

ASPCRO MID-YEAR MEETING

3/10/96

ATTENDEES:

Benny Mathis(TX)	President
Carl Falco(NC)	Vice-President
George Saxton(IN)	Secretary/Treasurer
Jim Wright(SC)	Immediate Past President
Grier Stayton(DE)	Member-At-Large 1995, 1996
Jim Haskins(MS)	Member-At-Large 1995, 1996, 1997 (absent)
Joel Kansinger(WA)	Member-At-Large 1996, 1997, 1998 (absent)
Bud Paulson(AZ)	ASPCRO Member
Roger Borgelt(TX)	ASPCRO Member
Lonnie Mathews(NM)	ASPCRO Member
Bob Wulfhorst(OH)	ASPCRO Member
Norman Goldenberg	Terminix/TruGreen-Chemlawn
Rob Rosenberg	NPCA
Tom Diederich	Orkin

BUSINESS MEETING:

1. Lonnie Mathews(NM) advised the Board that the 1996 meeting would be in Santa Fe, New Mexico from October 20 to October 23. He also advised the Board that he would be retiring 3/96.
2. Carl Falco(NC) moved to amend article 4, section 1 of the Constitution to allow the separation of the offices of Secretary and Treasurer. Jim Wright(SC) seconded the motion and the motion passed.
3. Bud Paulson(AZ) moved to amend article 5, section 2 of the Constitution to allow the amending of the Constitution in writing with a 3/4 vote of the ASPCRO membership. Carl Falco(NC) seconded the motion and the motion passed.
4. Benny Mathis(TX) reported on the IPM Model and Notification Notice. Carl Falco(NC) moved to mail out the information to the ASPCRO membership. The motion was seconded by Grier Stayton(DE) and the motion passed.
5. Bob Wulfhorst(OH) reported on indoor residues and the methyl parathion case in Ohio.
6. Tom Diederich (Orkin) discussed unlicensed pesticide applications in public structures.
7. Carl Falco(NC) discussed developing a database for ASPCRO membership and developing a home page for ASPCRO. ASPCRO President Benny Mathis(TX) directed Carl Falco(NC) to look into the concept.
8. Bud Paulson(AZ) volunteered to develop a computer program

cross-referencing the mailing lists of ASPCRO and NPCA. Robert Rosenberg (NPCA) volunteered to assist in the project.

9. Jim Wright(SC) discussed labeling for termiticides and was appointed to be the contact person for ASPCRO to discuss termiticide issues with EPA and report proposed changes to the ASPCRO membership.
10. Roger Borgelt(TX) discussed the technician training model and advised the Board that there would be another committee meeting in New Orleans on June 14, 1996.
11. Roger Borgelt(TX) discussed having a training program presented by the National Center for Investigator Training (NCIT) for state investigators and a possible credentialling for state investigators.

A handwritten signature in cursive script, reading "George N. Saxton", written over a horizontal line.

George N. Saxton
ASPCRO Secretary/Treasurer

MCS Referral & Resources

professional outreach, patient support and public advocacy
devoted to the diagnosis, treatment, accommodation and prevention
of Multiple Chemical Sensitivity Disorders

Undisclosed Bias and Misrepresentations of Dr. Ronald Gots

Results of an independent investigation by Albert Donnay, MHS, 15 August 1996

Dr. Ronald Gots, MD, PhD, describes himself in his writings and testimony as a toxicologist and president of the National Medical Advisory Service (NMAS). He does not usually reveal that NMAS is a private consulting firm that specializes in providing corporate clients with medical "experts" willing to oppose the claims of chemically injured patients and the diagnosis of Multiple Chemical Sensitivity (MCS). Dr. Gots himself has been testifying as a paid defense witness against MCS patients since at least 1985, representing Dow Chemical and the UNUM Life Insurance Company, among others.

Dr. Gots' Undisclosed Bias and Conflicts of Interest:

Dr. Gots fails to note in his resume and speaking engagements that he also is the founder and president of several other businesses. These include Risk Communication International (RCI), a consulting firm started in 1993 that provides corporate clients with "risk management and communication services," and the Environmental Sensitivities Research Institute (ESRI), an ostensibly non-profit organization founded in 1995 to serve the needs of industries affected by MCS litigation. Both RCI and ESRI share offices with NMAS at 6001 Montrose Rd, Suite 400, Rockville MD 20852 (tel. 301-984-8933). Dr. Gots has since started yet another organization called the International Center for Toxicology and Medicine, but his salary is still paid by NMAS.

An article in Risk Policy Report (6/16/95) about ESRI's 2-day founding meeting said "Establishment of the new group by the National Medical Advisory Service was prompted by concern that MCS claims are continuing to grow ..." ESRI's name is quite misleading, however, as it does not engage in or publish any research. Its work consists primarily of conducting literature searches for its corporate members, and keeping them up to date on legal and medical issues related to MCS via private "executive briefings" conducted by Dr. Gots.

An early ESRI brochure acknowledged that "ESRI member organizations comprise a diverse cross section of interested parties. ... ESRI will address issues relating to any and all products or product groupings that are relevant to the chemical sensitivity issue by virtue of their odor or chemical constituents." This brochure was quickly withdrawn, however, and ESRI has since become quite secretive. It offers no information to the public and refuses to release a membership list or even the names of its 16 directors. Dr. Gots has said under oath that "anyone who wants to join is welcome" but—judging by ESRI's dues structure—it is a very exclusive group: "Enterprise Membership" costs \$10,000 per year and "Service Membership" (the only other option) costs \$5,000 per year.

In June 1996, when Dr. Gots was asked in a deposition to name ESRI's directors, he claimed he could remember the names of only a few. They included Robert Strum, a scientist with Procter and Gamble; Dr. Gerald McEwen, vice president of the Cosmetic, Toiletry and Fragrance Association; Dr. Richard Hancey, medical director of Monsanto; and Tim Maniscalco, public affairs manager of Dow-Elanco, the manufacturer of chlorpyrifos (a.k.a. Dursban), which is associated with more reports of chemical sensitivity than any other pesticide, according to the EPA's National Pesticide Telecommunications Network.

[continued over]

Dr. Gots consistently misrepresents himself in his writings, testimony and speaking engagements as a "toxicologist." His resume makes clear, however, that he has a PhD only in pharmacology (1968), while his medical internship and fellowship were in surgery. He actually is not board certified in any medical specialty and, by his own admission, has not treated or followed any patients of his over 20 years (since 1976). When asked in June 1996 to identify the last time he testified on behalf of a plaintiff, Dr. Gots cited a 5-year old case of DWI (driving while under the influence of alcohol) and a 15-year old case of medical malpractice. On the subject of MCS, he has published only three opinion articles, none based on any original research.

Dr. Gots' Misrepresented Opinion on Multiple Chemical Sensitivity:

Through ESRI, Dr. Gots paid \$2,800 for a public relations firm called NewsUSA to distribute a 400-word "advertorial" on MCS (an advertisement made to look like a news article) to 10,000 newspapers nationwide in the fall of 1995. Entitled "MCS: Fear of Risk or Fact of Life?," this ESRI advertisement quotes Dr. Gots as saying that "MCS is a dangerous diagnosis" which "exists only because a patient believes it does, and because a doctor validates that belief." In support of this and his other anti-MCS claims, Dr. Gots usually cites only the work of other anti-MCS defense witnesses (especially Dr. Abba Terr, Dr. John Selner, Dr. Herman Staudenmayer, and Dr. Philip Witorsch) and the position papers of a few medical societies adopted in the late 1980s and early 1990s which opposed the practice of clinical ecology. Dr. Gots rarely acknowledges that these statements are all at least 5 years old and do not take into account any of the over 125 articles on MCS that have been published since (more than half of all papers on the subject).

Dr. Gots' Misrepresented Opinion on Idiopathic Environmental Intolerances:

Since attending an invitation-only MCS Workshop convened by the International Program on Chemical Safety in Berlin in February 1996, Dr. Gots and his colleague Dr. Staudenmayer have repeatedly misrepresented this event as a "World Health Organization (WHO) committee" or "panel" and its controversial conclusions and recommendations—which proposed that MCS be renamed Idiopathic Environmental Intolerances (IEI)—as formal "WHO policy." In fact, as clearly noted in a footnote on the first page of the workshop's otherwise unreferenced report, all three of the IPCS's organizational sponsors—the World Health Organization, the United Nations Environment Program and the International Labor Organization—expressly disclaim responsibility for the MCS Workshop's conclusions and recommendations.

These misrepresentations were made by Dr. Gots and other ESRI staff to the occupational-environmental-medicine list on the Internet, to magazine and newspaper reporters, in presentations before the American Industrial Hygiene Association and the American College of Asthma, Allergy and Immunology, and even in legal proceedings opposing the claims of MCS patients. Written protests about this from MCS Referral & Resources and others (including a letter signed by the Workshop's chairman, Dr. Howard Kipen, and over 80 other distinguished occupational health and safety experts from around the world) resulted in the IPCS issuing a "Note to Invited Participants" on 7 June 1996 that reiterates the original disclaimer and adds that, "with respect to 'MCS,' WHO has neither adopted nor endorsed a policy or scientific opinion." Even this, however, has not deterred Dr. Gots from continuing to refer to the name IEI as WHO policy, which he did again in a deposition given on 19 June 1996.

Contrary to Dr. Gots inflated claims, the suggestion that MCS be renamed IEI is nothing more than the still unpublished opinion of those who participated in the IPCS workshop, including 17 invited "experts" (only 7 of whom had ever published anything related to MCS), 14 representatives of German government agencies and institutes, and 4 representatives of non-governmental organizations (NGOs) who were actually full time employees of directly affected corporations: Bayer, BASF, Coca-Cola, and Monsanto.

For more information or documentation regarding any of the above, please contact Albert Donnay, Executive Director, MCS Referral & Resources, at 410-448-3319.

1. April 5, 1996 Original notice for membership dues
2. June 17, 1996 Notice of meeting and motel information
3. July 8, 1996 Model Indoor Posting and Pre-Notification Guidelines and constitutional amendments sent
4. August 7, 1996 School Integrated Pest Management Act of 1996 sent to state agencies.
2. August 7, 1996 Memo regarding the meeting and agenda and motel deadline.
4. August 27, 1996 Meeting reminder and address change requested.
3. August 30, 1996 Reminder of the meeting, motel reservation date, constitutional by-law change, Indoor Posting and IPM in schools.

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3/10/96

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August 22, 1996

To: Benny Mathis

From: Bob Rosenberg

Thanks for the invitation to attend the ASCPRO board meeting in Santa Fe. There is a topic I'd like to see on the agenda. Namely, it's an outgrowth of discussions I've had with you and others about unresolved regulatory issues relating to termite control.

What I'm thinking about is a workshop at NPCA in December. About twenty people would be invited to attend. These are the people I'm thinking about

- EPA (Dan Barolo, Steve Johnson and Becky Cool)
- Two representatives from each of the termiticide registrants (one executive and one technical/registration person)
- State Regulators (you, Jim, Carl and maybe one more)
- USDA (Larry Ellsworth)
- Forest Service (Brad Kard and maybe a Washington policy person)
- NPCA staff
- PCOs (3 or 4)

The idea is to bring together the top people in the research, regulatory, manufacturing and applicator communities to discuss a range of issues and start working to resolve some of the issues. The agenda would include:

- termiticide efficacy
- termiticide volume
- bait use and regulation
- foam
- the future of funding for the forest Service
- rigid foam insulation
- non-chemical alternatives
- et. cetera.

Would you look this over and give me a call to let me know what you think.

New Technologies Forum

8:00 AM **Termiticide Efficacy**
Brad Kard
U.S. Dept. of Agriculture

8:45 AM **How Premise Works**
John Ivey
Bayer Corporation

9:05 AM **Termiticide Labeling**
Jim Wright
Clemson University Dept. of Pesticide Regulation

9:25 AM **Termiticide Labeling PR Notice**
Becky Cool U.S. EPA

9:50 AM **BREAK**

10:00 AM **Styrofoam: Termite Super Highway?**
Paul Hardy
Orkin Pest Control

The Great Bait Debate

10:30 AM *Byron Reid-American Cyanamid*

10:50 AM *Jim Ballard-FMC Corporation*

11:10 AM *Kevin Burns-Dow Elanco*

11:30 AM *Roger Borgelt-TX Structural Pest Control Board*
&
Dennis Howard-MD Dept. of Agriculture

Questions

12:00 PM **Meeting Adjourned**

1996 ASPCRO ANNUAL MEETING SPONSORS

AgrEvo
 American Cyanamid
 Bayer
 Ciba Crop Protection
 DowElanco
 FMC
 National Pest Control Association
 New Mexico Pest Control Association
 PCT Magazine
 Responsible Industry for a Sound Environment
 Target Specialty Products
 Van Waters & Rogers
 Western Exterminator Co.
 Whitmire/Microgen
 Zeneca

Sunday Reception
 sponsored by Orkin Pest Control

Monday Lunch
 sponsored by Terminix International

Breakfasts
 sponsored by All-American Termite and Pest Control

**Association of
Structural
Pest
Control
Regulatory
Officials**

**1996
Annual Meeting
Santa Fe,
New Mexico**



Saturday, October 19

**9:00 AM
2:00 PM**

Annual Golf Tournament

**3:00 PM
6:00 PM**

ASPCRO Board of Directors

Sunday, October 20

**9:00 AM
5:00 PM**

Tour of Taos

**6:00 PM
7:30 PM**

Opening Reception

Monday, October 21

7:30 AM

BREAKFAST

8:00 AM

Morning Moderator
Bobby Simoneaux
LA Dept. of Agriculture

Welcoming remarks
Frank Dubois
NM Dept. of Agriculture

Lonnie Matthews
ASPCRO Program Coordinator

Benny Mathis
TX Structural Pest Control Board

Pesticides and Health Issues

8:30 AM

Has Our Future Been Stolen?
Dr. Linda Meyers
Ciba Crop Protection

9:15 AM

MCS-Real or Not?
Dr. Ronald Gots
Environmental Sensitivities Research Institute

10:15 AM

BREAK

10:30 AM

Policy Before Science
Fred Langley
Responsible Industry for a Sound Environment

11:00 AM

Summary of the Gulfport Termiticide Workshop
George Rambo
George Rambo Consulting

12:00 PM

Lunch

1:30 PM

Afternoon Moderator
Forrest St. Aubin
KS Dept. of Agriculture

New From EPA
Stephen Johnson and Artie Williams
U.S. Environmental Protection Agency

2:45 PM

BREAK

3:00 PM

Alternative Pest Control Technologies
Dr. Vernard Lewis
University of California-Berkeley

4:00 PM

Norman Goldenberg
Terminix and TruGreen
ChemLawn

4:30 PM

Adjourn

6:00 PM

7:30 PM

RECEPTION

Tuesday, October 22

7:30 AM

BREAKFAST

8:00 AM

Morning Moderator
Carl Falco
NC Dept. of Agriculture

Annual ASPCRO Business Meeting

10:00 AM

BREAK

10:10 AM

Legislation, Regulation and Other News From NPCA
Bob Rosenberg and Greg Baumann
National Pest Control Association

10:40 AM

The Ohio Methyl Parathion Mess
Bob Wolfhurst
OH Dept. of Agriculture

11:45 AM

News From the Research Community
Dr. Roger Gold
Texas A&M University

12:30 PM

Lunch on your own

7:30 PM

Santa Fe Music Hall

Wednesday, October 23

7:30 AM

BREAKFAST

8:00 AM

Morning Moderator
Gene Harrington/Bob Rosenberg
National Pest Control Ass'n

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Association of Structural Pest Control Regulatory Officials

ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS BOARD OF DIRECTORS ANNUAL MEETING OCTOBER 19, 1996 - 3:00 P.M.

