Private Applicator Recordkeeping

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

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Pesticide Education Program

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

Pesticide Application Records

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

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
Why Keep Pesticide Application Records

- Records can help you
  - Document proper application

Consider keeping records for all pesticide applications

Pesticide Application Records

Are they complete?

Complaints are investigated by the Pennsylvania Department of Agriculture (PDA)

Records are one of the first things the PDA inspector will ask to see

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

Records for Private Applicators

§ 128.65. 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 farm 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 certified applicator or applicator 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 or written or portable form no later than 24 hours after the application date and made immediately available to the Department upon request.

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
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

Records Provided By Commercial Business

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

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
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

Records – Use of Reduced Volatility Dicamba

- Additional federal recordkeeping requirements specific to the use of dicamba products applied to Xtend soybean varieties
  - 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

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

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)

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

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
Weather Data

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

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

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

Other Documentation

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

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
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

Other Records - Not Required

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

Suggested Records - Not Required

• Spill or emergency cleanup
  – Document spills or emergency cleanup

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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