

*Tentative  
Agenda  
Association of Structural  
Pest Control Regulatory Officials  
September 27-30, 1992  
Doubletree Hotel  
New Orleans, Louisiana*

<p style="text-align: center;"><u>SUNDAY, SEPTEMBER 27, 1992</u></p> <p>3:00 p.m. -Registration</p> <p>7:00 p.m. -Cocktail Reception - Hosted by Orkin Pest Control</p> <p style="text-align: center;"><u>MONDAY, SEPTEMBER 28, 1992</u></p> <p>7:00a.m. -Continental Breakfast</p> <p>7:30 a.m. -Registration</p> <p>8:00 a.m. -Call to Order - David Scott, President, A.S.P.C.R.O. -Welcome to Louisiana -Welcome to New Orleans -Welcome to the Convention - James Hale, President, Louisiana Pest Control Association</p> <p>8:45 a.m. -Update from Washington -Greg Baumann, NPCA</p> <p>9:30 a.m. -State issues - Thomas Diederick, Orkin</p> <p>10:00 a.m. -Break</p> <p>10:15 a.m. -Local Regulation, Norman Goldburg, Terminix Int.</p>	<p>10:45 a.m.-Carpenter Ant Biology and Control, Stoy Hedge, Ternimex Int.</p> <p>12:00 noon -Lunch</p> <p>1:00 p.m. -Termite Bait - Dr. Gregg Henderson, L.S.U. Entomology Dept.</p> <p>2:00 p.m. -Discussion - The need to stan- dardize Wood-Destroying Insect Inspections and Reporting Requirements. Moderated by Lonnie Matthews, Past President -Discussion - Efficacy of Termiticides Chemicals -Discussion - FIFRA sec. 2EE. Moderated by David Scott, President</p> <p>3:00 p.m. -Break</p> <p>7:00 p.m. -Dinner - Riverboat, Hosted by NPCA, LPCA &amp; RISE</p> <p style="text-align: center;"><u>TUESDAY, SEPTEMBER 29, 1992</u></p> <p>7:00 a.m. -Continental Breakfast - Hosted by FMC</p> <p>8:00 a.m. -Termicide Soil Residual - Bradford Kard &amp; C. A. McDaniel, Gulfport</p>	<p>9:00 a.m. -Termicide Soil Residual - Dr. James Jarratt or Jim Haskin, Miss State University Study</p> <p>9:30 a.m. -Termicide Soil Residual Update on ASPCRO Study, Jim Wright, Clemson University</p> <p>9:45 a.m. -Break</p> <p>10:00 a.m. -Power Post Beetle Control &amp; Borates, Lonnie H. Williams, USDA</p> <p>11:00 a.m. -Future of Pest Control, Jeffery Tucker</p> <p>12:00 noon -Lunch - Hosted by Dow Elanco</p> <p>1:00 p.m. -Afternoon free to enjoy New Orleans</p> <p>7:00 p.m. -Cocktail Reception Hosted by Van, Waters &amp; Rogers</p> <p style="text-align: center;"><u>WEDNESDAY, SEPTEMBER 30, 1992</u></p> <p>7:00 a.m. -Continental Breakfast</p> <p>8:00 a.m. -Business Meeting, State Reports</p> <p>12:00 p.m. -Adjourn</p>
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John M. Gonzalez  
Chairman  
Houston

David Melass  
Vice Chairman  
Lake Jackson

Robert W. Jenkins, Sr.  
Marble Falls

Ray P. Thompson  
Pasadena



**STRUCTURAL PEST CONTROL BOARD**

9101 Burnet Road, Suite 201

Austin, Texas 78758

Telephone: (512) 835-4066

**BENNY M. MATHIS**  
**EXECUTIVE DIRECTOR**

Bobby L. Davis  
Representing  
Commissioner, Department of Health

Dr. Philip J. Hamman  
Representing  
Head of Department of Entomology  
Texas A & M University

Alvin Ashorn  
Representing  
Commissioner of Agriculture

Rayford Kay  
Houston

Merle Carlson  
Houston

November 13, 1992

Mr. Jim Wright  
Regulatory Supervisor  
OFPC-Clemson University  
P.O. Box 21792  
Columbia, SC 29221

Mr. David Scott  
Pesticide Administrator  
Purdue University  
1154 Biochemistry Building  
West Lafayette, Indiana 47907

Dear Jim and Dave:

Enclosed is an account signature card that must have all of our original signatures on the same card.