AGENDA

- ~~I.~~ Update from Bob Rosenberg on FIFRA Reauthorization Bill (H.R. 1627) ✓
- ~~II.~~ Discussion of Unresolved Regulatory Issues relating to Termite Control at NPCA Convention - Bob Rosenberg ✓
- ~~III.~~ Review Product Specific Information on PR Notice ✓
- ~~IV.~~ Appoint Termiticide Labeling Committee
Committee of Jim Wright, Chair, Dave Scott and Bud Paulson ✓
- ~~V.~~ Discussion of EPA Proposal to add certain active ingredients to 25b list. ✓
PAVE GILES *TUES*
- ~~VI.~~ Report from Dave Scott regarding Subterranean Termite Treatment Service Agreement (Draft JID/NPCA form)
- ~~VII.~~ Discussion on Proposed Model Indoor Posting and Pre-Notification Guidelines along with IPM Guidelines
- ~~VIII.~~ Travel Expenses for ASPCRO Members attending ASPCRO Related Meetings, i.e. NPCA; SFIREG; Members of Various ASPCRO Committees; and Members Attending Meetings Representing ASPCRO. ✓
- ~~IX.~~ Soil Sampling Survey - George Saxon, Dave Scott and Jim Wright, ✓
- ~~X.~~ Monthly Pesticide Applications and Contracts - Dave Scott ✓
- ~~XI.~~ E-mail Addresses and Home Pages - George Saxon
- ~~XII.~~ Discussion of ASPCRO Internet Web Site/Home Page and what information needs to be included on ASPCRO Home Page. ✓

Association of Structural Pest Control Regulatory Officials

XIII. 1997 ASPCRO Meeting

- a. Host
- b. Committee - Jim Wright, Program Chairman, Bob Rosenberg, June Moncrief and Host state members
- c. Travel
- d. Contributors

XIV. Committee Report from Roger Borgelt and Jim Harron on Model Training for Technicians

XV. Amending the Constitution - Roger Borgelt

XVI. New Business

Knox Wright

10/19/96 BOARD meeting
President - Benny Mathis (TX)
VP - Carl Falco (NC)
Secretary - George Sutton (IN)
Im. Past Pres - Jim Wright (SC)
Joel Kangiser (WA) 96, 97, 98
Grier Stayton (DE) 95, 96
Bud Paulson (AZ) 96, 97

Also Present: Robert Rosenberg (NACR), Robert
Wulffhorst (OH), Brad Mitchell (MA), James Harrow (GA),
Roger Borgelt (TX), Forrest St Aubin (KS), Van
Brock (TX), Dennis Howard (MD) + Richard
Kramer Innovative Pest Management, Jeff Fenner, PCT.

- * Robert Rosenberg gave update on FIFRA Re-authorization Bill. (HR Bill 1622)
- * Robert Rosenberg discussed unresolved Regulatory Issues Relating to Termite Control (HANDOUTS)

Motion: Bud Paulson } Pursue Discussion @ ASPERO mid-year
2ND: Benny Mathis } meeting re: termiticide issues w/ NPCA
+ other invited guests." PASSED

- * President Benny Mathis Appointed Jim Wright, Dave Scott + Bud Paulson to a Termiticide Labeling Committee. The Committee was ~~Appointed~~ Directed to work w/ Robert Rosenberg + NPCA on Termite issues.
- * President Benny Mathis ~~re~~ requested Termiticide Labeling Committee to Submit CBI info to Him.
- * President Appointed Dave Scott, Grier Stayton + Carl Falco to a committee to address Active ingredients to EPA's 25B List w/ Business meeting.
- * Carl Falco was directed to Continue work on ASPCRO web site/Home Page.
- * Jeff Fenner + Richard Kramer discussed their Training modules for PCO's. Requested ASPCRO's Endorsement. (Handout(s))

Motion: Jim Wright } "ASPCRO Preliminarily accepts the
2nd Bud Paulson Training Proposal Submitted By PCT
i.e., ASPCRO will Review the Proposed Training
modules AND, PROVIDED the Training modules
meet ASPCRO'S MINIMUM STANDARDS FOR TRAINING,
AGREE to Discuss Endorsement of those Training
modules." PASSED

* Roger Borgelt + James Harron gave a Committee
Report on Model Training For Technicians.

Motion: Bud Paulson } "ASPCRO Accepts the Report From
2nd : CARL FALCO the Committee + the Direction
they are proceeding -" PASSED

* George Saxton discussed monthly "Baseboard
Praxing + Continuing the Soil Sampling Survey.

* President Mathis tabled the monthly pest Control
Concept For the Business meeting.

* President Mathis appointed George Saxton,
Jim Wright + Dave Scott to look into
Surveying the liquid termiticides which were

not on the original Survey.

- * TRAVEL EXPENSES FOR ASPCA members to meetings were DISCUSSED + APPROVED.
- * ROBERT WULFHORST + DENNIS HOWARD were asked to SERVE on the Resolutions Committee.
- * GRIER STAYTON, GEORGE SAXTON + JIM WRIGHT were ASKED to SERVE on the Nominations Committee.
- * Other topics were tabled For the Business Meeting .

①

C.B.I. - (INDIANA) BOARD OF DIRECTORS

10/19/99 Board Meeting

I ★ Bob Rosenberg - updates on FIFRA Reauthorization.
HR Bill 1622

II ★ Regulatory issues relating to Terrestrial ~~issues~~
(See handout)
Paulson - Please Discussion @ math mid year meeting
Mathur re: Terrestrial issues, sponsored by WPCN
& other invited guests

"PR notice" Committee assist Rosenberg **PASSED**

III ★ Reviewed Product Specific info on PR notice

IV TX Labeling Committee - Appointed by President
1. Jim Wright
Dave Scott
Bud Paulson

Request Can the members submit ^{state} CBI, confirmations
to President

V Dave Scott, Grier Stayton ^{Carl Falco} Committee to address
active ingredients & SB list of EPA

VI ^{Service Technician Magazine}
Jeff Fenwick - ~~FEF~~ Technician Training Program
Richard Kramer - Innovative Pest Management
Requests ASPERO Endorsement

George Gale

Carl Faleo

Robert Rosenberg

Jim Wright

Berry Mathis

Robert Wolfbush

Grace Mitchell

James Hannon

Roger Bengtson

Bud Paulson

Joel Kanger

Fareed St. Allin

Ugo Brack

Eric Staylor - LATE

Dennis Howard

"Ollie Noeth"

ASPERO accepts report from Tech committee + the
decide they are proceeding

②

MODEL TRAINING (see XIV)

VII Technician update - Roger Borgelt

Paulsen: Accept Report + decide they are proceeding
20 Falco -

Passed

Preliminary

wright ~~Falco~~ - Accept proposal by PET, ASPERO Review
Training + Endorse Training modules + research ^{in return for} ~~research~~
for ASPERO

200 Paulsen

Passed

* Roger Borgelt: CLEAR/PCIT TRAINING FOR ASPERO?

Benny: Table For Spring

Bob Guldberg / Dennis Hansen Resolutions

Krier - Nomination Committee

Stenger -

Jim Wright

10/19

→ motion: Paulson (AZ)
2nd : Falco (NC)

"ASPCRO Accepts the Report From the Technician Training Committee + the Direction they are Proceeding."

→ motion: Wright (SC)
2nd : Paulson (AZ)

"ASPCRO Preliminarily Accepts the training Proposal submitted By PCT, i.e. ASPCRO will Review the Proposed training ^{modules} materials and, Provided the training ^{modules} materials meet ASPCRO's minimum standards for training, Agree to Discuss endorsement of those training modules."

SANTA FE, NM

10/21/96 MONDAY

* FRANK DUBOIS - NMDA - Welcoming Remarks

* MARK GRAHAM ^(SP) NMPCA - welcome

* BERRY MATLIS - OPENING Remarks

110 registration

42 member states

* BOBBY SIMONCAK (LA) MODERATOR

* DR LINDA MEYERS - CIBA CROP Protection

"HAS OUR FUTURE BEEN STOLEN?"

- PCB's + ORGANOCHLORINES - Mimic Estrogen

- ESTROGEN IS A CARCINOGEN

- Testosterone IS A CARCINOGEN

* DR. RONALD GOTS - ENVIRONMENTAL Sensitivities

Research Institute.

"MCS - REAL OR NOT?"

- * Most illnesses ARE psychological + NOT MEDICAL ^{PHYSICAL}

- FATIGUE

- HEADACHE

- ABDOMINAL DISTRESS

- CHRONIC FATIGUE SYNDROME

- NO LABORATORY FINDINGS

- All MAN-MADE chemicals are Alleged Causes
- MCS. Does it exist? Depends on Definition.
- MCS is "Perceived" Exposure
- Effects due to exposure of chemicals Probably does not exist according to the medical field.
- Somatoform Disorders
 - VOCAL CORD PARALYSIS
 - CONVERSION DISORDERS
 - PARALYSIS
 - BLINDNESS
 - PAIN
 - SEIZURES
- NO Consistent Findings FOR MCS
 - TERR, KIPPEN ET AL
- MCS Authors
 - STAUDENMEYER
 - BRODSKY
 - SHOTTENFELD
 - BLACK
 - SIMON

Impromptu statement from RICHARD ADAMS
ROWANOA PHILLIPS

MCS Tark Force
2300W ALAMEDA A-1
SF CA 947501

1992 - DALBERT (SP)

• 75% of CHAINTANTS ARE ♀ 30 to 40

* FRED LANGLEY - Responsible industry for a sound Environment
"Policy Before Science".

• ADA, SSI, ITKD, ATSDR Recognize MCS.
AM TAY GHS
OIS Reg

* George Rambo - George Rambo Consulting
Summary of the GulfPort Termiticide Workshop.

LUNCH

~~Robert Rosenberg~~

STEPHEN JOHNSON, EPA

New from EPA

ARTIE WILLIAMS, EPA

Food Quality Protection Act 1996

• SIGNED 8/3/1996

→ Implementation of Food Quality Protection Act.
Re-ORGANIZATION of EPA

C = F

$$49 \times \frac{7}{5} = \frac{343}{5} = 68.6$$

$$\begin{array}{r} 25 \ 175 \ 86 \\ 120 \times 75 \ 2 \ 1080 \\ \hline 57 \ 254 \\ \hline 40 \end{array}$$

$$120 \times \frac{7}{9} = 93 \frac{32}{3}$$

$$\begin{array}{r} 86 \\ 22 \\ \hline 54 \end{array}$$

* JOHN IMPSON - USDA
- Certification + Training

* VERNARD LEWIS - University of CAL-Berkeley
- "ALTERNATIVE Pest Control Technologies"
- Treating For DRYWOOD TERMITES

* NORMAN GOLDENBERG (TERMINIX + TRUGREEN
chem-lawn)

* ALTERNATIVE CONTROLS
* ULTRA SOUNDS

10/22/96 Business Meeting

Jim Wright - Termination PR Notice
• Committee will work w/ registrants

DAVE SCOTT - FIFRA Sec 25B List
- model letter will be developed for states to
u & comment to EPA

JIM HARRON - Report on Registered Technician Committee's
Protect For ^{- DAN, employees -} new PCOS coming into
the Industry,

JEFF FENNER - Pct - GAVE PROPOSAL FOR their training
Disc - CD Rom - HARD Copies - Requests
endorsement, will TAILOR to States, will
Establish Research Fund FOR ASPERO w/
% OF SALES.

Steve Jarko - ASPERO directory update

Paul Falco - ASPERO Home Page (web/site)

Bob Rosenberg - FIFRA Reauthorization Bill

- Training language now in FIFRA

$\begin{matrix} \text{A 66} & + & \text{A 66} \\ \text{Service Tech} & & \text{Maintenance Applicator (not for Hire)} \end{matrix}$

- new Section in FIFRA - Congress encourages STATES to Register Tech's + MAINTENANCE APPLICATORS

~~DAVE SCOTT~~ -

Roger Borgelt - Report on Committee's model FOR INDOOR POSTING + Pre-notification GUIDELINES.

DAVE : Accept model plans for IPM +
DENNIS, HARRIS : Posting as Presented PASSED
JIM HASKINS

BOB WULFHORST - Report on minimum STANDARD FOR TERMITE CONTROL COMMITTEE.
President charged Committee to move Forward

Committee (Jim Haskins, Dennis Harris, Bob Wolfhorst)

BOB WULFHORST - Resolutions Committee Report

1. Recognize Host + Sponsors
2. Recognize need for training, Authorize ASPO Rep meet w/ Pot to work towards agreement.

3. Urge EPA + Prep Advisory Councils develop course
in: Urban issues -

4. ASPE enter joint venture w/ NKA on developing Tm
materials

motion :
2nd :

Falco
Wright

Accept

Passed

John Impson - USDA - C+T (HANDOUT)

Roger Bargett - Constitutional Amendments

Art 4 Sec 1 split Sec / Treasurer

Art 5 sec 2 - Amendments by mail 3/4 vote

motion
2nd

Hansen
Falco

Accept motion

Passed

Grier Saxton - Nominations Committee Report

1. Jim HASKINS Sec

2 TODD THOMPSON 97 (CRICK) 3XR

3 DENNIS HOWARD 97, 98 (WOOL)

motion

SAXTON
Falco

accept

Passed

Paul E
96-97

DAVID Newbill (TN) Report on 1997 meeting plan
- Sept 7th - 11th
14th - 18th
- Nashville

George Saxon - FINANCIAL Report

Kevin Stewart
John Hancock

Dennis Hammond - New Technologies Committee Report.
- TX BAITS (AM C)
- Fmc BAITS

New Business

FALCO - New Companies w/ Baits For TX
in addition to ones already presented.

* Robert Rosenberg - NPCA.

"Legislation, Regulation + other news FROM NPCA"

- Future of NPCA
- More Gail Sampling
- Other TX treating problems

Retical Terms

- * Dave Scott - NPCA-99A + NPCA-99B - DRAFTS
 - Subterranean Soil Treatment Builders Guarantee
 - New Construction Subterranean Termite Soil Treatment Record.
 - * Roger Gold - News From the Research Community
TEXAS A&M
 - Foam only covers $\frac{1}{4}$ " of soil
 - most termiticides bind very well to soil
 - H₂O Saturated Soil Does not Hold termiticide
 - Baits
 - ATTRACTANTS DO NOT WORK
 - Preferred Baits work for a while
 - Colony Elimination - Small Period of time
 - Population Suppression - < 50 TX makes new Colony
 - Localized Control - Only Hope For Baits
 - Interpreting zero.
 - Colony Disturbance looks like zero
 - Repellency keeps TX away, looks like zero
 - Time of Year - Foraging < Seasonally
 - Colony Management
- Baits have to Kill Queens

** BAITS CAN BE USED TO KILL LOCAL POPULATIONS
IN < 50% OF THE CASES

ROBERT WOLF HORST
OHIO METHYL PARATHION MASS

10/23/96 NEW TECHNOLOGIES FORUM

Termite Efficacy - Brad Kord (USDA)

- New products each year tested. Both before & after registration
- Four test sites - AZ, MS, FL, SC, MD, PANAMA, MIDWAY, PR
- 90% of chemicals never considered for field test.
- Non-chemical barriers tested
Basaltic Termite Barrier (BTB), Stainless Steel Mesh Barrier

Premise - Mike Ringo (Bayer)

- Modes of action
Chemical / Traditional
Slow, lethargic, stop feeding, disorientation
social behavior disrupted

Premise Plus Nature
Synergistic control.
Termites will penetrate carrier.

Termiticide Labeling and PR Notice ^{US.}
Jim Wright & Becky Cool (EPA)

- Oct 1, 1996 Final Notice issued
- Only applies to soil treatment termiticide
 - Effective October 1, 1997

54R Effectiveness

~~to~~ 2(cc) allowed unless label prohibits
except on pre-construction treatments

PPE according to toxic category. Difference between
mixing and application.

Precaution Statement for bystanders & pets.

Exterior treatment to 4' depth. (Equipment difficult
and termites in top 4" of soil)

Standardized Label Language

Variable concentrations supported by data.

ASPCRO review prior to label changes

Stand alone or with chemical carriers.

Pretreat or preventative.

Bait preference & attractance to food source.

Dennis Howard. - New Technologies

ISSUE:

The 1996 Annual Meeting of the Association of Structural Pest Control Regulatory Officials (ASPCRO) was held in Santa Fe, New Mexico. The program included excellent informative speakers as well as the opportunity to exchange ideas among representatives of states, industry and others who have an interest in structural pest control issues.

