

Q1 What State, Tribe or Territory do you represent?

Answered: 45 Skipped: 2

| Answer Choices | Responses |
|----------------|------------|
| Name: | 0.00% 0 |
| Company: | 0.00% 0 |
| Address: | 0.00% 0 |
| Address 2: | 0.00% 0 |
| City/Town: | 0.00% 0 |
| State: | 100.00% 45 |
| ZIP: | 0.00% 0 |
| Country: | 0.00% 0 |
| Email Address: | 0.00% 0 |
| Phone Number: | 0.00% 0 |

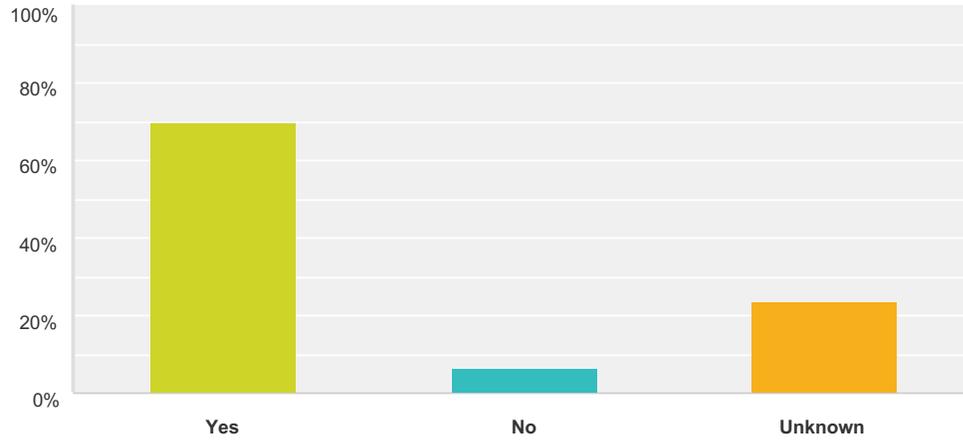
| # | Name: | Date |
|----|-------------------------|---------------------|
| | There are no responses. | |
| # | Company: | Date |
| | There are no responses. | |
| # | Address: | Date |
| | There are no responses. | |
| # | Address 2: | Date |
| | There are no responses. | |
| # | City/Town: | Date |
| | There are no responses. | |
| # | State: | Date |
| 1 | WA | 11/24/2015 12:28 PM |
| 2 | KS | 11/24/2015 9:23 AM |
| 3 | PR | 11/24/2015 7:54 AM |
| 4 | IA | 11/23/2015 3:32 PM |
| 5 | CA | 11/21/2015 10:33 AM |
| 6 | MS | 11/20/2015 4:54 PM |
| 7 | MN | 11/20/2015 3:53 PM |
| 8 | AZ | 11/20/2015 3:48 PM |
| 9 | NJ | 11/20/2015 3:38 PM |
| 10 | NY | 11/20/2015 12:45 PM |
| 11 | SD | 11/20/2015 9:33 AM |
| 12 | FL | 11/20/2015 9:14 AM |

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| | | |
|----------|-------------------------|---------------------|
| 13 | NC | 11/20/2015 8:17 AM |
| 14 | CT | 11/20/2015 7:47 AM |
| 15 | AL | 11/19/2015 5:20 PM |
| 16 | RI | 11/19/2015 10:02 AM |
| 17 | KY | 11/18/2015 6:42 PM |
| 18 | VT | 11/17/2015 2:16 PM |
| 19 | OR | 11/17/2015 10:56 AM |
| 20 | MO | 11/13/2015 2:23 PM |
| 21 | DC | 11/13/2015 1:41 PM |
| 22 | LA | 11/13/2015 10:35 AM |
| 23 | NE | 11/13/2015 8:14 AM |
| 24 | VA | 11/12/2015 4:55 PM |
| 25 | GA | 11/12/2015 3:31 PM |
| 26 | AK | 11/12/2015 1:08 PM |
| 27 | OH | 11/12/2015 12:32 PM |
| 28 | MD | 11/12/2015 12:06 PM |
| 29 | ME | 11/12/2015 10:28 AM |
| 30 | DE | 11/12/2015 8:50 AM |
| 31 | TN | 11/12/2015 7:12 AM |
| 32 | VI | 11/12/2015 6:37 AM |
| 33 | NH | 11/11/2015 5:15 PM |
| 34 | WI | 11/11/2015 3:04 PM |
| 35 | OK | 11/11/2015 8:28 AM |
| 36 | SC | 11/11/2015 7:56 AM |
| 37 | NM | 11/10/2015 10:44 PM |
| 38 | ID | 11/10/2015 6:44 PM |
| 39 | CO | 11/10/2015 5:35 PM |
| 40 | ND | 11/10/2015 5:01 PM |
| 41 | TX | 11/10/2015 4:59 PM |
| 42 | MT | 11/10/2015 4:54 PM |
| 43 | HI | 11/10/2015 4:52 PM |
| 44 | IN | 11/10/2015 4:52 PM |
| 45 | WY | 11/10/2015 4:43 PM |
| # | ZIP: | Date |
| | There are no responses. | |
| # | Country: | Date |
| | There are no responses. | |
| # | Email Address: | Date |
| | There are no responses. | |
| # | Phone Number: | Date |
| | There are no responses. | |

Q2 Will your State/Tribe/Territory submit written comments to the Federal docket on the EPA's proposed C&T rule?

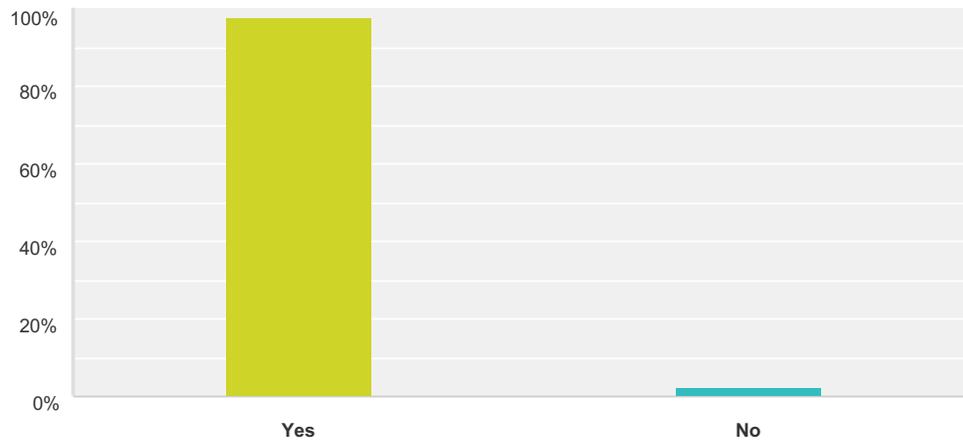
Answered: 46 Skipped: 1



| Answer Choices | Responses | |
|----------------|-----------|-----------|
| Yes | 69.57% | 32 |
| No | 6.52% | 3 |
| Unknown | 23.91% | 11 |
| Total | | 46 |

Q3 Has your State/Tribe/Territory reviewed the EPA's proposed rule?

Answered: 46 Skipped: 1

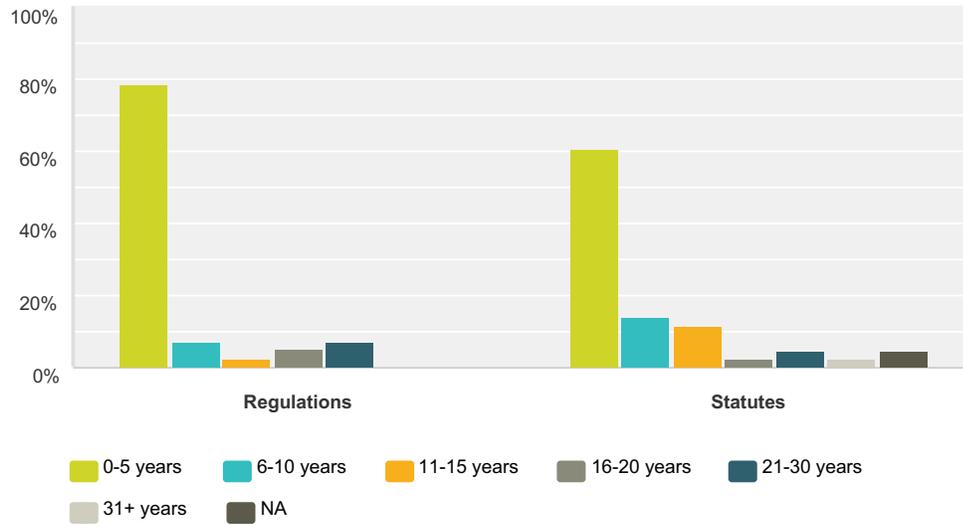


| Answer Choices | Responses |
|----------------|-----------|
| Yes | 97.83% 45 |
| No | 2.17% 1 |
| Total | 46 |

| # | If no, please explain: | Date |
|---|---|--------------------|
| 1 | Not fully to date due to limited resources. | 11/10/2015 5:35 PM |

Q4 Please indicate the last time your State/Tribe/Territory pesticide regulations and statutes were updated (most recent event)?

