CONFERENCE SPEAKERS

Don Alexander - AR State Plant Board
Gregg Baumann - NPCA
Melinda Baron - Mayor, Hot Springs
Tom Diederick - Orkin Pest Control Inc.
Harvey Gold - NPCA
Norm Goldenberg - Terminix International
Jim Herrin - GA Dept. of Agriculture
Charles Hromada - Terminix International
Dr. James Jarrett - MS State University
Van Kozak - EPA Region Six

Benny Mathis - TX Structural Pest Control Board
Mike McCauley - AR Pest Control Assoc.

Dr. C.A. McDaniels - Gulfport

Dave Scott - Prudue University

Reid Sprinkle - DowElanco

Dr. Gregg Story - Miles Inc.

Artee Williams - EPA, Washington

Jim Wright - Clemson University

SPONSORS

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Orkin Pest Control
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Allied Bruce Terminix Companies Inc.

AR Pest Control Assoc.

American Cyanamid Company

Mid American Insurance

Ramsey Chemical & Equipment Company

Valent Corporation

HOSPITALITY SUITE

Feel free to visit.
Snacks and non-alcoholic beverages provided.

SPOUSE

Please meet in Hospitality Suite each morning at 9:00 a.m. There will be several activities to choose from.

HOTEL

Arlington Hotel

Central Avenue & Fountain Street

Hot Springs, Arkansas

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ASSOCIATION

OF

STRUCTURAL

PEST

CONTROL

REGULATORY

OFFICIALS

33rd Annual Meeting

August 29 - September 1, 1993

Arlington Hotel

Hot Springs, Arkansas

Agenda

Association of Structural Pest Control Regulatory Officials

SUNDAY, AUGUST 29, 1993

4:00 p.m.	- ASPCRO Board of Director Meeting	
	Board Room off Lobby	
6:30 p.m.	- Reception - Hosted by	
	Orkin Pest Control,	

Magnolia Room

2:00 p.m. - Registration, Mezzanine

MONDAY, AUGUST 30, 1993

7:00 a.m.	- Continental Breakfast	
	Conference Room B	
	Hosted by NPCA & RISE	

- 7:30 a.m. Registration, Mezzanine
- 8:30 a.m. Call to Order David Scott,
 President, ASPCRO Welcome
 to Arkansas, Hot Springs and
 Convention: Don Alexander,
 ASPB; Ms. Melinda Baran,
 Mayor; Mike McCauley, APCA
- 9:15 a.m. Update from Washington,

 Harvey Gold, President, NPCA
- 9:45 a.m. State Issues, Tom Diederick, Orkin Pest Control
- 10:15 a.m. Break

10:30 a.m. - Local Regulations, Norm Goldenberg, Director Government Affairs, Terminix International

- 11:00 a.m. Technician Testing, Panel
 Discussion, Jim Herrin,
 GA Dept. of Agriculture,
 Benny Mathis, Texas
 Structural Pest Control
 Board, Charles Hromada,
 Terminix International
- 12:00 Noon Lunch

 Conference Room C, 2nd Floor

 Hosted by DowElanco
- 1:30 p.m. Certification & Training,
 Artee Williams, U.S. EPA,
 Washington, D.C.
- 2:15 p.m. EPA Region, Van Kozak, EPA Region 6, Dallas, TX
- 3:00 p.m. Break Hosted by
 Arkansas Pest Control Assoc.
- 3:15 p.m. Reporting Guidelines for
 HUD WDI Forms, Gregg Baumann,
 NPCA & Dave Scott, ASPCRO
- 3:45 p.m. Premise Experimental Use

 Termiticide, Dr. Gregg Story,

 Miles Inc.
- 6:00 p.m. Pool side Reception Hosted by Van Water & Rogers & FMC Corp.

7:00 p.m. - Pool side Barbecue

Hosted by Terminix International

TUESDAY, AUGUST 31, 1993

- 7:00 a.m. Continental Breakfast

 Conference Room B

 Hosted by NPCA & RISE
- 8:30 a.m. ~ Gulfport Termiticide Soil Residue
 Update, C. A. McDaniels, Gulfport
- 9:15 a.m. MS State Termiticide Soil Residue
 Update, Dr. James Jarrett,
 MS State Univ.
- 10:00 a.m. Break
- 10:15 a.m. ASPCRO Soil Residue Study, Jim Wright, Clemson Univ.
- 11:00 a.m. Termiticide Bait, Reid Sprinkle,
 DowElanco

AFTERNOON FREE TO ENJOY HOT SPRINGS

6:00 p.m. - Dinner Cruise on the Belle of Hot Springs

WEDNESDAY, SEPTEMBER 1, 1993

8:00 a.m. - Business Meeting

ASPCRO Committee Reports

State Reports

ASPCRO BOARD OF DIRECTOR'S MEETING Sunday, August 29, 1993

Mr. David Scott, President, opened the business meeting at 4:00 p.m. on Sunday, August 29, 1993, and recapped the agenda. Topics covered were: termiticide soil sampling project with Jim Wright, Committee Chairman, updating the board of directors on the status of the project; an update on the ASPCRO activities this past year; minimum treatment standards for subterranean termite control; treatment standards for use of wood treatments and baits; ASPCRO's concerns in the coming year including posting notifications, IPM in schools and discussion on termiticides.

Attendees at the board of director's meeting were: Dave Scott, President of ASPCRO, Indiana; Benny M. Mathis, Texas; Roger Borgelt, Texas; Jim Wright, South Carolina; Brad Kard, U.S.D.A. Forest Service, Gulfport, Mississippi; Jim Harron, Georgia; Diane Canaday, West Virginia; Carl Falco, North Carolina; Lonnie Matthews, New Mexico; Katherine Fedder, Michigan; Bob Wulfhorst, Ohio; Barry Patterson, New Mexico; George Saxon, Indiana; Katherine Fedder, Michigan; and Forrest St. Aubin, Kansas.

Jim Wright reported that the history of the termiticide sampling dates back to 1989. The project was launched under the direction of Jim Harron to evaluate termiticide soil residues. A couple of years ago we entered into an agreement with the manufacturers of the seven (7) termiticide products available for use at that time and set up a project to use PCO's to do those treatments and then for an evaluation process. Committee members are Jim Wright, Bob Russell, Jim Harron, Joe Maulden, Skip McDaniel, and Brad Kard.

Brad Kard stated we have collected at least 99% of the raw data. What that represents at this point, we do not know. We have all the data points before we can do a thorough statistical analysis. We will take all data points with a wide range of values and sit down with the Forest Service statisticians and make sure we can get the data in the most realistic format and results we can look at. Bio-mathematicians give the data more validity than an entomologist. He stated he thinks a regulatory decision can be reached based on the data.

Skip McDaniel stated that as all of you are aware, there are a lot of forensic variabilities in the way the pest control operator's are doing the treatments, the way samples are taken, variabilities in the way the samples were treated from laboratory to laboratory.

Further discussion followed regarding samples, costs, etc.

Motion passed whereby monies made available for analytical costs, outside statistician if needed, etc. that those funds can be disbursed to that individual (persons) contractually.

Brief discussion followed on the issue of pretreatments.

Discussion followed on pryfon (termiticide) data, releasing the data and establishing standards. Pryfon is registered in Indiana. It was suggested that ASPCRO prepare a model rule for the registration of termiticides. If EPA is not going to deal with the efficacy of a product, then states must assume responsibility to the consumer. The interaction of the National Forest Service and EPA was discussed. The manufacturers do the study on termiticides, and then submit to EPA for product registration.

The committee discussed Biflex, another termiticide. The National Forest Service in Gulfport states that Biflex shall be used at full label rates (.125). An issue ASPCRO and Gulfport (NFS) will take to SFIREG at their October meeting. The degradation study on termiticides included for registration, an issue with no failure rates.

ASPCRO resolutions discussed were that Biflex not be registered as the label recommends, but the highest rate to be used and research resolution for five (5) year study on efficacy of termiticides.

Lengthy discussion on the use of baits for termite control followed. Major concern is whether this method will be effective in providing long term control. Five year (efficacy) treatment will be a state specific issue. Gulfport believes that baits will not be successful if not used with conventional methods. Same assurances with the use of bait systems as with the use of conventional soil treatments. Researchers will own part of the paten on the bait systems.

Motion was made and passed to request EPA to allow two to three state representatives for development and review of label requirements for all non-conventional treatment methods. Vice President is responsible to see all resolutions are acted upon. To that end, we need to draft a letter jointly with the executive committee, ASPCRO and SPIREG representatives encouraging they work together with EPA.

Minimum treatment standards model was developed for adoption by each state along with the concept that each state adopt the things pertinent to that state. Kathy Fedder handed out a Termiticide Regulation survey which dealt with the state's standards. Motion was made and passed to present the model of minimum termite treatment standards to the ASPCRO group for adoption at the business meeting on Wednesday.

Dave Scott announced the next issue as being the need for posting and notification relative to pest control. Benny Mathis chaired a committee to develop a position for ASPCRO. This is a big issue.

Benny Mathis stated a survey was done with the states to come up

with guidelines. The necessity is apparent to develop a model rule to present to EPA on the posting and notification issue. Indoor air will be top priority for SFIREG. Opening statement will be to encourage research.

Motion was made by Kathy Fedder and seconded by Jim Wright to continue to encourage EPA to make indoor air quality a top priority and to devise a model for ASPCRO for indoor posting and notification requirements. Motion carried.

ASPCRO's goal is to enhance the relationship between ASPCRO and HUD, VA, and FHA is an important one to address the problems that exist with the posting and notification issue.

EPA has a manual on IPM. Executive committee to study document and make recommendations to ASPCRO.

The Board of Directors consists of three at large, President, Vice President and Secretary-Treasurer. Office is held for two years. Director is rotated each year. Jim Harron's term expires in 1994, Kathy Fedder's term expires in 1995, and Diana Canaday's term expires in 1995.

Executive committee meeting was adjourned at approximately 6:00 p.m.

33rd Annual ASPCRO Meeting Hot Springs, Arkansas Monday, August 30, 1993

Dave Scott

President, ASPCRO

Called the 33rd annual ASPCRO meeting to Order at 8:30 a.m.

Don_Alexander

Welcomed ASPCRO to Hot Springs, Arkansas, gave an overview of the State of Arkansas, and introduced the Mayor of Hot Springs.

Ms. Melinda Baran

Mayor, Hot Springs, Arkansas Welcomed the group to Hot Springs.

Mike McCauley

Arkansas Pest Control Association Welcomed ASPCRO to Arkansas.

Dr. Richard Kramer

National Pest Control Association Legislative update from Washington. Discussed the following:

Major Issues:

- -Pesticide Policies
- -Less Toxic Pesticides
- -Advertising in the pest control industry
- -Labeling Problems
- -Baits
- -Failure rates of termiticides
- -IPM strategies

Overview of Education of NPCA Membership:

- -Standards of competency
- -Continuing Education
- -Professionalism
- -Individual Credentials

Overview of NPCA's Organization

Levels of Credentials

- -Pest management credentials Technician
- -Master pest management credentials specialist

Role of the Association

- -Training and examination
- -Program promotions
- -Resource Materials

Cooperative Agreements

- -Between Pest Control Technology and NPCA
- -Termite Training Course first programs to be set up prior to 1994 termite season

Thomas Diederick

Chairman of Government Affairs, Orkin Pest Control

State Issues

-Posting & notification in limbo at present time

-FIFRA as amended - Re: Food Safety

Journal of Public Health stated that there is potential exposure and health risks for infants following indoor pesticide applications. National Research Council has published a 400 page report dealing with diets of infants. Risk assessments were made regarding all dietary and non-dietary exposures, and air as to the amounts of pesticides following treatments.

-Supreme Court decision on preemption

Thirty-eight out of fifty states have Attorney General rulings or laws regarding preemption.

-State Issues

- 1. local preemption
- 2. posting notification
- 3. multiple chemical sensitivity, (MCS)
- 4. health concerns in label warnings
- 5. restrictions of pesticides in schools
- 6. advertising
- 7. termite treatment standards
- 8. matrix fine schedule

Norman Goldenberg

Director of Government Affairs, Terminix International Local Regulations:

- Preemption Passed Legislature in Alabama, Arizona, Arkansas, Illinois, Michigan, Montana, Nebraska, New Hampshire, North Dakota and Texas. Legislation pending in Massachusetts, New York and Wisconsin. Legislation defeated in Colorado, Hawaii, Iowa, Maryland, and Wyoming. Legislation favorable in 94 for Colorado, Idaho, Iowa, Maryland, North Carolina, Utah, Wyoming. Prior Preemption laws in California, Connecticut, Minnesota, New Jersey, Ohio, Rhode Island, Louisiana, Mississippi, Pennsylvania, and West Virginia. Delaware, North Carolina and Oregon have attorney general opinions regarding preemption.
- Figures from the American Association of Poison Control Centers for 1991: Seven calls on pesticides; average life expectancy 75 years; and cancer rates are dropping.
 - Issues
 - -Water drinking, ground water
 - -Air indoor and outdoor
 - -Posting

Jim Harron, Georgia Department of Agriculture, Benny Mathis, Texas Structural Pest Control Board, and Charles Hromada, Terminix International

Technician Testing

Benny Mathis stated in 1986-1987, Texas started requiring verifiable training. Legislature amended Texas law in 1989 whereby required testing and training of technicians. SPCB has noted that complaints have dropped 20% since implementing testing and training and continuing education for certified applicators. The major

issue is having the testing and training available throughout the state. Apprenticeship requirement of no longer than 6 months is required and after receiving the required classroom and on the job training, an individual can then attend the training course and test to be a technician. The technician training course was developed by the Extension Service and went out by satellite to eleven locations in March. Approximately 1,200 people were reached by satellite at the eleven locations. All exams are graded by scanner and we can grade and send out letters in approximately one day.

Jim Harron stated in 1990 Georgia became concerned about applicators. In 1990 required all salesmen and service personnel to be registered in 1993. When we started testing, the biggest problem Georgia had was motivating companies to send their employees to the testing. Stated Georgia ended up testing hundreds of individuals a day at the end. We developed a training manual on a ninth grade reading level. Georgia requires reregistration — five hours of category retraining and recertification over a two year period. We hope to test all 3,500 with 85% passing and 15% failure rate. The individuals failing will probably end up losing their jobs or the employees have been with the company 25 or 30 years and cannot read. They will still be able to work with another registered employee. Georgia is using video cameras to document some cases and this is making a tremendous impression on hearing examiners.

Charles Hromada stated his view point on industry regulation and testing and was concerned about what the PCO was doing. A hidden video completely taped one of our employees doing a job at a customers house. Stated he is supportive of technician licensing and training and it is a big change for pest control companies. Stated Terminix is training all their new hires inhouse. should be fair and reasonable in regard to reading levels. information should be practical and designed for specific duty. Tests need to be expeditiously applied. Terminix had 250 individuals test under Georgia's program and need to test 150 more. There is a demand for geographic locations where tests can be taken on a weekly or daily basis and graded quickly. After the individual passes, the company would like to know the result of the test as soon as possible. Stated Terminix has revamped their pest and termite training process.

Artee Williams, U. S. Environmental Protection Agency, Washington, D. C.

Certification & Training

Stated announcement by USDA and EPA that they are committed to new policies to reduce the use of pesticides in this country. The Clinton administration is committed to reducing the use of pesticides and to promote sustainable agriculture. This will be implemented jointly by the USDA, EPA and the Food & Drug Administration with emphasis on the following:

- Reduce the risk while insuring availability of cost effective pest management tools.
- Intensify efforts to reduce use of higher risk pesticides and promote IPM.
- Help test and implement improved and safer methods of pest management.
 - Promote development.
- Reduce risk to all Americans and especially less risk to children.