RESOLUTION:

Therefore, ASPCRO resolves to recognize Lonnie Matthews and his family for their work with the planning committee in organizing and conducting the meeting. ASPCRO also wishes to recognize the New Mexico Department of Agriculture and the following sponsors for their assistance in making this meeting possible:

AgrEvo
American Cyanamid
Bayer
Ciba Crop Protection
DowElanco
FMC
National Pest Control Association
New Mexico Pest Control Association
Orkin
PCT Magazine
Terminix International
Responsible Industry for a Sound Environment
Target Specialty Product
Van Waters & Rogers
Western Exterminator Co.
Whitmire/Microgen
Zeneca

ISSUE:

ASPCRO has long recognized the need for training directed at structural pest control technicians (inspectors, sales people and handlers). The interest in particular is directed toward employees who are outside the scope of certified applicator programs.

In recognition of this need ASPCRO has established a committee charged to develop training materials for pest control technicians. Service Technician Magazine has contacted ASPCRO, informing us of their intention to develop a series of serviceman training materials. In order to enhance the recognition of their training materials they have requested ASPCRO's endorsement of their training materials. In exchange for this endorsement Service Technician Magazine is offering to ASPCRO, review rights of the materials as well as a percentage of their receipts from sale of those materials with the compensation being placed in a research fund under the control of Service Technician Magazine.

RESOLUTION:

Therefore, ASPCRO resolves to authorize its representative to meet with Service Technician Magazine and negotiate the terms of an ASPCRO endorsement for the PCT technician training program and the compensation to be provided to this organization.

ISSUE:

There is significant concern about both human exposure and other environmental impacts from pesticide usage in the urban environment. Further, the States recognize the quality of training that has been made available through Pesticide Regulatory Education Programs (PREP).

RESOLUTION:

Therefore, ASPCRO resolves to urge EPA and the PREP Advisory Committee to consider development of a PREP Course specific to the issues surrounding urban pesticide use.

ISSUE:

ASPCRO has long recognized the need for structural pest control technician training. This interest in particular is directed toward those technicians who are outside of the scope of certified applicator training programs. In recognition of this need, ASPCRO has established a committee with the charge to develop training materials for structural pest control technicians. To facilitate this process ASPCRO has obtained EPA/USDA grant funds.

The National Pest Control Association (NPCA) has approached the training committee with its own commitment to develop technician training materials and is seeking to work jointly with ASPCRO toward this mutual goal.

Under the terms of the EPA/USDA grant, ASPCRO is obligated to produce training materials which can be made available at no charge to states for use in their programs.

In contrast, NPCA would distribute any jointly developed training materials under copyright.

In order to satisfy both objectives, will require the development of parallel materials; one a manual outside of copyright and a separate offering to be more comprehensive in its content to be distributed under copyright.

ASPCRO would have full editorial review of those materials developed jointly with NPCA and would share in profit from sales of said training materials.

RESOLUTION:

Therefore, ASPCRO resolves to jointly develop with the NPCA service technician training materials. A representative of the ASPCRO Board of Directors is authorized to negotiate with NPCA concerning any financial terms for this joint operation.

LORA L. BRAMER, CPA
4641 JACKSON HIGHWAY
WEST LAFAYETTE, IN 47906
317-583-1507

Lo

October 14, 1996

*Approved By
Board*

Board of Directors
Association of Structural Pest Control
Regulatory Officials
1154 Biochemistry Building
Purdue University
West Lafayette, IN 47907

I have reviewed the receipts and disbursements of the Association of Structural Pest Control Regulatory Officials (ASPCRO) for the period of December 1, 1995 through September 30, 1996. The review was limited to bank statements, canceled checks, check registers, expense receipts and grant documentation.

The following procedures were performed in order to assess the accuracy and completeness of the above mentioned records:

1. The numerical sequence of the checks written during the period was verified. All checks were accounted for as either canceled checks or void checks.
2. Checks were traced to the computer generated check register. All checks were recorded in the check register.
3. The September 1996 bank statement was reconciled with the computer generated report. There was a \$.50 difference in the balances. The check register should be corrected to show that check #1029 was issued for \$483.36 instead of \$483.86.
4. Supporting documentation was examined for the checks written. Documentation was available for all but 5 of the checks written. The checks without documentation were for expenses paid in September after most documentation was submitted for review.
5. Prior treasurer's records were examined to verify that all funds were transferred to the new account.
6. Deposits were traced to the computer generated check register. All receipts were reported.

7. Grant income was verified against documentation.

8. Dues income was verified against paid dues receipts.

The above procedures do not constitute an audit in accordance with generally accepted accounting standards. I am, therefore, not expressing an opinion on the financial statements of the Association for Structural Pest Control Regulatory Officials.

In connection with the above referenced procedures, no material matters came to my attention that require adjustment of any income or expense accounts.

Sincerely,

A handwritten signature in cursive script, reading "Lora Brammer".

Lora L. Brammer, CPA

10/3/96
ASPCRO CHECK

Register Report

12/2/95 Through 10/2/96

Page

Date	Num	Description	Memo	Category	Clr	Amount
BALANCE 12/1/95						0.00
12/13/95	TXFR	Opening Balance		[ASPCRO CHECK]	x	2,000.00
12/15/95	DEP			Ag Research		25,000.00
1/2/96	Maint	Huntington Bank		Check Printing		-85.99
1/30/96	1001	Roger Borgelt		RT Meeting		-631.06
2/9/96	1002	Jim Harron		RT Meeting		-449.14
3/18/96	1003	George Saxton		Midyear meeting		-396.66
3/18/96	1004	Benny Mathis		Midyear meeting		-589.82
3/21/96	TXFR	Carl Falco		reimbursement		525.72
3/21/96	0143	Carl Falco		Midyear meeting		-525.72
3/29/96	TXFR			[ASPCRO CHECK]		21,377.78
4/4/96	1005	Printing Svcs		Stationary		-137.53
4/8/96	1006	Benny Mathis		Bus. Utilities:Telep...		-259.47
4/29/96	DEP			1996 Dues		1,000.00
5/8/96	1007	June Moncrief		1996 Meeting		-367.64
5/8/96	1008	June Moncrief		1996 Meeting		-1,000.00
5/22/96	1009	Benny Mathis		Forum Meeting		-656.43
5/22/96	1010	Jim Wright		1996 Meeting		-743.00
5/24/96	DEP			1996 Dues		1,500.00
5/24/96	1012	Bob Rosenberg		1996 Meeting		-360.00
6/4/96	1013	Bobby Simoneau		Overpayment		-200.00
6/5/96	DEP			Ag Research		25,000.00
6/5/96	DEP			NPCA Donat		1,000.00
6/5/96	DEP			Zeneca		2,000.00
6/5/96	DEP			1996 Dues		500.00
6/12/96	1014	Benny Mathis		RT Meeting		-433.65
6/12/96	1015	Roger Borgelt		RT Meeting		-419.20
6/17/96	1016	Drew Martin		RT Meeting		-444.37
6/17/96	1017	Penny Pava		Supplies, bus.		-10.45
6/17/96	1018	OISC		Postage		-64.88
6/17/96	1019	Carl Falco		RT Meeting		-312.84
6/19/96	1020	Dave Scott		RT Meeting		-519.94
6/24/96	1021	Donald Molnar		RT Meeting		-396.06
6/24/96	1022	Jim Wright		RT Meeting		-171.20
6/27/96	1023	Bob Wulfhorst		RT Meeting		-184.37
6/27/96	1024	Roger Borgelt		RT Meeting		-718.51
6/27/96	DEP			1996 Dues		600.00
6/27/96	DEP	Drew Martin		reimbursement		10.00
7/8/96	1025	Bob Wulfhorst		RT Meeting		-306.00
7/12/96	DEP			1996 Meeting		170.00
7/12/96	DEP			Target		500.00
7/12/96	DEP			AgrEvo		1,500.00
7/12/96	DEP			Western Ext		500.00
7/12/96	DEP			Rise		1,000.00
7/12/96	DEP			Whitmire		500.00
7/12/96	1026	OISC		Postage		-22.40
7/19/96	DEP			NPCA Reimb		1,336.89

10/3/96
ASPCRO CHECK

Register Report
12/2/95 Through 10/2/96

Page

Date	Num	Description	Memo	Category	Clr	Amount
7/19/96	DEP			1996 Meeting		340.00
7/19/96	DEP			1996 Meeting		85.00
7/19/96	1027	Jim Harron		RT Meeting		-295.67
7/24/96	1028	OISC		Postage		-70.18
7/24/96	1029	Benny Mathis		DC Meeting		-483.86
8/2/96	DEP			1996 Dues		150.00
8/2/96	DEP			1996 Meeting		510.00
8/2/96	1030	Todd Thompson		RT Meeting		-219.47
8/7/96	1031	OISC		Postage		-62.31
8/16/96	1032	OISC		Postage		-84.80
8/16/96	1033	MT Dept of AG		Overpayment		-50.00
8/16/96	1034	Clay Bernard		Bus for meeting		-300.00
8/21/96	1035	Printing Svcs		Stationary		-112.55
8/21/96	DEP			1996 Meeting		1,190.00
8/21/96	DEP			1996 Dues		200.00
9/3/96	1036	OISC		Postage		-94.19
9/3/96	1037	OISC		Postage		-85.13
9/3/96	1038	Bernie Rodriguez		Meals & Entertn		-150.00
9/9/96				Cancel 1038		150.00
9/9/96	DEP			1996 Meeting		2,495.00
9/9/96	DEP			1996 Dues		300.00
9/9/96	DEP			Orkin		3,000.00
9/9/96	DEP			Bayer		2,000.00
9/9/96	DEP			All America		2,850.00
9/9/96	DEP			Ciba		500.00
9/9/96	DEP			GIE		500.00
9/9/96	1039	Bernie Rodriguez		Meals & Entertn		-150.00
9/23/96	1040	Bob Russell		reimbursement		-85.00
9/23/96	DEP			1996 Dues		100.00
9/23/96	DEP			1996 Meeting		965.00

TOTAL 12/2/95 - 10/2/96

88,705.90

BALANCE 10/2/96

88,705.90

TOTAL INFLOWS
TOTAL OUTFLOWS

101,355.39
-12,649.49

NET TOTAL

RT . 45 575.94
GEN. 43 819.96
88,395.90

88,705.90
45 575.94
43,119.96

Register Report
12/2/95 Through 10/11/96

10/17/96
Technician Acct

Page

Date	Num	Description	Memo	Category	Clr	Amount
BALANCE 12/1/95						0.00
12/2/95		Opening Balance			x	25,000.00
1/30/96	1001	Roger Borgelt		RT Meeting		-631.06
2/9/96	1002	Jim Harron		RT Meeting		-449.14
4/8/96	1006	Benny Mathis		Conf. Call		-259.47
6/5/96	DEP					25,000.00
6/12/96	1014	Benny Mathis		RT Meeting		-433.65
6/12/96	1015	Roger Borgelt		RT Meeting		-419.20
6/17/96	1016	Drew Martin		RT Meeting		-444.37
6/17/96	1019	Carl Falco		RT Meeting		-312.84
6/19/96	1020	Dave Scott		RT Meeting		-519.94
6/24/96	1021	Dave Molnar		RT Meeting		-396.06
6/24/96	1022	Jim Wright		RT Meeting		-171.20
6/27/96	1023	Bob Wulforth		RT Meeting		-184.37
6/27/96	1024	Roger Borgelt		RT Meeting		-718.51
7/8/96	1025	Bob Wulforth		RT Meeting		-306.00
7/19/96	DEP			NPCA Reimb		1,336.89
7/19/96	1027	Jim Harron		RT Meeting		-295.67
8/2/96	1030	Todd Thompson		RT Meeting		-219.47
TOTAL 12/2/95 - 10/11/96						45,575.94
BALANCE 10/11/96						45,575.94
TOTAL INFLOWS						51,336.89
TOTAL OUTFLOWS						-5,760.95
NET TOTAL						45,575.94

Multiple Chemical Sensitivities Task Force of New Mexico
P.O. Box 23415, Santa Fe NM 87502-3415
505-466-4446

To: ASPCRO Conference Participants
From: Multiple Chemical Sensitivities (MCS) Task Force of New Mexico
Date: October 21, 1996

We, the MCS Task Force of New Mexico, are deeply disturbed that only the chemical industry view of MCS is being presented at this conference (by Dr. Gots and Mr. Langley). While it is to be expected that the chemical industry is more concerned with profits than human welfare, we believe that pest control regulators must be held to a higher standard -- that of protecting public health as well as managing pests. To that end, we urge pest control regulatory officials to get all the facts about MCS before coming to conclusions about it.

The Task Force would be happy to arrange for speakers at future ASPCRO meetings so that MCS researchers, doctors who treat people with MCS, experts on The Americans with Disabilities Act, and chemically sensitive people themselves, can be heard. Only in this way can a true picture of MCS be obtained. Unless chemically sensitive people are able to participate in the debate, they will remain invisible and misunderstood.

People with MCS are not those "other" people who are so different from everybody else. We are your fathers, mothers, sisters, brothers, husbands, wives, and children who have developed a complicated and serious illness. We are real people with real health problems. We deserve respect, compassion, protection, accommodation, and the right to be heard.

Common Misconceptions about Multiple Chemical Sensitivities (MCS)

FICTION	FACT
MCS is not a recognized illness.	MCS is recognized as a potentially disabling condition by Social Security, HUD, EPA, and the National Academy of Sciences. MCS is also recognized by the U.S. Army, Department of Veterans' Affairs, and many other federal, state, and local government entities.
MCS is a small problem affecting only a few individuals.	MCS is a widespread, growing, and serious public health problem that is reaching epidemic proportions. It occurs in men and women of all ages, races, and socio-economic backgrounds around the world. Preliminary results of a 1995 California Department of Health Services study found 16% of the study population were chemically sensitive and 7% had been diagnosed with MCS. That's approximately 2 million cases of MCS in California alone.
People only develop MCS after a doctor tells them they have it.	Most people with MCS see 15 - 20 doctors because of their troubling chemical sensitivities before finding someone who can diagnose and help them.
The diagnosis of MCS begins a downward spiral that condemns the sufferer to a life of misery and disability.	Being diagnosed with MCS usually marks the beginning of recovery for people with MCS, for which they are immensely grateful.
There are no abnormal lab tests in people with MCS.	Many people with MCS have abnormal brain scans, EEGs, immune studies, and neuro-psychological tests that indicate brain and/or immune damage.
Symptoms reported by people with MCS are not accompanied by any detectable changes on physical examination.	MCS patients may have a yellowish skin color, low body temperature, wheezing/asthma, rashes, edema/swelling, aphasia, irregular or rapid heartbeat, poor coordination, visual impairment, tremors, and seizures -- among other things.
Avoiding chemical exposures condemns the patient to a life of misery, isolation, and disability.	Avoiding chemical exposures has been shown to be the most helpful measure in relieving symptoms, stabilizing health, and helping patients regain their ability to function.

FICTION	FACT
<p>People with MCS are not entitled to protection under The Americans with Disabilities Act (ADA).</p>	<p>The U.S. Justice Department enforces the ADA and considers MCS a disability on a case-by-case basis -- as with all other conditions.</p>
<p>It is unreasonable to help people with MCS until all the medical facts are known about this illness.</p>	<p>"Public officials must acknowledge the existence of people with MCS and the sincerity of their needs.... The scientific debate should not be used as an excuse against taking proper action now." Judy Myers, Director, New Mexico Governor's Committee on the Concerns of the Handicapped, 1996.</p>
<p>People with MCS don't want to work.</p>	<p>So many people with MCS are asking for work place accommodations -- so they can work -- that chemical industry advocates are advising employers on how to deny requests for accommodations ("How to Marshal the Power of the ADA to Minimize Your Company's Exposure Liability to Individuals Seeking Accommodations for MCS," Lonny Dolan, 1995).</p>
<p>People with MCS just want sympathy and get it.</p>	<p>People with MCS are misunderstood, maligned, and rejected. Many lose their family and friends. Bosses, co-workers, neighbors, and even doctors, can be rude and hostile. Public officials usually ignore them. Children and adults make fun of them for wearing respirators. What sympathy??</p>
<p>The chemical industry wants to learn the truth about MCS.</p>	<p>The chemical industry has vowed to suppress the recognition of MCS in order to preserve profits ("The Chemical Manufacturers' Association Environmental Illness Briefing Paper," 1990).</p>
<p>Doctors who earn their living by testifying against people with MCS are scientifically objective when discussing MCS.</p>	<p>There is an obvious conflict of interest regarding MCS for those who profit from anti-MCS testimony.</p>
<p>The World Health Organization wants to change the name of MCS.</p>	<p>The World Health Organization categorically denies that the conclusions and recommendations of a 1996 industry-dominated MCS workshop represent the decisions or stated policy of the WHO.</p>

8100 Oak St.
Dunn Loring, VA 22027
Phone: 703-573-8330
Fax: 703-573-4116
Email: NatPestTec@aol.com
Home Page: [http:// www.nationalpest.org](http://www.nationalpest.org)

National Pest Control Association, Inc.

