevent two different types of contaminations with two different sets of concerns and potential treatment by-products.



VELSICOL CHEMICAL CORPORATION

WORLD HEADQUARTERS
341 EAST OHIO STREET
CHICAGO, ILLINOIS 60611
(312) 670-4500

January 31, 1984

Mr. James P. Harron
Secretary
Association of Structural Pest Control
Regulatory Officials
Pesticide Division
Georgia Department of Agriculture
Capitol Square
Atlanta, Georgia 30334

Dear James:

I am sorry it has taken me so long to respond to your letter regarding the above ground uses of chlordane.

We anticipate controlling this problem by tightening our label used to ship chlordane which will ultimately be used for remanufacturing and repackaging purposes. The exact wording to be used on these labels has not been finalized. When it is, however, I expect it to preclude any use except those permitted on our existing end-use labels.

As this project progresses, I will keep you informed.

Sincerely yours,

C. H. Frommer
(vh)

C. H. Frommer
Director
Regulatory Affairs

vh

FEB 10 1984

ASPCRO Association of Structural Pest Control Regulatory Officials

January 10, 1984

TO: ASPCRO Members

FROM: Neil Ogg, Past President ASPCRO

SUBJECT: OBJECTIONS TO HARPER'S FERRY BILL AS RESOLVED AT OCTOBER
MEETING OF ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY
OFFICIALS

Enclosed is a model letter addressing the six items discussed during our 1983 ASPCRO meeting relating to the FIFRA Reform Bill, i.e., the Harper's Ferry Bill and Key Committee Members to contact.

The items for the ASPCRO resolution of specific sections of the Bills can be titled as follows:

- (1) Section 3 Elimination of direct supervision of pesticide applicators requiring certification for all applicators.
- (2) Section 4(a) (6) Prohibits future registrations of cancelled, suspended, or withdrawn pesticides.
- (3) Subsection 7(b) Initiation of cancellation or suspension hearings by any person.
- (4) Section 8 Increased record keeping requirements for pesticide applicators.
- (5) Section 10 Private right to sue States and Federal Government for damages for inaction against a violator.
- (6) Section 16(b) (3) (D) Special local need registration for maximum of five states.

DA/ms

DATE

Dear (Senator or Representative):

The Federal Insecticide Fungicide and Rodenticide Act (FIFRA) Reform Bill (Harper's Ferry Bill) S-1774 and HR-3818 have been introduced into the Senate and House and make sweeping changes to FIFRA.

The Association of Structural Pest Control Regulatory Officials (ASPCRO) and we, the structural pest control regulatory officials for this state, have strong objections to the following changes to FIFRA:

- (1) Section 3 of this bill changes the definition of certified private and commercial applicators such that the clause "supervise the use of" is eliminated. Essentially, this would mean that all applicators of restricted use products would have to be certified and licensed. No one would be able to work under the supervision of a certified applicator as is presently permitted. Many state programs rely on the continuity of the present system of a trained professional licensed applicator as the focal point of receiving regulatory action. He is responsible for the correct application of the pesticide. This amendment would cause considerable changes and new resource allocations in our states laws and regulations.
- (2) The Bill in Section 4(a)(6) proposes to prohibit the future registration of any pesticide, any use of which has been cancelled, suspended or voluntarily withdrawn for health or environmental reasons. This is not workable in that new data, other scientific evidence, or future risk/benefit considerations may, indeed, justify the re-registration of a product and its uses.
- (3) The Bill in subsection 7(b) amends section 6(b) of FIFRA and provides for initiation of a hearing regarding cancellation of pesticides. There are many interest groups in the nation with diametrically approved opinions regarding pesticide use. To allow anyone to initiate a hearing regarding pesticide cancellation is to open a Pandora's box of pesticide cancellation activity by extremists special interest groups.
- (4) The Bill in Section 8 would require the Administrator to promulgate regulations for commercial applicator record keeping. State pesticide regulatory officials have been unable to demonstrate at the local level that mandatory record keeping requirements for all pesticide uses would significantly contribute to better tracking of the use of pesticides. At present the states require record keeping for restricted use pesticides. We believe this is adequate and therefore, oppose this proposal.
- (5) Section 10 of the Bill establishes a private right to sue for damages against a person, company, government agency or the Administrator of EPA. The suit can occur if action has not been taken by the state or EPA within

60 days of notice of the violation. Sixty days is insufficient time to complete any investigations or take appropriate regulatory action. Many states have provisions which protect them from law suits. Opening up law suits against a state may tax their very limited legal resources to the point of the demise of the regulatory agency.