Jim, please sign and forward to Dave for his signature.

Dave, please forward to me once you have signed.

I have enclosed previously addressed envelopes for your convenience.


I received a certified check from Alex in the amount of \$11,840.39 and a check from Florida for \$50.00 making the total deposit of \$11,890.39 into this account. The account number 510479 has been given to the ASPCRO account.

In order to place these funds in a money market account that will pay a small interest I will need a copy of the By Laws and the Federal Tax Number. I have not, as of this date, received any information on these records from Alex. If you can provide me with the Tax Number and with Copies of the By Law, please forward. Your help would be greatly appreciated.

I look forward to hearing from you soon. Once I have received all the information I will be able to make a report to the ASPCRO members.

If you have any questions, please do not hesitate to let me know.

Sincerely,

  
Benny M. Mathis, Jr.  
Executive Director

BMM:do  
enclosures

# Association of Structural Pest Control Regulatory Officials

RECEIVED  
LOUISIANA STATE CHEMIST  
AUG 2 - 1992

Reply to: Louisiana Structural Pest Control Commission  
Post Office Box 3596  
Baton Rouge, Louisiana 70821-3596  
Telephone: 504-925-3961  
Fax No. 504-925-3760

DATE: August 18, 1992  
TO: All ASPCRO Members  
FROM: Mancil Smith  
State of Louisiana Host Representative  
SUBJECT: 1992 Meeting

The 32nd Annual Meeting of the Association of Structural Pest Control Regulatory Officials (ASPCRO) will be held September 27 through September 30, 1992 at the Doubletree Hotel located at 300 Canal Street in New Orleans, Louisiana, 70140, telephone (504) 581-1300. We would like to emphasize that the hotel is located in the heart of downtown New Orleans, directly across from the French Quarter and within walking distance of many tourist attractions and shopping centers.

Enclosed, please find a tentative agenda for this meeting. If you have any questions, comments, or topics that you would like to discuss or have discussed at this meeting, please contact my office at (504) 925-3961.

If you plan to attend this meeting, reservations should be made as soon as possible. If reservations are made prior to August 27, 1992 you will be given a special rate of \$65.00 a night for single occupancy and \$79.00 a night for double occupancy. If reservations are made after this date, the rates will be a minimal of \$125.00, per night.

Please note that I have not scheduled a Women's Program, however, we will meet every morning to schedule the days events. Representatives of the Louisiana Department of Agriculture and Forestry will be on hand to assist with these events as well as making arrangements for tours, etc.

Also, representatives of the Louisiana Department of Agriculture and Forestry will be on hand to furnish transportation from the airport to the hotel. Please contact my office if you wish to take advantage of this transportation.

Please return the pre-registration form (enclosed) together with your check or money order in the amount of \$50.00, per person, for your registration fee, to this office as soon as possible in order to us to get a final count and finalize arrangements. Checks and/or money orders should be made payable to ASPCRO and submitted to the address above.

If you need any additional information or if you have any questions concerning this matter, please contact this office.

I look forward to seeing you there.