NPCA Fax

To: Interested Parties **From:** Greg Baumann, Director of Field Services

Fax: List **Pages:** 3

Phone: List **Date:** October 7, 1996

Re: Revised Forms **CC:** Tim Leatherman, Chair, WDO Committee

☐ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

• Comments:

Thanks once again for your interest. The following are the latest revisions to the form. There are several points to note:

1. We will try again to get HUD and VA to accept the five year guarantee for the builder from date of treatment. The four years from date of occupancy has been confusing for all of us. Also, we deleted the FHA and VA treatment standards considering that they don't exist.
2. If the buyer sells the house or structure in the five years, the successors or assigns will be covered.
3. We have clarified that the owner should go to the PCO who did the treatment preferably under Attention Buyer.
4. We added the consumer advisory from the NPCA-1 form.
5. We tried to make licenses pest control firm authorized by the state for states where no business licenses are issued.
6. On the NPCA-99b, we added more treatment information including type of construction.

Please consider these drafts and let me know if you have substantial comments as soon as possible, certainly by the end of Wednesday.

Thanks for all of the work and comments.

NEW CONSTRUCTION SUBTERRANEAN TERMITE SOIL TREATMENT RECORD

This form is completed by the licensed Pest Control Company.

This report is submitted for informational purposes to the builder on proposed (new) construction cases when soil treatment for prevention of subterranean termite infestation is specified by the builder, architect, or required by the lender, architect, FHA, or VA.

All contracts for services are between the Pest Control Operator and builder, unless stated otherwise.

SECTION 1: GENERAL INFORMATION

TREATING COMPANY INFORMATION (Street address, City, State and Zip):

COMPANY BUSINESS LICENSE NO.:

COMPANY PHONE NO.:

FHA/VA CASE NO. (If any):

SECTION 2: BUILDER INFORMATION

COMPANY NAME:

PHONE NO.:

SECTION 3: PROPERTY INFORMATION

LOCATION OF PROPERTY (Street Address, or Legal Description, City, State and Zip):

TYPE OF CONSTRUCTION: ☐ SLAB ☐ BASEMENT ☐ CRAWL
(More than one box may be checked)

APPROXIMATE DEPTH OF FOOTING:

SECTION 4: TREATMENT INFORMATION

DATE(S) OF TREATMENT(S):

BRAND NAME OF PRODUCT(S) USED:

CONCENTRATION %:

APPROXIMATE SQUARE FOOTAGE OF TREATMENT AREA:

APPROXIMATE TOTAL GALLONS APPLIED:

WAS TREATMENT COMPLETED ON EXTERIOR? ☐ YES ☐ NO

SERVICE AGREEMENT ISSUED: ☐ YES ☐ NO

Note: Some state laws require service agreements to be issued. This form does not preempt state law.

ATTACHMENTS (List):

COMMENTS:

NAME OF APPLICATOR(S):

AUTHORIZED SIGNATURE:

DATE:

**SUBTERRANEAN TERMITE SOIL TREATMENT
BUILDER'S GUARANTEE**

This form is completed by the builder.

This form is submitted for proposed (new) construction cases when soil treatment for prevention of subterranean termite infestation is specified by the builder or required by the lender, the architect, FHA or VA.

This form is completed by the builder. This guarantee is issued by the builder to the buyer. This guarantee is not to be considered as a waiver of legal remedies that the buyer may have against the builder.

FHA/VA CASE NO: _____

LOCATION OF PROPERTY (Street Address, or Legal Description, City, State and Zip): _____

BUYER'S NAME: _____

The undersigned builder guarantees to the buyer, successors, or assignees, that this property has been treated for subterranean termites by an application of a liquid termiticide and that additional treatment records are on file in the builder's office. The builder further guarantees that the applicator has used a product in accordance with the product label, state requirements and was applied by a licensed pest control company at not less than the volume or concentration specified on the EPA approved label. All treatment materials and methods used comply with state and federal regulations.

The builder hereby guarantees that, if subterranean termite infestation should occur within 5 years from the date of treatment, the builder will ensure that the responsible licensed or otherwise state authorized pest control company (where required by state law) or other qualified licensed pest control company, retreat the soil, or use other EPA registered products, as necessary to control the infestation in the structure. This retreatment will be without cost to the buyer. The builder further agrees to repair all damage by subterranean termites within the one year builder's warranty period. If, during the term of this agreement, additions or alterations are made which affect the structure or surrounding soil including landscape and mulch alterations and create new subterranean termite hazards, or interfere with the control measures, this guarantee will become null and void in the areas of additions or alterations unless stated otherwise.

If within the guarantee period the builder questions the validity of a claim by the buyer, the claim will be investigated by an unbiased expert agreeable to the buyer and builder. The report of the expert will be accepted as the basis for disposition of the case. The builder will pay the cost of inspections made to test the claim, if the claim is determined to be valid, or by the buyer if the claim is invalid.

This guarantee provides assurance to the buyer, successors, or assigns that treatment has been provided to mitigate the potential of termite activity.

BUILDER'S COMPANY NAME:

PHONE NO.: ()

AUTHORIZED SIGNATURE:

DATE:

ATTENTION BUYER: You may have the option of having the pest control company which performed the treatment or another pest control company inspect the property annually for an additional fee. For further information, contact the pest control firm listed on the NPCA-99b.

Consumer Maintenance Advisory regarding Integrated Pest Management for Prevention of Wood Destroying Insects Information regarding prevention of wood destroying insect infestation is helpful to any property owner interested in protecting the structure from infestation. Any structure can be attacked by wood destroying insects. Periodic maintenance should include measures to minimize possibilities of infestation in and around a structure. Factors which may lead to infestation from wood destroying insects include foam insulation at foundation, earth-wood contact, faulty grade, firewood against structure, insufficient ventilation, moisture, wood debris in crawlspace, wood mulch, tree branches touching structures, landscape timbers, and wood rot. Should these or other such conditions exist, corrective measures should be taken by the owner in order to reduce the chances of infestations by wood destroying insects, and the need for treatment.

An original and one copy are prepared by the builder and sent to the lender. The lender provides one copy to the buyer at closing. The builder sends one copy to the licensed pest control company which performed the treatment.

Attached is a copy of the state authorized pest control company's New Construction Subterranean Termite Soil Treatment Record, NPCA-99b.

SUBTERRANEAN TERMITE SOIL TREATMENT BUILDER'S GUARANTEE

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This form is submitted for proposed (new) construction cases when soil treatment for prevention of subterranean termite infestation is specified by the builder or required by the lender, the architect, FHA or VA.

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FHAVA CASE NO: _____

LOCATION OF PROPERTY (Street Address, or Legal Description, City, State and Zip): _____

BUYER'S NAME: _____

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PHONE NO.: ()

AUTHORIZED SIGNATURE:

DATE:

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FHAVA CASE NO. (If any):

SECTION 2: BUILDER INFORMATION

COMPANY NAME:

PHONE NO.:

SECTION 3: PROPERTY INFORMATION

LOCATION OF PROPERTY (Street Address, or Legal Description, City, State and Zip):

TYPE OF CONSTRUCTION:

☐ SLAB

☐ BASEMENT

☐ CRAWL

(More than one box may be checked)

APPROXIMATE DEPTH OF FOOTING:

SECTION 4: TREATMENT INFORMATION

DATE(S) OF TREATMENT(S):

BRAND NAME OF PRODUCT(S) USED:

CONCENTRATION %:

APPROXIMATE SQUARE FOOTAGE OF TREATMENT AREA:

APPROXIMATE TOTAL GALLONS APPLIED:

WAS TREATMENT COMPLETED ON EXTERIOR?

☐ YES

☐ NO

SERVICE AGREEMENT ISSUED:

☐ YES

☐ NO

Note: Some state laws require service agreements to be issued. This form does not preempt state law.

ATTACHMENTS (List):

COMMENTS:

NAME OF APPLICATOR(S):

AUTHORIZED SIGNATURE:

DATE:

8100 Oak St.
Dunn Loring, VA 22027
Phone: 703-573-8330
Fax: 703-573-4116
Email: NatPestTec@aol.com
Home Page: <http://www.nationalpest.org>

National Pest Control Association, Inc.

NPCA Fax

To: Interested Parties	From: Greg Baumann, Director of Field Services
Fax: List	Pages: 3
Phone: List	Date: October 7, 1996
Re: Revised Forms	CC: Tim Leatherman, Chair, WDO Committee

☐ **Urgent** ☒ **For Review** ☐ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

• Comments:

Thanks once again for your interest. The following are the latest revisions to the form. There are several points to note:

1. We will try again to get HUD and VA to accept the five year guarantee for the builder from date of treatment. The four years from date of occupancy has been confusing for all of us. Also, we deleted the FHA and VA treatment standards considering that they don't exist.
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6. On the NPCA-99b, we added more treatment information including type of construction.

Please consider these drafts and let me know if you have substantial comments as soon as possible, certainly by the end of Wednesday.

Thanks for all of the work and comments.

TERMITICIDE LABELING PR NOTICE

BACKGROUND

- **1988 - SFIREG committee formed - state regulatory officials, EPA, AND NPCA**
- **1989 - SFIREG "TERMITICIDE LABELING REPORT" issued**
- **PR NOTICES - system for informing registrants of Agency's policies and procedures**
- **JULY 1994 - Draft TERMICIDE LABELING PR NOTICE published for public comment**
 - **40 comments received**
- **OCTOBER 1, 1996 - TERMITICIDE PR NOTICE issued in FINAL**
 - **true collaborative effort between EPA, state regulatory personnel, and the regulated community**
 - **full ASPCRO participation**
 - **NPCA workshop**

SCOPE

- **ONLY applies to soil treatment termiticide products. Does NOT apply to fumigants and dry baits.**
- **All products distributed or sold by registrants and supplement registrants must bear approved labeling consistent with the notice by OCTOBER 1, 1997.**
- **All products distributed or sold by any other person must bear approved labeling by OCTOBER 1, 1999.**

MINIMUM PRODUCT PERFORMANCE

- **Soil treatment termiticide products should demonstrate efficacy for at least 5 YEARS.**
- **Generally, registration of a product with less than 5 years of efficacy not appropriate from safety or efficacy standpoint.**
- **Generally, will not grant registration for a termiticide product requiring annual retreatment.**

MINIMUM APPLICATION RATE

- **Section 2(ee) of FIFRA, a pesticide may be applied at any dosage, concentration, or frequency less than that specified on the labeling unless the labeling specifically prohibits it.**
- **PRE-CONSTRUCTION applications - those made prior to finished grade being installed.**
- **POST-CONSTRUCTION applications - those made after the final grade is installed.**
- **Less than labeled rates PROHIBITED for pre-construction applications. Post-construction applications can be made at less than labeled rates, although states may prohibit such applications if they so choose.**

LIMITATIONS ON USE

- **Requires the following statement for general use termiticide products:**

"For use by individuals/firms licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product."

- **Termiticide products classified for "Restricted Use" will remain so classified. Must bear the required restricted use statements.**

PERSONAL PROTECTIVE EQUIPMENT (PPE) STATEMENTS

- **End-use product labeling must contain current PPE statements based on acute toxicity of end-use product by route of entry and the amount of expected exposure.**

PRECAUTIONARY STATEMENTS

- **For termiticides, the precautionary statements apply to both the concentrate and any use dilution unless registrant provides data on use dilution showing a lower toxicity.**
- **Standardized precautionary statement for bystanders and pets:**

"When treating adjacent to an existing structure, the applicator must check the area to be treated, and immediately adjacent areas of the structure, for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the clean up is completed."

RETREATMENT

- **Requires the following statements regarding retreatment.**

"Retreatment for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation, or landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the barrier.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or barrier disruption has occurred."

TREATMENT OF FOUNDATIONS

- **For post-construction applications, where footer is more than 4' below grade, foundation walls should be treated to a minimum depth of 4'.**
- **For pre-construction applications, termiticide should be applied as the backfill is being replaced. However, if contractor does not notify applicator in sufficient time to allow this, foundation should be treated to a minimum depth of 4'.**

STANDARDIZED LABELING

- Notice provides standardized labeling language for:
 - mixing directions
 - treatment of crawl spaces, accessible and inaccessible
 - treatment of voids
 - foam treatments
 - mixing directions
 - treatment of structures that contain wells or cisterns.

CONSTRUCTION WORKERS

- Applicators must notify the general contractor, construction superintendent, or other responsible party of the intended application and instruct them to notify construction workers to leave the area to be treated during the application.

VARIABLE CONCENTRATIONS

- Label provisions for variable application rates must be supported by data, conducted in accordance with our product performance guidelines.
- Also, any amendment to add lower concentrations that those currently on a registered label must be supported by product performance data, as any change in concentration will affect product's efficacy.

FORMOSAN TERMITES

- **Applicator training should include instruction in the use of proper application volumes, dosages, and uniform distribution to control Formosan termites.**
- **Because application rates and method of control for the treatment of Formosan termites may differ from current labeling, any registrant seeking to register this use may have to submit applicator exposure and possible air monitoring data to the Agency.**

PLENUM CONSTRUCTION

- **Label directions for use in plenum construction will be the responsibility of the individual registrant, subject to Agency approval.**
- **Because plenum treatments are likely to increase air concentrations, air monitoring data or relevant information to assess the risk to applicators and bystanders must be submitted to the Agency.**
- **A standardized label statement for plenum treatments is required:**

"When treating plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil."

ASPCRO REVIEW

- **As of October 1, registrants are to submit a copy of the PROPOSED LABEL and any relevant EFFICACY DATA for any new application or significant amendment to ASPCRO, concurrent with their submission to the Agency.**
- **ASPCRO will review the pertinent portions of the application and communicate any concerns or questions in the early stages of the review process in time to resolve any issues prior to a registration decision.**
- **ASPCRO will review the submission and submit comments to the Agency within 90 days of receipt.**
- **There recommendations will be one of the factors considered in the Agency's decision making process.**
- **Measures will be taken to ensure that CBI is protected.**

ASSOCIATION
OF
STRUCTURAL PEST CONTROL
REGULATORY OFFICIALS

NEW TECHNOLOGIES
TERMITICIDE BAIT LABEL REVIEW COMMITTEE

COMMITTEE REPORT

October 1996

Committee Members - Dennis Howard, Maryland Dept. Of Agriculture
James Harron, Georgia Dept. Of Agriculture
Kiven Stewart, Arkansas State Plant Board

**1996 COMMITTEE REPORT
TERMITICIDE BAIT
LABEL REVIEW COMMITTEE**

During the Board Meeting at last years ASPCRO meeting representatives of American Cyanamid made a presentation regarding a termite bait product they were developing. Following the meeting they provided the committee with copies of a draft label for their product. The committee reviewed the draft label and provided our comments to American Cyanamid on April 22, 1996 (copy attached). American Cyanamid has reviewed the committee's comments and on October 18, 1996 provided the committee with a response to our review. In addition, they also provided the committee with a copy of a revised label for the committee's further review and a copy of EPA 's efficacy review for the termite bait. The committee will review the new label submission.

The committee also had the opportunity to review and comment (copy attached) on draft labels for FMC Corporation's two termiticide bait products (FirstLine Termite Bait Station & FirstLine Bait Tube Station). Upon reviewing these labels it was apparent many of the comments and concerns the committee raised in our March 1195 review of FMC's first label were incorporated in the two new labels.

The committee wishes to thank the FMC Corporation, American Cyanamid, Mr. John Wright, Dr. Jim Ballard and Dr. Byron Reid for their continued cooperation.