Recommendations:

- Toxicity testing
- Uncertainty factors
- Food consumption data break out risk assessment into categories.
- Pesticide residue data standardize analytical methods and increase sampling of foods consumed by children
 - Risk assessment dietary and all exposures
 - Reduce estimation of cancer risk

In regard to incidents, we do not have enough knowledge and we need to know more. Need to commit to exploring and addressing risk management. Setting up a Response Organization with an Interagency Policy Committee and Steering Committee. Work Groups will be broken down as follows: Pesticide Use Reduction; Risk Assessment; and Incident Monitoring. The short term strategy involves new active ingredients plus reduced risk or reduced opportunity for exposure and this will equal priority review. The long term strategy involves the following:

- Develop criteria for identifying reduced risk pesticides
- Streamline overall registration process
- Make information readily available to users
- Consider incentives for manufacturers and developers
- Expand to new products with existing active ingredients

In certification and training, software paperwork will be signed on test questions for the states. Increase training concerning groundwater concerns.

Van Kozak, Environmental Protection Agency

Region 6, Dallas, Texas

Perceptions of Where EPA is headed, the Delaney Dilemma, and Worker Protection.

Stated he administers and oversees Enforcement and Certification and Training for Region 6. Worker protection is a high priority and substantial changes in pesticide enforcement. Priorities are as follows:

- Demargination of the environment
- Four main themes:
 - Pollution prevention
 - Integration media

- Partnerships with the states
- Issues involving equity

Principles: Overall reduction of pesticides; interagency cooperation; policy on wetlands; approach to the Delaney Dilemma; media - task forces in headquarters regarding the handling of enforcement functions.

Delaney Dilemma is policy regarding court decision on pesticide products registered since 1947. Risks should be balanced against benefits. Tolerances are officially set under Sections 408 and 409 under the law. FDA amended the Act, Section 409 of the law. This bill was considered inconsequential. The Delaney clause strictly restricts the amount of any pesticide. In 1989 petitioned EPA to revoke food tolerances. Presently doing the following to implement the decision:

- Identify chemicals that have 409 tolerances.
- Identify pesticides that appear to meet the Delaney clause that induces cancer.

Decisions will have to be made as to whether EPA should modify their concentration policy, ready to eat policy, whether the court decision affects constituents policy and impacts agricultural food products and industry. EPA, USDA, and FDA reviewed policy on emergency exemptions. By late fall EPA will decide how to handle 32 pesticides.

<u>Greq Baumann, NPCA and Dave Scott, ASPCRO</u> Reporting Guidelines for HUD WDI Forms

Dave Scott stated Indiana's largest complaints are in the structural pest control industry. Most consumer complaints are WDI reports and inspections. It involves the seller, mortgagee, lending institution, and regulator. NPCA has gained an audience with HUD. NPCA allowed ASPCRO to become involved in the issue.

Greg Baumann stated that meeting with HUD is a unique window of opportunity. I went back in NPCA records and found legislation going back and forth from 1975. The WDI form is a high priority since for PCO's it is their major source of liability. Objective is to have a final draft of the WDI form by this fall. NPCA did not want to do an interpretation of conducive conditions. Every piece of property has inaccessible areas and visible evidence of previous infestations should be noted. Any damage whatsoever should be noted and if the damage was corrected by another company. Pennsylvania's program is designed to hand out to realtors the training manuals outlining the requirements necessary to do termite inspections.

<u>Dr. Gregg Story, Miles, Inc.</u> Premise Experimental Use Termiticide

Gave an overview, mode of action and experimental use regarding

Premise.

- Toxicology Dermal LD10 and Oral LD50
- Indoor air concentration highest average indoor air concentration in crawl space of homes.
 - Not a cholinesterase inhibitor
- Formulation 21% active ingredient, water-based, mixes well, no odor.

Purpose is to evaluate the effectiveness under conditions of use consistent with normally accepted practice of termite control. The scope of the program presently involves 24 states and 90 homes per year active infestation. Applications were made at the rate of 0.01% to 0.1% to post constructions, conventional, and with and without foam. Packaged in 55 fluid ounce units. Applications made under direct supervision of Miles R & D representatives, applied by licensed pco's and according to guidelines. Miles paid for application and provided Premise at no charge to pco. Evaluations were made at 30 days, followup as needed and inspections were done at one, two and three years. Annual summaries are issued and the final report will be within six months of the next three year evaluation. In summary, Miles contacts approved pco, preapplication site inspected, and on site during application. On site information is obtained - graphs, soil samples, volumes Conduct T-rig evaluations, return empty confirmed and etc. containers to Miles and followup inspections and reports are made. Some of the test sites are Florida, Georgia, Texas, Oklahoma, Indiana, Missouri, Kentucky, New Jersey, Pennsylvania, and Arizona. Presently developing and marketing in Japan.

TUESDAY, AUGUST 31, 1993

C. A. McDaniels, Gulfport, Mississippi Gulfport Termiticide Soil Residue Update

Soil samples were taken on days, 1, 30, 60, 120, 180, 240, 300, 360, 764 and 1,057. Showed slides of where applications of termiticides were applied and samples taken. The analysis were EPA approved sampling procedures.

Half-Life (days)

Dursban	1,420
Demon TC	362
Prevail	390
Tribute	684
Dragnet	688
Torpedo	688

Dr. James Jarrett, Ms State University Ms State Termiticide Soil Residue Update

Stated took soil and sifted and put back in trenches; took cores to

5 inch depth; reviewed collection site, date of application, date samples, time in field and concentration in PPM. All compounds put at lowest label rates.

<u>Steve McMasters and Mike Chambers, Dow Flanco</u> Discuss Hexaflumurom - Termiticide Bait

Steve McMasters discussed the following objectives:

- increase the level of understanding of this unique termite control concept
- initiated a dialogue to determine what regulation constraints would exist for the use of this concept and identify plans to address.

Mike Chambers covered new technology - colony control via bait system. There is a three step concept - monitoring, baiting, and monitoring. Baits will enhance traditional barrier treatments.

Meeting was adjourned at 11:00 a.m., August 31, 1993.

TUESDAY, AUGUST 31, 1993

BUSINESS MEETING

Called meeting to order at 11:00 a.m.

Mr. Mathis reads the states who have submitted their dues. All dues have to be paid to be in good standing.

Motion to amend the minutes of last meeting to reflect Kathy Fedder and Diana Canaday were elected to Board of Directors as opposed to the Historical Committee was made by Kathy Fedder. Kevin Stewart seconded the motion. Motion carried.

Kathy Fedder recaps the last committee meeting on the Minimum Treatment Standards for termiticides. Stated they started with a draft incorporating new technology and the conventional treatment to be used only as a "model".

Dave Scott states that back in 1989, ASPCRO came out with a termiticide labeling report to EPA and the industry stating what needed to be done to correct termiticide labeling. One of the recommendations that came out of that report was, the states that do not have regulations or standards relative to termiticides should consider developing them. Also, ASPCRO developed a "model" for the states consideration.

Motion to adopt by ASPCRO the proposal from the Committee as acceptable and submit to NPCA for review and comment before giving final proposal to the manufacturer by Jim Wright. Barry Patterson seconded the motion. Motion carried.

Kathy Fedder will continue to be the Chairman of this committee.

Discussion followed on states regulations and methods of termiticide use.

Dave Scott announced the next agenda item.

The "guidance" ASPCRO is working on jointly with NPCA is looking for approval of this guidance by the Association. When we meet jointly with HUD and NPCA, we will be able to educate them on the specifics of this document.

Lengthy discussion followed on the suggested guidelines for completing the WDI report. Suggestions were made to strike obstructions and inaccessible areas. Motion made to endorse those changes and return to NPCA for forwarding to HUD made by Jim Harron. Kathy Fedder seconded the motion. Motion carried.

Dave Scott requests report from the Resolutions Committee.

Bob Wulfhorst, Chairman of the Resolutions Committee, reported the committee had a lengthy discussion on where to position the Association in relation to the new termiticide treatment technology. The following resolutions were presented for consideration by the members:

Resolution 3: EPA Registration of Termiticides

There is a need for a scientifically based and economically sound efficacy standard for termiticides when they are considered for registration by EPA. The USDA Forest Service Laboratory at Gulfport, Mississippi, is recognized as the pre-eminent source for development of efficacy data submitted in support of termiticide registration. The USDA has included additional test protocols into their evaluation of termiticide chemicals, one of which now includes analytical data specific to environmental degradation of soil applied termiticides. Climatic and other environmental conditions, as they exist in different regions of the United present significant difficulties in the successful utilization of a standardized termiticide chemicals, one of which now includes analytical data specific to environmental degradation of soil applied termiticides. Climatic and other environmental conditions, as they exist in different regions of the United States, present significant difficulties in the successful utilization of standardized termiticide products and application methods. There are numerous reports of the failure of currently registered termiticides, when used under field conditions, to provide adequate control of termites for five years, which is the current efficacy standard accepted by the pest control industry and most pest control regulatory agencies.

Five years ago these termiticides (cypermethrin, permethrin and fenvelerate) were registered under less rigorous criteria and do not meet the current standards at the lowest rates of 100% efficacy for five years at four sites. All termiticides that do not meet the new standards should be re-evaluated. Recently EPA registered a termiticide that does not meet the existing standard of 100% efficacy for five years at all four USDA test sites. EPA has previously enforced these standards as a condition of registration.

Resolved: The Association of Structural Pest Control Regulatory Officials (ASPCRO) supports the continued concept of a minimum five year efficacy standard for the registration of conventional soil applied barrier termiticide products. ASPCRO encourages the United States Environmental Protection Agency to similarly support this standard when the agency considers the registration of a termiticide product. Additionally ASPCRO believes that prior to registration by the EPA, any new soil barrier termiticide should be registered only after the product has demonstrated 100% efficacy for five years at the four USDA Forest Service research sites. Such registration must consider as its minimum use concentration for labels, the minimum concentration which meets the five year

efficacy standard under USDA test conditions. And further, EPA should evaluate the importance of soil degradation data generated by the USDA Forest Service Laboratory when they consider registration of a termiticide product.

Kathy Fedder made a motion to approve Resolution 3. Jim Wright seconded the motion. Motion carried.

Resolution 4: Registration and Labeling of Termiticide Products, Baits, Biologicals, Wood Treatments, Foam Applications, etc.

Alternative termite treatment technologies are moving toward EPA registration and greater acceptance by the pest control industry. Considering the diversity of non-conventional control methods and products and the very significant differences between the new concepts and current control strategies, many questions will need to be answered concerning how to regulate these new products and methods. These include foam applications and baits. Clear, concise labeling is imperative to proper use of these methods and technologies. State regulatory agencies have a long history of regulation of the pest control industry and as such many ASPCRO members are highly qualified in the area of termite control and environmental assessment of termiticide chemicals.

Resolved: In the spirit of our state-federal partnership with the EPA, the regulatory officials encourage the EPA to include state regulatory officials in the process of development of regulatory standards and labeling for new termite control technologies. Proper initial labeling will prevent future problems with products and methods used in wood destroying insect control. Further, ASPCRO recommends that those states involved in the process represent the diverse geographic regions of the United States.

Carl Falco made a motion to adopt Resolution No. 4. Motion seconded by Jim Haskins. Motion carried.

Meeting adjourned at 12:30 p.m.

WEDNESDAY, SEPTEMBER 1, 1994

Meeting called to order at 8:00 a.m. by Jim Wright. Mr. Wright stated we will continue with the 1993 resolutions.

Resolution 1: Recognition of the Arkansas State Plant Board

The members of the Association of Structural Pest Control Regulatory Officials recognize the outstanding efforts of the Arkansas Plant Board as our host for the 1993 meeting. In particular we extend our special thanks to Don Alexander, Kiven Stewart and the staff for all of their efforts including the choice of a very pleasant meeting site, well organized hospitality and an extremely personable staff who took care of our every need.

Resolved: The members of ASPCRO express our sincere appreciation to the Arkansas State Plant Board for all of their work and effort which culminated in a well attended and highly productive annual meeting.

Dave Scott made a motion to adopt Resolution 1. Forrest E. St. Aubin seconded the motion. Motion carried.

Resolution 2: Recognition of Event Sponsors

There are numerous sponsors who contributed to the 1993 annual meeting of the Association of Structural Pest Control Regulatory Officials (ASPCRO). Provisions for support of hospitality arrangements are integral to communication which is the foundation of this meeting. Similarly, these hospitality arrangements resulted in enhancement of communication in a pleasant and relaxed atmosphere.

The members of ASPCRO wish to thank the following Resolved: sponsors for their gracious contributions and support: Orkin Pest Control; National Pest Control Association; Responsible Industry for a Sound Environment; Terminix Industries; Dow Elanco; Arkansas Pest Control Association; Van Water & Rogers; FMC Corporation; BASF Corporation; Miles, Inc.; Taylor Enterprises; Allied Bruce Terminix Companies, Inc.; American Cyanamid Company; Mid America Insurance; Ramsey Chemical & Equipment Company; Valent Corporation; Adkins Pickles; Riceland Foods; Colonial Earth Grains; Oaklawn; Butler Paper; Democrat Printing; Nationwide Paper; Coleman Crystals; Ciba-Geigy; Hot Springs Chamber of Commerce; Smith Whetstones; Hartz Seeds; Aromatique; Arkansas Milk Producers Assocation; Arkansas Game and Fish Commission; Hot Springs Factory Outlet; Hot Springs Packing Company; Bill Norman Lures; Arkansas Pest Control Supply, Inc.; Oldham Chemical Company; Mountain Valley Water; AMI National Park Medical Center; Hope Chamber of Commerce; Cullum Seeds, Inc.; Planters Peanuts; Worthen Bank; and TCBY.

Jim Harron made a motion to adopt Resolution 2. Jim Haskins seconded the motion. Motion carried.

Resolution 5: EPA Certification and Training Funds for Non-Certified Applicators.

EPA currently allocates grant funds on a formula basis for certification of pest control applicators by state lead agencies. However, no grant funds are available to assist states who register licensees or otherwise regulate pest control technicians outside federal certification programs. Many states train and/or test these non-certified applicators. Currently, there is no uniformity in this system and states are devising their own plan. Considering that these pest control technicians work under the supervision of a certified applicator, they need to be recognized by EPA and come under the jurisdiction of FIFRA.

Resolved: ASPCRO recommends that the EPA allocate some portion of certification and training funds based upon the numbers of registered technicians licensed under their EPA approved licensing schemes. This will not only encourage all states to develop licensing standards but also encourage consistent standards across all states.

Jim Haskins made a motion to adopt Resolution 5. Motion seconded by Benny Mathis. Motion carried.

Jim Wright reported that Dave Scott was able to get a seat on the SFIREG committee. EPA stated they felt structural pest control needs to have a position. Lonnie Matthews was nominated to sit on the SFIREG committee.

Jim Wright called on Benny Mathis to give the Treasury Report.

Benny Mathis stated in November 1992, we received \$11,840.39. From November to August we received \$3,536.45 in deposits and expenditures were \$3,846.19. The balance as of 8-15-93 was \$11,530.55.

Don Alexander reported that he anticipated having approximately \$2,500 to return to the ASPCRO account after paying all the bills for the 1993 ASPCRO convention.

Benny Mathis, stated since Texas was going to host the 1994 meeting in San Antonio, he would like to retain approximately \$2,000 in the account.

Jim Wright reported on the Soil Residue Analysis account. He stated the balance as of December 1, 1992 was \$56,161. He stated there were some small expenses for slides and postage and the interest for 1992 and 1993 to date was \$1,862. The account balance is presently \$56,018.