- (6) The Bill in subsection 16(b)(3)(D) would allow the same special local need registration in only five states. There are pesticides used in the structural pest area that are a special local need in far more than five states. This would limit use of these needed products to the first five states to request 24(c) registration. This is unacceptable.

House Committee Assignments, 98th Congress

Agriculture

Phone 225-2171

Room: 1301 LHOB

D 26 - R 15

Agriculture generally; production, marketing and stabilization of agricultural prices; animal industry and diseases of animals; crop insurance and soil conservation; dairy industry; farm credit and security; forestry in general; human nutrition; home economics; inspection of livestock and meat products; plant industry, soils and agricultural engineering; rural electrification; commodities exchanges; rural development.



E. "Kika"
de la Garza,
D-Texas,
chairman*

- ✓ Lane Evans, Ill.
- ✓ Lindsay Thomas, Ga.
- * ✓ James R. Olin (Va)
- * ✓ Timothy J. Penny, (Minn.)

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- Joe Skeen, N.M.
- Sid Morrison, Wash.
- ✓ Steve Gunderson, Wis.
- ✓ Cooper Evans, Iowa
- Gene Chappie, Calif.
- ✓ Webb Franklin, Miss.

Address:
U.S. House of Representatives
Washington D.C. 20515

* ✓ Department Operations, Research and Foreign Agriculture

Phone: 225-8408

Room: 1430 LHOB

✓ Brown - chairman

✓ Staggers	Roberts
✓ Penny	Gunderson
✓ Panetta	Evans, Iowa
✓ Foley	Franklin
✓ Coelho	
✓ Volkmer	
✓ Olin	



WASHINGTON OFFICE REPORT

WASHINGTON OFFICE: 1616 H Street, N.W. • Washington, D. C. 20006

Volume VI, Number 35
November 7, 1983

✓
EPA OKAYS LIMITED USE OF 1080. Last week the Environmental Protection Agency issued its final decision on Compound 1080 use against coyotes and other feral dogs. The decision allows the registration of Compound 1080 for use in toxic collars and in single lethal dose baits. However, 1080 will not be permitted for use in large bait stations or smear posts. NASDA was instrumental in securing evidentiary hearings in 1981, and has worked with the National Wool Growers and others to coordinate a strong case for lifting the ban on 1080.

over
POULTRY INDUSTRY ALARMED BY AVIAN INFLUENZA OUTBREAK. At least four Pennsylvania flocks in the Lancaster County area have been infected with a deadly and apparently unknown form of avian influenza. APHIS has decided to establish a federal quarantine, to disinfect around the perimeter of the quarantine area, to beef-up surveillance, and to help Pennsylvania trace the origin and nature of the disease. Meanwhile, a special task force is considering additional steps to deal with the potentially serious problem.

DAIRY UPDATE. On Friday the House of Representatives approved a modified closed rule to govern debate on the "Dairy Production Stabilization Bill" (H.R. 4196) when it comes to the Floor, possibly this week. The rule permits a limited number of amendments including the Conable amendment to cut dairy supports by \$1.50 per cwt. without any diversion payments. Sec. Block has pulled back on his endorsement of the compromise bill and indicated support for the Conable plan which is given an even chance of passage.

FRUIT FLY IN CALIFORNIA. As of November 4, 98 Mexican fruit flies have been trapped in Los Angeles County. State and APHIS officials are undertaking a program of aerial application of malathion bait, and a federal quarantine is being developed. The county has already established a regulatory program. A stepped-up trapping effort and the release of sterile flies is underway. Meanwhile, state and APHIS officials are hopeful that the Oriental fruit fly problem in San Francisco Bay area is under control.

POTATO HEARING SET. USDA has announced a November 8 hearing in Denver, Colorado to consider proposed changes in the Potato Research and Promotion Plan. Specifically, the Potato Board wants to change the assessment rate to .5 percent of the past 10-year U.S. average price received by growers, and USDA wants consumer representation on the Board.