Dennis W. Howard, Chairman
Termiticide Bait Label Review Committee

DWH:dh

Attachments

PARRIS N. GLENDENING, *Governor*

LEWIS R. RILEY, *Secretary*

HENRY A. VIRT, D.V.M., *Deputy Secretary*



The Wayne A. Cawley, Jr. Building
50 HARRY S. TRUMAN PARKWAY
ANNAPOLIS, MARYLAND 21401
Baltimore/Annapolis (410) 841-5700
Washington (301) 261-8106
Facsimile (410) 841-5914
MD Relay 1-800-735-2258

STATE OF MARYLAND
DEPARTMENT OF AGRICULTURE
PESTICIDE REGULATION SECTION
(410) 841-5710

April 1, 1996

Mr. John F. Wright, Manager
Product & Regulatory Development
FMC Corporation
Pest Control Specialties Operations
P.O. Box 8
Princeton, New Jersey 08543

Re: Association of Structural Pest Control Regulatory Officials comments regarding proposed labels for FMC Corporations FirstLine™ Termiticide Bait

Dear Mr. Wright:

The enclosed comments are provided on behalf of the Association of Structural Pest Control Regulatory Officials (ASPCRO). These comments were prepared by a committee of ASPCRO members with additional input from our Board of Directors. We believe that this input reflects the level of expertise and interest which is provided by this association and request your consideration of our comments.

On behalf of the association I would like to thank you and the FMC Corporation for your willingness to work closely with ASPCRO in advance of the regulatory (registration) process. If you have any questions concerning the attached comments, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Dennis W. Howard".

Dennis W. Howard, Chair
ASPCRO, New Technologies, Termiticide
Bait Label Review Committee

DWH:nc

Enclosure

cc:file

Jim Wright
Benny Mathis
Jim Harron
Kiven Stewart

wp\line ltr

PARRIS N. GLENDENING, *Governor*
LEWIS R. RILEY, *Secretary*
HENRY A. VIRTIS, D.V.M., *Deputy Secretary*



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STATE OF MARYLAND
DEPARTMENT OF AGRICULTURE
PESTICIDE REGULATION SECTION
(410) 841-5710

March 29, 1996

Ms. Becky Cool
Registration Division (7505C)
Insecticide, Rodenticide Branch
Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460

RE: Comments from the Association of Structural Pest Control Regulatory Officials (ASPCRO) regarding FMC Corporation's proposed labels for Sulfluramid Termiticide Bait and American Cyanamid's proposed label for Hydramethylnon Termiticide Bait

Dear Ms. Cool:

The attached comments are provided on behalf of the Association of Structural Pest Control Regulatory Officials (ASPCRO), an association of persons who license and regulate businesses and individuals involved in structural pest control throughout the United States and Canada. I am forwarding the attached comments to you at the request of Mr. Jim Wright of Clemson University's Fertilizer and Pest Control Department. Jim indicated to me that he spoke with you recently regarding FMC Corporation's proposed labels for their Sulfluramid Termiticide Bait product (FirstLine™) and American Cyanamid's Hydramethylnon Termiticide Bait.

FMC Corporation had provided the association with a draft of a single label for a Sulfluramid termiticide bait product in February 1995. At that time the association reviewed the label and provided FMC with a list of the comments and concerns (copy attached). FMC recently provided the association with copies of the proposed labels for their two FirstLine™ products. Upon reviewing these labels it was apparent that a majority of the association's comments and concerns were addressed in the new labels. However, the association still has a few comment and concerns regarding the proposed labels. Jim Wright suggested that I provide you with copies of the association's comments. These comments were prepared by a committee of ASPCRO members with additional input from our Board of Directors. We believe that this input reflects the level of expertise and interest which is provided by this association and request your careful consideration of our comments..

Should you have any questions concerning the committee's comments, please feel free to contact me.

Sincerely,

Dennis W. Howard, Chair
ASPCRO New Technologies, Termiticide
Bait Label Review Committee

DWH:dwh

Enclosures

cc:file ✓

Jim Wright
Benny Mathis
wp\bcool.txt

**ASSOCIATION
OF
STRUCTURAL PEST CONTROL
REGULATORY OFFICIALS**

NEW TECHNOLOGIES
TERMITICIDE BAIT LABEL REVIEW COMMITTEE

COMMITTEE REPORT

Review of
FMC Corporation's
Proposed Labels for
Sulfluramid Termiticide Bait
FirstLine™ Termite Bait Station Code 1629
FirstLine™ Termite Bait Tube Station Code 1743

April 1996

Committee Members -

Dennis Howard, Maryland Dept. Of Agriculture
James Harron, Georgia Dept. Of Agriculture
Kiven Stewart, Arkansas State Plant Board

ASPCRO
TERMITICIDE BAIT
LABEL REVIEW COMMITTEE

In March of 1995 ASPCRO's Termiticide Bait Label Review Committee reviewed and commented on FMC Corporation's proposed label for Sulfluramid Termite Bait Station. In March of 1996 FMC Corporation provided the committee with copies of two new labels for termiticide bait products containing Sulfluramid (FirstLine™ Bait Station and FirstLine™ Termite Bait Tube Station). These labels incorporated many of the comments and concerns the committee raised in our March 1995 review of FMC Corporation's first draft label. In providing the committee and opportunity to review their draft labels FMC has shown a willingness to work closely with ASPCRO in advance of the regulatory (registration) process. The committee feels that FMC Corporation has done a good job in addressing ASPCRO's comments and concerns.

The committee feels that FMC Corporation has done a good job in addressing ASPCRO's first comments and suggestions. Upon reviewing the two labels FMC provide the committee has the following comments and or suggestions:

- A. **General Comment** - The label for the FirstLine™ Bait Tube Station references in several places "FirstLine™ Termite Bait Stations". Is this referring to this product or to the other (FirstLine™ Termite Bait Station) product label? If so, should one label refer to another pesticide product label? What is the difference between the two product? This reference is unclear and confusing.
- B. **FirstLine™ Bait Tube Station Label**
1. Directions For Use - First paragraph - Permitted areas of use include "vessels". Vessels would not appear to be an appropriate use site. Product is intended to be used in an integrated pest management program consisting of frequent monitoring and inspection of bait. How would a PCO monitor a vessel that is in transit?
 2. Directions For Use-For Structures With an Active Infestation
 - (a). First sentence "Termite Bait Stations should be placed in close proximity...". **Should read** "Termite Bait Stations must be placed in close proximity...".
 - (b). Third sentence "Use the tubes ..." Same comments as item A (above) General Comment.
 3. Directions For Use-For Structures With No Active Infestations
 - (a). First paragraph - Makes reference to product being intended for use in an integrated pest management (IPM) program. Is an IPM program required? Also many states have a requirement to correct conditions conducive to infestation as part of the regulations, while some states do not. Does this language make it a requirement? If so there need to be additional guidance such as how much ventilation, how much clearance between wood and soil?

- (b). First paragraph, last sentence - “Only PCO’s authorized by FMC may apply this bait product.”
 - (1). Is the requirement that FMC provide the training enforceable? Would the State take action or would FMC? Could product be applied by a technician working under the supervision of an FMC trained and certified individual? and if so would the FMC authorized individual have to be on-site at the time of application?
 - (2). Why is authorization by FMC required to use the FirstLine™ Bait Tube Station but not the FirstLine™ Termite Bait Station? Both products contain the same active ingredient.
- (c). Second paragraph, last sentence - “Termites infesting areas adjacent to wells may ... but no baits may be placed inside of a well.” **Recommend that statement should read “... baits must not be place inside a well”.**

D FirstLine™ Bait Station Label

- 1. Directions For Use - First paragraph - Permitted areas of use include “vessels” . Vessels would not appear to be an appropriate use site. Product is intended to be used in an integrated pest management program consisting of frequent monitoring and inspection of bait. How would a PCO monitor a vessel that is in transit?
- 2. For Structures With An Active Infestation - Second paragraph - “As an option, the bait may be misted with water ... to enhance Termite attraction.” How much water? and why is this comment not on the label for the other product, FirstLine™ Bait Tube Station.

PARRIS N. GLENDENING, *Governor*
LEWIS R. RILEY, *Secretary*
HENRY A. VIRT, D.V.M., *Deputy Secretary*



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STATE OF MARYLAND
DEPARTMENT OF AGRICULTURE
PESTICIDE REGULATION SECTION

(410) 841-5710

April 22, 1996

Dr. Byron Reid
American Cyanamid
P.O. Box 400
Princeton, New Jersey 08543-0400

Re: Association of Structural Pest Control Regulatory Officials comments regarding proposed label for American Cyanamid's Hydramethylnon Termite Bait.

Dear Dr. Reid:

The enclosed comments are provided on behalf of the Association of Structural Pest Control Regulatory Officials (ASPCRO). These comments were prepared by a committee of ASPCRO members with additional input from our Board of Directors. We believe this input reflects the level of expertise and interest which is provided by this association and request American Cyanamid's consideration of our comments.

On behalf of the association I would like to thank you and American Cyanamid for your cooperation and willingness to work closely with ASPCRO in advance of the regulatory (registration) process. Should you have any questions concerning the attached comments, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Dennis W. Howard".

Dennis W. Howard, Entomologist
Enforcement Program Coordinator

DWH:nc
Enclosure
cc:file

Benny Mathis
Jim Wright
Jim Harron
Kiven Stewart

PARRIS N. GLENDENING, *Governor*
LEWIS R. RILEY, *Secretary*
HENRY A. VIRTIS, D.V.M., *Deputy Secretary*



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STATE OF MARYLAND
DEPARTMENT OF AGRICULTURE
PESTICIDE REGULATION SECTION
(410) 841-5710

March 29, 1996

Ms. Becky Cool
Registration Division (7505C)
Insecticide, Rodenticide Branch
Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460

RE: Comments from the Association of Structural Pest Control Regulatory Officials (ASPCRO) regarding FMC Corporation's proposed labels for Sulfluramid Termiticide Bait and American Cyanamid's proposed label for Hydramethylnon Termiticide Bait

Dear Ms. Cool:

The attached comments are provided on behalf of the Association of Structural Pest Control Regulatory Officials (ASPCRO), an association of persons who license and regulate businesses and individuals involved in structural pest control throughout the United States and Canada. I am forwarding the attached comments to you at the request of Mr. Jim Wright of Clemson University's Fertilizer and Pest Control Department. Jim indicated to me that he spoke with you recently regarding FMC Corporation's proposed labels for their Sulfluramid Termiticide Bait product (FirstLine™) and American Cyanamid's Hydramethylnon Termiticide Bait.

FMC Corporation had provided the association with a draft of a single label for a Sulfluramid termiticide bait product in February 1995. At that time the association reviewed the label and provided FMC with a list of the comments and concerns (copy attached). FMC recently provided the association with copies of the proposed labels for their two FirstLine™ products. Upon reviewing these labels it was apparent that a majority of the association's comments and concerns were addressed in the new labels. However, the association still has a few comment and concerns regarding the proposed labels. Jim Wright suggested that I provide you with copies of the association's comments. These comments were prepared by a committee of ASPCRO members with additional input from our Board of Directors. We believe that this input reflects the level of expertise and interest which is provided by this association and request your careful consideration of our comments.

Should you have any questions concerning the committee's comments, please feel free to contact me.

Sincerely,

A handwritten signature in dark ink that reads "Dennis W. Howard".

Dennis W. Howard, Chair
ASPCRO New Technologies, Termiticide
Bait Label Review Committee

DWH:dwh

Enclosures

cc:file ✓
Jim Wright
Benny Mathis
wp\bcool.txt

**ASSOCIATION
OF
STRUCTURAL PEST CONTROL
REGULATORY OFFICIALS**

**NEW TECHNOLOGIES
TERMITICIDE BAIT LABEL REVIEW COMMITTEE**

COMMITTEE REPORT

**Review of
American Cyanamid's
Proposed Label for
Hydramethylnon Termiticide Bait**

March 1996

Committee Members -

**Dennis Howard, Maryland Dept. Of Agriculture
James Harron, Georgia Dept. Of Agriculture
Kiven Stewart, Arkansas State Plant Board**

ASPCRO
TERMITICIDE BAIT
LABEL REVIEW COMMITTEE

Upon reviewing American Cyanamid Company's proposed label for Hydramethylnon Termiticide Bait the Label Review Committee has the following comments or concerns:

1. Storage and Disposal "Wrap used bait cartridges in newspaper and place in a trash can."
 - A. Suggestion that above statement should also include "cartridges in poor condition" so that statement would read "Wrap used bait cartridges or cartridges in poor condition in newspaper and place in trash can."
2. Direction for Use - General Information
 - A. First paragraph reference is made that the Termiticide Bait contains a bait matrix which has been shown to be a preferred food source, that the bait matrix has been shown to stimulate feeding activity and induce the recruitment of termites, and that the Termiticide Bait, hydramethylnon, has been shown to be effective in suppression or eliminating communal or social insects. **Is there data to show this and if so can ASPCRO obtain a copy of the data?**
 - B. Second paragraph - last sentence- "...and the number of baits that are discovered and fed on." **should read** "... and the number of bait stations that are discovered and fed on."
 - C. Third paragraph - first sentence - "Termiticide Bait should be used in conjunction ..." **should read** "Termiticide Bait must be used in conjunction..." or alternatively "Termiticide Bait shall be used in conjunction..."
 - D. Third paragraph - fourth sentence - "Whenever the supply of bait is depleted by heavy termite feeding, a fresh supply of Termiticide Bait should be installed ..." **should read** "Whenever the supply of bait is depleted by heavy termite feeding, a fresh supply of Termiticide Bait must be installed.. "
 - E. Third paragraph - seventh sentence - "More frequent inspection may be necessary in some cases." What cases would require more frequent inspections? and where?
3. Preventative Treatment
 - A. First sentence - Reference is made to installing semi-permanent plastic housings fitted with a Termiticide Bait cartridge in the soil around the exterior of the building or structure to be protected yet no mention is made of how many bait stations should be installed or at what intervals the stations should be placed. (Note this comment is for the entire label)
 - B. Second sentence - "The baits ..." **should read** "The bait stations or the bait cartridges ..."

- C Fourth sentence - "Monitor the bait placements and inspect building or structure at least annually for signs of termite activity or infestation."
- (1). Concern over whether or not this language is enforceable under either State or Federal law or regulation. Would failure to monitor or inspect constitute a violation of label directions?
 - (2). Concern that the frequency of monitoring or inspection of bait stations and structures protected by Termiticide bait may be two different questions.
 - (a). Recommend inspection or monitoring frequency for bait stations be more frequent than annually. Feel strongly that label language should require inspection frequency must be every 2 to 4 weeks.
 - (b). Recommend frequency of inspection or monitoring of protected structure for signs of termite activity or infestation should be more frequent than annually. Feel strongly that language should require inspection or monitoring frequency for protected structures must be at least every two months.

4 Supplemental Treatment First sentence - "Monitor the bait placements and inspect building or structure at least annually for signs of termite activity" Same concern as expressed in item 3 C (1) & (2) above.

5. Remedial Treatment

- A. First sentence - "... Termiticide Bait cartridges at intervals around the perimeter of the building or structure." Additional language is needed, recommending a minimum number of bait placements.
- B Fourth sentence - "Monitor the bait placements and inspect building or structure at least annually for signs of termite activity or infestation." Same concerns as expressed in item 3 C (1) & (2) above.

6 General Use Instructions

- A. First paragraph-second sentence - "... and in areas (e.g., wet areas, areas where wood is in contact with soil) ." Most state regulations require removal of wood in contact with soil. Recommend that label should reference IPM practices regarding debris, wood in contact with soil, and ventilation (conditions conducive).
- B - First paragraph-last sentence - "After locating bait placements in those areas of likely termite activity " General comments, why would applicator place bait in areas where there is not much chance of getting a "hit".
- C. Third paragraph-third sentence - "Water that contains any pesticide, or that has been stored near any pesticide, should be avoided ..." **should read** "Water that contains any pesticide, or that has been stored near any pesticide, must be avoided ..."

- D Fifth paragraph-third sentence - "In areas of suspected high termite activity, bait availability should be monitored often as termites can rapidly deplete the bait supply..."
- (1). How often must bait stations be monitored? Feel strongly that label language should require inspection frequency must be every 2 to 4 weeks. If termites can rapidly deplete the bait supply this is all the more reason for monitoring more frequently than annually as referenced in other sections of the proposed label.
 - (2). Is there a time frame in which the bait should be changed? Should it be changed out once a year? Or more frequently? Bait can't stay in ground forever, can it?
- E Fifth paragraph-last sentence - "Whenever baits become saturated with water or moldy they should be replaced with fresh bait." **should read** "Whenever baits become... they must be replaced with fresh bait."