Jim Wright gave an update on soil residue analysis. Stated 98 to 99% of all data points analyzed. Joe Mauldin represented the scientific community. Data is more complex than anticipated. They are going back and selectively looking and rerunning samples. They fully plan to draw some conclusions. We may find we cannot do soil samples on termiticides. We are going to make a decision as ASPCRO as to where we want to go with this information. Final decision will come back as a recommendation.

Benny Mathis gave a committee report on posting and notification. Outlined what other states are going to do regarding posting and notification. We have identified some elements and will come back to ASPCRO next year with a model program. Quite a few of the states have registries requiring posting and notification for yards, public buildings and schools.

The Nominations Committee, consisting of Jim Harron, Chairman, Lonnie Matthews and George Saxon have nominated Jim Wright for President, Benny Mathis for Vice Chairman and Carl Falco for Secretary-Treasurer.

Kevin Stewart made a motion to approve these nominations. Dave Scott seconded the motion. Motion carried.

Benny Mathis stated he had received bids from numerous hotels in San Antonio, Texas for the 1994 convention and the best price appears to be the Hilton on the Riverwalk. The members mutually agreed that the Hilton would be the ideal selection for the meeting.

Sylvester Davis made a motion to increase the registration fee for attendees to the convention to \$75.00. Dave Scott seconded the motion. Motion carried. It was further discussed that one guest attending with the member will be free and any additional guests will be required to pay the registration fee.

Members stated they would like to get the extension people involved and target them for invitations along with leaders of the state associations to attend the ASPCRO convention. Suggested speakers for the convention were someone from the research community to discuss non-soil termite control and strategies, someone to discuss case law and the criminal arena and someone from the Attorney General's office to discuss suits regarding advertising. Need to also invite Artee Williams from EPA as soon as possible in order that she can be sure to have the date available.

Members discussed having the 1995 meeting in North Carolina, 1996 meeting in New Mexico and 1997 meeting in Tennessee.

Barry Patterson, George Saxton and Carl Falco discussed drafting and developing an ASPCRO publication.

Jim Wright presented Dave Scott an award from the association for his outstanding work as President of ASPCRO.

Business meeting was adjourned at 9:35 a.m., September 1, 1993

The following is a brief summary of the state reports:

Benny Mathis, Structural Pest Control Board, Texas Stated during the 73rd Legislative session, and Texas had the following changes in their Act: (1) Allowing a technician license to be issued to individuals working under the supervision of noncommercial applicators. (2) Employ legal counsel to assist the Board in enforcement and legal matters. (3) Ability to enter into memoranda of agreements with other state agencies. (4) Incidental use situation section gives the Board the authority to define and set standards for the application of an occasional, isolated, site

specific pesticide use. (5) Definite license requirements for noncommercial license requirements for governmental employees who apply pesticides on a routine basis or as part of their employment. (6) A registration system and license requirements for beekeepers using pesticides and collect, remove or destroy honeybees attached to a dwelling or structure occupied by the public. (7) Applications to buildings, including apartment, buildings both inside and the buildings to be provided by noncommercial outside of applicators or licensed companies. Gave an administrative penalties, establishment inspections, technician apprentice licenses, and termite treatment standards and wood destroying inspection reports.

Kevin Stewart, Arkansas State Plant Board, Commercial Pest Control Service, Arkansas

This section is charged with enforcement of the Arkansas Pest Control law and regulations and FIFRA, concerning the nonagriculture use of pesticides. The Section issues licenses in fourteen separate categories, makes inspections of work performed by licensed commercial pest control operators and investigates individuals performing commercial pest service without a license. The heaviest amount of work is inspection of buildings treated for structural pests. During FY 92-93 the section performed 5,004 such inspections resulting in the issuance of 966 reports substandards termite treatment reports. One thousand three hundred seventeen pesticide use observation inspections were made and 126 examinations were given to 238 applicants. Twenty investigations were performed on individuals performing commercial pest work without a license, resulting in criminal charges being filed on five individuals. Changes in Pest Control Law increased the amount of surety bond required from \$1,500 to \$5,000 for licensed operators in our termite, other structural pest, household pest and rodent control license categories. Another change made requires public liability insurance for license holders of our general fumigation category.

Jim Haskins, Mississippi Department of Agriculture and Commerce, Mississippi State, Mississippi

Now have in place a \$100,000 liability insurance and \$5,000 bond requirement for all pest control license holders. We have cancelled over 100 licenses because of failure to provide. We also have authority to levy civil penalties. The maximum per offense is \$5,000. Since this was enacted January 1, 1993, we have levied a total of \$11,000 fines against five pest control operators.

Jim Lea, Missouri Department of Agriculture, Bureau of Pesticide Control

Bureau of Pesticide Control is entering its eighteenth year of regulating the sale and use of pesticides. Missouri currently has licensed 3,316 certified commercial applicators, 779 certified noncommercial applicators, 1,809 certified public operators, (2,942 of the 5,904 total are license in the structural categories) 1,036

dealers and over 36,962 certified private applicators. Since the technician program was implemented in July 1990 approximately 1,582 persons have been licensed as technicians, 1,050 of these persons are licensed in the structural categories. In addition, there are 9,866 pesticide products registered by 1,091 companies. Nine field investigators conducted a total of 10,857 inspections involving use, license, records, marketplace, producer establishments and technician programs. Of the 168 investigations this year, 55 were structural related. Of these, 18 were general structural, 36 termite and one fumigation.

David E. Scott, Office of Indiana State Chemist West Lafayette, Indiana

Legislation/Regulation Changes - Indiana Pesticide Use Application Law was amended to pre-empt regulation of pesticide use local units of government. A wood destroying organism inspection rule and reporting form were proposed for the second time in the last two years. Upon opposition to the proposed rule by unlicensed home and real estate inspectors, the Indiana Attorney General ruled that the existing pesticide law did not grant clear authority to develop such a rule and require the use of such a form The Office of the Indiana State for real estate transactions. Chemist will seek legislative authority in 1994. Largest number of structural pest control related complaints in 1993 involved wood organism inspections and report. destroying investigations and enforcement actions involving underdosing on preconstruction termiticide applications occurred during 1992/1993. Administrative civil penalties were utilized, often as part of negotiated settlements, in a large number of cases involving repeat offenders. Maximum penalties include \$250 for first violation, \$500 for second, and \$1000 for third and subsequent violations. Purdue Pesticide Programs (PPP) a division of the Cooperative Extension Service, in cooperation with OISC and the structural pest control industry held the first two training sessions for termite control at the Purdue Structural Pest Control Training Center on April 28 and 29, 1993. Approximately 20 individuals attended the training center during each of these sessions.

Diana J. Canaday, Pesticide Regulatory Programs, West Virginia Department of Agriculture

Regulations have passed for non-bulk pesticide rules for permanent operational areas, general groundwater protection rules for pesticides and bulk pesticide operation rules. The West Virginia Pesticide Control Act of 1990 has been amended to include regulated business. A regulated business applies pesticides for there own use (i.e., schools, housing authority) and are not for hire. The registered technician program is started. The Department levied \$650 in fines and sent out 29 notices of warning.

Ray Howell, North Carolina Department of Agriculture Raleigh, North Carolina North Carolina structural pest control program has not undergone

significant changes from previous years. Staffing levels. structural pest control rules and law remain unchanged. Progress has been made in several areas of the program. Las year it was reported that we had a scanner and software to facilitate electronic grading and statistical analysis of examinations and During the 1992-93 year the Division fully exam questions. implemented the electronic scoring and statistical analysis of license and certification examinations. Based upon these data, examinations are being reviewed and revised regularly. During the 1992-93 year the Division developed a plan for the development and implementation of a registered technician training program. committee has been appointed to develop a curriculum, delivery mechanisms, and to study and make recommendations concerning necessary rule and statute changes. Full implementation of this program will take place over the next two to four years. Division has performed a study of the feasibility of equipping all field inspectors with laptop personal computers to be used in completing standard inspection reports. If implemented, electronic reporting and record keeping will replace hard-copy reports and paper files.

Virginia Office of Pesticide Management.

Ten fulltime pesticide investigators provided the needed field support staff to conduct an effective pesticide enforcement program to ensure the safe and proper use of pesticides in Virginia. compliance manager position was filled to review inspections and investigations for possible enforcement actions. Policies established by the Pesticide Control Board encouraged voluntary compliance with laws and regulations. In efforts to support this policy, and to obtain compliance in those instances where voluntary compliance was not achieved, Office of Pesticide Mgt. staff carried out various activities, including misuse investigations, pesticide product monitoring, and compliance monitoring. For situations where voluntary compliance did not occur, the use of a penalty matrix to assess civil penalties for cases of pesticide misuse was initiated. As a result of investigations and subsequent hearings, twenty-seven civil penalties were assessed ranging from \$160 to \$3,000 against violators during FY 1992-93, for a total of \$26,340.

Structural Pest Control Commission, State of Arizona
New Licensing Categories - Two new licensing categories have been created. They are preconstruction pest control and golf course pest control. Preconstruction pest control is for termite pretreaters. These licensees must also maintain a post-construction license. The commission licenses all golf courses in the state. A comprehensive reorganization bill was introduced and resulted in changing the continuing education requirements. Preemption was included in the bill. The commission is now the only political subdivision allowed to regulate non-agricultural pesticide use in Arizona. A second bill with citizen sponsorship requires the Arizona Dept. of Education and the Arizona Structural

Pest Control Commission to develop guidelines for notification of pesticide applications and posting requirements for public schools.

Dennis Howard, Pesticide Regulation Section, Maryland Department of Agriculture, Annapolis, Maryland Regulations have been drafted to establish minimum requirements for general pesticide storage. Proposed regulations have been published in the register and the open comment period closes September 8, 1993. Regulations are also being developed to include a license for not-for-hire or non-commercial applicators. A total of 4,805 applicators and 3,330 commercial and public agency applicators are currently certified Approximately 136 written complaints have been received since the beginning of the year. Forty-two complaints involved wood destroying insect inspection reports, and twenty-eight cases of alleged non-agricultural misuse were investigated as well as seventeen cases of alleged Sixteen cases were a result of complaints agricultural misuse. related to turf or ornamental pesticide applicators and nineteen complaints were received regarding contractual disputes.

Jim Harron, Department of Agriculture, Atlanta Georgia As of June 30, 1993, there were 1,443 certified operators and 870 licensed pest control companies. In addition there are approximately 3,000 registered non-certified employees working for these companies. Inspections: treatments inspected -1,462; soil samples analyzed - 571; violations of one or more treatment standards - 825; and percentage of treatments inspected with a violation - 56.4%. Certifications: applicants - 334; exams given -468; exams passed - 270; and percent passed - 57.6%. Enforcement actions: hearings - 69. Georgia Structural Pest Control Commission made a significant change to the rules in 1991. This change required all registered employees of pest control companies (both service and sales) to take and pass a written examination as a requirement of registration by June 30, 1993. Testing began in August 1992 and over 3,000 employees were tested in an 11 month period. Effective October 20, 1992 any one that becomes certified or recertifies will be required to accumulate recertification training every five years.

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ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS

TERMITICIDE REGULATION SURVEY SUMMARY

In February, 1993, a termiticide regulation survey form was mailed to regulatory officials in the United States and Canada. This summary includes responses from thirty-four of those states and Ontario, Canada.

TERMITE INSPECTIONS

1. QUESTION Does your state currently regulate termite inspections?

RESPONSE

NO (16 RESPONDENTS)

Delaware	New Hampshire	Tennessee
Idaho	New York	Utah
Maine	Oregon	Virginia
Massachusetts	Pennsylvania	Wisconsin
Missouri	South Dakota	Wyoming
		Ontario, Canada

NO, BUT FUTURE REGULATION IS INTENDED (3 RESPONDENTS)

Michigan Ohio

West Virginia

YES (15 RESPONDENTS)

STATE Arizona Arkansas Florida Georgia Indiana Kentucky Maryland Minnesota Mississippi Nevada New Mexico North Carolina	ACT/REGULATION Arkansas Pest Control Entomology Pest Control Structural Pest Control Pesticide Use & Appl. Reg. 302, Chp.31 Pesticide Appl. law Regs. governing PCO's Custom Appl./ Pesticide NMDA Rule No 89-1 Structural Pest Control	copy received copy enclosed copy enclosed copy enclosed copy enclosed copy enclosed copy enclosed

2. QUESTION Are termite inspectors required to be: Certified Applicators; Trained in identification of structural elements; Other:

RESPONSE

INSPECTORS ARE REQUIRED TO BE CERTIFIED APPLICATORS (11 RESPONDENTS)

Arizona Maine Pennsylvania West Virginia Arkansas Maryland Texas Wisconsin

Indiana Oregon Washington

INSPECTORS ARE REQUIRED TO BE TRAINED IN IDENTIFICATION OF STRUCTURAL ELEMENTS (4 RESPONDENTS)

Florida Georgia Mississippi North Carolina (R.T. Minimum)

OTHER (5 RESPONDENTS) REQUIRE INSPECTORS TO:

Kentucky work under licensed pest control operator

Nevada be licensed applicators

New Mexico be Pest Management Consultants

Utah did not specify

Ontario Canada No requirement, but primary inspection by building inspector

3. QUESTION Does your state currently regulate termiticide applications?

RESPONSE

NO (3 RESPONDENTS)

Oregon Utah Wisconsin

NO, BUT FUTURE REGULATION IS INTENDED (1 RESPONDENT)

Indiana

YES (31 RESPONDENTS) REGULATE TERMITICIDE APPLICATIONS

STATE ACT/REGULATION COPY ENCLOSED

Arkansas Commercial Pest Control copy received

Arizona --

Delaware Pesticide Law (pretreat) copy received Florida Entomology Pest Control copy received

STATE

Georgia Idaho lowa Kentucky Maine Maryland Massachusetts Michigan Minnesota Mississippi Missouri Nevada New Hampshire New Mexico New York North Carolina North Dakota

Ohio
Pennsylvania
South Dakota
Tennessee
Texas
Virginia
Washington
West Virginia

Wyoming Ontario, Canada

ACT/REGULATION

Structural Pest Control Pesticide Law, Chpt 34

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Regulation 302
Certification & Licensing
Pesticide Applicator Law
Pest. Reg. 333CMR
Pesticide Control Act
P.C.O. Requirements
P.C.O. Regulations
Pesticide Use Act
NV Statutes, Chp 555
RSA430:28-48,Chp reg
Control/Wood Destroying
Pest. Appl/Guide T.cont
Structural Pest Control

Rules & Reg. 7PA Code Pesticide Appl. Law TN Appl.&Pesticide Act Structural Pest Control Pesticide Control Act WA Pest Application Act Weed Destroy. Insect R.

ND Pesticide Act

Pesticides Act

Environmental Pest

COPY ENCLOSED

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APPLICATOR REQUIREMENTS

4. QUESTION Are termiticide applicators required to pass written examinations (i.e. certification)?

RESPONSE

YES (27 RESPONDENTS) REQUIRE TERMITICIDE APPLICATORS TO PASS WRITTEN EXAMINATIONS

Arizona Michigan South Dakota Minnesota Delaware Tennessee Georgia Nevada Texas Idaho New Hampshire Virginia New Mexico Washington Indiana New York West Virginia lowa North Dakota Wisconsin Maine Ohio Wyoming Marvland

Massachusetts Pennsylvania Ontario, Canada

NO (7 RESPONDENTS) DO NOT REQUIRE TERMITICIDE APPLICATORS TO

PASS WRITTEN EXAMINATIONS

Arkansas Certification is not required for Service Technicians. Licensed

operator is held responsible for the work performed.

Florida Kentucky Mississippi

North Carolina Registered Technicians are required to view a safety video (No

exam required)

Oregon Utah

5. QUESTION Are termiticide applicators required to complete specific

training in addition to passing written examinations? no

yes (describe)

RESPONSE

YES (16 RESPONDENTS & CANADA) REQUIRE TRAINING IN ADDITION TO WRITTEN EXAMINATIONS

Arizona Requires training for treatment proposals.

