

From: [Lloyd Knight](#)
To: [Kirk's Barrier Email](#)
Cc: [Denise Lauerman](#)
Subject: RE: Source documents
Date: Friday, June 9, 2023 3:16:48 PM

Denise – can you please post this thread to the website for the pesticide rule? Thanks.

Lloyd B. Knight
Deputy Director
Idaho State Department of Agriculture
Office: (208)332-8615
Cell: (208)859-4173

From: Kirk's Barrier Email <kirk@barrierpestcontrol.com>
Sent: Friday, June 9, 2023 2:27 PM
To: Ryan Ward <Ryan.Ward@ISDA.IDAHO.GOV>
Cc: Lloyd Knight <Lloyd.Knight@ISDA.IDAHO.GOV>
Subject: Re: Source documents

CAUTION: This email originated outside the State of Idaho network. Verify links and attachments BEFORE you click or open, even if you recognize and/or trust the sender. Contact your agency service desk with any concerns.

Ryan,

Thanks for the information!

Kirk Dean
Barrier Pest Control

(208) 249-9666

On Jun 9, 2023, at 11:02 AM, Ryan Ward <Ryan.Ward@isda.idaho.gov> wrote:

Good morning Kirk,
In an attempt to address the concerns brought forth in the 5/22 rulemaking meeting, the proposed recordkeeping requirements were amended to include only those elements required by the Code of Federal Regulations, information necessary to verify label compliance, or compliance with state rule (categories, apprentice, etc.).

I have included the draft rule below with the justification for each of the recordkeeping requirements.

1. Full name and license number of the professional applicator applying

the pesticide. **Complies w/7 CFR § 110.3(a)(5)**

1. If applied by a professional commercial apprentice, the full name and license number of the professional applicator supervising the pesticide application. – **to identify compliance w/ 02.03.03.400.02 and define category**

1. Date and time of application, including both start and end times. **Complies w/7 CFR § 110.3(4), 40 CFR § 170.311(b)(1)(iv), to identify compliance with IDAPA 02.03.03.400.05, and label restrictions (pollinators, inversion conditions, etc.)**

1. Weather conditions - wind speed, wind direction, and temperature, if applicable – **to identify compliance w/02.03.03.400.04(b); 02.03.03.400.07; and common label restrictions - Idaho Code § 22-3420(1).**

1. Full name of responsible party for the property to which the pesticide was applied. **Complies w/7 CFR § 110.3(e)**

1. Location by the address, general legal description (township, range, and section) or latitude/ longitude of the specific crop, animal, or property treated. **Complies w/7 CFR § 110.3(a)(3)**

1. Trade name or brand name and the EPA registration number pesticide applied. **Complies w/7 CFR § 110.3(a)(1)**

1. The rate of application, including the amount of formulated product per volume or weight to be applied on a given unit area. **To identify compliance w/label restrictions - Idaho Code § 22-3420(1).**

1. Total dilution applied, if applicable, (dilution is comprised of formulated product plus carrier). **To identify compliance w/label restrictions - Idaho Code § 22-3420(1)**

1. Total amount of pesticide applied. **Complies w/7 CFR § 110.3(a)(2)**

1. Target pest or pests. **To identify compliance w/label restrictions - Idaho Code § 22-3420(1); and 02.03.03.100.04 categories**

1. Specific crop, animal, or property treated. **Complies w/7 CFR § 110.3(a)(3)**

1. The size (area or volume) or amount (number of trees, livestock, pounds of treated commodity etc.) of specific crop, animal, or property treated. **Complies w/7 CFR § 110.3(a)(3)**

1. Application method or equipment. **To identify compliance w/label restrictions - Idaho Code § 22-3420(1); and 02.03.03.100.04 categories**

Please feel free to contact me with any additional questions.

Ryan Ward, Administrator
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Boise, Idaho 83707
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Ryan.Ward@ISDA.Idaho.Gov
<image001.png>

From: Kirk's Barrier Email <kirk@barrierpestcontrol.com>
Sent: Thursday, June 8, 2023 5:23 PM
To: Ryan Ward <Ryan.Ward@ISDA.IDAHO.GOV>
Subject: Source documents

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Ryan,

Other than this information on the EPA's CFR(<https://www.ecfr.gov/current/title-7/subtitle-B/chapter-I/subchapter-E/part-110/section-110.3>) is there any other guidelines that you get from the EPA as to how you go about looking at recordkeeping requirements? Other source documents I mean?

Thanks,

Kirk Dean
Barrier Pest Control

(208) 249-9666