7. General Comments

- A Feel strongly that label must bear directions for a minimum frequency for monitoring or inspection of bait stations.
- B In general the label directions for use seem very broad. A PCO could put out as few or as many of the bait stations about anywhere they wanted to so long as they are placed in a semi-permanent plastic housing. This can be a regulatory problem for states which rely solely on the pesticide label for their treating requirements for termite control. Additional language needs to be added that recommends a minimum number of stations around a building. For example one bait station every 25 feet around the outside perimeter with not less than one on each side of a building.
- C Label should bear language stating "Do not reuse old bait cartridges."
- D Would like to see data to support claims made on label such as "bait matrix shown to stimulate feeding activity", "Termiticide Bait, hydramethylnon, has been shown to be effective in suppressing or eliminating communal or social insects."
- E General concern about the use of bait products as "stand alone" treatment as opposed to being used as a component or supplement to a larger termite management program.

AUG 31 1996

PESTICIDE REGULATION (PR) NOTICE 96-X
08-22-96

NOTICE TO MANUFACTURERS, PRODUCERS, AND REGISTRANTS OF PESTICIDE PRODUCTS

ATTENTION: Persons Responsible for the Registration of
Pesticide Products

SUBJECT: TERMITICIDE LABELING

This notice sets forth the Agency's policy with respect to certain labeling statements and minimum product performance (5 year period) for soil treatment termiticide products.

I. BACKGROUND

Because of the highly specialized nature of termiticides, a number of issues have evolved over the years with regard to termiticide product labeling regarding: 1) limitations on distribution, sale or use; 2) precautionary statements; 3) environmental hazards statements; 4) storage and disposal statements; 5) use directions; 6) the minimum product performance of termiticide treatments; and 7) application at less than labeled rates. This notice describes the Agency's decisions on some of these issues and the policies it intends to apply to current and future termiticide products.

II. SCOPE

This notice addresses product labeling statements for currently registered uses of and future uses of soil treatment termiticide products. The labeling statements addressed by the notice include labeling statements regarding environmental hazards, exposure information for construction workers, retreatment, and use directions. This notice is **not** applicable to fumigant type termiticides such as sulfuryl fluoride and nitrogen, and dry baits, such as hexaflumuron.

In addition, this notice addresses questions about minimum product performance and application at less than labeled rates. EPA believes that the label changes and policy clarifications set forth in this PR Notice will reduce risk while maintaining the

efficacy associated with currently registered products. Accordingly, failure of any registrant subject to this notice to adopt the label changes set forth in this policy may result in the issuance of a notice of intent to cancel or an enforcement action.

Lastly, the Agency is announcing a new procedure for submission of new termiticide registration applications and significant amendments to current termiticide registrations that will ensure coordination with the Association of Structural Pest Control Regulatory Officials (ASPCRO).

III. EFFECTIVE DATES

Registrants should make the changes specified in this notice on all applicable termiticide products and submit an application for amendment to the appropriate Product Manager in accordance with Section XII. of this notice. All products distributed or sold by registrants and supplemental registrants should bear approved labeling which is consistent with this notice and complies with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) by October 1, 1997. All products distributed or sold by any person after October 1, 1999 should bear this same approved labeling. After these dates, the Agency may either issue a Notice of Intent to Cancel a product or bring enforcement action against registrants of products bearing labeling inconsistent with this notice. Registrants should submit their applications for amendment as soon as possible to ensure adequate time for review and approval from EPA before the effective dates in this notice.

IV. EFFICACY

A. MINIMUM PRODUCT PERFORMANCE

The current Agency policy (see Pesticide Assessment Guidelines, Subdivision G, Product Performance, Section 95-12(b)(i)(C)) regarding termiticides is that soil treatment termiticide products should demonstrate efficacy for at least five years against termites. The most recent data from the USDA Gulfport Mississippi Laboratory regarding currently registered termiticides indicate that most currently registered products are effective for three to five or more years. In addition, the

information from the USDA Gulfport Mississippi Laboratory supports the current five year termite soil treatment warranties required by Federal housing agencies concerned with new construction.

The Agency believes that registration of a product demonstrating less than five (5) years of efficacy for control of termites is generally not appropriate from a safety or efficacy standpoint, considering the costs of treatment and the potential damage that could occur. The Agency does not believe that the homeowner should be subjected to such costly protection as would occur with products that are only efficacious for one year. Such products could, quite possibly, pose unreasonable adverse effects on the environment because of higher risk than alternatives (because more treatments required could result in greater exposure and risk) or fewer benefits (because of being less effective if not retreated, or more expensive if retreated).

Thus, the Agency will generally not grant a registration for a termiticide that requires annual retreatment. The Agency will continue its current policy of requiring that applications for registration of soil treatment termiticide products be supported by data showing a minimum of 5 years of efficacy which is accepted by the Agency, unless the applicant can demonstrate that the pesticide is either significantly less toxic than currently registered pesticides or the benefits from the use of the pesticide are much greater than currently registered alternatives.

Until more data can be gathered and evaluated regarding what the longevity of termiticide treatments should be, the Agency will consider applications requesting registration of termiticide products on an individual basis. However, in addition to the standard data package for termiticide products and the risk and benefit information just described, the Agency will require additional data on anticipated homeowner and/or applicator exposure risks resulting from treatment and retreatment over the projected life-span of the structure to be treated and/or retreated.

B. MINIMUM APPLICATION RATE

Under Section 2(ee) of FIFRA, a pesticide may be applied at

any dosage, concentration, or frequency less than that specified on the labeling, unless the labeling specifically prohibits such a deviation. However, EPA has been informed by state enforcement agencies of inadequate efficacy and unnecessary retreatments resulting from termiticide applications at less than the labelled rates. In this regard some states have in accordance with FIFRA section 24(b) regulated the use of termiticides to prohibit the application of less than the specified dosage or concentration. Until now, the Agency has not officially addressed the application of termiticides at less than the labeled rate.

EPA has always required efficacy data to be submitted by registrants to demonstrate that termiticides perform their intended function as claimed. EPA has reviewed such data prior to registration to assure that the benefits of the use would outweigh the potential risks.

No efficacy data have been submitted by registrants or reviewed by EPA concerning use of termiticides at rates lower than the minimum rate specified on the label. Consequently, EPA has no evidence that such lower rates would result in adequate efficacy. Accordingly, EPA is concerned that registered termiticides used at rates lower than those specified on the label may not achieve adequate benefits to counterbalance the risks from use.

EPA is further concerned that application at rates lower than the minimum would likely necessitate more frequent applications which, in turn, would increase the risks to applicators and users. Such increased risks, when balanced against lower or inadequate efficacy, would likely make a product unregistrable (or subject to cancellation). EPA realizes however, that there are significant differences between pre-construction and post-construction treatment which affect the applicators ability to apply the full label rate. For the purposes of this PR Notice, preconstruction applications are defined as those applications made prior to the finished grade being installed, and post construction applications are defined as those applications made after the final grade is installed. There are often circumstances encountered in post-construction treatment that make application at the full label rate impossible or undesirable. These circumstances could include environmental

conditions such as the presence of a well, structural barriers that do not allow application of the labeled volume, or construction elements that would encourage a reduced volume. Treatment to the top of the footing is sometimes not possible because of equipment limitations or the inordinate amount of labor involved.

In order to assure that termiticide products perform their intended function, that the benefits of their use outweigh their risks, and that states are able to carry out enforcement necessary to protect the public, EPA has determined that, for preconstruction applications, no termiticide may be used at less than the dosage, concentration, or frequency specified on the labeling. Accordingly, registrants should add the following statement to the labeling of termiticides:

"PRECONSTRUCTION TREATMENT: DO NOT APPLY AT A LOWER DOSAGE, CONCENTRATION, OR FREQUENCY, THAN SPECIFIED ON THIS LABEL FOR APPLICATIONS PRIOR TO THE FINISHED GRADE BEING INSTALLED."

While this notice is silent in regards to post-construction application rates, states may continue to prohibit applications at less than label dosage and/or concentration if they so choose.

V. LIMITATIONS ON USE

Most currently registered termiticide products are not classified for restricted use, but contain label statements limiting their use to commercial applicators. Registrants should replace the current statement on the labeling of termiticide products intended for use by commercial applicators, or individuals/firms licensed or registered by the state to apply termiticide products, with the following statement:

"For use by individuals/firms licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product."

Termiticide products already classified for "Restricted Use" will remain so classified and must bear the required restricted use statements on product labeling.

VI. PERSONAL PROTECTIVE EQUIPMENT STATEMENTS

Registrants of end-use termiticide products should make revisions necessary to ensure that their product labeling contains the current personal protective equipment (PPE) terminology described in this section. An end-use termiticide product is a product whose labeling bears instructions for using or applying the product (as packaged and sold, or after dilution by the applicator) for controlling termites. In general, PPE requirements for pesticide handlers should be based on the acute toxicity of the end-use product, by route of entry, and the amount of expected exposure. Handlers, under this guidance, are defined as persons directly exposed to a pesticide, such as mixers, loaders, and applicators. Registrants of end-use termiticide products should refer to the acute toxicity data for the end-use product, determine the PPE required based on that data, and adopt the toxicity-derived PPE outlined below.

The following provisions for personal protective equipment statements reflect the minimum requirements, based on the acute toxicity of the end-use product and expected exposure, and contain acceptable terminology.

- A. Toxicity Category I. Signal Word: DANGER (Add POISON + Skull and Cross-bones if Toxicity Category I by oral, inhalation or dermal routes)

"All pesticide handlers (mixers, loaders, and applicators) must wear long-sleeved coveralls worn over long-sleeved shirt and long pants, socks, chemical-resistant footwear, chemical-resistant gloves, respiratory protection device¹, and protective eyewear²."

- B. Toxicity Category II. Signal Word: WARNING

"All pesticide handlers (mixers, loaders, and applicators) must wear long-sleeved coveralls worn over a minimum of short-sleeved shirt and short pants, socks, chemical-resistant footwear, chemical-resistant gloves, and protective eyewear². In addition, all pesticide handlers must wear a respiratory protection device¹ when handling the concentrate or when working in a non-ventilated space."

- C. Toxicity Categories III or IV. Signal Word: CAUTION

"All pesticide handlers (mixers, loaders, and applicators) must wear long-sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves. In addition, all pesticide handlers must wear a respiratory protection device¹ when working in a non-ventilated space and all pesticide handlers must wear protective eyewear² when working in a non-ventilated space or when applying termiticide by rodding or sub-slab injection."

¹ If the Inhalation Toxicity of the end-use product is Category I or II, or if the Inhalation Toxicity of the end-use product is Category III or IV but the termiticide is being applied in a non-ventilated space, then one of the following respirator types and the appropriate Mine Safety and Health Administration (MSHA)/National Institute for Occupational Safety and Health (NIOSH) approval number prefix should be indicated: (i) Dust/mist filtering respirator with MSHA/NIOSH approval number prefix TC-21C; or (ii) Respirator

with an organic-vapor removing cartridge and a prefilter approved for pesticides with MSHA/NIOSH approval number prefix TC-14G; or (iii) Supplied-air respirator with MSHA/NIOSH approval number prefix TC-19C or self-contained breathing apparatus (SCBA) with MSHA/NIOSH approval number TC-13F.

² Protective eyewear is goggles, a faceshield, or safety glasses with front, brow, and temple protection. "Protective eyewear" is the term to be used instead of goggles and/or faceshield and/or shielded safety glasses.

VII. PRECAUTIONARY STATEMENTS

The Agency's current policy regarding precautionary statements is that they apply to both the concentrate and any use dilution unless the registrant provides data on the use dilution product which demonstrate lower toxicity than the concentrate. For example, if a label states "Do not get in eyes or on skin. Wear chemical-resistant gloves and protective eyewear. etc.," the Agency means that a handler must abide by those precautions during handling of the concentrate and during application of the product diluted for use unless specifically stated otherwise on the pesticide labeling.

Termiticide labels have been found to be inconsistent with respect to precautionary statements for applicators, bystanders, and pets. In order to standardize termiticide labels so that they include precautions for each of these three groups, the following additional precautionary statements should be added to all termiticide labels that contain directions for subterranean use:

"When treating adjacent to an existing structure, the applicator must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the clean up is completed."

VIII. ENVIRONMENTAL HAZARDS STATEMENTS

Because termiticides are applied both indoors and outdoors, product labels are required to carry generic environmental hazard

statements that may, in some cases, result in inappropriate information. For example, a statement such as "Cover and incorporate spills" on a product intended to be applied only indoors would be inappropriate. Some termiticides may also carry a bee toxicity statement. Such a statement would not be applicable to products intended only to be injected into the soil or applied as a trench treatment. Registrants should modify the Environmental Hazard statements on termiticide products labeled for indoor use where existing Environmental Hazard statements transmit inappropriate or inapplicable information. Existing Environmental Hazard statements should, however, be retained on termiticide products labeled for other uses for which the Environmental Hazard statements are appropriate.

IX. STORAGE AND DISPOSAL STATEMENTS

The Agency has proposed revised Storage and Disposal statements for pesticide products (59 FR 6712, Feb. 11, 1994). Until those statements are issued in final form, the Agency will continue to require the standard storage and disposal label language, as specified in P.R. Notices 83-3, Label Improvement Program for Storage and Disposal Labeling Statements, and 84-1, Clarification of Label Improvement for Farmworker Safety and Pesticide Storage and Disposal Instructions.

X. USE DIRECTIONS

A. RETREATMENT

To remain consistent with the requirements of FIFRA, registrants should add the following retreatment statement to their labels:

"Retreatment for subterranean termites may be performed only if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation, or landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on

factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the barrier.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or barrier disruption has occurred."

B. MIXING DIRECTIONS

To remain consistent with the requirements of FIFRA, registrants should include clear and specific mixing directions for each application rate on the label. A table should be added to each label to make the label mixing directions as simple as possible. Only the rates that are applicable to the product at that site and target pest should be on the label.

The following generic directions should be used in labeling each termiticide for soil treatment:

"Mix the termiticide use dilution in the following manner:

1. Fill tank 1/4 to 1/3 full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of (product name).
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes.

To prepare a ____% water emulsion, ready for use, dilute _____ gallons of (product name) with _____ gallons of water. To prepare a ____% (for labels with more than one rate) water emulsion, ready for use, dilute _____ gallons of (product name) with _____ gallons of water. For termite control operations requiring smaller volumes use _____ fluid ounces of (product name) per gallon of water to achieve a ____% concentration.

Application Volume: To provide maximum control and protection against termite infestation it is important to apply the specified volume of the finished water emulsion and active ingredient as set forth in the directions for use section of this label. If soil will not accept the labeled application volume, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same. NOTE: Large reductions of application volume reduce the ability to obtain a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved."

All labels should contain the following statement:

"Do not treat soil that is water saturated or frozen. Do

not treat while precipitation is occurring. "

C. PRE-CONSTRUCTION SUBTERRANEAN TERMITE TREATMENT

1. TREATMENT OF FOUNDATIONS

Registrants should add the following statement to the pre-construction section of their label:

"PRECONSTRUCTION TREATMENT: DO NOT APPLY AT A LOWER DOSAGE, CONCENTRATION, OR FREQUENCY THAN SPECIFIED ON THIS LABEL FOR APPLICATIONS PRIOR TO THE INSTALLATION OF THE FINISHED GRADE.

When treating foundations deeper than 4 feet, applicators should apply the termiticide as the backfill is being replaced. If the construction contractor fails to notify the applicator to permit this, such foundations must be treated to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements, at the rate prescribed from grade to a minimum depth of 4 feet. When the top of the footer is exposed, the applicator must treat the soil adjacent to the footer to a depth not to exceed the bottom of the footer. However, in no case should a structure be treated below the footer."

D. POST-CONSTRUCTION SOIL TREATMENT

1. TREATMENT OF FOUNDATIONS

Treatment to the top of the footing is sometimes not possible in post-construction soil treatment because of equipment limitations or the inordinate amount of labor involved. Also, termite activity is generally limited to the upper four (4) feet of soil. The following statements should be added to the post-construction soil treatment section of all termiticide labels:

"POST-CONSTRUCTION TREATMENT: For applications made after the final grade is installed, the applicator must

trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements, at the rate prescribed from grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing."