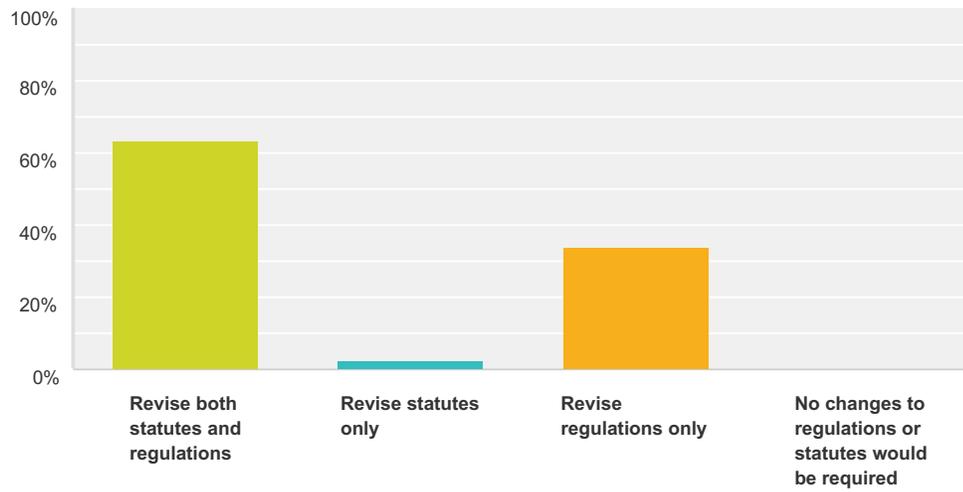
Answered: 44 Skipped: 3



| | 0-5 years | 6-10 years | 11-15 years | 16-20 years | 21-30 years | 31+ years | NA | Total |
|-------------|--------------|-------------|-------------|-------------|-------------|------------|------------|-------|
| Regulations | 78.57% 33 | 7.14% 3 | 2.38% 1 | 4.76% 2 | 7.14% 3 | 0.00% 0 | 0.00% 0 | 42 |
| Statutes | 60.47% 26 | 13.95% 6 | 11.63% 5 | 2.33% 1 | 4.65% 2 | 2.33% 1 | 4.65% 2 | 43 |

Q5 If the proposed rule was adopted, would your State be required to:

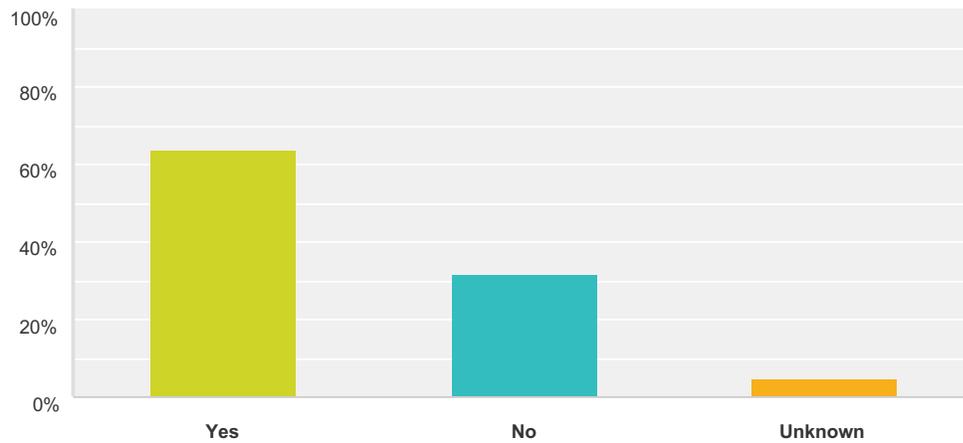
Answered: 44 Skipped: 3



| Answer Choices | Responses |
|---|-----------|
| Revise both statutes and regulations | 63.64% 28 |
| Revise statutes only | 2.27% 1 |
| Revise regulations only | 34.09% 15 |
| No changes to regulations or statutes would be required | 0.00% 0 |
| Total | 44 |

Q6 A primary goal stated in the C&T rule is to increase private applicator competency. Does your State/Tribe/Territory agree with the proposed expanded standards for private applicators to meet the CORE standard of a commercial applicator? (e.g, practical knowledge of pesticides, equipment, application methods, laws, stewardship)

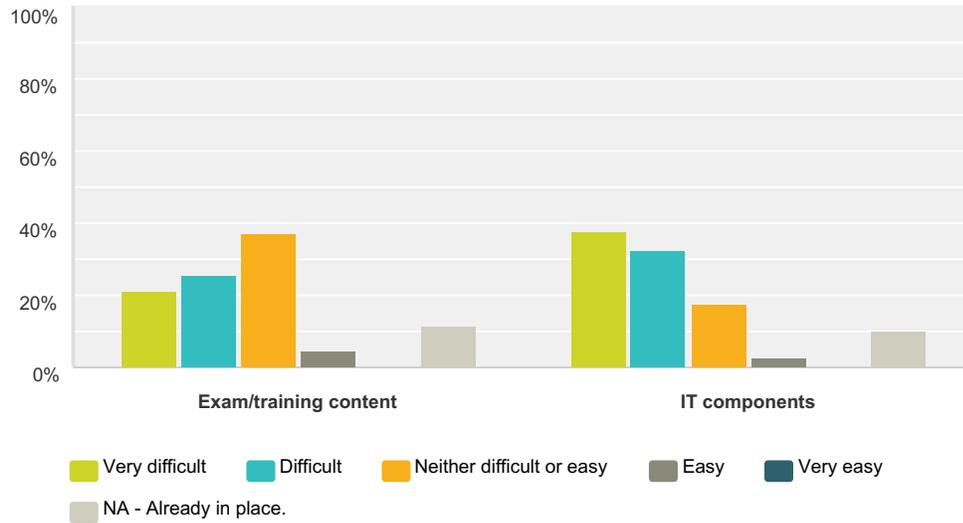
Answered: 44 Skipped: 3



| Answer Choices | Responses | |
|----------------|-----------|-----------|
| Yes | 63.64% | 28 |
| No | 31.82% | 14 |
| Unknown | 4.55% | 2 |
| Total | | 44 |

Q7 How difficult will it be for your State/Tribe/Territory to implement the proposed changes for private applicators, specifically, the exam/training content and IT components?

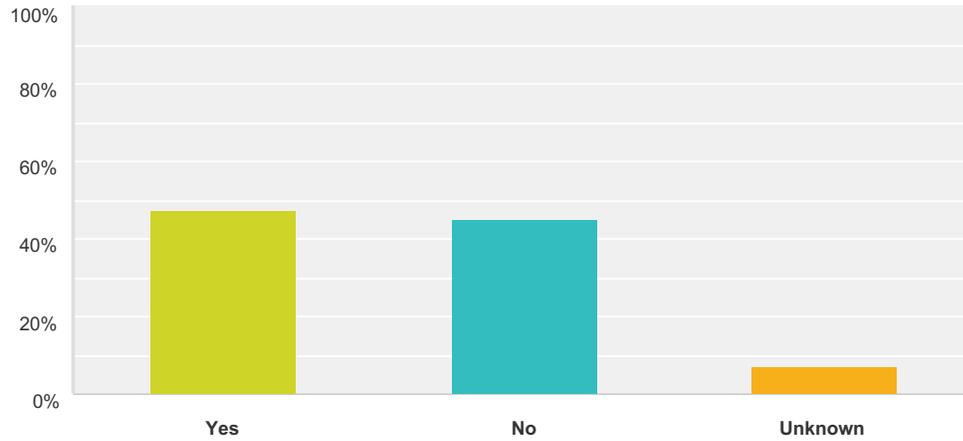
Answered: 43 Skipped: 4



| | Very difficult | Difficult | Neither difficult or easy | Easy | Very easy | NA - Already in place. | Total |
|-----------------------|----------------|--------------|---------------------------|------------|------------|------------------------|-------|
| Exam/training content | 20.93% 9 | 25.58% 11 | 37.21% 16 | 4.65% 2 | 0.00% 0 | 11.63% 5 | 43 |
| IT components | 37.50% 15 | 32.50% 13 | 17.50% 7 | 2.50% 1 | 0.00% 0 | 10.00% 4 | 40 |

Q8 A primary goal stated in the C&T rule is to increase commercial applicator competency. Does your State/Tribe/Territory agree with the expanded standards for commercial applicators?

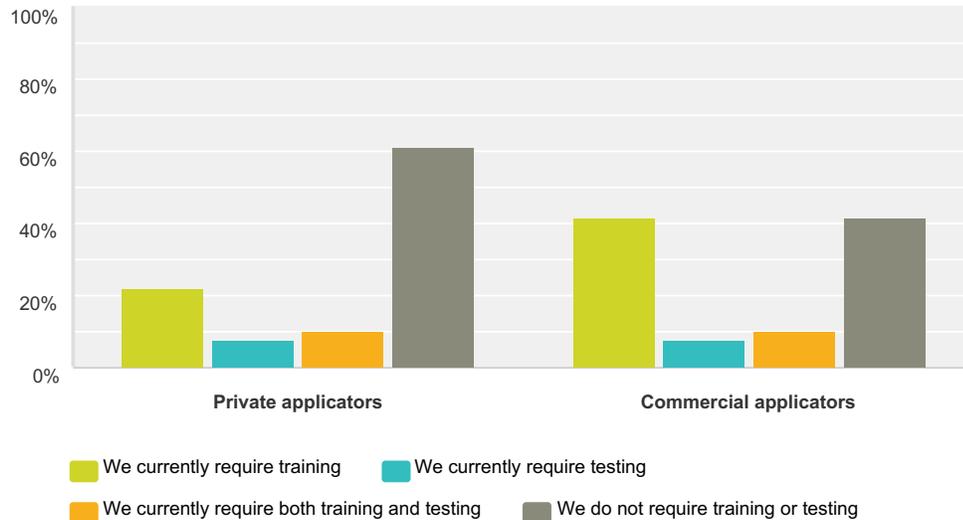
Answered: 42 Skipped: 5



| Answer Choices | Responses |
|----------------|-----------|
| Yes | 47.62% 20 |
| No | 45.24% 19 |
| Unknown | 7.14% 3 |
| Total | 42 |

Q9 A primary goal stated in the C&T rule is to increase noncertified applicator training. Does your state currently require training and/or testing of non-certified applicators?

Answered: 42 Skipped: 5



| | We currently require training | We currently require testing | We currently require both training and testing | We do not require training or testing | Total |
|------------------------|-------------------------------|------------------------------|--|---------------------------------------|-------|
| Private applicators | 21.95% 9 | 7.32% 3 | 9.76% 4 | 60.98% 25 | 41 |
| Commercial applicators | 41.46% 17 | 7.32% 3 | 9.76% 4 | 41.46% 17 | 41 |