Enclosures

**ASPCRO**

**BOARD OF DIRECTORS MEETING**

**Sunday, Sept. 27, 1992**

**4:00 p.m.**

**AGENDA**

- 1. Secretary/Treasurer Vacancy**
- 2. ASPCRO Termiticide Soil Sampling Project**
- 3. ASPCRO/SFIREG Activities**
- 4. Minimum Treatment Standards for Subterranean Termite Control**
- 5. Preconstruction Termiticide Treatments; Are They Necessary?**
- 6. Interior Residue Sampling**
  - What Does It Mean?**
  - How Do We Do It?**
- 7. Consumer Notification Issues**
- 8. Status of Previous Resolutions**

# Association of Structural Pest Control Regulatory Officials

## ASPCRO

### BOARD OF DIRECTORS MEETING

Sunday, Sept. 27, 1992

4:00 p.m.

#### AGENDA

- ✓ 1. Secretary/Treasurer Vacancy → *Board Quorum*
- ✓ 2. ASPCRO Termiticide Soil Sampling Project
- ✓ 3. ASPCRO/SFIREG Activities → *Herb Harrison letter (SFIREG Report)*
- ✓ 4. Minimum Treatment Standards for Subterranean Termite Control  
→ *Adopted? Need to advise? SFIREG Report*
- ✓ 5. Preconstruction Termiticide Treatments; Are They Necessary?
- ✓ 6. Interior Residue Sampling
  - What Does It Mean?
  - How Do We Do It?
- ✓ 7. Consumer Notification Issues
- ✓ 8. Status of Previous Resolutions
9. *Association Historian*

COPY

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**MEMORANDUM**

**OFFICE OF INDIANA STATE CHEMIST**

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**ASPCRO**

TO: Jim Wright, Alex Hawkins, Lonnie Mathews, Jack Root  
FROM: Dave Scott *DES*  
DATE: February 27, 1992  
SUBJECT: Dr. Susan Jones/Termite Research

Enclosed is a copy of a letter from Stanley Barras of USDA Forest Service, regarding Dr. Susan Jones and her termite research. Call me at (317) 494-1587 if you have questions or comments.



United States  
Department of  
Agriculture

Forest  
Service

Southern Forest Experiment Station  
Room T-10210, USPSB, 701 Loyola Avenue  
New Orleans, LA 70113

Reply to: 1500

Date: February 20, 1992

Dr. David E. Scott, President  
Association of Structural Pest  
Control Regulatory Officials  
Office of Indiana State Chemist  
Purdue University  
1154 Biochemistry Building  
West Lafayette, IN 47907-1154

**RECEIVED**  
INDIANA STATE CHEMIST

FEB 26 1992

Dear Dr. Scott:

I wrote to you in December concerning your interest in Dr. Susan Jones and her research. At that time, we did not know if we would have enough funds in FY 92 to keep her employed full time. We have received the final allocations and we will be able to employ Dr. Jones in a full-time position, located in Tucson, Arizona. Because of the way the money was allocated, she will spend one-half time on termite research in the southwest and the other half on termite ecology work in Puerto Rico. While the latter work is not on control, it will increase the overall knowledge of termites.

At your request, I am advising you that the FY 93 President's budget submitted to Congress contains a cut of \$218,000 in Dr. Mauldin's unit that would seriously affect both Gulfport and Tucson locations. A cut of this magnitude would close research on the use of chemicals from termite-resistant woods and would close research on the use of baiting systems for control of subterranean termites. It would also very likely result in the termination of one scientist.

We appreciate your offer of support for our research effort. I will be in contact with you to provide further details, or you may contact me at 504-589-3003.

Sincerely,

  
STANLEY J. BARRAS  
Assistant Director - West

cc:

J.Mauldin, SO-4502  
WO-FIDR





# Association of Structural Pest Control Regulatory Officials

RECEIVED  
INDIANA STATE CHEMIST  
AUG 12 1992

July 30, 1992

Mr. Herb Harrison  
Office Of Pesticides  
USEPA  
Washington, D.C.

Dear Herb:

Please reference our telephone conversation last Thursday July 23, 1992, regarding the request presented to you by the National Pest Control Association (NPCA). This request focused on a proposed change to have the labeling for termiticide products amended to only require the soil adjacent to the outer foundation walls treated to a maximum depth of four (4) ft. This would only involve the soil immediately adjacent to the outer foundation wall where there is a basement in the structure or a sloping grade with extensive back fill.