Georgia Ten hours classroom & 70 hours on-the-job training required (Eff.

7/1/93)

Idaho Does not require training for initial certification, however,

recertification requires 40 hours training or exam.

lowa A minimum of 6 hours of training is required annually. The training

does not have to be specific to termite control.

Mississippi Specific training is required and 1 person per company & location

is required to pass examination. Technicians are required to

receive 40 hours on-the-job training + 16 hours classroom.

Missouri Recertification training is required every 3 years.

Nevada Only problem individuals are required to receive training.

New Hampshire Applicators are also required to pass oral examinations.

New Mexico Four hours training, specifically on wood destroying organism, is

required.

Pennsylvania Recertification update training is required per [128.45])

South Dakota For initial certification. May recertify by training

Tennessee Recertification through continuing education credits

Texas Technician training by employer + RT termite control

Ontario, Canada Applicator is required to assist licensed person a minimum of 6

months + exam.

Maryland Other than annual update for recertification

Massachusetts (No before certification, but after certification receive continued

education)

NO (16 RESPONDENTS) DO NOT REQUIRE TRAINING

DelawareNew YorkVirginiaFloridaNorth DakotaWashingtonIndianaOhioWisconsinMaineOregonWyoming

Michigan Utah

Minnesota No reference to termite is made in PCO

North Carolina Registered Technician is required to view safety video

6. QUESTION May uncertified applicators perform termiticide applications if supervised by a certified applicator?

RESPONSE

NO (9 RESPONDENTS)

Iowa South Dakota

*Massachusetts Utah
Minnesota Virginia
New York Wisconsin

Ontario, Canada

YES, UNDER DIRECT SUPERVISION ONLY (15 RESPONDENTS)

Arizona (Limited to 90 days) Must register 30 days

Georgia Idaho

Indiana If Registered Technician

Maine On site

Mississippi Missouri Nevada

New Hampshire Licensed or certified person

Ohio

Tennessee Texas Washington Wyoming

Pennsylvania

^{*}Massachusetts is subject to change

YES, UNDER DIRECT OR INDIRECT SUPERVISION (9 RESPONDENTS)

Arkansas Delaware

Kentucky Maryland

Oregon West Virginia

New Mexico

Florida

Michigan

ENFORCEMENT STANDARDS

7. QUESTION

Are termiticide applications regulated by:

Pesticide label requirements only; pesticide label requirements and enforceable standards; pesticide label requirements and

nonenforceable guidelines; other (specify).

<u>RESPONSE</u>

PESTICIDE LABEL REQUIREMENTS ONLY (16 RESPONDENTS)

Delaware *Florida lowa Maine Maryland

Michigan Minnesota New Mexico North Dakota

Pennsylvania Utah Virginia Wisconsin Wyoming

Ohio Oregon

PESTICIDE LABEL REQUIREMENTS AND ENFORCEABLE STANDARDS (14 RESPONDENTS)

Arkansas

Mississippi Missouri

South Dakota Texas

Georgia Idaho Kentucky Nevada New Hampshire

Washington West Virginia

Massachusetts

North Carolina

PESTICIDE LABEL REQUIREMENTS AND NONENFORCEABLE GUIDELINES (4 RESPONDENTS)

Arizona Indiana Tennessee

Ontario, Canada

OTHER (1 RESPONDENT) (SPECIFY)

New York

Pesticide label requirements and state regulation

^{*}Florida (Pre-treats only)

NOTIFICATION

8. QUESTION Are applicators required to notify your agency of termiticide

applications?

RESPONSE

NO (25 RESPONDENTS)

Massachusetts Delaware Oregon Michigan South Dakota Florida Minnesota Tennessee Georgia Idaho Missouri Texas Indiana New Mexico Utah lowa New York Virginia North Dakota Washington Maine Maryland Ohio West Virginia Wisconsin

YES (8 RESPONDENTS)

Arizona Uses a probation requirement. All are required to post notice.

All completed termite projects reported to state.

Arkansas Require monthly application records be submitted to state

Kentucky Require application records be submitted to agency.

Mississippi Require notification of treatments after they are performed.

Nevada Required to submit application records to agency. New Hampshire Required to submit application records to agency.

North Carolina Records are subject to inspection. Routine inspections are

preferable twice annually.

Ontario, Canada Submit application records to agency plus a completion certificate

TREATMENT REQUIREMENTS

9. QUESTION Are the treatments of specific structural elements required?

RESPONSE

YES, BUT ONLY AS REQUIRED BY PESTICIDE LABELING (22 RESPONDENTS)

Arizona Minnesota Pennsylvania South Dakota Delaware Missouri Idaho Nevada Tennessee New Hampshire Texas lowa New Mexico Maryland Utah Massachusetts Ohio Wisconsin Michigan Oregon Wvomina

*Ontario Canada

^{*} Province, Ontario Canada (Includes removal of wood/soil contact)

YES, IN ADDITION TO THAT REQUIRED BY PESTICIDE LABELING (SEE (7 RESPONDENTS) SPECIFICS BELOW)

Arkansas

(See enclosed minimum treating requirements)

- Exterior perimeter of foundations from grade to footing 1.
- 2. Sub-slab injection or rodding and/or trenching along interior perimeter of foundation and partition walls
- 3. Voids of hollow block, rubble, and other stone walls
- 4. Sub-slab injections of elements adjacent to the structure being treated (sidewalks, driveways, slabs)

Georgia

(See enclosed minimum treating requirements)

- Exterior perimeter of foundations from grade to footing 1.
- 2. Sub-slab injection or rodding and/or trenching along interior perimeter of foundation and partition walls
- 3. Voids of hollow block, rubble, and other stone walls
- 4. Sub-slab injections of elements adjacent to the structure being treated (sidewalks, driveways, slabs)

Indiana

- 1. Exterior perimeter of foundations from grade to footing
- 2. Voids of hollow block, rubble, and other stone walls
- 3. Sub-slab injections of elements adjacent to the structure being treated (sidewalks, driveways, slabs)

Kentucky

- Exterior perimeter of foundations from grade to footing 1.
- 2. Sub-slab injection or rodding and/or trenching along interior perimeter of foundation and partition walls
- 3. Voids of hollow block, rubble, and other stone walls
- 4. Sub-slab injections of elements adjacent to the structure being treated (sidewalks, driveways, slabs)

Mississippi

- Exterior perimeter of foundations from grade to footing 1.
- 2. Sub-slab injection or rodding and/or trenching along interior perimeter of foundation and partition walls
- Voids of hollow block, rubble, and other stone walls 3.
- 4. Sub-slab injections of elements adjacent to the structure being treated (sidewalks, driveways, slabs)

- North Carolina 1. Exterior perimeter of foundations from grade to footing
 - Sub-slab injection or rodding and/or trenching along interior 2. perimeter of foundation and partition walls
 - Voids of hollow block, rubble, and other stone walls 3. (chimneys, step buttresses, etc. all masonry foundation components)
 - Sub-slab injections of elements adjacent to the structure being 4. treated (sidewalks, driveways, slabs)

West Virginia 1. Exterior perimeter of foundations from grade to footing

- 2. Sub-slab injection or rodding and/or trenching along interior perimeter of foundation and partition walls
- 3. Voids of hollow block, rubble, and other stone walls
- 4. Sub-slab injections of elements adjacent to the structure being treated (sidewalks, driveways, slabs)

NONE (3 RESPONDENTS)

Florida Reported no standards or label required treatment on post

construction.

Virginia -

Washington Reported no requirements to treat specific structural elements.

OTHER (1 RESPONDENT)

New York Specific treatments are not required to be made, but if made, must

conform to the label and regulations.

10. QUESTION Are variances from the above requirements allowed if adequate alternate pest management techniques are used?

RESPONSE

NO (18 RESPONDENTS)

Arizona Minnesota *Pennsylvania Idaho Mississippi South Dakota

IowaMissouriTexasKentuckyNew HampshireUtahMarylandNew MexicoWyoming

Massachusetts Oregon Province. Ontario

Canada

*Pennsylvania (IPM approach supported by PDA

Label directions requirements must be followed

YES (10 RESPONDENTS) SEE SPECIFICS BELOW

Arkansas 1. Only if impractical due to physical condition of structure.

Georgia -

Indiana 1. If customer prohibits complete treatment or if environmental concerns prohibit and it is conveyed to customer in writing.

2. Use of non-soil termiticides (i.e., sodium borates)

Michigan 1. Installation of physical barriers

- 2. Use of non-soil termiticides (i.e., sodium borates)
- 3. IPM program, customer request

Nevada 1. Grade Alterations

- 2. Correction of structural moisture problems
- 3. Installation of physical barriers

4. Use of non-soil termiticides (i.e., sodium borates)

North Carolina 1. Property owner must approve sub-standard treatment in writing on

Division form

Ohio 1. By agreement with customer

Tennessee 1. If physical prohibitions exist

Washington 1. Grade Alterations

2. Correction of structural moisture problems

3. Installation of physical barriers

4. Use of non-soil termiticides (i.e., sodium borates)

West Virginia 1. If conditions prevent a conventional treatment

11. QUESTION Are termiticide applicators required to make applications at the label dilution and rate addressed by labeling? Yes No

RESPONSE

NO (11 RESPONDENTS)

Delaware Massachusetts Ohio

Idaho North Carolina South Dakota

Maryland *North Dakota Texas
*Oregon *Washington

*North Dakota 2 (ee) applies
*Oregon Can apply at less than label rate but cannot exceed label

ra

*South Dakota Cannot go over, but 2 (ee) may apply

*Washington Allow 2(ee)

YES (22 RESPONDENTS)

Arizona Michigan Tennessee Arkansas Minnesota Utah

Florida (Pretreat only) Mississippi West Virginia

Georgia Missouri Wisconsin (Can use less than

Indiana New Hampshire label rate)

lowa New Mexico Wyoming

Kentucky *New York Province, Ontario

Maine (per FIFRA) Pennsylvania (Except for Canada

FIFRA 2(ee)

^{*}New York (Unless a state-approved 2(ee) recommendation at lower rates exists.

12. QUESTION Are spot or localized treatments of a previously-untreated structure allowed? yes no

RESPONSE

YES (29 RESPONDENTS)

Arizona *Maryland *North Carolina

Delaware Massachusetts Ohio

Florida *Michigan Oregon (label permit)

Minnesota *Pennsylvania Georgia Idaho *Mississippi South Dakota *Indiana Missouri Tennessee lowa Nevada Texas New Hampshire Kentucky Washington Maine New Mexico *West Virginia

New York Wisconsin (label permit)

*Indiana "Only if customer insists and PCO clearly indicates in writing."

*Maryland Because of lack of standards
*Michigan Only per customer request

*Mississippi Only for slabs structures (because large size of commercial)

*New Hampshire If label permit

*North Carolina With property owner written approval

*Pennsylvania YES/NO Per label directions *West Virginia If specified on the contract

NO (4 RESPONDENTS)

Arkansas

Utah

Wyoming (Unless allowed by labeling)

Province, Ontario Canada

PROTECTION/DWS

13. QUESTION Are specific means of protecting drinking water sources (DWS)

addressed?

RESPONSE

NO, OTHER THAN THE REQUIREMENTS OF PESTICIDE LABELING (28 RESPONDENTS)

Arizona Florida Kentucky Arkansas Idaho Maine Delaware Iowa Maryland

Termiticide Survey Summary

Massachusetts
Michigan
Minnesota
Mississippi
Missouri
Nevada
New Mexico
North Carolina
North Dakota
Ohio
Oregon
Pennsylvania

South Dakota Tennessee Utah Washington Wisconsin

Ontario, Canada

Wvomina

YES (6 RESPONDENTS) SEE SPECIFICS BELOW

New Hampshire Did not specify

New York No-treatment zones in the vicinity of DWS (See attached regulations for

other requirements)

Texas (Excavation/treated backfill around well casing)

West Virginia (Applications are required \ collect information on wells in order to

make treatment considerations)

Georgia Removal/relocation of DWS prior to treatment

Indiana Removal/relocation of DWS prior to treatment, "If within the

structure"

14. QUESTION In the event that a complete treatment cannot be made, is the

termiticide applicator required to notify the consumer of the

treatment's inadequacies? Yes NO

RESPONSE

YES (13 RESPONDENTS)

Arizona Kentucky Tennessee Arkansas Michigan Texas

Georgia Mississippi West Virginia Indiana North Carolina Wyoming

Province. Ontario

Canada

NO (20 RESPONDENTS)

Delaware Minnesota Oregon
Florida Missouri Pennsylvania
Idaho Nevada South Dakota

Iowa New Hampshire Utah

Maine New Mexico Washington Maryland New York Wisconsin

Massachusetts Ohio

ADDITIONAL COMMENTS:

Arizona Agreed with the proposed standards as written.

Arkansas "The Survey look pretty good and if followed I believe would

provide consistent control."

Florida Proposed minimum standards: "Looks good"

Indiana Future regulation is intended

Maine "There are very few termites in Maine, only the extreme southern

tip and some coastal sections have any."

Maryland Maryland has also been considering the issue of termite treatment

standards. For additional comments on proposed standards, see

attached letter.

Massachusetts "This area in my opinion should be regulated by consumer affair

department of any state...Inspection is a non-pesticide activity"

Minnesota There has been very limited number of termite infestations in MN

and those were treated by licensed pest control companies. No

new regulation anticipated.

North Carolina See attachment for comments on proposed standards

North Dakota Termites are not an overwhelming concern in ND. We have no

additional requirements for these applicators or inspectors. We

have 4 field staff for the entire state.

The proposed minimum standards look fine

Ohio In the process of developing a record keeping rule which would

require the applicator to disclose to its customer which label

treatment specifications were deleted.

Oregon This department does not license inspectors only pesticide

applicators. Licensed commercial or public pesticide applicators must have the license category "IIHS - Structural Pest Control" to apply pesticides, other than fumigants, to control wood-destroying insects. We have no license category specifically for termites.

Pennsylvania "Inspection service requires not only a working knowledge of pest

control and procedures but architectural engineering as well. Therefore, government agencies with building inspection jurisdiction

should rightfully address the WDI issue."

"The PA Pest Control Assoc. is actively upgrading its educational approach to WDI with a high degree of professionalism. The attached proposal which uses tones like "flooding voids" would be conducive to pesticide misuse situations. Agriculture departments that find themselves regulating architectural engineering and influencing lending institutions decision making process are on shaky, regulatory expertise ground if best."

South Dakota

Direct all future correspondence to Brad D. Beruen, Administrator, SD Dept. of Agriculture, 445 E. Capitol, Pierre, SD 57501.

Texas

See attachment for comments on proposed standards

Virginia

Submitted on page one. NO additional comments

Washington

"Infestation pressure from Subterranean Termites is much lower in Washington State than in other areas. We receive virtually zero complaints of treatment efficacy. A requirement to make full treatments, not allow FIFRA 2(ee), may create more problems than what we are now dealing with."

West Virginia

"In general, I find them to be good" There are some areas I feel should be revisited..." See attachment for comments.

Ontario, Canada

"Twenty one municipalities have adopted termite control bylaws requiring termite infestations (or properties within 2 meters of live infestations) to be treated, (i.e., all wood ?{.80l} contact removed and soil treated)

"Only Dursban TC is available in Canada for termite control."

"Limited stocks of Aldrin/Dieldrin are being used up for outside foundation soil treatments."