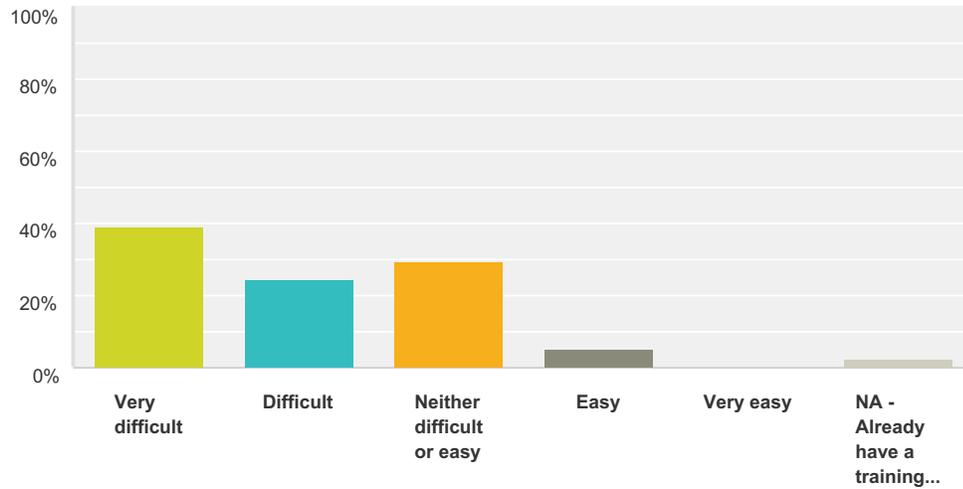
| # | Please provide any additional information: | Date |
|----|--|---------------------|
| 1 | Most private applicators working in Agriculture, must be trained as a handler or work under WPS. We believe that training is already happening through their employer and/or industry. | 11/24/2015 12:49 PM |
| 2 | Exception: Commercial uncertified applicator training is required in categories 3, 7A, and 7E. | 11/24/2015 10:59 AM |
| 3 | Keeping track of training for noncertified applicators would be difficult. | 11/23/2015 3:49 PM |
| 4 | Registered technicians working under a licensee holding a structural pest control license must obtain 16 hours of classroom training and 40 hours on-the-job training. | 11/20/2015 5:40 PM |
| 5 | We follow WPS. For the structural side there is a period of time when they can be uncertified and they must be trained. | 11/20/2015 4:37 PM |
| 6 | All applicators applying RUP in Minnesota must be certified, so there is really no good answer here for our state. All certified private applicators and all licensed/certified commercial applicators must pass a test to become certified. I chose the closest right answer. | 11/20/2015 4:07 PM |
| 7 | All applicator must be certified in SD to apply pesticides we do not have a supervisor law. | 11/20/2015 9:50 AM |
| 8 | We only require training for structural non-certified applicators. There is no requirement for all other private or commercial non-certified applicators. | 11/20/2015 9:00 AM |
| 9 | We do not allow, unless under line of sight/hearing of a certified applicator. So in the terms of this question it does not apply. | 11/17/2015 2:20 PM |
| 10 | For private applicators, where WPS does not apply, a non-certified applicator could apply RUPs under supervision of a certified private applicator. | 11/17/2015 1:07 PM |

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| | | |
|----|---|---------------------|
| 11 | 40 hours of Pesticide Technician training per category (3- Ornamental and Turf, 7A - General Structural P.C., and 7B - Termite P.C. is required for those noncertified applicators working as pesticide applicators under the direct supervision of ONLY licensed certified commercial applicators. Noncertified applicators using pesticides under the direct supervision of certified commercial applicators, certified noncommercial applicators and certified public operators in all remaining categories are not required to complete the Pesticide Technician training. | 11/13/2015 2:58 PM |
| 12 | Per statute, "Persons who hold certificates issued under the provisions of this Chapter may provide direct supervision for the application or sale of a restricted use pesticide by competent uncertified persons. The certified person shall be fully responsible for the actions of the uncertified persons under his direct supervision. The certified person shall give instruction and direction to the uncertified persons and shall be available when and if his presence is needed. The certified person need not be physically present at all times unless the commissioner by rule requires the physical presence of the certified person at the time the restricted use pesticide is sold or applied." | 11/13/2015 10:46 AM |
| 13 | We only allow a 60-day period for uncertified applicators to work, after which they must be fully certified. Basic handler training is required during this period. | 11/13/2015 8:33 AM |
| 14 | In Alaska, no training is required, but non-certified applicators must be directly supervised by a certified applicator to apply GUP or RUP commercially or apply RUPs to private land. | 11/12/2015 1:18 PM |
| 15 | Our current regulations require that non-certified applicators must receive verifiable training from a certified applicator within the first 30 days of their employment. Training records must be maintained. In addition, the non-certified must be registered with our office as a Registered Technician. Private applicators receive training from the County Extension Agents and are required to pass a written private exam administered by our Department. | 11/12/2015 12:51 PM |
| 16 | non certified applicators working with a pesticide company are trained by the company until they receive applicator certified training. | 11/12/2015 6:47 AM |
| 17 | Wisconsin requires that an applicator who uses a RUP must be certified. This applies to both private and commercial applicators. A certified applicator cannot supervise an uncertified applicator using a RUP. | 11/11/2015 3:51 PM |
| 18 | Our applicators are required to verify training by having non-certified applicator sign and date a copy of the label OR sign a training affidavit, which can be presented at time of inspection by the SLA. | 11/10/2015 5:39 PM |
| 19 | Regarding PA's. We require testing to be a PA. We allow PA's to supervise untested people, but there are constraints, such as phone contact, site specific application instructions. | 11/10/2015 5:13 PM |
| 20 | EPA's broad expansion of non-certified applicator training and requirements effectively makes it easier just to make the person get a license. | 11/10/2015 4:53 PM |

Q10 How difficult will it be for your State/Tribe/Territory to implement a proposed training/exam program for non-certified applicators?

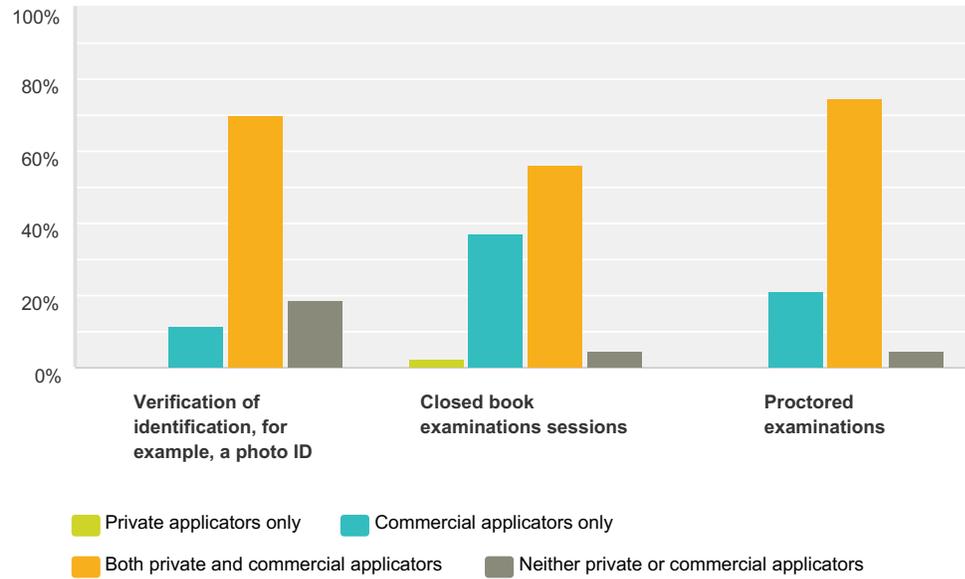
Answered: 41 Skipped: 6



| Answer Choices | Responses | |
|---|-----------|-----------|
| Very difficult | 39.02% | 16 |
| Difficult | 24.39% | 10 |
| Neither difficult or easy | 29.27% | 12 |
| Easy | 4.88% | 2 |
| Very easy | 0.00% | 0 |
| NA - Already have a training/exam program for non-certified applicators | 2.44% | 1 |
| Total | | 41 |

Q11 Which of the following does your State/Tribe/Territory currently require for applicators taking certification examinations?

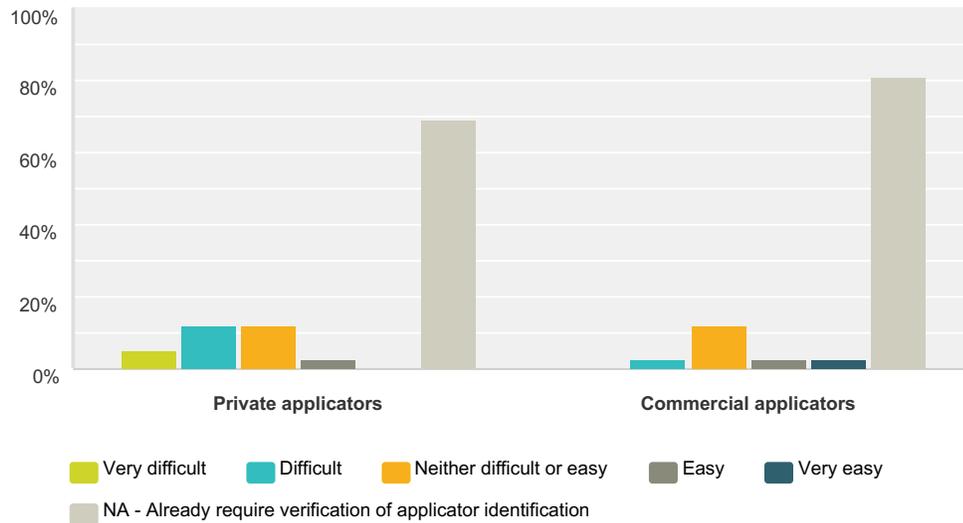
Answered: 43 Skipped: 4



| | Private applicators only | Commercial applicators only | Both private and commercial applicators | Neither private or commercial applicators | Total |
|---|--------------------------|-----------------------------|---|---|-------|
| Verification of identification, for example, a photo ID | 0.00% 0 | 11.63% 5 | 69.77% 30 | 18.60% 8 | 43 |
| Closed book examinations sessions | 2.33% 1 | 37.21% 16 | 55.81% 24 | 4.65% 2 | 43 |
| Proctored examinations | 0.00% 0 | 20.93% 9 | 74.42% 32 | 4.65% 2 | 43 |

Q12 If your State/Tribe/Territory does not currently require verification of applicator identification, for example, a photo ID, how difficult would it be to implement the proposed changes for exam security for private and commercial applicators?

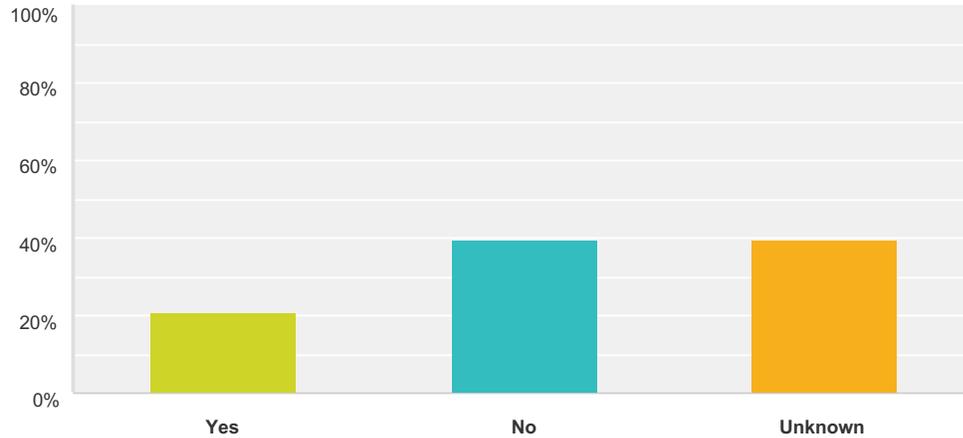
Answered: 42 Skipped: 5



| | Very difficult | Difficult | Neither difficult or easy | Easy | Very easy | NA - Already require verification of applicator identification | Total |
|------------------------|----------------|-------------|---------------------------|------------|------------|--|-------|
| Private applicators | 4.76% 2 | 11.90% 5 | 11.90% 5 | 2.38% 1 | 0.00% 0 | 69.05% 29 | 42 |
| Commercial applicators | 0.00% 0 | 2.38% 1 | 11.90% 5 | 2.38% 1 | 2.38% 1 | 80.95% 34 | 42 |

Q13 Will the proposed rule change the way you reciprocate certifications with other states?