COMPROMISE WHEAT BILL APPROVED BY COMMITTEE. Last week the full House Ag Committee unanimously okayed Rep. Tom Foley's wheat bill (H.R.4072) which would scale back scheduled increases in the 1984 and 1985 target price and also mandate a 1984 acreage reduction of 30 percent, including a 10 percent paid diversion. The bill also sets an 85 percent PIK payment rate. The bill also mandates haying and grazing of PIK acres and advance target payments. Sen. Dole is pushing a similar "compromise" in the Senate, and prospects for passage look favorable despite Administration disapproval.

SENATE PASSES EEC TRADE RESOLUTION. By a nearly unanimous vote, the Senate last week passed a resolution (Sen. Helms' S.Res.233) expressing opposition to the European Community's proposal to "reform" the Common Agricultural Policy (CAP) by restricting the importation of non-grain feed ingredients such as corn gluten and citrus pellets, and by placing a consumption tax on vegetable oils. This resolution is meant to strengthen the position of Secretaries Block, Shultz and Regan when they meet with EC officials in Brussels on December 9.

CONGRESS VOTES TO BAN OMB FROM REVIEWING MARKETING ORDERS. Despite a challenge from Rep. Barney Frank (D-MA), the House of Representatives voted overwhelmingly to retain a provision in the 1984 Treasury Department Appropriation Bill which prohibits the Office of Management and Budget from expending any funds to study or review agricultural marketing orders. The Senate bill, on the Floor this week, contains a similar provision.

UPCOMING HEARINGS. The House Public Works Committee and the Senate Environment and Public Works Committee will continue hearings on a rewrite of the Clean Water Act. The House hearings will be November 9, 10, 15, 16, 17. The Senate hearings are set for November 8, 10, 15, 17.

The House Agriculture Subcommittee on Conservation, Credit and Rural Development will hold a hearing November 17 to consider two bills (H.R.3049 and H.R.4113 by Reps. Cooper Evans and Dan Glickman respectively) to amend the Federal Crop Insurance Act.

FIFRA MARK-UP CANCELLED. The subcommittee mark-up of the "Harpers Ferry" pesticide bill (H.R.3818), which had been scheduled for Nov. 3, 8 and 9, has been cancelled. Mr. Ruckelshaus expressed EPA's opposition to the bill in a subcommittee hearing on Wednesday, and NASDA and other organizations have strongly urged the subcommittee to defer consideration.

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College of Agricultural Sciences

S.C. CROP PEST COMMISSION
PLANT PEST REGULATORY SERVICE

CLEMSON
UNIVERSITY

June 15, 1984

Dr. C. G. Wright
N.C. State University
School of Agriculture & Life Sciences
Department of Entomology
Box 5215
Raleigh, NC 27650

Dear Charles:

I recently had the pleasure of reviewing a copy of the research you completed in North Carolina regarding soil residues and ambient air levels of termiticides. I am going to recommend that this paper be presented at the Association of Structural Pest Control Regulatory Officials (ASPCRO) meeting in September of this year in Nashville, Tennessee. Again, my compliments on a paper and research well done.

One item that we are having some difference in our sample results and your research is seemingly consistent high levels of heptachlor in homes treated within several weeks of our sample collection. For example, generally we will find chlordane around three or four micrograms per cubic meter and heptachlor levels around 15-17 micrograms per cubic meter. I have seen Velsicol research with Termide showing similar results. I am really soliciting any help you might give me regarding this discrepancy with your research and our sampling. We are using a chromosorb 102 tube in our sampling technique. I am speculating that perhaps chromosorb 102 tubes are more capable of absorbing the heptachlor vapors. Do you have any thoughts on this matter? Do you think it would be possible if I pulled samples along side those you may be taking in North Carolina using my technique as a comparison? Let me know your thoughts on this matter.

I am carbon copying Jim Harron who is secretary for ASPCRO providing your willingness to participate in the ASPCRO meeting in September. I look forward to discussing this matter with you.

Sincerely,

Neil
Neil Ogg
Pesticide Coordinator

NO/jf

cc: James P. Harron ✓
Department of Agriculture
Capitol Square
Atlanta, GA 30334

JUN 18 1984