2. CRAWL SPACES

The Agency is aware that confusion exists regarding use directions for certain termiticides labeled for overall surface applications in crawl spaces. The wording currently used on some labels dealing with overall crawl space treatment does not indicate precisely where and how overall soil treatment may be applied in crawl spaces. To clear up that confusion and to provide standardized labeling for treating crawl spaces (both accessible and inaccessible), the following standardized wording for treatment of crawl space areas should be used.

a. Accessible Crawl Spaces

"For crawl spaces, apply vertical termiticide barriers at the rate of 4 gallons of emulsion per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions, such as concrete walkways adjacent to foundation elements, prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of label if situations are encountered where the soil will not accept the full application volume.

- A. Rod holes and trenches shall not extend below the bottom of the footing.
- B. Rod holes shall be spaced so as to achieve a continuous chemical barrier but in no case more than 12 inches apart.

- C. Trenches shall be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench shall be stepped to ensure adequate distribution and to prevent termiticide from running off. The emulsion must be mixed with the soil as it is replaced in the trench.
- D. When treating crawl spaces, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil."

b. Inaccessible Crawl Spaces

"For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, apply one or a combination of the following methods of treatment.

- A. Excavate the crawl space so that it is accessible for treatment. This is the preferred method of treatment.
- B. To establish a horizontal barrier, apply to the soil surface, 1 gallon of emulsion per 10 sq. ft. overall using a nozzle pressure of less than 25 p.s.i. and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or powerspray with higher pressures.
- C. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of emulsion per 10 square feet. Drill spacing must

be at intervals not to exceed 16 inches. Many states have smaller intervals so check state regulations which may apply.

- D. When treating crawl spaces, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil."

Because overall surface application may increase indoor air concentrations of termiticides, the Agency has required registrants with these use patterns on their product label to submit air monitoring data or relevant information to assess the risk to applicators and inhabitants from inhalation exposure.

Accordingly, the Agency will generally require registrants/applicants applying to add these uses to currently registered termiticide products or applying to register new products with these uses to use the above standard labeling language and to submit air monitoring data or relevant information to assess the risk from exposure via the respiratory route to applicators and inhabitants. Such labeling and data must be accepted by the Agency before applications for these uses will be approved.

Registrants who have currently registered products with these use patterns on their label should submit an amended application to add the above standard language to the label. No additional data are required for these registrants, at this time, since they have already submitted acceptable air monitoring data or exposure information.

E. TREATMENT OF VOIDS

The Agency requires that termiticide product labels provide clear and specific instructions for the treatment of different types of structural voids. In order to provide more adequate treatment of voids and to remain consistent with the requirements of FIFRA, registrants should adopt the following label language on all termiticide product labels intended for treatment of voids:

"Drill and treat voids in multiple masonry elements of the

structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of emulsion per 10 linear feet of footing using a nozzle pressure of less than 25 p.s.i. When using this treatment access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely monitored: Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the clean up is completed."

It should be noted that newly constructed buildings may contain rigid foam insulation. If the registrant intends for their product to be used in voids containing rigid foam insulation, then use directions must be provided on the label. If the registrant does not intend for their product to be used on these systems then the label should prohibit such use with the following statement.

"Not for use in voids insulated with rigid foam."

The Agency also encourages more training of applicators in the treatment of different types of structural voids and encourages national and state pest control associations, termiticide registrants, State Cooperative Extension Services, and State Lead Agencies to continue to provide training and materials in these areas.

F. FOAM TREATMENT

Foam application is a recent innovation enabling volumetric treatment of certain inaccessible voids. It has been found to be useful in treating areas where conventional application may not give acceptable distribution of an aqueous emulsion. These sites

would include situations such as sub-slab treatments where the fill has settled, and voids in and behind fireplaces, veneers, piers, etc.

Most current labels give dilution directions only for water and provide treatment information in gallons per square feet. Because foam applications involve the use of foaming agents and a unique application method, termiticide labels must bear specific instructions for use of such agents or such use constitutes a misuse pursuant to section 12 of FIFRA. Registrants must have specific rates for using foam or liquid, including proper dosage and dilution, incorporated into the Directions for Use under post-construction treatments. The sites of application where foam treatment is appropriate, recommended expansion ratios for each site, and the methods of application must be provided. The labels must include an explanation of what an expansion ratio actually is, meaning how many gallons of foam are required to move one gallon of termiticide solution. Also there must be an explanation of how to determine the expansion ratio by calibration of the foaming equipment. Also, the label must indicate what the desired ratio would be to yield effective delivery of their product. Generally, it is recommended that the termiticide solution be applied with at least 75% of the labeled rate delivered with typical liquid application. The remaining 25% or less may be delivered to appropriate areas, such as hollow voids, beneath concrete slabs, and earth-filled porches, using foam application.

Registrants should develop language of their own which follows the above guidelines or add the following label statement which addresses foam treatment to their labels:

"FOAM APPLICATIONS: The emulsion may be converted to a foam and the foam used to control or prevent termite infestations.

Depending on the circumstances, foam applications may be used alone or in combination with liquid emulsion applications. Applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids or structural voids, under slabs, stoops, porches, or to the soil in crawlspaces, and other similar voids.

Foam and liquid application must be consistent with volume and active ingredient instructions in order to ensure proper application has been made. The volume and amount of active ingredient are essential to an effective treatment. At least X% (fill in the correct number) of the labeled liquid emulsion volume of product must be applied, with the remaining percent delivered to appropriate areas using foam application. Refer to label and use recommendations of the foam manufacturer and the foaming equipment manufacturer.

Foam applications are generally a good supplement to liquid treatments in difficult areas, but may be used alone in difficult spots."

Registrants applying to add these uses to currently registered termiticide products or to register new products with these uses should incorporate the above instructions or develop language of their own which follows the above guidelines. Product performance data are required to support new label uses unless adequate distribution data are provided with the submission. Such data will be reviewed by the Agency in light of the Pesticide Assessment Guidelines, Subdivision G, Product Performance, Section 95-12(b)(i)(C), which states that soil treatment termiticide products should demonstrate efficacy for at least five years (Refer to Section IV. Efficacy). Such labeling and data must be accepted by the Agency before applications for these uses will be approved.

Registrants who currently have registered products with these use patterns on their label should submit an amended application to add the above standard language or language they developed which follows the above guidelines to the label. No additional data are required for these registrants, at this time, because they have already submitted acceptable data/information.

G. TREATMENT AROUND WELLS OR CISTERNS

To remain consistent with the requirements of FIFRA, registrants should have specific instructions for treatment of structures that contain wells or cisterns which address the following general guidelines. Treatment restrictions on structures which contain a cistern should be limited to a cistern in use or in usable condition. Structures which contain cisterns which have been permanently disabled may be treated by normal methods. For wells, the treatment technique(s) recommended must consider the proximity of the well to the structure, soil type, and the characteristics of the termiticide. The applicator should be instructed to take these and other site specific conditions into consideration when selecting a treatment method. The label should refer the applicator to state, county, and local authorities, including the state Wellhead Protection Program, for good practices to determine proper treatment procedures relating to factors such as water table, soil conditions, etc. The treated backfill technique may be recommended to allow treatment of a structure when a well is within, adjacent, or near the structure.

To remain consistent with the requirements of FIFRA, registrants should add the following specific label statement which addresses treatment around wells or cisterns.

"Do not contaminate wells or cisterns.

"STRUCTURES WITH WELLS/CISTERNS INSIDE FOUNDATIONS

Structures that contain wells or cisterns within the foundation of a structure may be treated provided the following conditions are met:

- (1) Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method may be used if soil is removed and treated outside/away from the foundation. The **treated backfill technique** is described as follows:
 - (a) trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a

wheelbarrow.

- (b) treat the soil at the rate of 4 gallons of dilute emulsion per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. See "Rate Determination Guidelines". (If Rate Determination Guidelines are not already on the label, provide directions in this section). Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.
- (c) After the treated soil has absorbed the diluted emulsion, replace the soil into the trench.

- (2) Infested and/or damaged wood in place may be treated using an injection technique such as described in the "Control of Wood Infesting Insects" section of this label.

STRUCTURES WITH ADJACENT WELLS/CISTERNS
AND/OR OTHER WATER BODIES

Contamination of public or private water supplies (e.g. wells or cisterns), surface ponds, streams, and other bodies of water must be avoided. Therefore, structures with nearby water sources must be inspected and all treatment options evaluated prior to making an application. Structures with adjacent wells/cisterns and/or other water bodies may be treated provided the following conditions are met:

- (1) Prior to treatment, if feasible, expose the water pipe(s) coming from the well to the structure, if they enter the structure within 3 feet of grade.
- (2) To avoid applying termiticide directly into subsurface drainage which could empty into adjacent bodies of water, do not automatically apply termiticides to the top of the footer on the side of the house nearest the water. In such situations, the applicator must limit the depth of treatment sufficient to avoid contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.
- (3) When appropriate (i.e., on the water side of the structure), the treated backfill technique (described above) can also be used to minimize off-site movement of termiticide."

H. PLUGGING OF HOLES

For safety reasons all exterior holes and accessible drilled holes in commonly occupied areas into which material has been applied must be plugged. The Agency's labeling requirement that "all holes into which material has been applied must be plugged"

has been modified to read "all holes in commonly occupied areas into which material has been applied must be plugged" and will continue. The label should also contain the statement that "Plugs should be of a non-cellulose material or covered by an impervious, non-cellulose material."

To remain consistent with the requirements of FIFRA, registrants of currently registered termiticide products without the above statements on the product label should add them to the label.

I. COVERING TREATED SOIL

The Agency no longer requires the label statement "cover treated soil with a layer of untreated soil" and this statement has been deleted on most termiticide labels. This statement was originally required due to the concern for exposure to the certain termiticides such as chlordane and heptachlor. Available data indicate that termite tunneling even occurs over treated soil. Therefore, the benefit of covering treated soil with untreated soil is negligible compared to the risk of termite infestation. To remain consistent with the requirements of FIFRA, registrants should delete this statement from all termiticide products.

J. EXPOSURE INFORMATION FOR CONSTRUCTION WORKERS

EPA does not have any information demonstrating that a precautionary statement informing construction workers to wear protective clothing during or subsequent to pre-construction termiticide applications is necessary. In general, construction personnel or other individuals on-site during or subsequent to a pre-construction treatment application are neither directly nor frequently exposed to the pesticides being applied and, therefore, are generally considered not to be at risk. However, to ensure that construction personnel and other individuals are not exposed to termiticides during or subsequent to treatment, the Agency believes that label precautions are necessary. Accordingly, to remain consistent with the requirements of FIFRA, the following statement should be added to the label of all termiticide products with pre-construction application use directions:

"Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct

the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil."

K. VARIABLE CONCENTRATIONS

The Agency encourages termiticide registrants, pest control companies, national and state pest control associations, State Cooperative Extension Services, State Lead Agencies and others responsible for applicator training to emphasize the importance of training applicators in the use of proper application volumes, dosages, and uniform distribution to control all species of subterranean termites in their applicator training plans and in their research and development plans. Termiticide product registrants, pest control companies, and others responsible for applicator training should incorporate data from USDA's Starkville, Mississippi Laboratory, as well as regional research centers, together with recommendations of appropriate state entomologists, in the training of applicators in order to facilitate their choice of the proper concentration where variable concentrations exist on the termiticide product label.

The Agency is also receptive to the generation of data supporting variable concentrations and appropriate label provisions regarding variable concentrations. In addition, the Agency encourages the development of information and label provisions regarding the efficacy of such treatments in different soil types.

However, any change in concentration will likely affect the product's efficacy and the duration of the efficacy. Therefore, product performance data to support use of lower concentrations than those currently specified on the label must be submitted to the Agency with an application to amend the product to add those lower concentrations (refer to Section XI.B.). Such data will be reviewed by the Agency in light of the Pesticide Assessment Guidelines, Subdivision G, Product Performance, Section 95-12(b)(i)(C), which states that soil treatment termiticide products should demonstrate efficacy for at least five years (Refer to Section IV. Efficacy). Such labeling and data must be accepted by the Agency before applications for these uses will be approved.

L. FORMOSAN TERMITES

The Agency encourages termiticide registrants, pest control

companies, national and state pest control associations, State Cooperative Extension Services, State Lead Agencies and others responsible for applicator training to emphasize the importance of training applicators in the control of Formosan termites. Applicators should be instructed in the use of proper application volumes, dosages and uniform distribution to control Formosan termites in their applicator training plans and in their research and development plans in areas where Formosan termites are known or suspected to occur. In this regard, considerable data concerning application rates for Formosan termites and other types of termites are well documented by the United States Department of Agriculture's Forest Service (USDA-FS). USDA-FS can provide such data to interested parties. Requests for such data should be sent to:

USDA-FS, Southern Research Station
P.O. Box 928
Starkville, Mississippi 39760-0928

Street Address:
201 Lincoln Green
Starkville, Mississippi 39759

Phone Number:
601-325-0199

Because application rates and method of control for the treatment of Formosan termites may differ from current labeling, any registrant adding Formosan Termite Treatment to his/her product label or seeking to register a new product for Formosan Termite Treatment may have to submit applicator exposure and possibly air monitoring data to the Agency. Registrants contemplating adding this use pattern to their product label should consult with the Agency Product Manager for guidance prior to submitting their application.

M. PLENUM CONSTRUCTION

The Agency's policy with regard to plenum construction is that label directions for use in plenum construction will be the responsibility of the individual registrant, subject to Agency approval. However, registrants should be aware that they should also contact the Agency to determine any data needed to support

application to such areas. For example, because these treatments are likely to increase air concentrations, adequate air monitoring data or relevant information to assess the risk from exposure via the respiratory route to applicators and inhabitants must first be submitted by the registrant and accepted by the Agency.

At a minimum, labels which include directions for application in plenum airspaces should include the following standard language:

"When treating plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil."

Registrants applying to add these uses to currently registered termiticide products or to register new products with these uses should use the above labeling statement and submit air monitoring data or relevant information to assess the risk from exposure via the respiratory route to applicators and inhabitants. Such labeling and data must be accepted by the Agency before applications for these uses will be approved.

Registrants who have currently registered products with these use patterns on their label should submit an amended application to add the above standard language to the label. No additional data are required for these registrants, at this time, since they have already submitted acceptable air monitoring data or exposure information.

XI. COORDINATION WITH THE ASSOCIATION OF STRUCTURAL PEST CONTROL REGULATORY OFFICIALS (ASPCRO)

Effective as of the date of this notice, the Agency requests that registrants submit a copy of the proposed label and the relevant efficacy data for any new termiticide product or for any significant amendment to a currently registered termiticide product, such as a change in concentration or method of application, to the Association of Structural Pest Control Regulatory Officials (ASPCRO) at the same time the application is submitted to the Agency. This will allow ASPCRO the opportunity to review the pertinent portions of the proposed registration or

amendment and communicate any concerns or questions they have regarding the proposed registration or amendment to the Agency and the registrant in the early stages of the registration process and to provide sufficient time for resolving any issues prior to a registration decision.

ASPCRO will designate 3 to 5 state officials to serve on a Termiticide Review Committee whose function will be to review the proposed registrations/amendments. ASPCRO agrees to appoint to this committee only representatives from those states whose pesticide laws provide the ability to maintain the integrity of Confidential Business Information (CBI) received with the submission. ASPCRO will review the submission and submit written recommendations to the Agency within 90 days of their receipt of the submission. ASPCRO's recommendations will be one of the factors considered in the Agency's decision making process. The specifics of this coordinated review process will be further detailed in a Memorandum of Understanding (MOU) between the Agency and ASPCRO. The Agency believes that the involvement of ASPCRO in the review process will speed review of amendments and applications and therefore strongly encourages registrants to submit applications to ASPCRO. Copies of termiticide applications should be sent to the following address:

ASPCRO Termiticide Review
c/o George Saxton
Office of the Indiana State Chemist
Purdue University
1154 Biochemistry Building
West Lafayette, IN 47907-1154
ATTN: Jim Wright

XII. PROCEDURES

All modifications to termiticide product labeling should be submitted as proposed amendments on the EPA application form 8570-1. In Section I. of the application, indicate the Registration Division (RD) Product Manager (PM) for the product. In Section II. of the application, make the following notation: "Amendment to product label in accordance with PR Notice 96-X on Termiticides." The amendment should be accompanied by five (5) copies of the proposed revised labeling. Applications should be sent to the following address:

For USPS Submissions:

Document Processing Desk (AMEND)
Office of Pesticide Programs (7504-C)
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460-0001

For Courier Deliveries:

Office of Pesticide Programs
Document Processing Desk (AMEND)
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, Virginia 22202

XIII. FOR FURTHER INFORMATION

You may call Rebecca S. Cool, Insecticide-Rodenticide

Branch, RD at (703) 305-7690 if you have any questions about this notice.