Answered: 43 Skipped: 4



| Answer Choices | Responses |
|----------------|-----------|
| Yes | 20.93% 9 |
| No | 39.53% 17 |
| Unknown | 39.53% 17 |
| Total | 43 |

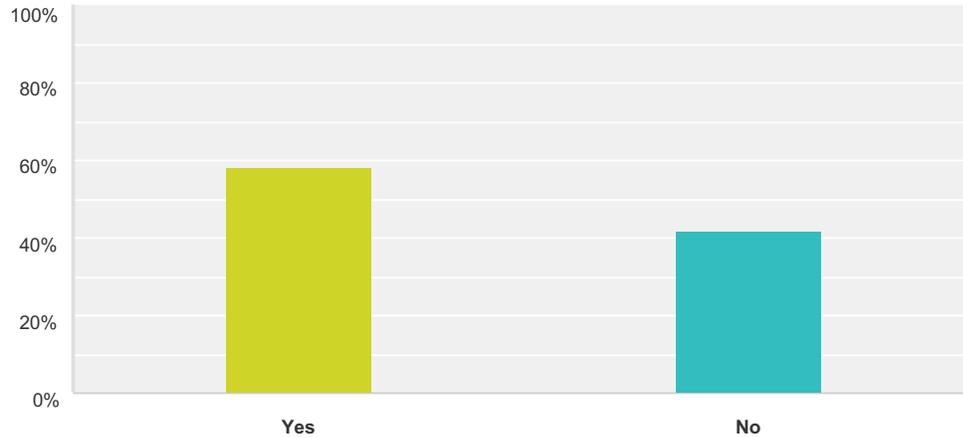
| # | If yes, please explain: | Date |
|----|---|---------------------|
| 1 | We already reciprocate whenever we can. It depends on how the implementation of training requirements and recertification categories will alter whether we can continue with reciprocation. | 11/24/2015 12:49 PM |
| 2 | Potential changes | 11/23/2015 3:49 PM |
| 3 | It really depends on how this roles out. On the ag side we have reciprocated with most everyone but not quite sure what needs to be done moving forward for the EPA clearance. | 11/20/2015 4:37 PM |
| 4 | As is, we would need to cancel some existing agreements and limit new agreements. | 11/20/2015 4:07 PM |
| 5 | Currently we just reciprocate with states that border SD, and the applicator must have tested in the bordering state. | 11/20/2015 9:50 AM |
| 6 | We currently only reciprocate with a few states that maintain similar C & T programs. This would require new agreements for reciprocity with these states. | 11/18/2015 7:08 PM |
| 7 | This may help formalize our process. | 11/17/2015 2:20 PM |
| 8 | Hope it expands the number of states | 11/17/2015 1:11 PM |
| 9 | We currently require the applicator to have tested in the State to issue a certification based on reciprocity. | 11/17/2015 1:07 PM |
| 10 | Yes, the EPA proposed changes and our ability to amend our statutes and regulations may directly affect our ability to maintain reciprocal agreements. | 11/13/2015 2:58 PM |
| 11 | Maybe, has not been discussed yet | 11/13/2015 1:52 PM |
| 12 | We currently offer reciprocity with any state that has equal or higher standards of competency. EPA's proposal would possibly force us to revise that, and we do not have the resources to do so. | 11/13/2015 8:33 AM |
| 13 | We currently do not recepricate Structrural Pest Control Licenses | 11/12/2015 3:54 PM |

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|----|---|---------------------|
| 14 | Because Wisconsin does not use continuing education credits some of our existing challenges with reciprocity will remain. The new aerial, soil and non-soil fumigation certification categories will may make reciprocity for these categories easier. Differences between state categories will continue to pose difficulties. | 11/11/2015 3:51 PM |
| 15 | We currently reciprocate on a case by case basis w/ requirement to provide official licensing certification documentation from original state to review and determine reciprocity. Initial time only so must meet NM requirements to recertify. | 11/11/2015 12:17 AM |
| 16 | If passed as proposed we would no longer have the time to deal with reciprocal licenses. | 11/10/2015 5:13 PM |

Q14 Will the proposed maximum recertification cycle of 3 years require a change in your state?

Answered: 43 Skipped: 4



| Answer Choices | Responses | |
|----------------|-----------|-----------|
| Yes | 58.14% | 25 |
| No | 41.86% | 18 |
| Total | | 43 |

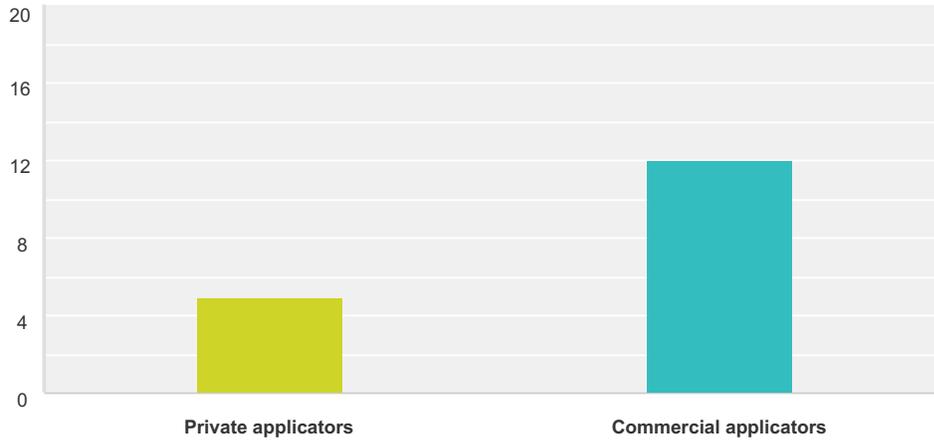
| # | If yes, please explain: | Date |
|----|--|---------------------|
| 1 | Yes, we've had a 5 year recertification cycle for all applicators, Private and Commercial for over 25 years. | 11/24/2015 12:49 PM |
| 2 | Private certifications are currently on 5 year recertification cycles. | 11/24/2015 10:59 AM |
| 3 | will need changes in the regulation and increase the number of training section need that will provoke more human resource. The economy of the PR will dificult this implemetation.. | 11/24/2015 8:47 AM |
| 4 | Private applicator certification is currently every 5 years. A change in the regulations will be required. | 11/20/2015 5:40 PM |
| 5 | We currently have a 1 year cycle, but if the CEUs role out as proposed this will certainly be changed. | 11/20/2015 4:37 PM |
| 6 | Current recertification in 5 years. Will require changes to invoicing process and databases. | 11/20/2015 3:49 PM |
| 7 | Private applicators currently recertify every 5 years and this is set in statute. | 11/20/2015 12:58 PM |
| 8 | Our recertification period is 4 years for most license types. A change to 3 years would require extensive time and money spent to realign our statutes, regulations, policies, computer programming, applicator databases, website revisions, revenue and billing cycles, and internal administration and management structures. There will be an increase in paperwork and frequency of license turnaround requiring an increase in staff. License fees may need to be changed to account for the shorter recertification period which would require additional statutory change. | 11/20/2015 10:01 AM |
| 9 | Currently we are two years | 11/20/2015 9:50 AM |
| 10 | All commercial ground applicator certification cycles are currently at 5 years. Aerial applicators are currently on a 2 year certification cycle. Private applicators are on a 3 year cycle | 11/20/2015 9:00 AM |
| 11 | Our certification period is currently 5 years | 11/17/2015 11:03 AM |
| 12 | Yes, only for our Certified Private Applicators. | 11/13/2015 2:58 PM |
| 13 | We currently have a 5 year requirement | 11/12/2015 3:54 PM |
| 14 | Unable to currently keep track of whether or not at least half of the required credits were obtained in the last 18 months of certification | 11/12/2015 1:06 PM |

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|----|--|---------------------|
| 15 | No, for private applicators, as our current regulations are for recertification every 3 years. However, are commercial applicators are required to attend recertification meetings annually in order to renew their certificates | 11/12/2015 12:51 PM |
| 16 | Just made that change to our rules. | 11/12/2015 10:39 AM |
| 17 | Our current re-certification is 4 years the statute would have to be changed. | 11/12/2015 6:47 AM |
| 18 | We currently use a 5 year certification cycle. State statute and rules will need be revised. The shorter certification period is expected to require more staff time and IT resources. Revising exams and training manuals will also become more challenging. Applicators must recertify by examination, CEUs are not used | 11/11/2015 3:51 PM |
| 19 | We currently have a five year cycle. | 11/11/2015 8:43 AM |
| 20 | Only for private applicators | 11/11/2015 12:17 AM |
| 21 | Texas requires a yearly recertification cycle for commercial applicators; and a 5 year recert cycle for private applicators. | 11/10/2015 5:39 PM |
| 22 | We currently have a 5 year cycle. It would require legislative change | 11/10/2015 5:13 PM |
| 23 | Private applicators are currently on a 5 year recertification period and Commercial applicators are on a 4 year recertification period. | 11/10/2015 5:08 PM |
| 24 | For private applicators only, it will move them from 5 years to 3 years. Our recert. cycle for commercial is already 3 years. By changing the private applicator cycle it will increase our annual workload by 60%. | 11/10/2015 4:53 PM |

Q15 How many CEUs does your State/Tribe/Territory currently require for private and commercial applicators?

