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Private Applicator Recordkeeping

Have You Dotted Your i's and Crossed Your t's?

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extension.psu.edu

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Learning Objectives

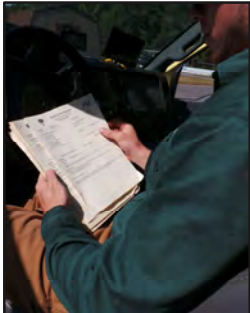
- List who must keep pesticide application records
- Discuss the importance of keeping records
- List items from the application that **must** be recorded
- Describe additional items that can be recorded but are not required
- Explain how pesticide application records can be kept

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Pesticide Application Records

**RECORDS
RECORDS
RECORDS**



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Who Has To Keep Records

- Commercial businesses
 - All applications
- Public agencies
 - All applications
- Dealers
 - Sale of restricted use pesticides (RUPs)
- Private applicators
 - Restricted use pesticide applications



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Why Keep Pesticide Application Records

- Thorough, accurate records are important
- Good records can not be stressed enough
- Serve several purposes, including:
 - Assess application effectiveness
 - Help with purchasing decisions



Photo: Pennsylvania Department of Agriculture

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Why Keep Pesticide Application Records

- Records can help you
 - Document proper application



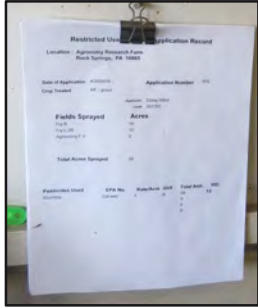
Photo: Maryland Department of Agriculture - Pesticide Regulation

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Pesticide Application Records

Are they complete?




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Pesticide Application Records

**DOCUMENT
DOCUMENT
DOCUMENT**



Consider keeping records for all pesticide applications

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Pesticide Application Records

- Complaints are investigated by the Pennsylvania Department of Agriculture (PDA)
- Records are one of the first things the PDA inspector will ask to see




Photo: Maryland Department of Agriculture - Pesticide Regulation

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Pesticide Application Records

- Treat each record as if it may document an application that produced:
 - A complaint investigation by PDA
 - A lawsuit going to court




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Records for Private Applicators

Recordkeeping.

(a) A private applicator shall keep for each application of a restricted use pesticide a record containing the following information:

- (1) The date of application. For a restricted use pesticide requiring a reentry time, the date of application must include the hour completed.
- (2) The place of application including the name and address of the firm and the specific field or land area and the crop treated.
- (3) The size of the area treated.
- (4) The brand name of every restricted use pesticide used.
- (5) The EPA product registration number.
- (6) The total amount of every restricted use pesticide used in pounds, ounces, gallons, liters, applied to a treated area.
- (7) The dosage or rate of application of every restricted use pesticide used.
- (8) The names and the permit or certification numbers of the persons making or supervising the application. When applicable, the names of the noncertified applicators acting under the direct supervision of the private applicator shall be recorded.

(b) A record required to be kept under this section shall be maintained for at least 3 years.

(c) Pesticide product and application information shall be made immediately available to medical personnel in an emergency.

(d) A restricted use pesticide application record must be completed in written or printable form no later than 24 hours after the application date and made immediately available to the Department upon request.

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Records for Private Applicators

Minimum requirements when using a restricted use pesticide:

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.

What application items do you keep records of?







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Records for Private Applicators

Minimum requirements when using a restricted use pesticide:

1. Date of application
 - If it has a Restricted Entry Interval (REI) – the hour completed must be included
2. Place of application – name and address of farm and specific field
3. Size of treated area






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Records for Private Applicators

Minimum requirements when using a restricted use pesticide:

4. Brand name
5. EPA Registration Number
6. Total amount used
7. Dosage or rate
8. Name and certification number for each person making or supervising the application

Consider maintaining records for all pesticide applications





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Records Provided By Commercial Business

- Requirements for commercial agricultural applications:
 - Provide copy of records of RUP applications to customers within 30 days





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Records for Businesses/Agencies

§ 128.35. Record-keeping.