Stephen L. Johnson, Director
Registration Division

YOU ARE CURRENTLY RECEIVING A FAX FROM

ILLINOIS DEPARTMENT OF PUBLIC HEALTH

Division of Environmental Health

525 West Jefferson Street

Springfield, IL 62761

FAX #(217)785-5897

Name Fred Riecks Telephone# 217/782-5830Date 10/17/96 # of Pages 3 Including cover.PLEASE DELIVER TO: George Saxton or Dave Scott, Structural
Rest Cntrl.

COMMENTS: Gentlemen - I will not be attending ASPERO next week but thought I would give you some comments on the EPM and posting guidelines. Please see attached. Would appreciate it if they could be incorporated into discussions surrounding these topics. Regarding the changes to Article IV and V, I have no objections. Questions, please call me.

Fred

RECEIVED

OCT 17 1996

INDIANA STATE CHEMIST

Illinois Department of Public Health

John R. Lumpkin, M.D., M.P.H., Director

525-535 West Jefferson Street • Springfield, Illinois 62761-0001

Comments

Proposed ASPCRO Model Indoor Posting and Pre-Notification Guidelines

1. Under "WHO," it indicates that the pest control company may choose to post a structure. I think that language needs to be more enforceable. If the PCO is to do the posting for a client over the owner, manager, etc., there should be some written documentation required between owner and PCO as to who will do.
2. Under "LOCATION OF SIGN," a sign should be posted at all entry doors to structure, not just to "primary points" of entry.
3. Under "TIMING," shouldn't a notice only be required for the application of liquid, aerosol, dust, powder, fog, mist or other products that could become airborne? You don't want to post for placing insecticide bait stations (max force), mouse/rat bait stations, gels, etc., do you? Also, how do you determine if a product is dry when applied to cracks and crevices, plumbing chases, etc.? Who would determine that an application is dried? Also, the notice should be posted for a specified amount of time (i.e., say 24 hrs) before the application to ensure that occupants know about the application.
4. Under "REQUIRED INFORMATION," shouldn't a reentry time be on the posted notice? If a reentry time is to be on a posted notice, it may mean that you need two postings—one to alert that an application is to occur and a second to advise when reentry can occur.
5. Under "PRE-NOTIFICATION REGISTRY," I don't believe that this should be a requirement of a state regulatory agency. There is the potential that this registry could comprise thousands of names because of the requirement to post virtually all buildings but private residences. It would take a several people to implement and maintain the registry which could never be completely accurate or distributed to those required to provide the notification in a timely fashion. Inaccurate registries or untimely notification would negate the usefulness of the concept. A state agency could also be faulted for not providing accurate/timely information to the applicators. In addition, there would be a substantial cost to a state agency to perform this service. Wouldn't it make more sense to require industry/building owners to maintain a registry for their clients since they are required to post the notices? After all, they would be in a better position to know which people would object to applications or want to be notified prior to the application. This information would also be in their hands in a more timely manner.

Finally, why is a registry needed in the first place? Since certain individuals are required to post virtually all buildings, occupants and visitors are being notified in advance that a pesticide application will occur or is occurring. This can be assured if the signs are posted for a specified amount of time before the application at all building entrances.

**Illinois Department of
Public
Health**

John R. Lumpkin, M.D., M.P.H., Director

525-535 West Jefferson Street • Springfield, Illinois 62761-0001

Comments

School Integrated Pest Management Act (1996)

1. Section 4(B)(6)(b) talks about individuals not being in the immediate area when chemical control is performed. That would seem to mean that baits like MaxForce (for roaches) could not be applied in an operational kitchen or office. Do we really mean for that to occur? Aren't we really interested in products that have the potential to contaminate food or irritate people, such as aerosols, dusts, liquids, etc.?
2. Section 5(A) requires IPM coordinators to receive "verifiable training" in school IPM techniques or be a certified applicator before performing pesticide applications in schools. Who establishes what "verifiable training" is? Who is responsible for maintaining a listing of individuals "verifiably trained" as school IPM coordinators? There will certainly be a cost if a state agency is to do this. Aren't we actually creating another category of certification for a voluntary (not regulatory) program? Also, who will pay the costs for providing the seminars (i.e., travel, rooms for teaching staff, seminar location, etc.)? States cannot accept additional mandates without a funding mechanism and state legislators have not been receptive to placing additional monetary burdens upon individuals.
3. How will this Act affect existing IPM programs established by other states which may not be as detailed as this Act?

**Technician Training Needs Survey
October, 1996**

**Conducted For
The Association of Structural Pest Control Regulatory Officials**

**Presented By
Service Technician Magazine**

Summary Of Results

The vast majority of *Service Technician* readers responding to the poll indicated that label comprehension, safety issues and customer relations were among the most important topics for new hires to be instructed in. **Label Comprehension** earned a **72%** response rate, and **Safety Issues** and **Customer Relations** earned **67%** and **65%** responses, respectively (See Table 1).

Interestingly, when *Service Technician* combined the top two rankings from each category it reinforced the message that these three topics, plus **Inspection Techniques** and **Laws & Regulations** were important for new hire training. All received rankings of **80%** or higher (See Table 2).

The survey was sent to 300 randomly-selected *Service Technician* readers nationwide. Survey respondents worked in a variety of job classifications including service technician, service manager/supervisor, technical director and owner/president.

Respondents were asked to rank the topics in order of importance on a scale of 1 to 5 (1 = Most Important; 5 = Least Important). A breakdown of the survey and responses of *Service Technician* readers follows.

Q: Please rank the topics that are most important for new hires (e.g. technicians) to be instructed in?

TABLE 1

1.) Label Comprehension	72%
2.) <i>Safety Issues</i>	67%
3.) Customer Relations	65%
4.) <i>Laws & Regulations</i>	63%
5.) Application Techniques	57%
6.) <i>Inspection Techniques</i>	52%
7.) Pest Identification	37%
8.) <i>Equipment Operation</i>	26%

(Respondents indicating #1 [most important] on survey)

TABLE 2

1.) Label Comprehension	84%
2.) <i>Safety Issues</i>	83%
Inspection Techniques	83%
Customer Relations	83%
3.) Laws & Regulations	80%
4.) <i>Application Techniques</i>	78%
5.) Equipment Operation	65%
6.) <i>Pest Identification</i>	63%

(Respondents indicating either #1 [most important] or #2 [somewhat important] on survey)

Service Technician Training Initiative

ASPCRO Board of Directors

October 19, 1996

Santa Fe, New Mexico

Presented By:

Jeff Fenner, Service Technician Magazine

Dr. Richard Kramer, Innovative Pest Management

June 21, 1996

TO: ASPCRO Officers
FROM: *Service Technician* magazine
SUBJECT: *Service Technician* Technician Training Initiative

Dear ASPCRO Officer:

To bring ASPCRO up to speed on *Service Technician's* Technician Training Tutorial initiative, please find enclosed a copy of the proposal presented to the ASPCRO Technician Training Committee.

The proposal outlines *Service Technician's* industry-wide training initiative and proposes ASPCRO designate the program a "Recommended Educational Resource" similar to the designation granted *Service Technician* magazine.

The *Service Technician* training initiative will consist of specially crafted training tutorials encompassing a wide range of pest control topics. The tutorials will be available on a variety of educational formats, including CD-ROM, computer disk and text version, to satisfy the training needs of **all** pest control technicians. All options will be available simultaneously at the project's launch in mid-1997.

With its exclusive designation ASPCRO would increase its exposure to industry professionals by having its logo appear on all training materials (see proposal cover jacket). ASPCRO's designation of this program would also reinforce its on-going commitment to assist industry members in improving training standards and creating a safer, pest-free environment for both the applicator and consumer.

ASPCRO would also have the opportunity to provide input for the training tutorials and review the material for accuracy before publication. Final editorial approval, however, will remain with *Service Technician*.

Key elements of the *Service Technician* training initiative include flexibility of the delivery system and editorial content, and the verifiable testing component. *All versions of the training tutorials can be custom formatted to satisfy the specific training requirements of individual states.* Each version of the tutorials also include verifiable training tests for technicians.

The project is funded in whole by *Service Technician* magazine and would **not** require ASPCRO to seek changes in its Environmental Protection Agency grant obligations.

Service Technician appreciates ASPCRO's consideration of our proposal for the "Recommended Educational Resource" designation and welcomes the opportunity to discuss areas of mutual concern and assist the members of ASPCRO in delivering quality, verifiable training to technicians in their respective states.

Best Regards,

Jeff Fenner
Editor

Service Technician Magazine ***Technician Training Initiative***

When management in the structural pest control industry prioritize their company's needs, the issue typically topping the list is the need for improved technician training. Proper training is the foundation behind any successful, safe pesticide application and is an issue with universal appeal with industry members and consumers alike.

However, the resources for obtaining proper training have not been uniform, nor in some industry member's and regulator's view, adequate. This is not to say there aren't excellent training programs available to technicians, but merely that there is always room for another source of training information.

That was the thought behind the creation of *Service Technician* and was the impetus for the magazine to seek ASPCRO's "Recommended Educational Resource" seal of approval in 1994. It has been the magazine's mission to offer industry technicians the information resources to expand their professional knowledge and improve service standards for consumers, a mission shared by the members of ASPCRO.

In 1996, *Service Technician* is taking the *next step* in the education process with the development of comprehensive technician training tutorials designed to address one of the industry's most pressing needs -- the effective and safe use of pesticides. And we are again seeking the "Recommended Educational Resource" endorsement of ASPCRO for what we believe will be a valuable training asset for the industry.

We recognize ASPCRO and this committee are currently developing a standardized technician training program for states not possessing a formal registration program and *Service Technician* applauds and supports this program. We feel, however, that there is always room for additional development of training programs that could benefit all technicians.

The *Service Technician* Technician Training Tutorial initiative is being written by Dr. Richard Kramer, contributing technical editor for *Service Technician*, and developed in conjunction with Dr. Philip Koehler and Tom Fasulo of the University of Florida. The tutorials will be offered in a variety of formats including CD-ROM, computer disk and textbook.

The CD-ROM and computer tutorial will be graphic-based rather than text based, created in a Windows format and include a verifiable training test at the end of the program. A tutorial workbook (with testing component) will also be available for technicians whose companies aren't equipped with computers.

The verifiable training, a highly sought after asset of industry professionals (see attached chart), will allow technicians to obtain continuing education units in approved states on a wide variety of technical topics. The topics will be divided

into individual training modules.

The first *Service Technician* training tutorial is scheduled for release in mid-1997. It will cover "Pesticide Safety & Environmental Protection" and include modules on personal protection, spill clean-up and prevention, laws and regulations, and mixing and application techniques (see attached outline).

The core program is applicable to a wide range of applicators, including those in both the private and commercial sectors. The educational level of the target audience is 12th grade. Emphasis in the program will be placed on the safe use and handling of pesticides, focusing on environmental protection.

Service Technician's computer programs will require minimal supervision for training and administration of the testing components. The programs are self-paced and bookmarks can be left by individual trainees. Thus, a single computer can be used to train multiple individuals. Tests are self-grading and under the control of the program administrator. The contents are easy to update or modify and can be tailored to reflect individual state laws and/or regulations.

Service Technician magazine is looking forward to embarking on this revolutionary project and is confident it will satisfy the industry's need for more targeted, interactive training programs. We welcome ASPCRO's input on this project and look forward to future discussions.

**Service Technician Magazine
Pesticide Safety and Environmental Protection
Computerized Training Tutorial**

PROPOSAL

I. Introduction

This section will discuss the role of pesticides in integrated pest management programs and the role of the technician in protecting the environment when using these products. The theme throughout the course of instruction will be the safe handling of pesticides and environmental protection. The program will be based on understanding the information contained on product labels.

II. Laws & Regulations

- A. FIFRA
- B. DOT
- C. ESA
- D. U.S. EPA and State Regulatory Agencies
- E. Chemical Sensitivity
- F. Hazard Communications
- G. Notification and Posting
- H. Record Keeping

III. Labels, Labeling & MSDS Sheets

- A. Classification
 - 1. General Use
 - 2. Restricted Use
- B. Labels
 - 1. Hazards
 - 2. Trade and Common Names
 - 3. Ingredients
 - 4. Net Contents
 - 5. Name and Address of Manufacturer
 - 6. Registration and Establishment Number
 - 7. Directions For Use
 - 8. Misuse Statement
 - 9. Reentry Statement
 - 10. Storage and Disposal Directions
 - 11. Formulation
 - 12. Precautionary Statements
 - 13. Environmental Hazards
 - 14. Physical and Chemical Hazards
- C. Mixing
 - 1. Precautions
 - 2. Procedures
- D. Application Precautions & Procedures
 - 1. Outdoors
 - 2. Indoors
 - a. Crack and Crevice
 - b. Spot
 - c. Broadcast or General

d. Space

IV. Storage & Disposal

- A. Requirements
- B. Precautions

V. Transportation

- A. Hazardous Materials
- B. Reportable Quantities
- C. Shipping Papers
- D. Marking and Placarding

VI. Spill Prevention & Clean-Up

- A. Emergency Procedures
- B. Notification
- C. Spill Control Kit
- D. Containment and Control
- E. Decontamination
- F. Disposal

VII. Poisoning & First Aid

- A. Symptoms of Pesticide Poisoning
- B. First Aid

Notes:

The concept of this program is to construct approximately six or more modules in disk or CD-ROM format. They would be constructed in a programmed text format, with tests to insure mastery and verification of the knowledge. The target audience education level is 12th grade. Average time for completion of all modules would be 24 hours. Information would also be produced in a printed text format. The CD-ROM format would allow for integration of some live footage (e.g. mixing, spill management, calibration). The disk format would require the use of photographs and/or slides.

Proposed Structure & Composition

C&T Advisory and Working Groups

ADVISORY GROUP

Co - leads: OPP-EPA

CSREES USDA

Members: President - AAPSE

Rep - AAPCO

Rep - ASPCRO

Rep - AAPCO/SFIREG

EPA Region

Secretariat/Contributing Member

WORKING GROUPS

Program Funding

- Advisory (2)
- SLA
- CES
- EPA Region
- OPP

Program Content

- Advisory
- SLA
- CES
- EPA Region
- OPP

Program Intra- Structure & Delivery

- Advisory
- SLA
- CES
- EPA Region
- OPP

Program Evaluation

- Advisory
- SLA
- CES
- EPA Region
- OPP

Proposed Goals / Objectives

Certification & Training Advisory and Working Groups

ADVISORY GROUP

- Lead effort to determine current status and define the future direction of C&T Program.
- Coordinate four Working Groups and produce ~~and~~ *AN* annual/biennial report, including:
 - overview of program, highlight recent accomplishments, anticipate changes and upcoming events;
 - overview of each state program, highlight basics and recent accomplishments, recent changes, anticipated changes and upcoming events;
- Facilitate implementation of findings of the Working Groups as appropriate.

WORKING GROUPS

PROGRAM FUNDING

- Capture actual program cost and funding sources (state & national).
- Review distribution of federal funds (funding formula) and recommend modification as appropriate.
- Explore alternative funding sources and recommend additional resources or more effective use of resources.

WORKING GROUPS

PROGRAM CONTENT

- Levels of supervision
- ✓ • Initial certification
- ✓ • Recertification
- ✓ • Training materials
- ✓✓ • Matching training and competency demonstration

WORKING GROUPS

PROGRAM INFRASTRUCTURE & DELIVERY

- Roles and responsibilities of stakeholders
- State regulations, plans and reciprocity issues
- Training delivery
- Certification process delivery
- Involvement of stakeholders in decision making
- Maintaining communication with stakeholders

WORKING GROUPS

PROGRAM EVALUATION

- Assessment of national program
- Measurement of competency