Answered: 41 Skipped: 6



| Answer Choices | Average Number | Total Number | Responses |
|------------------------------|----------------|--------------|-----------|
| Private applicators | 5 | 204 | 41 |
| Commercial applicators | 12 | 492 | 41 |
| Total Respondents: 41 | | | |

| # | Private applicators | Date |
|----|---------------------|---------------------|
| 1 | 20 | 11/24/2015 12:49 PM |
| 2 | 0 | 11/24/2015 10:59 AM |
| 3 | 0 | 11/24/2015 8:47 AM |
| 4 | 6 | 11/21/2015 10:55 AM |
| 5 | 0 | 11/20/2015 5:40 PM |
| 6 | 3 | 11/20/2015 4:37 PM |
| 7 | 3 | 11/20/2015 4:07 PM |
| 8 | 24 | 11/20/2015 3:49 PM |
| 9 | 8 | 11/20/2015 10:01 AM |
| 10 | 0 | 11/20/2015 9:50 AM |
| 11 | 4 | 11/20/2015 9:00 AM |
| 12 | 0 | 11/19/2015 5:32 PM |
| 13 | 6 | 11/19/2015 10:10 AM |
| 14 | 0 | 11/18/2015 7:08 PM |
| 15 | 8 | 11/17/2015 2:20 PM |
| 16 | 6 | 11/17/2015 1:11 PM |
| 17 | 0 | 11/17/2015 1:07 PM |
| 18 | 16 | 11/17/2015 11:03 AM |

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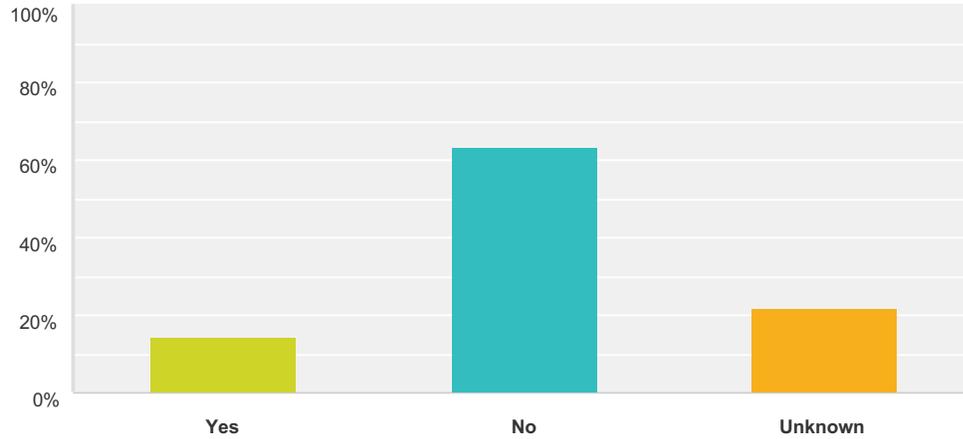
| | | |
|----------|-------------------------------|---------------------|
| 19 | 0 | 11/13/2015 2:58 PM |
| 20 | 3 | 11/13/2015 1:52 PM |
| 21 | 0 | 11/13/2015 10:46 AM |
| 22 | 3 | 11/13/2015 8:33 AM |
| 23 | 3 | 11/12/2015 3:54 PM |
| 24 | 6 | 11/12/2015 1:18 PM |
| 25 | 3 | 11/12/2015 1:06 PM |
| 26 | 4 | 11/12/2015 12:51 PM |
| 27 | 6 | 11/12/2015 10:39 AM |
| 28 | 3 | 11/12/2015 9:45 AM |
| 29 | 0 | 11/12/2015 7:50 AM |
| 30 | 0 | 11/12/2015 6:47 AM |
| 31 | 0 | 11/11/2015 3:51 PM |
| 32 | 1 | 11/11/2015 8:43 AM |
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| 36 | 15 | 11/10/2015 5:39 PM |
| 37 | 3 | 11/10/2015 5:18 PM |
| 38 | 6 | 11/10/2015 5:13 PM |
| 39 | 20 | 11/10/2015 5:10 PM |
| 40 | 6 | 11/10/2015 5:08 PM |
| 41 | 0 | 11/10/2015 4:53 PM |
| # | Commercial applicators | Date |
| 1 | 40 | 11/24/2015 12:49 PM |
| 2 | 8 | 11/24/2015 10:59 AM |
| 3 | 12 | 11/24/2015 8:47 AM |
| 4 | 20 | 11/21/2015 10:55 AM |
| 5 | 0 | 11/20/2015 5:40 PM |
| 6 | 6 | 11/20/2015 4:37 PM |
| 7 | 7 | 11/20/2015 4:07 PM |
| 8 | 24 | 11/20/2015 3:49 PM |
| 9 | 20 | 11/20/2015 10:01 AM |
| 10 | 0 | 11/20/2015 9:50 AM |
| 11 | 10 | 11/20/2015 9:00 AM |
| 12 | 30 | 11/19/2015 5:32 PM |
| 13 | 8 | 11/19/2015 10:10 AM |
| 14 | 12 | 11/18/2015 7:08 PM |
| 15 | 16 | 11/17/2015 2:20 PM |
| 16 | 8 | 11/17/2015 1:11 PM |
| 17 | 0 | 11/17/2015 1:07 PM |

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| | | |
|----|----|---------------------|
| 18 | 40 | 11/17/2015 11:03 AM |
| 19 | 0 | 11/13/2015 2:58 PM |
| 20 | 3 | 11/13/2015 1:52 PM |
| 21 | 0 | 11/13/2015 10:46 AM |
| 22 | 3 | 11/13/2015 8:33 AM |
| 23 | 25 | 11/12/2015 3:54 PM |
| 24 | 6 | 11/12/2015 1:18 PM |
| 25 | 5 | 11/12/2015 1:06 PM |
| 26 | 8 | 11/12/2015 12:51 PM |
| 27 | 9 | 11/12/2015 10:39 AM |
| 28 | 18 | 11/12/2015 9:45 AM |
| 29 | 9 | 11/12/2015 7:50 AM |
| 30 | 0 | 11/12/2015 6:47 AM |
| 31 | 0 | 11/11/2015 3:51 PM |
| 32 | 20 | 11/11/2015 8:43 AM |
| 33 | 4 | 11/11/2015 12:17 AM |
| 34 | 15 | 11/10/2015 7:04 PM |
| 35 | 9 | 11/10/2015 6:07 PM |
| 36 | 5 | 11/10/2015 5:39 PM |
| 37 | 6 | 11/10/2015 5:18 PM |
| 38 | 20 | 11/10/2015 5:13 PM |
| 39 | 30 | 11/10/2015 5:10 PM |
| 40 | 12 | 11/10/2015 5:08 PM |
| 41 | 24 | 11/10/2015 4:53 PM |

Q16 Do you agree with the EPA's Proposal to require 6 CEUs for the core and 3 CEUs per category in a 3 year period for private applicators?

Answered: 41 Skipped: 6



| Answer Choices | Responses |
|----------------|-----------|
| Yes | 14.63% 6 |
| No | 63.41% 26 |
| Unknown | 21.95% 9 |
| Total | 41 |

| # | If no, please explain: | Date |
|----|---|---------------------|
| 1 | We believe this is arbitrary and we already have a good program that works, trains applicators well and isn't as burdensome for state recordkeeping or applicators time commitment and cost. | 11/24/2015 12:49 PM |
| 2 | Too many core hours on general topics. There's not enough new information for that many hours. We want to advance knowledge - not repeat ad nauseam the same information year after year. | 11/24/2015 10:59 AM |
| 3 | Our system follows a CIC format. Shifting over to a CEU system will be a totally different system. | 11/23/2015 3:49 PM |
| 4 | For now, private applicators are not required to maintain CEUs and there are no sub-categories for private applicators. The average training for private applicators in MS is 3 hours which would double with the rule change. Also, the rule would require a database change for us while currently working in an out-dated system. | 11/20/2015 5:40 PM |
| 5 | Some categories don't need this. Who is going to provide all the training and materials? What is the problem that is being fixed? | 11/20/2015 4:37 PM |
| 6 | We strongly support training over testing as a recertification option. However, support for raising the training bar this high will require an investment of substantially more resources (more program costs) and place a larger burden on the applicator (much more time). The applicator is likely opt out a training and retest because it will become the easier option (bad outcome). Nevertheless, more testing will result in more program costs. | 11/20/2015 4:07 PM |
| 7 | Current recertification is 5 years. | 11/20/2015 3:49 PM |
| 8 | We do not object to the 6 CORE and 3 category CEUs for Private, but do not agree with the 3 year period for recertification for the reasons above. | 11/20/2015 10:01 AM |
| 9 | impossible to track credits for 5,000 plus applicators, do not have the staffing, would drain the budget, SD would not have a strong C & T program | 11/20/2015 9:50 AM |
| 10 | The 6 CEU core requirement is too high. | 11/20/2015 9:00 AM |