(a) A pesticide application business shall keep for every application of a pesticide a record containing the following information:

- (1) The date of application. For a pesticide requiring a reentry time, the date of application must include the hour completed. For continuous applications, such as swimming pools and chlorination, the record must include start and finish dates and the total amount of pesticide product used during that time period. For each addition of a pesticide to the system, an entry in the record is required.
- (2) The name and address of the customer and the address and location of the application site if different from the address of the customer.
- (3) The brand name of the pesticide used.
- (4) The EPA product registration number.
- (5) The total amount of every pesticide used in ponds, canals, ditches, flows, applied to a treated area.
- (6) The dosage in one of application, of every pesticide used.

(7) The names and the certification or technician's registration number of each person making or supervising the application. When applicable the names of noncertified nonregistered persons involved in the application.


(8) The identification of the application site, including the specific field or land area and the crop and size of the area treated for pesticides used in the production of an agricultural commodity.

(9) When a restricted use pesticide is used in the production of an agricultural commodity, a copy of the record required under this section shall be provided by the application business to the customer within 30 days of the pesticide application.

(10) Pesticide product and application information shall be made immediately available to notified personnel in an emergency.

(11) A pesticide application record must be completed in written or printable form no later than 24 hours after the application date and made immediately available to the Department upon request.


(12) A record required to be kept under this section shall be maintained for at least 3 years.




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Records for Businesses/Agencies

- Minimum requirements:
 - Date of application
 - Name and address of customer and address of application site if different
 - Brand name
 - EPA Registration Number
 - Total amount used
 - Rate
 - Name and cert number (or ID number) for each person making or supervising application







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Records for Businesses/Agencies



- Additional requirements for agricultural applications:
 - Identify application site – specific field or land area, crop, and size of area treated
 - Provide copy of records of RUP applications to customers within 30 days
- Additional federal requirements for the use of reduced volatility dicamba formulations
 - Used on dicamba-resistant crops
 - Labels require specific record keeping information

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Records – Use of Reduced Volatility Dicamba


- Additional federal recordkeeping requirements specific to the use of dicamba products applied to Xtend soybean varieties
- Product labels require applicators to:
 - Maintain proof that required training was completed
 - Keep copies of receipts for each purchase and a copy of the label
 - Records of buffer distance calculations
 - Start and finish time for each application

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Records – Use of Reduced Volatility Dicamba

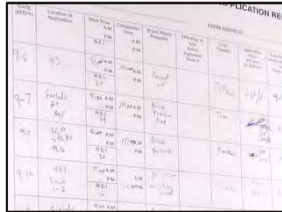

- Product labels require applicators to record:
 - Sensitive crop registry was consulted OR neighboring fields were surveyed – specifically:
 - Name of registry and date consulted or
 - Survey of neighboring fields and date conducted
 - Type of application (pre- or post-emergence) and if post-the number of days after planting
 - Air temperature – start and finish
 - Wind speed and direction – start and finish at boom height
 - Nozzles and pressure – including manufacturer/brand, type, orifice size
 - Tank mix products – all pesticides and adjuvants
 - Spray system cleanout – verification of before and after



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Additional Recordkeeping for WPS



- Additional recordkeeping requirements under the federal Worker Protection Standard (WPS)
 - Active ingredient
 - Restricted entry interval (REI)
 - Dates and times application started and ended
- Another WPS requirement:
 - Must maintain a copy of the Safety Data Sheet (SDS)

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Pesticide Application Records

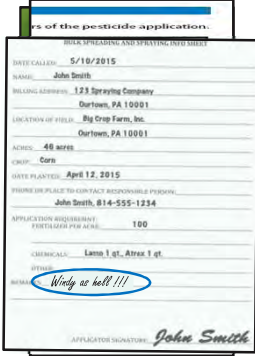

- Must be completed within 24 hours
- Maintained for 3 years
- Made immediately available to PDA upon request
- Made available to medical personnel in an emergency