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS

PROPOSED MINIMUM SUBTERRANEAN TERMITE TREATMENT STANDARDS

Introduction

The following document is intended to serve as a model for states who are considering the adoption of laws or regulations related to the application of termiticides. This model represents the minimum termite regulation standards recommended by the Association of Structural Pest Control Regulatory Officials (ASPCRO). The model is directed only towards the liquid chemical control barrier products generally in use in the United States on the date of adoption, for the control of subterranean termites. This standard does not include dust or powder termiticide formulations, nor does it include new formulations such as foams, biological control organisms or baits.

I. Labeled Use of Chemical Barrier Termiticide

Termiticides permitted for the control of subterranean termites shall be only those compounds that are registered by E.P.A. and which are labeled for use in the control of termites. A termiticide shall be used in the rate, volume and manner directed on the label and herein.

II. Variation From Label

Both pre-construction and post-construction treatments include establishing a complete and evenly distributed chemical barrier in all target soils/areas, at the volume prescribed by the product label. However, limited deviations from the termiticide label application volumes and placement may be permitted if the conditions outlined in both (a) and (b) below occur:

- (a) One or more of the following situations is present:
 - 1. Specific environmental conditions are such that a complete application may result in adverse environmental impact. Examples may include the presence of a well, a footing drain that empties into a water body, a high water table, etc.
 - 2. Structural barriers or soil conditions or types exist that prohibit a complete treatment:
 - 3. Construction elements are present that would or could encourage a reduced volume, i.e., poured walls vs. hollow block walls;

- 4. Specific customer request.
- (b) The following information is furnished in writing to the customer:
 - 1. A full disclosure explaining the difference between full, partial and spot applications. The disclosure shall include the termite control strategies being utilized and the reasons for those alternatives;
 - 2. The pesticide(s) used, including brand name and EPA registration number;
 - 3. The calculated volume and concentration of termiticide, as per label directions, for a complete treatment which includes maximum volume and site applications as per the product label;
 - 4. The actual volume of termiticide applied;
 - 5. Specific information of sufficient detail to distinguish where treatment actually occurred, such as a graph of the structure identifying treated areas, utilities and sites of termite activity;
 - 6. A statement indicating whether a continuous protective barrier between termite colonies and wood in the structure have been established; and
 - 7. A clear, concise statement indicating whether the application has any guarantee or warranty associated with the application, and the terms of the guarantee or warranty.

III. General Treatment Standards

- (a) All cellulose-bearing debris such as scrap wood, wood chips, paper, stumps, dead roots, etc. must be removed from underneath buildings. Large stumps or roots that are too sound to be removed may be trenched, drilled or rodded and treated provided they are six inches or more from foundation timbers.
- (b) Eliminate all direct wood/soil contact, both inside and outside the foundation. Wooden supports which can not be removed shall be placed on a concrete or masonry footing which projects a minimum of six (6) inches above the soil. Pressure treated pilings and other pressure treated construction elements are exempt from this requirement.
- (c) Termite tunnels Remove all visible termite tunnels from foundation walls, pillars and those on the wood understructure.

IV. Pier and Beam (Crawl Space) Construction

- (a) Trenches Trench or trench and rod to treat soil adjacent to all sides of all foundation elements with a termiticide, from the top of the grade to the top of the footing. Trenches shall be a minimum of four (4) inches wide and deep. Soil injection techniques alone shall not be acceptable.
 - 1) Where footings are less than four (4) inches beneath the top of the grade, trench shall extend to the top of the footing.
 - 2) Where the footings are not covered by soil, dig trenches adjacent to, but not below the bottom of the footing.
 - 3) Footings less than twelve (12) inches deep shall be treated at the same rate used for a footing which extends twelve (12) inches below soil grade.
- (b) Pipes The soil adjacent to pipes underneath the structure shall be treated by rodding or trenching according to label directions. When pipes are covered with insulating material, treat sufficiently to penetrate soil below the depth to which such covering extends.
- (c) Treatment of Voids in Masonry Construction Elements Drill and treat all voids in multiple masonry elements of the structure extending from the structure to the soil.
 - (1) The distance between drill holes shall not exceed 12 lineal inches.
 - (2) Drill holes shall be no more than 16 inches above the footing or immediately above the lowest soil level, whichever is closest to the footing.
- (d) Dirt Fills All dirt filled structures such as concrete slab porches, steps, chimneys, porch columns, etc., shall be treated by one of the following methods:
 - (1) Excavation Remove soil in at least a 12 inch by 12 inch area beneath the slab adjacent to the main foundation wall and treat soil as indicated in item IV(a).
 - (2) Drill and Treat -
 - A. Drill vertically through slab as close as practicable from the foundation wall at no more than 12 inch intervals and treat soil beneath slab to the top of the footing. In determining the drilling interval, attention should be paid to soil type and

- compaction. Drill holes shall be placed so as to establish a continuous termiticide barrier in the soil; or
- B. Drill horizontally through the wall of slab or other structure at no more than 12 inch intervals beginning immediately below the bottom of slab and rod treat soil from yhe bottom of the slab to the top of the footing. Drill holes shall be spaced so as to establish a continuous termiticide barrier in the soil. In determining the drilling interval, attention should be paid to soil type and compaction.

V. EXISTING SLAB-CONSTRUCTION

Post-construction treatment for subterranean termites in structures with slab-construction must be in conformance with the following procedure:

- (a) Rod or trench and treat the soil adjacent to the entire perimeter of the slab foundation as described in IV(a).
- (b) Treat all traps and other openings in the slab.
- (c) Treat all expansion joints, visible cracks and other openings in the slab with a termiticide by rodding under or drilling through the slab and thoroughly treating the area beneath the slab where the above stated conditions exist. Drill and treat all attached slabs (porches, patios, carports, garages, walkways, etc.) When the slab is drilled or rodded the holes must not be more than 12 inches apart along the above stated areas.
- (d) Drill at intervals not to exceed 12 inches and treat all masonry voids and brick veneer walls.
- (e) Securely plug or fill with mortar all drill holes in living areas, basements, and other commonly occupied areas immediately following treatment.

VI. PRETREATMENT FOR TERMITE CONTROL

(a) MONOLITHIC SLAB

After grading is completed and prior to pouring of the slab, create a horizontal barrier with termiticide by treating the soil under the entire slab as directed by the product label. Treat all critical areas such as, bath traps, plumbing lines, openings, electrical conduit openings, etc. with a termiticide. After final grade and landscaping, trench or trench and rod and treat the entire perimeter of the slab foundation with a termiticide as specified in IV(a) above.

(b) SUSPENDED (SUPPORTED) AND FLOATING SLABS

Treat as described in (a) above for monolithic slab. In addition to this treatment, treat the soil in the bottom of the trench with a termiticide prior to pouring the footing. If this footing is poured prior to pretreatment, treat the block/brick voids in the foundation wall with termiticide. After foundation walls are erected and prior to pouring the slab, trench or rod and trench and treat soil on the interior and exterior perimeters of the foundation walls with a termiticide as specified in IV(a) above.

(c) PIER AND BEAM (CRAWL SPACE)

. . . .

After grading is completed and prior to pouring the footing for the foundation walls, pillars, pilasters, chimneys, etc. apply the termiticide to the soil in the bottom of the trenches. If the footings are poured prior to the pretreatment, treat the voids in the block/brick foundation walls, pillars, pilasters, etc. with a termiticide as specified in item VI(b) above. Treat interior adjacent to the foundation walls, pillars, pipes, etc. After final grading trench or trench and rod soil adjacent to the exterior footing/foundation walls, pillars, pipes, and any other object from the structure to the soil with a termiticide as specified in IV(a) above.

ASPCRO-1993 HOT SPRINGS, ARKANSAS

Informal Survey of Posting and

Notification Requirements

As mentioned by many committee members and other interested parties, there are so many variations of posting and notification requirements existing that meaningful and accurate analysis is exceedingly difficult. However, this paper attempts to provide an overview of existing laws concerning notification for structural pest control. Notification is intended to mean any type of sign, written notification or registry requirement found in state law or regulation.

First, based upon the most recent information available, I will review and summarize the existing requirements in this area on a categorized basis as follows:

chemical sensitivity registries personal notification outdoor posting

This categorization will differentiate the targets and methods of the various notification strategies.

Registries

To date, the following states have adopted some sort of notification registry concerning a pesticide application:

Colorado	Connecticut
Florida	Louisiana
Maryland	Pennsylvania
West Virginia	Washington

The following chart summarizes the requirements of the registries as they exist today.

	Medically Verified	Notification of Adj. Prop.	Pre-Notification
CO	X	X	X
CT		X	X
FL	X	X	X
LA	X		
MD	X	X	X
PΑ	X	X	
W.V.	X		
₩A	X	X	X

The common regulatory themes in this area are concerns over the following:

- 1. Proximity or distance required for notification of registrant.
- 2. Amount of time for prior notice to registrant.
- 3. Medical verifiability of chemical sensitivity.

As to proximity, there seems to be a fairly consistent requirement that "adjacent" or "abutting" property requires notification. This would seem to be a reasonable position to take for most structural applications. Absolute distance requirements lead to difficult enforcement problems and absurd legal results, requiring detailed maps of neighborhoods. There is no consistent theme in the pre-notification time frames in use. The "most common" requirement, when there is one, is 24 hours. This would seem to be a time frame that best allows a meaningful notification. If there is to be a pre-notification time frame, it only makes sense that a sufficient amount of time be allowed for the registrant to make arrangements to be away at the time of treatment. Notification at the time of or just prior to treatment makes the entire regulatory endeavor useless if the purpose is to allow the registrant to voluntarily avoid exposure.

Medical verifiability is almost uniformly required. Although it is apparent from various information that there is some question as to the necessity for medical verifiability, it is mandated by the regulatory requirement for enforceable regulations. A large demand for an "open" registry in a particular jurisdiction points to the need for greater public notification of applications not just a registry for a select few.

This leads to an important consideration as far as registries are concerned. Considering that only eight states have adopted registries as a form of pest control registration can they be considered a useful notification tool? Arguably, registries get the notification to the chemically-sensitive registrant, the person who most wants it and needs it. Registries are an administrative burden however, for both regulatory agencies and licensed applicators. General notification requirements through posting of all applications accomplish notification to the chemically-sensitive as well. It is perhaps for this reason that registries have not been widely adopted across the U.S. Nevertheless, they remain an important notification tool for the jurisdictions that have chosen to use them.

Notification and Posting

Due to the types and varieties of posting and notification programs and the interrelationship of posting and notification requirements, they are summarized together in the table set out below:

Direct Notification

	Advance	When Applied	Neighbor	Posting
ΑZ	X			
CO		X		X
CT	X		X	X
DE	X	X	X	
FL	X	X		X
EL	X	X	X	X
IN		X		X
ΙA	X	X	X	X
KS	X	X	X	
ΚY	X	X	X	X
ΜE	X		X	X
MD	X	X		X
ΜA	X			X
MN		X		
NH	X			
NJ	X		X	X
NM		X		
ΝY	X			X
OH	X	X	X	X
PΑ	X		X	
RI	X	X	X	X
TX		X		
VT	X	X	X	X
WI	X	X		X

The analysis provided in a chart such as this is necessarily brief and simplistic and the variety of schemes for posting/notification seem to be limitless, making a meaningful statistical analysis almost impossible. Briefly, the <u>broad</u> issues seem to be these.

<u>NEIGHBORS</u>-Should neighboring properties be included in notification requirements?

ADVANCE NOTICE-Should there be advance notice or notice at the time of application?

<u>POSTING-Should</u> there be posting in conjunction with or in the absence of direct notification?

SUMMARY OF DATA

Recertification Interval - 34 states responding

Interval (yrs)	# States
N/A	1
1	3
2	2
3	11
4	2
5	14
6	1

Methods of Recertification - 34 states responding

Method	# States
Exam	30
Continuing Education	30
Workbook	1
Other .	1
N/A	1

No. of states utilizing CEU's - 16

No. of states requiring CEU's be category specific - 13

Approvable training -

Entry level	8
Advanced	21
Out of state	25
Non government	24
In house	14

No. of states willing to accept ASPCRO units -

Yes	14
No	7
Mavbe	8

Method of Evaluation -

Twenty-nine states evaluated by detailed outline at least with some of these performing in-person evaluations also.

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STATE	CERTIFICATION CATEGORIES	INTERVAL	PCSSIBLE METHODS	CEU's REQUIRED	CEU's	COMPLETE RECERTIFICATION	CATEGORY	ACCUMULATED ANNUALLY	EARNED ANY TIME DURING INTERVAL	CONTACT HOUR EQUIVALENT	IN PERSON	DETAILED OUTLINE	INSTRUCTOR RESUME'	отнея	ENTRY LEVEL	ADVANCED	OUT-OF-STATE	NON- GOVERNMENTAL	IN-HOUSE	PRIOR APPROVAL REQUIRED	·	RECIPROCAL RECERTIFICATION AGREEMENTS	WILL ACCEPT ASTORO UNITS
AZ	VII (all)	5	Exam									Y					Y	Y	Y	Y	Accred. Committee Board Appointed	None e/	Y
DE	7, 7A	3	Exam Cont. Ed.	8	Y	N	Y	N	Y	1	Y	Y									Pesticide Compliance Section	2	
FL	HF, WDO F, L&O		Exam Cont. Ed.	4	Y	Y	N	Y	Y	1	Y	Y	Y		N	N	Y	Y	N	Y-I N-O	Director	None	N
GA	HP WDO F	5	Exam Cont. Ed.	10 10 6		Y	Y	N	Y		Y/N	Y	Y										
IN	7A B C D	5	Exam Cont. Ed.	18 12 18 12		N	Y	N	2. courses Minimum	1	Y	Y	Y	Y	N	N	Y	Y	N	Y	State Chemist Staff	None	N
IA	7A-HP 7B-WDO 7C-F 7D-Com	1	Exam Cont. Ed.	N/A	N	Y	N/A	N/A	N/A	N/A	Y	N	N	N	N	Y	N	N	N	Y	IA S. U. Ext. Ser.	IL, KS, MN, MO, NE, SD, WI.	
KS	WDO stor Prod. Ind. We Health Struc.	1	Exam Cont. Ed.	N/A	N	Y	N/A	N/A	N/A	N/A	Y	Y	N	Y	N	Y	Y	Y	N	Y	Plant Health Div KBA	None	Y/N
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MT	EPA	4	Exam Cont. Ed.	100 RC's	Y	N	Y	N		5 - 10		Y	Y		N	Y	Y	Y	Y	Y	Training Com. MTDA		Y/N	
NE	1-Struc Inst. Pub. Heal 2-Food proc Grain F	th	Exam Cont. Ed.	N/A	N	Y	N/A	N/A	N/A	N/A				Y	N	Y	Υ	N	N	Y	EPA	All		
ND	SPC	4	Exam	N/A	N/	Y	N/A	N/A	N/A	N/A		Y	Y		N	N	Y	N		Y	U of Reno Nev. NDDA	None	Y	
ИН	FI- Ind. Inst Stru Hea. FIII- WDO FIV-F		Exam Cont. Ed.	N/A	N	Y	N/A	N/A	N/A	N/A	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Div. P'cio Control	ie None	Y	
NJ	7A-HP 7B-WDO 7C-F 7D-FD I 7E-Wood Pres		Exam Cont. Ed.	8 Core		N 	Y	N	N	120	Y	Y	N	N	Y	Y	Y	Y	Y	Y	NJ Dep	All	Y	
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STATE	CERTIFICATION CATEGORIES	INTERVAL	POSSIBLE METHODS	CEU'S REQUIRED	CEU's	COMPLETE RECERTIFICATION	CATEGORY SPECIFIC	ACCUMULATED ANNUALLY	EARNED ANY TIME DURING INTERVAL	16. 11	IN PERSON	DETAILED OUTLINE	INSTRUCTOR RESUME*	CTHER	ENTRY LEVEL	ADVANCED	OUT-OF-STATE	MON- GOVERNMENTAL	IN-HOUSE	PRIOR APPROVAL REQUIRED		RECIPROCAL RECERTIFICATION AGREEMENTS	WILL ACCEPT ASPCRO UNITS	
LA .	Gen. P. WDO Com. Vert. F	. 3		N/A	N	Y *	N/A 5 hr	N/A s. M	N/A	N/A	1 1						Y	Y	Y	Y		None	Y/N	
MD	EPA	1	Exam Cont. Ed.	N/A	N	Y	N/A	N/A	N/A	N/A	Y	Y	Y	N	N	Y	Y	Y		Y	Shriver	None	Y	
MA	41-PC 42-F 43-WDO 44-Vert 45-Site San 50-Fd.	e 1	Exam Cont. Ed.	3	Y		Y	N	Y	2	Y	Y					Y	Y	Y		Pesticide Bureau			
MI	7A-Gen 7B-WDO 7C-Pub. Healt 7D-Ver		Exam Cont. Ed.	21	Y	Y	Y	N	Y	1	Y	Y	N	N	Y	Y	Y	Y	N	Y	Prog. Man & Training Coord'r		Y	
,MN		1	Exam Cont. Ed.	N/A	N	Y	N/A	N/A	N/A	1 1	Purd	d. Pd	PCO CO Co roved	nf.			N	N	N	Y		None	N	
MS	VII etc	c 3	Exam Cont. Ed.	N/A	A N	Y	N/A	N/A	N/A	N/A		Y			N	Y	Y	Y	Y	Y	Ms Div. Plant. In		?	
МО	Gen WDO F	3	Exam Cont.	N/A	A N	Y	N/A	N/A	N/A	N/A	Y	Y			N	Y	Y	Y	N		Bureau P'cide Control	None	Y/N	