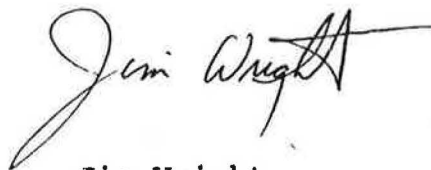
First, I would categorically state that there may be circumstances where the Pest Control Operator (PCO) could encounter a structural problem which would prohibit the full label rate application of a termiticide to this type of structure. It is not our intent to require the PCO to exacerbate the structural flaw during the termite treatment. Additionally, if the owner of the property requests a less than labeled volume application, for any reason, it is incumbent upon us to allow that to occur. In these situations, clearly the PCO should be allowed to make the owner aware of the difficulty in treating at the full label rate and have the owner authorize the less than label rate application. Otherwise, the owner will not be aware that they are getting an incomplete treatment.

Second, I have drawn upon the expertise of the scientific and regulatory community regarding the wisdom in limiting these outer wall treatments to a depth of 4ft. The consistent response is that there is no scientific reason to limit the depth of treatment. If the termites are present they will simply forage around the bottom of the barrier and eventually infest the structure.

Third, controlling termites, through the use of pesticides, is a function of placing the termiticide in the proper place and in the proper quantity to create a barrier which will prevent the termites from gaining access. The proper quantity is a function of the proper amount of active ingredient in a mixture and delivered in sufficient amounts to treat the soil completely to the top of the footing. It appears that the primary reason for this request is to sanction the methods currently employed when treating these types of structures. This is the same as saying that because people exceed the posted speed limit on our highways, we should then increase that speed limit to accommodate those who are guilty of speeding.

I would like to go on record with your agency as stating that the Association Of Structural Pest Control Regulatory Officials (ASPCRO), does not believe these label changes should be allowed, which would limit the depth of soil treatment on outer foundations to a maximum depth of 4ft. We strongly feel that these changes are not based upon sound science and do not represent the best interest of the public or the user community. I am convinced you will give this position a great deal of consideration, as you make your decision.

With kindest personal regards, I am,

A handwritten signature in cursive script, appearing to read "Jim Wright". The signature is fluid and stylized, with a long horizontal stroke at the end.

Jim Wright  
Vice President ASPCRO

cc: Dave Scott ✓  
Alex Hawkins

Association of  
Structural  
Pest  
Control  
Regulatory  
Officials

RECEIVED  
INDIANA STATE CHEMIST

AUG 06 1992

1715 SW Crest Drive  
Topeka, Kansas 66604  
August 3, 1992

David E. Scott  
Office of the Indiana State Chemist  
Department of Biochemistry  
Purdue University  
West Lafayette, Indiana 47907

Dear Dave:

As of the end of July, I have resigned my position as administrator of the pesticide use program in Kansas. As a result, I regret that I will no longer be the Kansas delegate to ASPCRO, and I must resign my position as Secretary/Treasurer. Please advise me at your earliest convenience as to the appropriate disposition of the various documents and files in my possession, as well as what to do with the funds in the treasury - roughly \$11,600 at present. Since I sent out dues reminder notices around the first of July with the Kansas State Board of Agriculture return address, it may be best for me to continue as Secretary/Treasurer until the annual meeting in September so that members are not confused about where to send their dues. I still work for the same agency.

Although I still work for the Board of Agriculture, I am actively looking for a position elsewhere. I have worked in the same program for 15 years, and although I have truly enjoyed my jobs here, it is time for a change. I hope to find a challenging and rewarding position in a pesticide-related field - possibly in industry - or maybe even at EPA. If you know of any job openings or happen to hear of any, I'd appreciate it if you would let me know.