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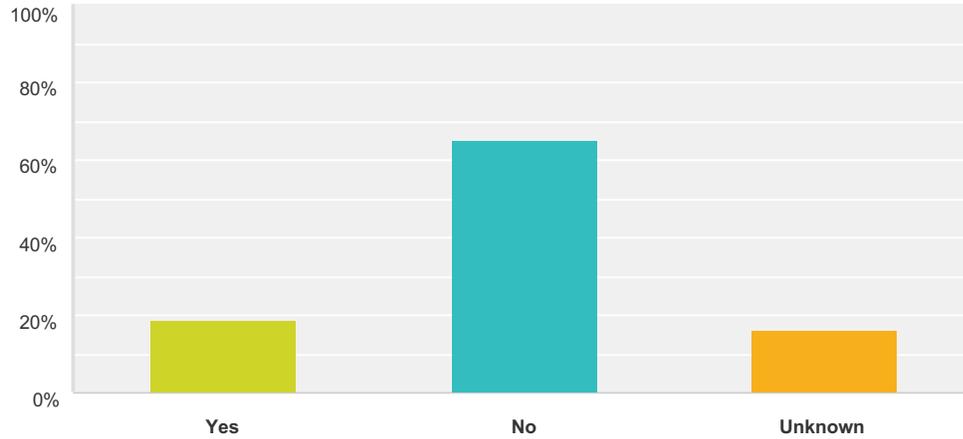
| | | |
|----|--|---------------------|
| 11 | We require a recertification training that is similar to the initial certification training and testing for private applicators. Funding is not available to implement this CEU requirement as well. | 11/18/2015 7:08 PM |
| 12 | to long of a requirement for the limited required safety information | 11/17/2015 1:11 PM |
| 13 | NO. MO does not agree with the idea of moving to a CEU program. MO requires private applicators to recertify for renewal by attending an approved training program provided by MU Extension every five (5) years. | 11/13/2015 2:58 PM |
| 14 | Not discussed/no decision made at this time | 11/13/2015 1:52 PM |
| 15 | Requiring this much training will push many applicators toward the exam or study manual option, which in turn circumvents the training we want them to attend. | 11/13/2015 8:33 AM |
| 16 | Because core competency is built into initial training and most CEU courses include some core competency. | 11/12/2015 3:54 PM |
| 17 | Too time consuming, training will be redundant, licensees will retest and never receive information on new/emerging technology and rules because it will be easier to just retake the exams they have already passed | 11/12/2015 1:06 PM |
| 18 | We currently require private applicators to obtain 4 CEUs in a 3 year period and it has worked well for us. Many private applicators are employed off their farms and would have difficulty in attending additional meeting. | 11/12/2015 12:51 PM |
| 19 | TDA has never required CEU's or required testing for Private Applicators. The Extension Service provides training and a pre and post test for privates. | 11/12/2015 7:50 AM |
| 20 | This increases the number of classes given per year by Extension Services and new funding will be required. | 11/12/2015 6:47 AM |
| 21 | Don't think necessary for every single category...if too many required, ends up diluting quality of content as they hear same over and over if there isn't new info. In NM we likely might not get enough training available to cover this in an adequate timeframe and enough locations statewide to meet that level of need. | 11/11/2015 12:17 AM |
| 22 | This will require major programming in our license program. All states have issues with keeping full staff in IT and getting major programming done is difficult and often takes at least 3-5 years to get it done. This will also make it difficult to keep a private applicator license and will drive up the cost to control pest problems, due to having to pay for professional applications. | 11/10/2015 7:04 PM |
| 23 | This requirement will be extremely costly and difficult for a commercial applicator to obtain. It will have the opposite effect and drive applicators to retest, rather than participate in CEU sessions. The cost to take a CEU course in Colorado, and obtain the number of CEUs proposed, would be more than to just retest. | 11/10/2015 6:07 PM |
| 24 | In Texas, we have required CEUs of our applicators since 1990. First, we feel our current requirements are just right. Second, it has been our experience that some CEUs are extremely difficult to attain b/c of a lack of material to cover in the training. We have found that this training material becomes redundant w/o the requirement for core and category specific training. Adding that requirement will likely exacerbate that problem. | 11/10/2015 5:39 PM |
| 25 | There is no evidence that going to 6 hours of core will improve applicator competence. We support 3 of core and 3 of category. | 11/10/2015 5:18 PM |
| 26 | Core is an arbitrary concept. Additionally, the high number of hours would result in more retesting. | 11/10/2015 5:13 PM |

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| | | |
|-----------|---|---------------------------|
| <p>27</p> | <p>CEUs. States can be equal to or more restrictive of FIFRA. Wyoming for example requires a flat 24 CEUs, no matter how many categories a person has, and those CEUs can be in any related pesticide / biological / pest / safety areas. A number of issues here based on the current structure of the program, staff and comments from industry this week, and from the other states. Thoughts from states include • a minimum number of CEUs are always required, with a cap on the maximum needed to renew and not necessarily a fixed number per category. CEUs can be earned anytime during the valid term of the license, not one-half earned within the 18 months immediately prior to the license expiration date. Michelle Arling indicated the required number of CEUs be for the PRIMARY category only, NOT sub-categories. Example. Agricultural Pest Control is one category. States have sub-categories of Ag weed; Ag insect; Ag disease; Animal Control; rodent control; chemigation. Some states interpret this as, the applicator would need as proposed: 6 CEUs in the General Core - and - 6 CEUs in Agricultural Pest Control - and - NOT 6 CEUs in each sub-category. One state commented their license has 11 primary categories plus the core. Under the EPA proposal this applicator would need to obtain 72 hours of CEUs to recertify, with one-half of those earned in the 18 months immediately before the expiration date of the license. If the applicator gets credits for each sub-category, then that number jumps to 28 categories or 168 hours to recertify. • Tracking of CEUs, including validating if one-half are earned in the 18 months immediately prior to the expiration date of the license will be complex and resource intensive. States will be required to develop and utilize an online database, with user account features and the applicator will out of necessity do all their own tracking. The proposal will require both private and commercial applicators (in Wyoming 6,251 individuals) to be tracked. Bids currently received to develop such a system was in excess of \$58,000. • State re-certification seminars will require extensive restructuring. To offer enough CEUs for each category will require a state to offer 120 hours of recertification credits using 3 concurrent sessions, it will take a full 40 hour week to provide the course material. If eliminated, the applicators will have to seek alternative methods of re-certification, either online or other training / meeting opportunities and then they would have to report their training to the state, who would have to validate for each and every person (thousands of individuals). . • In the current system CEUs are manageable. A state could consider requiring a set number in core, safety, specific category, etc. , but Reg 8 states have expressed serious concern and dismay over the requirement to earn 6 in the core, and then 6 for each category. In addition, under the proposal, both commercial and private applicators will be held to this standard. Private applicators will be a significant challenge. A state will require a full time pesticide program coordinator to achieve the goals as proposed by EPA. One state said “ the 50 minutes = one (1) CEU really doesn’t make sense. Make it one hour (60 minutes) for one CEU with a 10 minute tolerance, plus or minus. We’ll just round it off to one hour anyway. This is viewed as over-kill to retain a license.” • Region 8 states have indicated it will be quicker, easier, and cheaper just to retake the exams, and forgo all the hassle of tracking CEUs and the cost to attend or do online recertification courses. In addition, having to complete more CEUs eventually will lead to the coursework becoming redundant, e.g. Ag Pest CEUs will be similar to Ornamental Pest. States are saying “Making it harder to retain a license is not the answer”. The excessive training requirements for getting a new licence will encourage applicators to skip all the training and bank on the fact they can pass the exam, which defeats the purpose that the applicator stays up-to-date on pesticides and their application. • Many of the applicators are saying they will drop all categories and only keep what they absolutely need to do their job.</p> | <p>11/10/2015 4:53 PM</p> |
|-----------|---|---------------------------|

Q17 Do you agree with the EPA's Proposal to require 6 CEUs for the core and 6 CEUs per category in a 3 year period for commercial applicators?

Answered: 43 Skipped: 4



| Answer Choices | Responses | |
|----------------|-----------|-----------|
| Yes | 18.60% | 8 |
| No | 65.12% | 28 |
| Unknown | 16.28% | 7 |
| Total | | 43 |

| # | Please explain: | Date |
|---|---|---------------------|
| 1 | We believe this is arbitrary and we already have a good program that works, trains applicators well and isn't as burdensome for state recordkeeping or applicators time commitment and cost. We believe this will force applicators to re-test rather than try to comply with this expensive change to their training. | 11/24/2015 12:49 PM |
| 2 | Too many core hours on general topics. Required hours should be category specific. For example, seed treatment - it would be extremely difficult to fill 12 hours even throwing in content that would clearly be a waste of everyone's time. | 11/24/2015 10:59 AM |
| 3 | We already have a 12 credits program for the category 8A | 11/24/2015 8:47 AM |
| 4 | CEU system is a totally different system and the current state training program has different components. | 11/23/2015 3:49 PM |
| 5 | We would recommend limiting to 1 or 2 CEUs max per category with a set total CEUs required per renewal cycle. 6 CEUs seems excessive and will likely be repetitive as some of the category competencies overlap. For some categories or specialized approved subcategories, there is not enough information to cover 6 CEUs. We suggest the max CEUs be set at 20 CEUs per renewal cycle. | 11/21/2015 10:55 AM |
| 6 | The proposal would cost us time, resources, and a complete overhaul of our database to keep track of the required CEUs. Furthermore, we would be required to come up with a system for CEUs since our state does not currently have one. | 11/20/2015 5:40 PM |
| 7 | See above. | 11/20/2015 4:37 PM |
| 8 | We strongly support training over testing as a recertification option. However, support for raising the training bar this high will require an investment of substantially more resources (more program costs) and place a larger burden on the applicator (much more time). The applicator is likely opt out a training and retest because it will become the easier option (bad outcome). Nevertheless, more testing will result in more program costs. | 11/20/2015 4:07 PM |
| 9 | Current recertification is 5 years. | 11/20/2015 3:49 PM |