		RECERTIFICATION			APPR FOR	OVEI	UNITS					VALU ETHO	ATIO	N		TRAI					AUTHORITY		
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NM .	EPA 3, 7	5	Exam Cont. Ed.	6	Y	Y	Y	N	Y	1		Y			Y	Y	Y	Y	Y	Y	NM DA	None	Y
NY	7A	6	Exam Cont. Ed. Wkbook	varies w/	N	Y	Y	N	Y	1	Y	Y	Y		Y	Y					Pesticide Control Spec. Bureau Director	NJ, MA VT, RI part CT part	
	HF WD F	5	Exam Cont. Ed.	5 7 9	Y	N	Y	N	Y	1	Y	Y	Y	N	N	Y	Y	Y	N	Y	NCSPCC	None	Y
ОН	Vert. Anim. Gen PC WDO F	3	Exam Cont. Ed.	5	Y	Y	Y	N	Y	1	Y	Y	Y		Y	Y	Y	Y	N	Y	OH DA Pesticide Spec. in Charge	None	Y
OK nswers for roposed prg.	7B-Strue Pest	5	Exam Cont. Ed.	12	Y	N	Y	N	Y	1	Y	Y	N	N	N	Y	Y	Y	Y	Y	OK DA	None	Y
OR _.	Ind, Ins. 1 Health Struct.		Exam Cont. Ed.	40	Y	N ·	N	N	Y	1		Y	Y			Y	Y	Y	Y		. ORDA Feed Fert & P'cide Section	None	Y/N

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RI ,	7A-HP 7B-WDO 7C-F 7D-Vert. 7E-Mosq		Exam Cont. Ed.	N/A	N		N/A			N/A		Y	Y		Y	Y	Y	Y	Y	Y		None	Υ	
rn	Cat. 7	5	Exam	N/A	N/A																		Y	
rx	Pest,WD0 L & O F Weed Wood pro	·	As det by the Board												N	N	N	N	N	N		None	11	
UT	Cat. 7	5	Exam Cont. Ed.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Y	N	N	N	N	Y	N	N	N	Y	Extension UT DA	None	И	
VA	7B-WDO	3	Exam Cont. Ed.	N/A	N	Y	N/A	N/A	·. N/A	N/A	Y	Y	Y	N	N	N	Y	Y	Y	Y	Off. Pesticide Reg.	None	Y/N	
٩V	8B-SPC	3	Exam Cont. Ed.	N/A	N	Y 8 hr, min	N/A	N/A	N/A	N/A	Y	Y	N	approved out-of-state	N	Y	Y	Y	N	Y	Program Leader- Div. Director	OH, PA MD, VA with review	Y	

	RECERTIFIC		CRTIFICAT	TION APPROVE FOR		ROVE	EDUCATION UNITS			EVALUATION METHOD				TRAINING						AUTHORITY	i			
TATE	CERTIFICATION	INTERVAL	POSSIBLE METHODS	CEU's REQUIRED	CEU's	COMPLETE RECERTIFICATION	CATEGORY SPECIFIC	ATEL	EARNED ANY TIME DURING INTERVAL	l 🗀 11	IN PERSON	DETAILED OUTLINE	INSTRUCTOR RESUME	отнея	ENTRY LEVEL	ADVANCED	OUT-OF-STATE	NON- GOVERNMENTAL	IN-HOUSE	PRIOR APPROVAL REQUIRED		RECIPROCAL RECERTIFICATION AGREEMENTS	WILL ACCEPT ASPCRO UNITS	
WY .	Ind., Inst. Struc.	2	Exam Cont. Ed.	24 hrs.	Y	N	N	N	Y	1	Y	Y	N		Y	Y	Y	Y	Y	Pref	WYDA U of WY Ext.	None	N	
Anon.	7A, B,		Exam Cont. Ed.	2	Y	N	Y	Y	Y	N/A	N	Y	N	N	Y	Y	Y	Y	N	Y		IN, TN NC	Y	
SD		2	Exam Cont. Ed.	N/A	N		N/A		n/A		Y	Y	N	N			rarely	N	N	Y	Pesticide Super.	WY, MT	N	

SUGGESTED GUIDELINES FOR COMPLETING THE STANDARD WOOD DESTROYING INSECT INFORMATION FORM (HUD FORM 92053, VA FORM 26-8850, REVISED 5/91)

The above referenced form must be used by pest control operators for any HUD/VA guaranteed loan unless the STATE has mandated a specific form to be used to the exclusion of all others. This policy was described in Mortgagee Letter #91-12.

GENERAL INFORMATION REGARDING WOOD DESTROYING INSECTINSPECTIONS FOR HUD/VA GUARANTEED LOANS

Under accepted practices within the pest control industry, it is the responsibility of the inspector/inspecting company to inspect for and to fully report visible signs of infestation and visible damage by wood destroying insects, and visible evidence of conditions conducive to infestation by subterranean termites.

IF THE STATE HAS PRESCRIBED OR ACCEPTED PROCEDURES FOR INSPECTIONS, THOSE SHOULD BE FOLLOWED IN CONDUCTING THE INSPECTION. IF NO SUCH STATE GUIDANCE EXISTS, THE INSPECTION PROCEDURES SHOULD BE IN COMPLIANCE WITH THE GUIDELINES FOUND IN THE PENNSYLVANIA PEST CONTROL ASSOCIATION ACCREDITED WOOD DESTROYING INSECT INSPECTOR PROGRAM MANUAL AND NPCA PUBLICATIONS

Instructions on reverse side of the form should be read and understood.

- 1A. VA Case Number--Enter the number if available; otherwise, leave blank.
- 1B. HUD/FHA Case Number-Enter the number if available; otherwise, leave blank.
- 2. Date--Enter the date of <u>inspection</u>, <u>not</u> the date the report was prepared.
- **3A.** Name of Inspection Company--Enter the name of the licensed inspection company or pest control company performing the inspection.
- **3B.** Address of Inspection Company--Enter the mailing address of the company listed under 3A.
- **3C.** Telephone Number--Enter the telephone number of the company listed under 3A.

- 4. Pest Control License Number--Enter the pest control business license number of the company listed under 3A. If not applicable, list the individual inspector's pest control license, certification, registration, or permit number as required by your state. If licenses are not required in the state, note as such.
- 5A. Name of Property Owner/Seller--Enter the name of the property owner
- **5B.** Address of Property--Enter the complete physical address of the property. If mailing address differs from the physical address (such as a post office box), note as such and include both.
- **5C. Structure(s) Inspected**—Enter a clear and accurate description of all of the structures on the property which were inspected (e.g. "house and garage ONLY").
- **6. Were Any Areas of the Property Obstructed or Inaccessible--**Virtually every property will have some obstructed or inaccessible area, so the box is regularly checked "YES." In the unlikely situation that there is no obstructed or inaccessible areas, check "NO." If "YES" is checked, then go to item 7.
- 7. Obstructions or Inaccessible Areas-Enter a list of obstructions or inaccessible areas. For an expanded explanation of many common obstructions and inaccessible areas, refer to the PPCA WDI 1. Consumer Disclosure Attachment which lists many possible inaccessible areas to be considered. Note that this is not a complete list of all inaccessible areas which may be encountered in all states. Other inaccessible areas must also be considered and listed depending on the state. Special consideration and notation should be made of those inaccessible areas of the structure(s) which wood destroying insects commonly infest in the state.
- 8. Based on Careful Visual Inspection of the Readily Accessible Areas of the Property--This section provides for the findings of the inspection. Note that the report is for <u>visible</u> inspection only. In Section 8, <u>more than one box may be checked</u> unless box 8B is checked. If 8B is checked no other box in the section may be checked.
- **8A.** Visible evidence of wood destroying insects was observed. No control measures were performed. Insects observed:--Check the box and enter wood destroying insects observed, the area of the property, and any evidence of insects even such were not seen. If marking evidence but did not see the insects, note as such. Box 8A should be used when there are insects and/or evidence be if active, inactive, or of indeterminable activity status, AND the inspection company did not provide treatment for any reason. For example, perhaps the inspection company does not do treatments, the homeowner wanted other quotes, the weather was inappropriate, etc. An explanation must be provided as to why no treatment was performed.

- 8B. No visible evidence of infestation from wood destroying insects was observed-Check this box if absolutely no evidence of wood destroying insects was present, either active or inactive, recent or old. If Box 8B is checked, no other boxes in Section 8 should be checked.
- 8C. Visible evidence of infestation was noted; proper control measures were performed--Check this box if the inspection company found evidence of infestation and provided control measures. All appropriate documents such as description of treatment, graphs, contracts, etc. must be attached to the form and referenced in Box 10.

	_has been observed in the following
areasIf any damage is vis	sible due either to evidence of active or inactive
infestation, it must be noted. The	type of insect must be listed in the first blank and
all damaged areas of the property i	must be listed in the second blank. A graph of the
damaged structure must be provi-	ided. If box 8D is checked, then a box must be
checked in section 9.	

- **8E. Visible evidence of previously treated infestation, which is now inactive, was observed**--Check this box if there is there is no evidence of insect activity <u>and</u> the company previously treated the property. Inspectors should exercise caution and not assume that there was in fact treatment or that treatment was performed according to state regulations unless the inspecting company performed the treatment. Any such evidence and explanation must be noted in Box 10.
- 9. Damage Observed Above, If Any--If box 8D is checked, then a box in 9 must be checked.
- **9A.** Will be/has been corrected by this company--Check this box if the inspection company will or has corrected the damage, referencing any attachments such as repair contracts in Box 10. Care should be exercised to document and clarify how much of the damage listed in 8D will be/has been corrected.
- **9B.** Will be corrected by another company--Check this box if the damage will be corrected by a company related to the inspection company, in which case a contract or documents must be attached and referenced in Box 10. Caution should be exercised to document and clarify how much of the damage listed in 8D has been corrected.
- **9C.** Will not be corrected by this company. Recommend that damage be evaluated by a qualified building expert--Check this box if the damage will not be corrected by the inspecting company or a company related to the inspecting company. This box recommends that a building expert should evaluate the damage. It is NOT the responsibility of the inspector to make this evaluation.

- 10. Additional Comments--List all attachments to the report. Note that all documents are integral parts of this report. Each attached document should be named specifically (e.g. "see attached graph, warranty, and contract all of which are integral parts of this report").
- 11. Statement of Pest Control Operator--Read and understand this section.
- 12A. Signature of Authorized Company Representative—Either the inspector or the representative required by state regulations or company policy signs the report.
- **12B.** Title--Enter the title such as owner, manager, inspector, etc. and employee identification number, if applicable of the person who signed the report.
- 12C. Date--Enter the date this form was signed by the individual listed in 12A.
- **14. Signature of the Purchaser--**This is not the responsibility of the inspector unless required by the state.
- 15. Date--This is not the responsibility of the inspector.

Visible evidence of conditions conducive to infestation by **subterranean termites** shall be listed on the back of the form or as an attachment referenced in Box 10.

Note: Additional information such as encyclopedia or entomological information, copies of prior inspections and/or treatment reports, drawings, and other documents such as the Pennsylvania Pest Control Association Consumer Disclosure Attachment to HUD Form 92053/VA Form 26-8859 may be helpful to the consumer in understanding the scope, limitations, and specific findings of the inspection and may be provided to the consumer where appropriate.

This document is a result of the joint efforts of the following not-for-profit organizations which may be contacted for further information:

National Pest Control Association Attn: Greg Baumann 8100 Oak Street Dunn Loring, VA 22027 (703) 573-8330

Association of Structural Pest Control Regulatory Officials c/o The Indiana State Chemist
Attn: Dave Scott
Purdue University
1154 Biochemistry Bldg.
West Lafayette, IN 47907
(317) 494-1585

Pennsylvania Pest Control Association Attn: Len Bruno 509 N. Second St. Harrisburg, PA 17101 (215) 586-5640 (Bruno)

PGT

PEST CONTROL TECHNOLOGY

NPCA, PCT ANNOUNCE JOINT VENTURE

ANNUAL FLEA CONTROL UPDATE

INDUSTRY IMAGE BUILDING

WHY PCOS SHOULD SEE 'JURASSIC PARK'

Could They be in the Future of Termite Control?



n six field tests in southern Florida, 90 to 100 | percent control was apparently gained against subterranean termite colonies by using a termite control bait technology under development by the University of Florida in cooperation with DowElanco.

Hexaflumuron, a DowElanco insect growth regulator (IGR), was the active ingredient used in these | termite alates swarmed "real world" field tests against three Formosan subterranean termite colonies and three native subterranean colonies.

This IGR belongs to a group of compounds called chitin synthesis inhibitors. Termites, like other insects, need to form a new outer skin when molting Insect skin is made of a material called chitin, which is similar to the human fingernail. Hexaflumuron interferes with the formation of chitin, resulting in molting tailure (see photo at right).

One of the field sites, Colony III, was recommended by a pest control firm because of in ongoing control problem. The building is a two-story. 12-unit apartment building constructed in 1986. Company records showed that the building had received a preconstruction treatment in 1986, followed by annual spot treatments from 1987 through 1991. Two different termiticides had been used. Despite these efforts, native eastern subterranean 1

in the building each spring.

Because this building represented the difficult control situations pest control operators sometimes face, it was added to our field test program.

> The DowElanco IGR causes molting failure in termites.



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BAITS

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COLONY ELIMINATION. In two additional field tests against native eastern subterranean termites, we believe 100 percent control of the colony was achieved.

COLONY I - One of these field tests

was made at a building at the University of Florida Research Center in Fort Lauderdale. Termite activity was discovered in the door and door frame of the building in 1989. From 1990 to 1992, foraging activity and consumption were monitored. The colony's foraging worker population was 476,000.

Bait stations containing hexaflumuron were introduced in January and February 1991, and by Aprilino termite activity was noticed. Monitoring since has shown no activity.

COLONY II — Another field test with an eastern subterranean colony was conducted in a wooded area to see if termite behavior differed and the baiting system would perform in a nonresidential area. This colony had a foraging worker population of 730,000. Colony activity was monitored throughout 1990 and the spring of 1991. Baiting was initiated in April 1991 and a reduction in wood consumption was noted in May. In July 1991, all signs of activity ceased, and the site remains free from termite activity.