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Include Weather


- Outdoor applications - list weather conditions from application site
 - Temperature
 - Wind speed
 - Wind direction
 - Humidity
- Use a quality device
- Use a dedicated section or notes section on records
- Valuable information





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Weather Data

- Meter connects to smart phones and tablets with Bluetooth
- Data provided:
 - Temperature
 - Wind speed: average and gusts
 - Wind direction
 - Pressure
 - Humidity

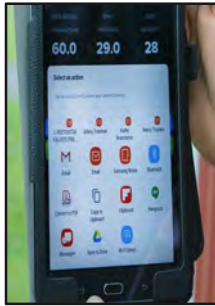





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Weather Data

- Data is saved on device and can be exported in different formats
- Location is recorded using GPS coordinates and can be plotted on a map







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Weather Data

- Detailed weather information can increase effectiveness of applications by:
 - Helping to determine conditions conducive for specific pests
 - Determining growing degree days for tracking insect pest development
 - Target applications during optimal time periods

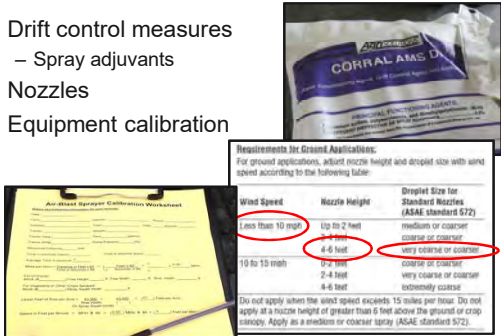





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Other Documentation

- Drift control measures
 - Spray adjuvants
- Nozzles
- Equipment calibration




Wind Speed	Nozzle Height	Droplet Size for Standard Nozzles (ASAE standard S22)
Less than 10 mph	Up to 2 feet	medium or coarser
	4-6 feet	very coarse or coarse
10 to 15 mph	Up to 2 feet	coarse or coarser
	2-4 feet	very coarse or coarse
	4-6 feet	extremely coarse



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How to Keep Pesticide Application Records

- PDA does not mandate a specific recordkeeping form be used
 - Can develop your own to meet your business's needs
 - Must include all required information
- PSU Extension developed a sample form
 - Meets all PDA requirements
- Available on website at: extension.psu.edu/recordkeeping-form-for-pesticide-applicators




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Pesticide Application Records

Records must be maintained for three years and completed within 24 hours of the pesticide application.


Pest/Target/Operator Name:		BEI #	County Name:						
Date (M/D/Y)	Client or Operator Name and Address	Applicator/Technician Name	Brand Name of Pesticide Used	EPA Registration #	Storage or Sale Code	Amount of Pesticide Used	How Crop or Controlling Agent	Completion Time (M/D/Y)	Notes
MM/YY								MM/YY	
MM/YY								MM/YY	
MM/YY								MM/YY	
MM/YY								MM/YY	
MM/YY								MM/YY	



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How to Keep Pesticide Application Records

- Records can be maintained electronically
- Must contain all required information
- Must be able to provide PDA with information immediately



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Other Records - Not Required

- Pest scouting or monitoring information
 - Pest species present
 - Numbers
 - Growth stages
 - Size and location of infestation - vegetation
- Control techniques

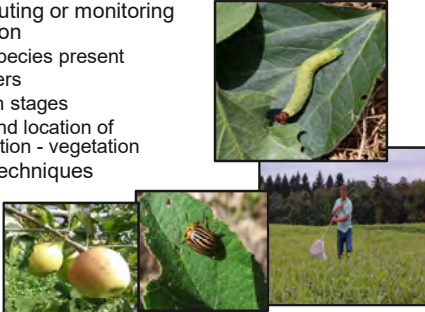



Photo: Sandy Feather, Penn State

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Suggested Records - Not Required

- Spill or emergency cleanup
 - Document spills or emergency cleanup



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Record Keeping Rules of Thumb

- Make sure records are complete
- You can't have too much information
 - Make notes
- Document, Document, Document
 - Go above and beyond
- Treat each application record or incident as if it may be the one in a complaint investigation or lawsuit
- Keep records of all applications



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