I have enjoyed working with you in ASPCRO over the past 10 years or so, and I hope we will run into each other in the future. My mailing address is shown above. If you prefer to call, my number is (913) 272-6573. Please give my regards to Ed White and the rest of your staff.

Sincerely yours,



W. A. Hawkins, Jr.

A. R. Hanks  
State Chemist &  
Seed Commissioner

R. J. Noel  
Associate State Chemist &  
Laboratory Director

J. G. Eikenberry  
Feed Administrator

R. L. Geiger  
Chief Inspector &  
Auditor

Office of

INDIANA STATE CHEMIST AND SEED COMMISSIONER

Purdue University • 1154 Biochemistry Building  
West Lafayette, IN 47907-1154  
(317) 494-1492

L. W. Nees  
Seed Administrator

R. C. Rund  
Fertilizer Administrator

D. E. Scott  
Pesticide Administrator

C. L. Wiese  
Accounting &  
Administrative Assistant

August 11, 1992

Mr. Herb Harrison  
Chief, Insecticide-Rodenticide Branch  
Office of Pesticide Programs, U.S. EPA  
401 M Street S.W.  
Washington, D.C. 20460

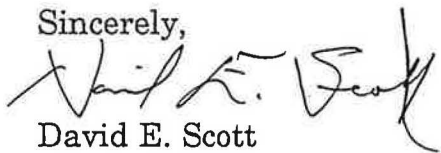
Dear Mr. Harrison:

Pursuant to recent conversations that I have had with Anne Lindsay and other OPP staff members and your discussions with Jim Wright, ASPCRO Vice President, this is to confirm ASPCRO's desire to have U.S. EPA move forward in response to the recommendations made in the "1989 AAPCO/SFIREG TERMITICIDE LABELING REPORT." A copy of that report has been enclosed for your reference.

It is our understanding that of particular concern to the Agency are the recommendations on pages 1 and 2 of that report, dealing with restricted use classification for the soil termiticides. It is also our understanding that this concern has been a major cause for delay in formal Agency actions. Therefore, it is ASPCRO's opinion that U.S. EPA should deal with and address the restricted use classification issue independently of the remainder of the report. This would then allow the other recommendations to be addressed in, hopefully, a more expeditious manner.

We appreciate any consideration that you and the U. S. EPA are able to give to this matter. Questions or concerns may be directed to me at (317) 494-587 or at the address on the enclosed business card.

Sincerely,



David E. Scott  
Pesticide Administrator

cc: Anne Lindsay, OPP  
Bud Paulson, President AAPCO  
Ned Zuelsdorff, Chairman SFIREG  
Jim Wright, Vice President ASPCRO

# Association of Structural Pest Control Regulatory Officials

ASPCRO

December 22, 1992

Ms. Phyllis Flaherty, Chief  
Pesticide Enforcement Branch  
Office of Compliance Monitoring  
401 M. Street S.W.  
Washington, D.C. 20460

Dear Phyllis:

Enclosed is a copy of a July 28, 1992 memorandum and attachments to you from Ed White. The memorandum addresses termiticide efficacy, FIFRA Section 2ee, and FIFRA Section 24.

I am sending this again with a specific request for a response from U.S. EPA regarding the Agency's position relative to the states' authority to regulate termiticide use above and beyond the product labels. This is particularly important to ASPCRO, as many member states have already or are in the process of adopting termiticide use restrictions and requirements which are more restrictive than the use requirements established by the product labels. In addition, ASPCRO has planned a meeting with the National Pest Control Association (NPCA) regarding termiticide use pending your response to this inquiry.

Your rapid attention to this matter will be appreciated. Questions may be directed to me at (317) 494-1585.

Sincerely,



David E. Scott  
President ASPCRO

cc: Harvey Gold, Executive Director NPCA  
Jim Wright, ASPCRO Vice President  
Benny Mathis, ASPCRO Secretary  
Bud Paulson, AAPCO President  
Ned Zuelsdorff, SFIREG Chairman