FORMOSAN TERMITE CONTROL. Because of their large colony populations, aggressive behavior and difficulty for control, Formosan subterranean termites are an important target pest for a termite control bait technology. Field studies against three colonies show that the bait system being researched by DowElanco and the University of Florida can effectively control active Formosan colonies.

COLONY IV — This 11-story high-rise has been infested with Formosan subterranean termites since 1986. Numerous soil termiticide treatments were done to protect the building, but our monitoring research showed that this did not affect the colony's foraging population — slightly more than 1 million termites — or its

(continued on page 78)

RESEARCH MONITORING*PROCEDURE

- 1. Locate an active infestation.
- 2. Install wood stakes in the ground at regular intervals around the site.
- 3. Check the stakes regularly for signs of termite attack.
- 4. When a stake is attacked, place four additional stakes around it.
- Remove the soil around the center stake, and install a PVC or plastic monitoring chamber at the site. Install a wood monitoring block in the monitoring chamber to allow estimation of termite worker population and wood consumption rates.
- Capture termites from the monitoring chamber, mark, release and recapture them for population estimation.
- 7. Use monitoring chambers to determine colony foraging territory.
- 8. Use a stake site adjacent to the monitoring chamber for bait placement.
- Use monitoring chambers to measure reduction of termite worker numbers and reading.
- Use monitoring chambers to measure residual populations or a total lack of activity.

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foraging activity. Baiting was initiated in April 1991, and by July the wood consumption in monitoring chambers had been reduced 60 to 80 percent. In November 1991, no termines were found in the monitoring chambers and only slight feeding was found in a few bait stations. By February 1992, no feeding was observed and none has resumed state: We believe this colony has been eliminated.

COLONY V — Another high-rise had

been infested with a Formosan subterranean colony since at least 1987, and the building had been fumigated and repeatedly treated with soil termiticides. While this protected the property, it did not affect the activity of the colony. In March 1991, the foraging population was estimated to be more than 2.4 million termites, and this colony's feeding levels remained high year-round. In April 1991 bait stations were installed, and within two weeks 90 percent of the bait had been consumed. Foraging activity declined to near zero by October, and by November no termite activity was detected. This colony was apparently eliminated.

CÓLONY VI — A third Formosan subterranean termite colony infested the utility room area of a high-rise condominium. Monitoring was done from 1989 to early 1991. Feeding activity declined in the winter months in 1989 and 1990, but did not drop off in the winter months of 1991. In April 1991, we estimated the foraging population to be 1.2 million termites. In July 1991, bait stations were introduced and foraging activity declined to near zero by November when baiting ceased. Slight feeding was detected in two monitoring stations in October 1991, and in March 1992 the remaining colony foraging population was estimated to be slightly more than 100,000. This residual population is being monitored to learn whether it will recover, and if so, how rapidly.

(continued on page 80)

EXPANDING OUR TERMITE BIOLOGY & BEHAVER KNOWLEDGE

The potential for development of an effective termite control bait technology has meant that termite biology and behavior need to be better understood. Research relating to the field testing of hexaflumuran has led to some important new discoveries:

- Eastern subterranean termite colonies may be much larger than was previously thought (Grace et al. 1989). In Florida, one eastern subterranean colony had a foraging population estimated to be 5 million termites (Su et al., in press).
 - A colony's foraging territory can change shape and area

over a matter of weeks or months. Termite colonies sometimes forage throughout a maximum foraging territory, then at other times forage in only a portion of their territory.

• Foraging territory can be larger than has been thought. In our studies, one Formosan termite colony was observed to be foraging over an area equal to a half acre. Eastern subterranean termite colonies were observed to have a foraging territory of up to one-third of an acre. In addition, foraging distance was observed to be up to 550 feet for Formosan and 233 feet for native eastern subterranean termites.

BAITS

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CONCLUSIONS. Field trials using hexaflumuron-based termite control bait provided control for both eastern and Formosan subterranean termites. Control was evidenced in as little as nine weeks after the initial bait exposure, though repeated monthly baiting was needed in some field trials of Formosan subterranean

(continued on page 1:14)

DEVELOPING AN EFFICACY MEASUREMENT STANDARD

Developing the first commercial termite control bait system involves an important regulatory challenge: there is no recognized method to demonstrate that a termite control bait really works after the bait material has been offered.

This challenge — demonstrating field efficacy — was addressed to a large extent in our field research.

Past research indicates that termites may feed on a bait material, then stop for a number of possible reasons. These could include delayed detection of the active ingredient by termites, repellency of the material, boredom with the bait material, or a shift in foraging territory away from the bait locations.

To avoid false conclusions regarding efficacy, four scientific checks were included in our field tests. They included:

- 1. Estimating the colony population. This was done by capturing workers, feeding them a dyed material, then releasing a known number of marked (dyed) termites back into the monitoring station where they were captured. By repeating this procedure a triple mark/recapture technique a valid population estimate of each colony was gained by counting both marked and unmarked randomly captured termites. This technique allows accurate estimation of any population change after the bait material has been offered (Su & Scheffrahn 1988).
- 2. Determining the colony foraging territory. The triple mark/recapture technique also allows the definition of the colony's feeding territory by simply noting where marked (dyed) termites were found. Defining the foraging territory helps determine whether activity has changed or stopped for the entire colony.
- 3. Measuring food consumption by a termite colony.

 Once a monitoring chamber has been established, wood blocks are installed for termite feeding. By knowing the exact weight of each block when it is placed in the station, it's possible to measure wood consumption after one month of feeding. (Before weighing an attacked block the termites, mud and debris were first removed and the block is dried to the same moisture content level as fresh blocks.) The goal in measuring wood consumption is to detect even a minor drop in consumption.
- 4. Measuring colony activity over time. To establish a long-term baseline for the field test, colonies were monitored for foraging territory, population and feeding levels. The length of time varied from one year to as long as six years. This allowed us to make sure that any changes after baiting were due to the bait and not a natural shift in any of the field activity measurements.

Note that use of a commercial control bait would not require measuring termite population or wood consumption. In commercial applications it would be sufficient to rely on an ongoing system of monitoring for termite activity, baiting when activity is noted, and monitoring again after control has been gained. — Nan-Yao Su

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TERMITE CONTROL

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(continued from page 80)

termites.

The results of these field tests indicate that very effective property protection can be gained by using an integrated pest management program of monitoring, baiting when termite activity is noted, and then resuming monitoring after control is gained. It is possible that a combination of liquid termiticides and a termite control bait system could be used to improve termite control results. Liquid termiticides could be used for preconstruction treatments and for spot treatments to gain fast control of an active infestation. A termite bait control product could enhance protection of a termiticide treatment, work well in an ongoing monitoring program and provide control in situations where a termiticide may not be practical. Certainly, development of a termite control bait system will ofter pest control operators an important option for protecting their customers' property.

Success in our field tests is now being expanded by DowElanco with USDA-FS and several university researchers in other areas of the nation. These additional tests will provide data useful to evaluate the commercial potential of hexaflumuron in a bait system, and provide efficacy data for practical considerations.

Nan-Yao Su, Ph.D., is an associate professor of entomology with the University of Florida Fort Lauderdale Research and Education Center, Fort Lauderdale, Fla.

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Avitrol 1/6 Odd

Incide Tech 1/4 Odd

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Association of Structural Pest Control Regulatory Officials

December 8, 1993

Mr. James P. Harron Agriculture Manager Georgia Department of Agriculture Capitol Square Atlanta, Georgia 30334

Dear Mr. Harron:

Reference our recent telephone conversation regarding the progress of Association Of Structural Pest Control Regulatory Officials (ASPCRO) data collection project involving termiticide residues in soil. To date, we have collected all of our samples in the four participating states (Ga., In., Az., and Ok.). The samples have been analyzed and collated but the statistical analysis of the sample results is not complete. Thus, ASPCRO is not ready to publish any results relative to what quantity of residues we would expect to find up to one year after a "by the label" treatment. I am in hopes that this information will be available for discussion and use by the various member states in the next six to nine months.

As you know, the problem that we as regulators have with soil sampling for regulatory purposes is that there is a huge amount of variation inherent to soil sampling. There have been any number of studies begun which attempt to answer some of the questions about what residues you should have or at what rate the termiticide decays in the soil. There are some people who are of the opinion that the termiticides should last forever. However, since the loss of the organochlorine termiticides there are no termiticides which provide that level of persistent control. What we do know is that all of the currently registered termiticides do have a definitive life in the soil beyond which they are no longer present and provide no control.

Because of the tremendous amount of variability inherent to soil sampling I know of no one, who is knowledgeable about soil sampling, in the scientific or regulatory community who recommends sampling soil for regulatory purposes beyond one year of the completion date. Because of the unreliable results, one can not sample soil several years after the termiticide application date and draw any conclusions about whether a violation occurred. For this reason ASPCRO recommends soil sampling for regulatory purposes up to one year after the completion date.

There are no studies under way to tell us what the soil residues should be after many years. The termiticide degradation study currently being conducted by Dr. Brad Kard and Dr. Skip McDaniel at the USDA Southern Forest Experiment Station in Gulfport, Ms. is in the fourth year. This study is designed to measure the rate of termiticide degradation occurring in the soil after application. This is not a residue study and should never be interpreted as such. Due to the lack of scientific information no one knows what residues would be expected to be found in the soil up to five years after a treatment. If any conclusions are to be drawn relative to this it would drawn from speculation and not from a detailed scientific study. The bottom line is that we don't know what to expect to find in the soil many years after the termiticide has been applied. As earlier stated we are striving to develop information which would give us guidance relative to soil residues for up to one year after the treatment.

I hope this answers your question about the ASPCRO position on soil sampling. With kindest regards, I am,

Jim Wright President

ASPCRO

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 M. R. Hancock
Fertilizer Administrator

L. W. Nees
Seed Administrator

D. E. Scott

Pesticide Administrator

C. L. Wiese Accounting & Administrative Assistant

TO: ASPCRO Executive Committee

FROM: Dave Scott, ASPCRO President

DATE: June 18, 1993

SUBJECTS: 1) FIFRA Sec. 2ee, Sec. 24(a), and Termiticides

2) Reporting Guidelines for HUD Wood Destroying Insect

Information Form

3) ASPCRO Representation on SFIREG Working Committee

Enclosed for your information are copies of correspondence and attachments to and from ASPCRO and U.S. EPA regarding the issue of FIFRA Sec. 2ee, Sec. 24(a), and termiticide use. I believe that this correspondence is self explanatory.

Also enclosed is a copy of a discussion draft dated 6/11/93 entitled "Suggested Guidelines for Completing the Standard Wood Destroying Insect Information Form (HUD Form 92053, VA Form 8850, Revised 5/91)." In the past several months ASPCRO has been extended the opportunity to work jointly with NPCA in meeting with and providing input to HUD relative to the wood destroying organism inspection and reporting issue. In particular HUD has allowed NPCA, with input from ASPCRO, to draft guidelines for use and completion of the frequently misused and misunderstood HUD Form. Having been given a very short response and turnaround time by HUD, I have been working closely with Greg Baumann of NPCA to provide comments on behalf of ASPCRO. However, prior to final concurrence, I am asking each of you to review this draft and advise me if you have any serious reservations about the draft or ASPCRO's endorsement of these guidelines. Your response by June 25, 1993 will be greatly appreciated.

Finally, I am happy to report that after considerable lobbying of AAPCO, SFIREG, and U.S. EPA, it has been agreed that a state representative well versed in structural pest control regulatory issues and closely aligned with ASPCRO should be appointed to serve on a SFIREG Working Committee. Ned Zuelsdorf, the

A. R. Hanks State Chemist & Seed Commissioner

Office of INDIANA STATE CHEMIST AND SEED COMMISSIONER Purdue University • 1154 Biochemistry Building

West Lafayette, IN 47907-1154

(317) 494-1492

Fertilizer Administrator L. W. Nees

M. R. Hancock

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D. E. Scott Pesticide Administrator

C. L. Wiese Accounting & Administrative Assistant

R. J. Noel Associate State Chemist & Laboratory Director

> J. G. Eikenherry Feed Administrator

R. L. Geiger Chief Inspector &

August 5, 1993

To: AAPCO

From: Dave Scott, Office of Indiana State Chemist Subject: AAPCO/ASPCRO Liaison Committee Report

During 1993, ASPCRO has been working through AAPCO and SFIREG to insure adequate representation of and input to structural pest control related pesticide issues. Recent appointment of immediate past ASPCRO President Lonnie Mathews of the New Mexico Department of Agriculture, to the SFIREG Enforcement Working Committee will help facilitate that effort. ASPCRO extends its appreciation to AAPCO for this consideration.

ASPCRO has formally encouraged U.S. EPA OPP Insecticide/Rodenticide Branch to move forward with implementation of the recommendations made in the "1989 AAPCO/SFIREG TERMITICIDE LABELING REPORT". It was suggested by ASPCRO that U.S. EPA address the restricted use classification recommendation in the report separately from the rest of the recommendations so that some progress might be achieved. As suggested in that report, ASPCRO is working on finalizing model minimum subterranean termite treatment standards for consideration by those states that do not already have such standards.

It is anticipated that ASPCRO will, during the next two to three months, finalize the termiticide residue soil sampling project which has been conducted in Georgia, Arizona, Oklahoma, and Indiana over the last two years. Results of that project will be shared with all ASPCRO and AAPCO members when it becomes available in its final form.

During the upcoming year ASPCRO hopes to work with AAPCO on such structural pest control related issues as posting and notification, IPM in schools and other public buildings. and safe and effective treatment standards for use of non-soil termiticides.

The annual meeting of ASPCRO will be held on August 29 - September 1, 1993 in Hot Springs, Arkansas. I have been asked by President-Elect Jim Wells to represent AAPCO at this meeting.

DES:jd

current SFIREG Chairman, has selected Lonnie Mathews of New Mixico to serve on the SFIREG Enforcement and Certification Working Committee. I am pleased that SFIREG has recognized the importance of working committee level input on the numerous current and upcoming structural pest control related regulatory issues that ASPCRO members must address.

Your comments, questions, and responses may be directed to me at (317) 494-1585, FAX (317) 494-4331, or the above address.

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 &
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Purdue University • 1154 Biochemistry Building West Lafayette, IN 47907-1154 (317) 494-1492 M. R. Hancock
Fertilizer Administrator

L. W. Nees
Seed Administrator

D. E. Scott

Pesticide Administrator

C. L. Wiese Accounting & Administrative Assistant

TO: ASPCRO Executive Committee

FROM: Dave Scott, ASPCRO President

DATE: August 10, 1993

SUBJECT: Wood Destroying Organism Reporting Guidance Being Developed for

HUD/VA

This is to serve as a follow up to my memo of June 18, 1993.

Enclosed is the final draft (8/9/93) of the above referenced guidance. Some changes were made to the 6/11/93 draft based on the comments previously received from the ASPCRO Executive Committee.

Unless I hear from you by close of business today (8/10/93) I will assume that this guidance is worthy of ASPCRO support and will advise NPCA. Again, sorry for the short response time but we have a limited window of opportunity.

(703) 573-8330 • FAX (703) 573-4116

August 9, 1993

RECEIVED

AUG 09 1993

To: Len Bruno Richard Kramer Dave Scott

From: Greg Baumann

Re: Draft #6 WDI Reporting Guidelines

Enclosed for your information is the final draft of the Guidelines. This draft removes "all" on page 1, lines 15 and 16, and adds the paragraph as underlined on page 8. These changes were agreed to by all.