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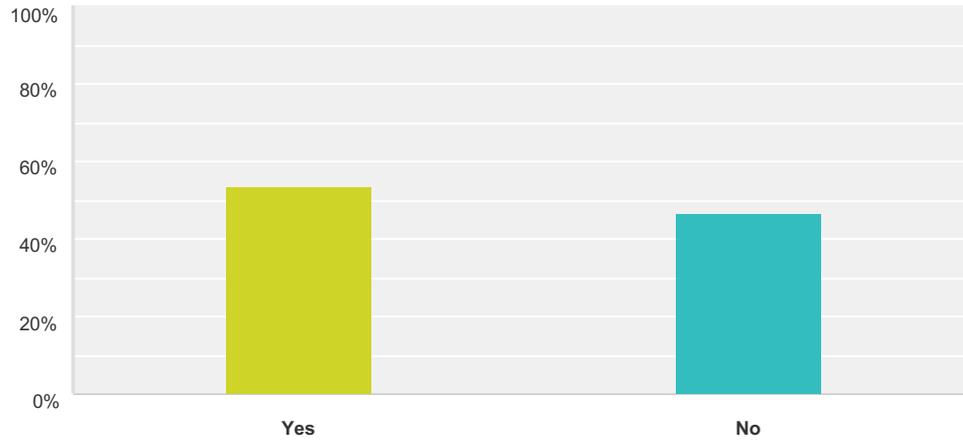
| | | |
|----|--|---------------------|
| 10 | Finding 6 credits in some of the "minor" categories will be impossible and applicators can not repeat courses more than once in a cycle and never within 12 months. | 11/20/2015 12:58 PM |
| 11 | We do not object to the 6 CORE and 6 category CEUs for Commercial applicators, but do not agree with the 3 year period for recertification for the reasons above. | 11/20/2015 10:01 AM |
| 12 | impossible to track credits for 3,000 plus applicators, do not have the staffing, would drain the budget, SD would not have a strong C & T program; commercial applicator are tough to find for ag retailers, this would make it harder or force applicator to apply without the proper certification | 11/20/2015 9:50 AM |
| 13 | The proposed CEUs are too burdensome for applicators, especially if they hold multiple categories. The time and expense of attending the amount of training proposed will lead applicators to recertifying by exam every three years instead of attending the latest, most specific up-to-date training sessions. | 11/20/2015 9:00 AM |
| 14 | we do not require Any core ceus for com certificates | 11/19/2015 10:10 AM |
| 15 | The core requirements of safety, regulations, equipment calibration is crucial to protect consumers and the environment. The category specific training is important but the information covered in the training is more focused on job/application efficiency rather than consumer/environment/applicator protection, which is truly most important. | 11/18/2015 7:08 PM |
| 16 | to long of a requirement for the limited required safety information some categories - seed treatment for example-- what new will there be to say | 11/17/2015 1:11 PM |
| 17 | NO. MO does not agree with the idea of moving to a CEU program. MO requires certified commercial applicators, certified noncommercial applicators, certified public operators and licensed pesticide technicians to recertify for renewal by attending an approved training program provided by MU Extension, industry sponsored program/course, or by re-examination every three (3) years. | 11/13/2015 2:58 PM |
| 18 | Not discussed/no decision made at this time | 11/13/2015 1:52 PM |
| 19 | Same reason as above, plus the incredible burden this places on applicators and university extension alike. There is simply not enough information available that would occupy 6 hours of training, the cost to applicators would triple to pay for the meeting, plus the added cost of multiple trips to numerous meetings. The cost to our state to create a CEU program that isn't really warranted is also a serious concern. | 11/13/2015 8:33 AM |
| 20 | Core training is currently not required and licensees and there is currently no courses for this requirement. | 11/12/2015 3:54 PM |
| 21 | Too time consuming, training will be redundant, licensees will retest and never receive information on new/emerging technology and rules because it will be easier to just retake the exams they have already passed | 11/12/2015 1:06 PM |
| 22 | We currently require commercial applicators to obtain 8 CEUs annually in order to renew their pesticide applicator certificates | 11/12/2015 12:51 PM |
| 23 | Some of our categories already have a hard time finding classes that cover the category. Such as Forestry, Aquatic Weed. | 11/12/2015 9:45 AM |
| 24 | TDA has had required CEU's for many years and this is already in place. | 11/12/2015 7:50 AM |
| 25 | This increases the number of classes given per year by Extension Services and new funding will be required. | 11/12/2015 6:47 AM |
| 26 | More applicable for commercial applicators but still think shouldn't assign by each and every category. in a state revision we were proposing grouping of categories (ag, stru., O&t, etc.) with some categories still being individual categories - ex. seed treatment, public health, etc. and some requiring more ceus - wood destroying org. and fumigation. May end up causing more to just test every time which diminishes the intent of continuing education. | 11/11/2015 12:17 AM |
| 27 | Again, this would take major program changes that we can not afford, nor have time to get accomplished. Many commercial applicators have over 5 categories on their license and this change would force them to take more time off to find specific training for their license. Smaller categories in Idaho will be hard to find and might require significant travel. They could take recertification tests, but each test takes about an hour to complete and would require multiple trips to a test facility to take the tests for all categories. I have 7 categories on my license. | 11/10/2015 7:04 PM |
| 28 | This requirement will be extremely costly and difficult for a commercial applicator to obtain. It will have the opposite effect and drive applicators to retest, rather than participate in CEU sessions. The cost to take a CEU course in Colorado, and obtain the number of CEUs proposed, would be more than to just retest. | 11/10/2015 6:07 PM |
| 29 | Absolutely NOT. Many of our commercial applicators have at least 3-4 categories. Assuming an applicator has 4 categories, the proposed EPA rule would double the CEU requirement for applicators in Texas. We have a difficult enough time now getting them to attend 5 CEUs/year. Additionally, we would have to double our staff to keep up with the number of CEU courses that would be required to fulfill the proposed EPA rules. | 11/10/2015 5:39 PM |
| 30 | There is no evidence that going to 6 hours of core will improve applicator competence. We support 3 of core and 3 of category. | 11/10/2015 5:18 PM |

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| | | |
|----|--|--------------------|
| 31 | <p>Core is arbitrary. I can easily make the argument that most topics could be considered core. Anecdotally, I researched individual applicators in our state and found that during their re-certification cycle they were receiving basic safety information.</p> | 11/10/2015 5:13 PM |
| 32 | <p>CEUs. States can be equal to or more restrictive of FIFRA. Wyoming for example requires a flat 24 CEUs, no matter how many categories a person has, and those CEUs can be in any related pesticide / biological / pest / safety areas. A number of issues here based on the current structure of the program, staff and comments from industry this week, and from the other states. Thoughts from states include</p> <ul style="list-style-type: none"> • a minimum number of CEUs are always required, with a cap on the maximum needed to renew and not necessarily a fixed number per category. CEUs can be earned anytime during the valid term of the license, not one-half earned within the 18 months immediately prior to the license expiration date. Michelle Arling indicated the required number of CEUs be for the PRIMARY category only, NOT sub-categories. Example. Agricultural Pest Control is one category. States have sub-categories of Ag weed; Ag insect; Ag disease; Animal Control; rodent control; chemigation. Some states interpret this as, the applicator would need as proposed: 6 CEUs in the General Core - and - 6 CEUs in Agricultural Pest Control - and - NOT 6 CEUs in each sub-category. One state commented their license has 11 primary categories plus the core. Under the EPA proposal this applicator would need to obtain 72 hours of CEUs to recertify, with one-half of those earned in the 18 months immediately before the expiration date of the license. If the applicator gets credits for each sub-category, then that number jumps to 28 categories or 168 hours to recertify. • Tracking of CEUs, including validating if one-half are earned in the 18 months immediately prior to the expiration date of the license will be complex and resource intensive. States will be required to develop and utilize an online database, with user account features and the applicator will out of necessity do all their own tracking. The proposal will require both private and commercial applicators (in Wyoming 6,251 individuals) to be tracked. Bids currently received to develop such a system was in excess of \$58,000. • State re-certification seminars will require extensive restructuring. To offer enough CEUs for each category will require a state to offer 120 hours of recertification credits using 3 concurrent sessions, it will take a full 40 hour week to provide the course material. If eliminated, the applicators will have to seek alternative methods of re-certification, either online or other training / meeting opportunities and then they would have to report their training to the state, who would have to validate for each and every person (thousands of individuals). • In the current system CEUs are manageable. A state could consider requiring a set number in core, safety, specific category, etc. , but Reg 8 states have expressed serious concern and dismay over the requirement to earn 6 in the core, and then 6 for each category. In addition, under the proposal, both commercial and private applicators will be held to this standard. Private applicators will be a significant challenge. A state will require a full time pesticide program coordinator to achieve the goals as proposed by EPA. One state said “ the 50 minutes = one (1) CEU really doesn’t make sense. Make it one hour (60 minutes) for one CEU with a 10 minute tolerance, plus or minus. We’ll just round it off to one hour anyway. This is viewed as over-kill to retain a license.” • Region 8 states have indicated it will be quicker, easier, and cheaper just to retake the exams, and forgo all the hassle of tracking CEUs and the cost to attend or do online recertification courses. In addition, having to complete more CEUs eventually will lead to the coursework becoming redundant, e.g. Ag Pest CEUs will be similar to Ornamental Pest. States are saying “Making it harder to retain a license is not the answer”. The excessive training requirements for getting a new licence will encourage applicators to skip all the training and bank on the fact they can pass the exam, which defeats the purpose that the applicator stays up-to-date on pesticides and their application. • Many of the applicators are saying they will drop all categories and only keep what they absolutely need to do their job. | 11/10/2015 4:53 PM |

Q18 Does your State/Tribe/Territory currently have sub-categories of certification for commercial applicators, for example, IPM inSchools or Bed Bugs under broader categories of certification, for example, General Pest Control?

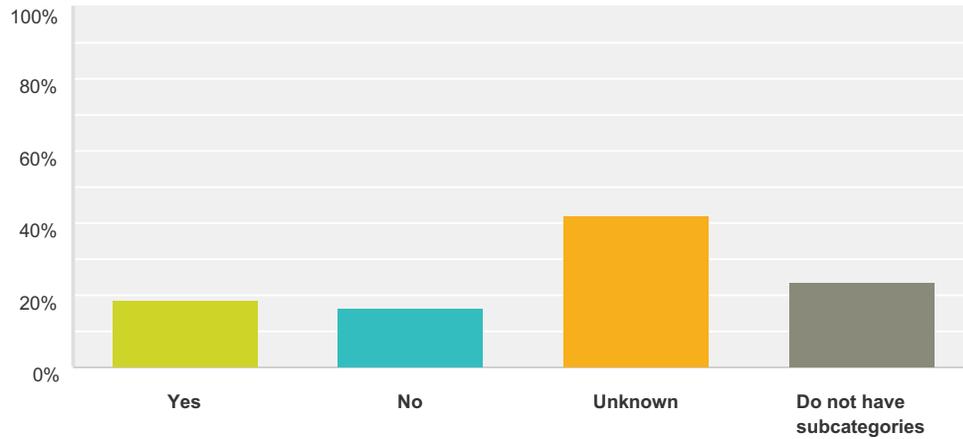
Answered: 43 Skipped: 4



| Answer Choices | Responses | |
|----------------|-----------|-----------|
| Yes | 53.49% | 23 |
| No | 46.51% | 20 |
| Total | | 43 |

Q19 Assuming implementation of the rule as it is currently proposed, would you require additional CEUs for any subcategories (6 CORE/6 per category/6 per sub-category in a 3 year period)?

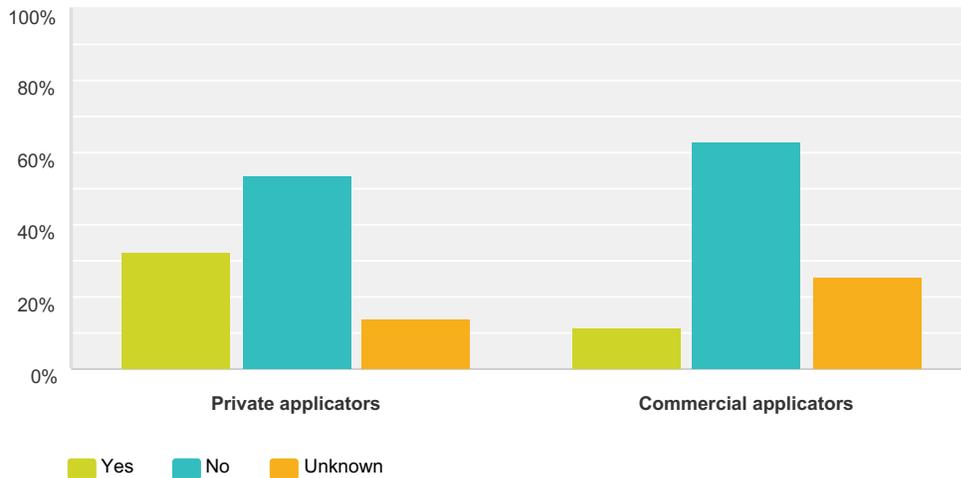
Answered: 43 Skipped: 4



| Answer Choices | Responses | |
|---------------------------|-----------|-----------|
| Yes | 18.60% | 8 |
| No | 16.28% | 7 |
| Unknown | 41.86% | 18 |
| Do not have subcategories | 23.26% | 10 |
| Total | | 43 |

Q20 The proposed rule only applies to RUPs. Assuming it is adopted as written, will your State/Tribe/Territory differentiate between applicators of RUPs and GUPs within your certification program when implementing these requirements?

