

**From:** [Todd Sawyer](#)  
**To:** [Vic Mason](#)  
**Cc:** [Janis Perry](#)  
**Subject:** {External}Re: Rule making meeting  
**Date:** Tuesday, June 30, 2020 1:53:45 PM  
**Attachments:** [image001.png](#)

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Hi Vic,

These are a few little things that I believe would help clarify some parts of the rule as long as we are about it.

Please add to the record of the meeting and I would be happy to further discuss.

The language is from other states with similar issues.

05. – d. - As the regulation indicates, when the application or recommendation is for units such as acres, square footage, cubic footage, or linear footage they must be recorded.

**For applications to structures where such footage measurements do not apply, then a description of the area of the structure treated must be recorded.**

05. – f. -Total amount of pesticide(s) used. The total amount of pesticide used must be recorded for each application. **When applications are made using techniques or equipment that makes exact measurement impossible (i.e., Crack and crevice applications, hand sprayer, aerosol containers), then the best estimate of finished dilution must be recorded.**

**05. Records Requirements:** Professional applicators shall Maintain pesticide application records for three (3) years, in a location designated by the professional applicator ready to be inspected, duplicated, or submitted when requested by the Director. The records shall be maintained. Record Contents. Such records shall must contain include all of the following: (3-20-20)T( )

- a. The name and address of the owner or operator of each property treated; and (3-20-20)T( )
  - b. The specific crop, animal, or property treated; and (3-20-20)T( )
  - c. The location by the address, general legal description (township, range, and section) or latitude/ longitude of the specific crop, animal, or property treated; and (3-20-20)T( )
  - d. **The size or amount of specific crop, animal, or property treated; and (3-20-20)T**
  - e. The trade name or brand name of the pesticide applied; and (3-20-20)T( )
  - f. **The total amount of pesticide applied; and (3-20-20)T( )**
  - g. The dilution applied or rate of application; and (3-20-20)T( )
- IDAPA 02.03.03 Proposed Rule Text Page 8
- h. The EPA registration number of the pesticide applied; and (3-20-20)T( )
  - i. The date of application; and (3-20-20)T
  - j. The time of day when the pesticide is applied; and (3-20-20)T( )
  - k. The approximate wind velocity; and (3-20-20)T( )
  - l. The approximate wind direction; and (3-20-20)T
  - m. The full name of the person recommending the pesticide application; and (3-20-20)T( )
  - n. The full name of the professional applicator applying the pesticide; and (3-20-20)T( )
  - o. The license number of the professional applicator applying the pesticide; and (3-20-20)T
  - p. Full name and license number of professional applicator supervising the pesticide application of the professional applicator holding the Apprentice Category (CA).
  - q. Worker protection information exchange, if required by the worker protection standard, prior to pesticide application, shall be documented by: including name of grower or operator contacted and date and time of contact. (3-20-20)T( )

**Section 03.a** (regarding Certification exams) states that exams are presented and answered in writing. I wonder if there is a way to include electronic formats (I don't think this would include computer-based testing), writing sounds like a paper and pencil test. Even if it's not

available today, it would be good to not exclude the possibility in the future. Consider: a. presented and answered in text-based format

#### Section 04 - Categories

Non-soil fumigation is called space (area) fumigation? I know it's because it includes fumigants applied below soil for rodent control. So, I would suggest renaming it Non-soil & Rodent or Space (volumetric) Fumigation. Note: you never fumigate an area, only a volume, It's a 3-dimensional treatment. Same note under Private Applicator section

Thank you,  
Todd

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**From:** Vic Mason <Vic.Mason@ISDA.IDAHO.GOV>

**Date:** Tuesday, June 30, 2020 at 1:22 PM

**To:** Todd Sawyer <tsawyer@orkinpest.com>

**Cc:** Janis Perry <Janis.Perry@ISDA.IDAHO.GOV>

**Subject:** Rule making meeting

Hi Todd,

First of I wanted to thank you for being part of the licensing advisory committee, and for taking time out of your busy day to be part of the rule making stakeholder group today. You said that you had a couple of edits that you would like to see to the rule. Could you email me what those were so I can get them included in the comments of the meeting?

Thanks

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