As our audience with HUD may occur this week, please call by Tuesday noon if there is a problem with anything in the document. If I do not hear by noon, Draft #6 will be the final document to be submitted to HUD. Once submitted, we will still be able to add and improve, but we should agree on the final document to be submitted this week.

Thank you again.

termiticide. After final grade and landscaping, trench or trench and rod and treat the entire perimeter of the slab foundation with a termiticide.

(b) SUSPENDED (SUPPORTED) AND FLOATING SLABS

Treat as described in (a) above for monolithic slab. In addition to this treatment, treat the soil in the bottom of the trench with a termiticide prior to pouring the footing. If this footing is poured prior to pretreatment, treat the block/brick voids in the foundation wall with termiticide. After foundation walls are erected and prior to pouring the slab, trench or rod and trench and treat soil on the interior and exterior perimeters of the foundation walls with a termiticide.

(c) PIER AND BEAM (CRAWL SPACE)

After grading is completed and prior to pouring the footing for the foundation walls, apply the termiticide to the soil in the bottom of the trenches. If the footings are poured prior to the pretreatment, treat the voids in the block/brick foundation walls, pillars, pilasters, etc. with a termiticide as specified in item VI(b) above. Treat interior adjacent to the foundation walls, pillars, pipes, etc. After final grading trench or trench and rod soil adjacent to the exterior footing/foundation walls, pillars, pipes, and any other object from the structure to the soil with a termiticide.

holes shall be placed so as to establish a continuous termiticide barrier in the soil; or

B. Drill horizontally through the wall of slab or other structure at no more than 12 inch intervals beginning immediately below the bottom of slab and rod treat soil from the bottom of the slab to the top of the footing. Drill holes shall be spaced so as to establish a continuous termiticide barrier in the soil. In determining the drilling interval, attention should be paid to soil type and compaction.

V. EXISTING SLAB-CONSTRUCTION

Post-construction treatment for subterranean termites in structures with slab-construction must be in conformance with the following procedure:

- (a) Rod or trench and treat the soil adjacent to the entire perimeter of the slab foundation as described in IV(a).
- (b) Treat all traps and other openings in the slab.
- (c) Treat all expansion joints, visible cracks and other openings in the slab with a termiticide by rodding under or drilling through the slab and thoroughly treating the area beneath the slab where the above stated conditions exist. Drill and treat all attached slabs (porches, patios, carports, garages, walkways, etc.) When the slab is drilled or rodded the holes must not be more than 12 inches apart along the above stated areas.
- (d) Drill at intervals not to exceed 12 inches and treat all masonry voids and brick veneer walls.
- (e) Securely plug or fill with mortar all drill holes in living areas, basements, and other commonly occupied areas immediately following treatment.

VI. PRETREATMENT FOR TERMITE CONTROL

(a) MONOLITHIC SLAB

After grading is completed and prior to pouring of the slab, create a horizontal barrier with termiticide by treating the soil under the entire slab as directed by the product label. Treat all critical areas such as, bath traps, plumbing lines, openings, electrical conduit openings, etc. with a

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- inches above the soil. Pressure treated pllings and other pressure treated construction elements are exempt from this requirement.
- (c) Termite tunnels Remove all visible termite tunnels from foundation walls, pillars and those on the wood understructure.

IV. Pier and Beam (Crawl Space) Construction

- (a) Trenches Trench or trench and rod to treat soil adjacent to all sides of all foundation elements with a termiticide, from the top of the grade to the top of the footing. Trenches shall be a minimum of four (4) inches wide and deep, but shall not extend below the top of footing. Where the footings are not covered by soil, dig trenches adjacent to, but not below the bottom of the footing. Footings less than twelve (12) inches deep shall be treated at the same rate used for a footing which extends twelve (12) inches below soil grade. Soll injection techniques alone shall not be acceptable.
- (b) Pipes The soil adjacent to pipes underneath the structure shall be treated by rodding or trenching according to label directions. When pipes are covered with insulating material, troat sufficiently to penetrate soil below the depth to which such covering extends.
- (c) Treatment of Voids in Masonry Construction Elements Drill and treat all voids in multiple masonry elements of the structure extending from the structure to the soil.
 - (1) The distance between drill holes shall not exceed 12 lineal inches.
 - (2) Drill holes shall be no more than 16 inches above the footing or immediately above the lowest soll level, whichever is closest to the footing.
- (d) Dirt Fills All dirt filled structures such as concrete slab porches, steps, chimneys, porch columns, etc., shall be treated by one of the following methods:
 - (1) Excavation Remove soil in at least a 12 inch by 12 inch area beneath the slab adjacent to the main foundation wall and treat soil as indicated in item IV(a).
 - (2) Drill and Treat -
 - A. Drill vertically through slab as close as practicable from the foundation wall at no more than 12 inch intervals and treat soil beneath slab to the top of the footing. In determining the drilling interval, attention should be paid to soil type and compaction. Drill

- 3. Construction elements are present that would or could encourage a reduced volume, i.e., poured walls vs. hollow block walls;
- Specific customer request.
- (b) The following information is furnished in writing to the customer:
 - 1. A full disclosure explaining the difference between full, partial and spot applications. The disclosure shall include the termite control strategies being utilized and the reasons for those alternatives;
 - 2. The pesticide(s) used, including brand name and EPA registration number:
 - 3. The calculated volume and concentration of termiticide, as per label directions, for a complete treatment which includes maximum volume and site applications as per the product label;
 - The actual volume of termiticide applied;
 - 5. Specific information of sufficient detail to distinguish where treatment actually occurred, such as a graph of the structure identifying treated areas, utilities and sites of termite activity;
 - 6. A statement indicating whether a continuous protective barrier between termite colonies and wood in the structure have been established; and
 - 7. A clear, concise statement indicating whether the application has any guarantee or warranty associated with the application, and the terms of the guarantee or warranty.

III. General Treatment Standards

- (a) All cellulose-bearing debris such as scrap wood, wood chips, paper, stumps, dead roots, etc. must be removed from underneath buildings. Large stumps or roots that are too sound to be removed may be trenched, drilled or rodded and treated provided they are six inches or more from foundation timbers.
- (b) Eliminate all direct wood/soil contact, both inside and outside the foundation. Wooden supports which can not be removed shall be placed on a concrete or masonry footing which projects a minimum of six (6)

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS MINIMUM SUBTERRANEAN TERMITE TREATMENT STANDARDS

DRAFT #4

Introduction

The following document is intended to serve as a model for states who are considering the adoption of laws or regulations related to the application of termiticides. This model represents the minimum termite regulation standards recommended by the Association of Structural Pest Control Regulatory Officials (ASPCRO). The model is directed only towards the liquid chemical control barrier products generally in use in the United States on the date of adoption, for the control of subterranean termites. This standard does not include dust or powder termiticide formulations, nor does it include new formulations such as foams, biological control organisms or baits.

I. Labeled Use of Chemical Barrier Termiticide

Termiticides permitted for the control of subterranean termites shall be only those compounds that are registered by E.P.A. and which are labeled for use in the control of termites. A termiticide shall be used in the rate, volume and manner directed on the label and herein.

II. Variation From Label

Both pre-construction and post-construction treatments include establishing a complete and evenly distributed chemical barrier in all target solls/areas, at the volume prescribed by the product label. However, limited deviations from the termiticide label application volumes and placement may be permitted if the conditions outlined in both (a) and (b) below occur:

- . (a) One or more of the following situations is present:
 - 1. Specific environmental conditions are such that a complete application may result in adverse environmental impact. Examples may include the presence of a well, a footing drain that empties into a water body, a high water table, etc.
 - 2. Structural barriers or soil conditions or types exist that prohibit a complete treatment;

A. R. Hanks State Chemist & Seed Commissioner

Office of
INDIANA STATE CHEMIST AND SEED COMMISSIONER

Fertilizer Administrato

L. W. Nees

Seed Administrator

M. R. Hancock

R. J. Noel

Associate State Chemist &

Laboratory Director

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

D. E. Scott

Pesticide Administrator

R. L. Geiger
Chief Inspector &
Auditor

J. G. Eikenberry

C. L. Wiese
Accounting &
Administrative Assistant

TO:

ASPCRO Executive Committee

FROM:

Dave Scott, President

DATE:

February 25, 1993

SUBJECT:

AZ Structural Pest Control Commission Letter to EPA

Enclosed is a copy of a letter from Jack Root (AZ) to EPA Region IX. This letter and the issue of termiticide efficacy will apparently be discussed at the AAPCO Board of Directors meeting on March 14, 1993 in Washington D.C.

As this is an issue that is very near and dear to ASPCRO's heart, I encourage those of you who may be attending the AAPCO spring meeting to sit in on the Board of Directors meeting. In addition, I would appreciate any thoughts or comments you may have relative to this issue and Jack's letter so that I may adequately prepare to discuss this with the AAPCO Board.

Thanks

A + A + P + C + O

ASSOCIATION OF AMERICAN PESTICIDE CONTROL OFFICIALS, INC.

Arizona Department of Agriculture
Environmental Services Division
1688 West Adams
Phoenix, Arizona 85007
(602) 542-3579 FAX (602) 542-0466



Date:

February 17, 1993

To:

AAPCO Board of Directors

SFIREG Chairs

Phil Gray Arty Williams

From:

J. H. 'Bud' Paulson, President

Subject:

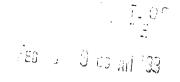
AZ Structural Pest Control Commission letter to Dave Howekamp of Region IX,

EPA

I am forwarding a copy of Jack Root's letter to Dave Howekamp of Region IX, EPA to all of the board members, SFIREG chairs and Arty with the idea that this should probably be a discussion item at the spring board meeting. If you have any questions concerning the letter itself please contact Jack directly.

See you in March.





STATE OF ARIZONA

Structural Pest Control Commission

FIFE SYMINGTON
Governor

1150 SOUTH PRIEST, SUITE 4 TEMPE, ARIZONA 85281 (602) 255-3664

JACK D. ROOT

February 3, 1993

Mr. David Howekamp, Director Air and Toxic Division U. S. Environmental Protection Agency Region IX 75 Hawthorne Street San Francisco, California 94105

Dear Mr. Howekamp:

We had a very brief discussion at the State/EPA meeting in Phoenix two months ago regarding the efficacy of the current insecticides registered for termite control. Since then I have been working with a group of licensees who perform a majority of the termiticide pre-construction treatment applications in Arizona. The purpose of this group is to attempt to outline problems of the failures of termiticides in Arizona and to develop corrective actions.

The retreatment work done under federal and state obligation following pre-construction termite treatments, is reaching very alarming levels. I estimate that one of our pretreaters is spending somewhere in the neighborhood of \$10,000 a month for retreatments only. We feel that we have limited the major sources of problems to two areas. The first is construction related activity which disturbs termiticides barriers. The second problem is the termiticides, themselves.

The current termiticides seem to be very unforgiving. Construction practices have not changed significantly in the last thirty years. However, in 1988 the chlorinated hydrocarbon termiticides were withdrawn from the marketplace. The current group of pyrethroid and organophosphate termiticides do not seem to be as forgiving as the chlorinated hydrocarbon termiticides. It is becoming apparent that they do not last under soil conditions in Arizona.

I am currently working with one subdivision of approximately 115 high income homes. The subdivision has a retreatment rate for termites of approximately 75%. The majority of the retreatments are external and relatively easy to retreat. However, it is apparent to us that the termiticides are breaking down within

Mr. Howekamp February 3, 1993 Page 2

a period of months. The homeowners association is concerned that their major investment is not being protected. A lot of blame is being assigned to several parts of the community. There is no real scientific basis for some of the failures. The lack of scientific information is, in part, the problem concerning termiticides today.

We believe that there are some things that the Environmental Protection Agency can do to assist in the correction of some of these problems. The first would be the requirement of post-construction sampling standards, for compliance purposes relating to termiticide usage. Arizona and several other states do not honor FIFRA Section 2(ee) relating to less than label rate usage of termiticides. A sampling standard required at the time of registration would assist those states with their regulatory program of insuring full compliance with termiticide usages. We encourage the Environmental Protection Agency to adopt regulations such as those in Arizona and other states that do not allow use of less than label rates of termiticides. In Arizona we have seen two directly correlated reasons for failure. One is failure to put down sufficient gallonage of termiticide solution to provide protection to the consumer's property. The second is failure to use a sufficient concentration of termiticide to provide the same level of protection. These suggestions have been made through the Structural Pest Control Regulatory Officials and the SFRIEG channels. The requests have been put forth for many years running.

We also feel that the Environmental Protection Agency along with the consortium of other federal agencies such as the Department of Agricultural, Forest Service, Housing and Urban Development, and other agencies related to environmental protection and consumer protection should fund research for protection of consumers from damage by termites. There are very little monies going into termite protection in this country at this time. Our commission feebly gave \$15,000 to the University of Arizona three years ago in order to do a start up project. The university was not able to obtain funds to continue that work even though we have an excellent research facility in Arizona. The only other termite work, of which I'm aware being done on a regular basis, is with the Forest Service. That work is of a very limited nature and is certainly isolated as well. This philosophy of not supporting research continues the reliance on pesticide chemicals for the control of termites even though there are indicators that alternative methods for control of some termites may be available.

I would also like to discuss the technical fate of the chlorinated hydrocarbons in the United States. I don't believe that it would be difficult to show that the loss of the chlorinated hydrocarbon to the consuming public in the United States has cost a great deal in terms of property loss and the agony of reliance on repeated disruptions of their homes, required by multiple applications of weaker termiticides. I don't believe that I am over reacting by the use of the term agony. I deal, on a daily basis, with people whose homes have been retreated six, ten, and twenty-four times for termites without success. These types of scenario are the extreme, but they are very taxing on the individuals involved. There is also increased risk from repeated exposure to termiticide applications.

Mr. Howekamp February 3, 1993 Page 3

Other countries have done risk/benefit analyses for the continued use of chlorinated hydrocarbon termiticides. These include Australia, a nation with a strong attitude toward environmental and consumer protection, as little as fifteen months ago. I would like to suggest that the Environmental Protection Agency might also consider such a study of the risk and the benefits of these types of termiticides. I believe the pest control industry and the consuming public would be willing to live with restricted uses of chlorinated hydrocarbon termiticides in order to achieve the level of protection that they desire for their homes.

There are many avenues available at this time. Special Local Needs labeling may be available. Expedited registrations in Section 3 may be available.

All will not be well with registration of the chlorinated hydrocarbon termiticides. There will be local environmental groups who will oppose such use. There will be health based opposition to such use. There would also be a group of persons involved in litigation who would view the re-registration of a product with potential environmental health risk as a promising profit maker for their careers. I believe that any project to support the re-registration of chlorinated hydrocarbons as termiticides would have to be of a grassroot consumer generated nature. I think that such a cause lead by either government or industry would not be looked upon favorably. The only way that this could work would be with strong restrictions and strong support from the consumer community.

In summary, I believe there are significant problems related to termite control and the termiticide chemicals available today. I do not believe there are any major differences among the chemicals registered for the control of termite in the United States. There needs to be a significant increase in regulatory support and research for alternatives for the control of termites. The state and the federal governments should reevaluate the use of longer lasting, more versatile old chemistry as an interim preventive measure to protect the homes of the consuming public. The public is losing its battle against termites at great cost. They are being subjected to repeated applications of termiticides. I believe there may be alternatives available. Thank you for consideration.

Sincerely,

STRUCTURAL PEST CONTROL COMMISSION

Jack D. Root

Executive Director

beach

JDR/oz

Mr. Howekamp February 3, 1993 Page 4

cc: Rita Pearson, Office of the Governor
Commissioners, Structural Pest Control Commission
Ken Davis, Compliance Manager
Bud Paulson, Arizona Department of Agriculture
Don Woods, U.S. Environmental Protection Agency
Edward Fox, Arizona Department of Environmental Quality