Answered: 43 Skipped: 4



| | Yes | No | Unknown | Total |
|------------------------|--------------|--------------|--------------|-------|
| Private applicators | 32.56% 14 | 53.49% 23 | 13.95% 6 | 43 |
| Commercial applicators | 11.63% 5 | 62.79% 27 | 25.58% 11 | 43 |

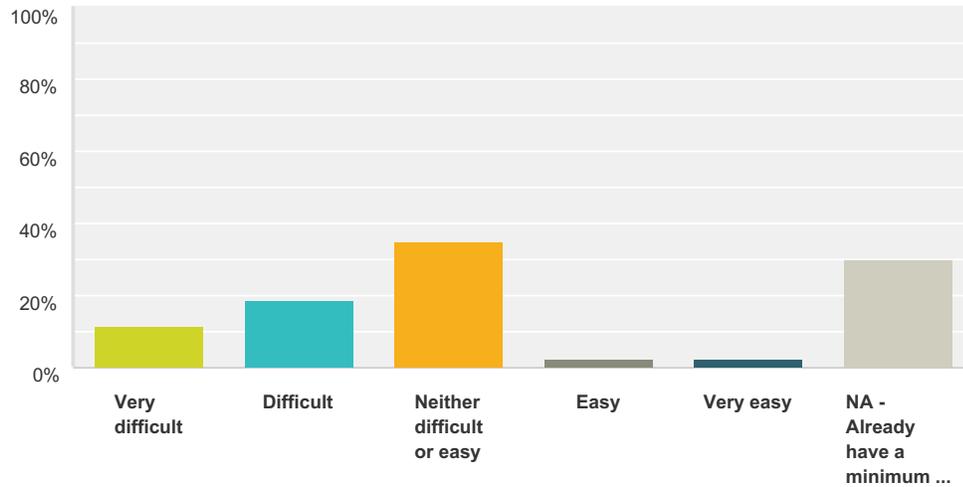
| # | Please provide any additional information: | Date |
|----|---|---------------------|
| 1 | This would be too difficult to track. The applicators may use RUP's and GUP's in their business. Very few Commercial Applicators use RUP's - mostly just fumigant users or Agriculture at this point. This would be virtually impossible to implement or build a database for. Our applicators already keep extensive records for this kind of data as do our dealers related to RUP's. | 11/24/2015 12:49 PM |
| 2 | Exception for commercial applicators are those working for a government agency or a non-pesticide business such as a golf course. | 11/24/2015 10:59 AM |
| 3 | Currently, the state certifies commercial applicators that use both general use and restricted use products. | 11/23/2015 3:49 PM |
| 4 | It would be extremely difficult to operate a two tier system. | 11/20/2015 4:37 PM |
| 5 | The Minnesota Pesticide Law requires that any commercial applicator must be licensed/certified where they apply RUP or GUP. The rule will not affect private applicator certification. | 11/20/2015 4:07 PM |
| 6 | There are currently some pest control licenses on a 4 year term that would be moving to a 3 year however they are not allowed to use RUPs so many of these changes would not apply. | 11/20/2015 10:01 AM |
| 7 | All applicator use and RUP at some point. | 11/20/2015 9:50 AM |
| 8 | we have com license for people who only apply GUPs | 11/19/2015 10:10 AM |
| 9 | This is dependent on the state legislature and our regulated community. | 11/13/2015 2:58 PM |
| 10 | There likely no states that can afford to run parallel programs, one for RUP applicators and a second for everyone else. The proposed rule needs to take ALL applicators into account for the economic assessment. | 11/13/2015 8:33 AM |

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| | | |
|----|--|---------------------|
| 11 | In Alaska, commercial pesticide applicators must be certified, regardless whether GUP/RUP. This will not change. | 11/12/2015 1:18 PM |
| 12 | Currently we require commercial applicators to be licensed whether it is an RUP or not. We may need to no longer require this and thus have less of a presence and impact on commercial applications of general use pesticides. | 11/12/2015 1:06 PM |
| 13 | No sure at this points as it would not make sense to differentiate between applicators of RUP's and GUP's. Private applicators apply both RUP's and GUP's, as do commercial and public agency pesticide applicators. | 11/12/2015 12:51 PM |
| 14 | The current rule references both RUP and GUP for commercial applicators | 11/12/2015 7:50 AM |
| 15 | Currently all private applicator using RUPs must be certified (no supervision of uncertified applicators allowed), and commercial applicators must be certified to use any RUP or GUP for-hire. | 11/11/2015 3:51 PM |
| 16 | So few applicators use RUPs that if we totally focus on RUPs we would have a program that misses the largest group which is non-RUP users. It is just as important and in terms of amount used, more important that those using GUP pesticides are also competent to make applications. Historically more RUPs were used so it was an important group to focus on but today, that is no longer the case. RUPs are only 28% of the total products registered in our state. GUPs can and do cause significant problems with misuse. Less than 2% on enforcement actions involve RUP products. Currently we spend time educating agricultural producers who use any pesticide yet funding to support certification is based only on those who get licensed to use an RUP which is decreasing annually yet there are actually more individuals attending trainings. We understand the focus of FIFRA is RUPs but that is not the case of state programs in these days and times. | 11/11/2015 12:17 AM |
| 17 | At our agency we regulate both structural and ag applicators. Our structural applicators who make pesticide applications (for hire) are required to certify regardless of use type; this includes those who use pesticides in school and government settings. In ag pesticide applications, only users of RUP (and state-limited) pesticides are required to be certified. | 11/10/2015 5:39 PM |
| 18 | It is possible that we may have different certification standards for RUP vs. GUP in some commercial situations. | 11/10/2015 5:18 PM |
| 19 | We would never consider implementing a dual system. Doing so would result in mass confusion. Additionally, in thinking about ONLY RUP's, the agency will lose a conduit into the industries. If they truly want ONLY RUP's to be addressed, throw pollinator protection out the window. Additionally, the vast majority of misuse involves GUP's. | 11/10/2015 5:13 PM |

Q21 If your State/Tribe/Territory does not currently have a minimum age of 18 for all RUP applicators, how difficult will it be to implement that age in your state?

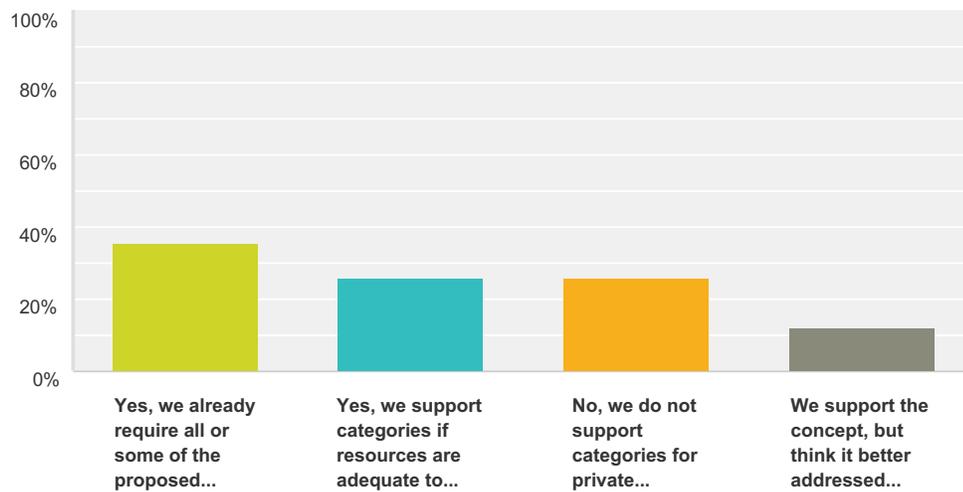
Answered: 43 Skipped: 4



| Answer Choices | Responses |
|---|-----------|
| Very difficult | 11.63% 5 |
| Difficult | 18.60% 8 |
| Neither difficult or easy | 34.88% 15 |
| Easy | 2.33% 1 |
| Very easy | 2.33% 1 |
| NA - Already have a minimum age requirement of 18 | 30.23% 13 |
| Total | 43 |

Q22 Does your SLA support categories for private applicators?

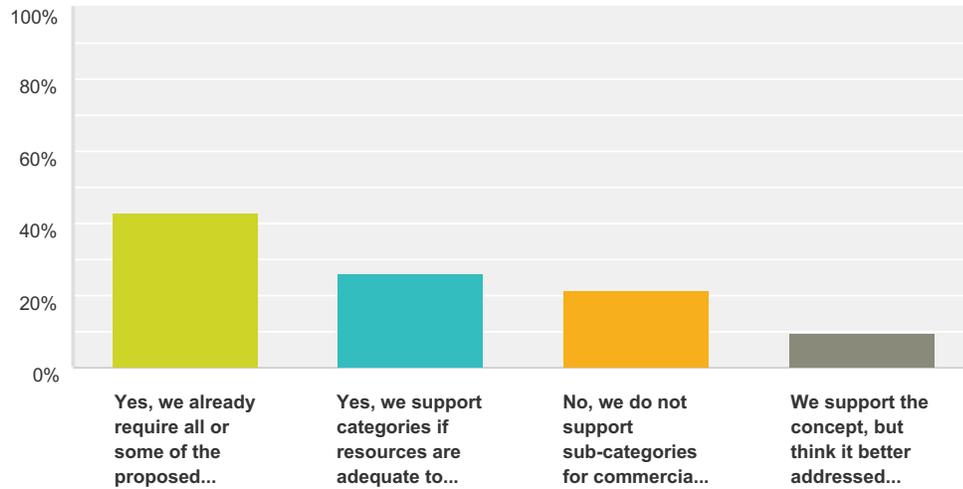
Answered: 42 Skipped: 5



| Answer Choices | Responses | |
|--|-----------|-----------|
| Yes, we already require all or some of the proposed categories | 35.71% | 15 |
| Yes, we support categories if resources are adequate to develop the categories | 26.19% | 11 |
| No, we do not support categories for private applicators | 26.19% | 11 |
| We support the concept, but think it better addressed through label-mandated training requirements | 11.90% | 5 |
| Total | | 42 |

Q23 Does your State/Tribe/Territory support the application method-specific certification sub-categories (for example, soil/non-soil fumigation) for commercial applicators?

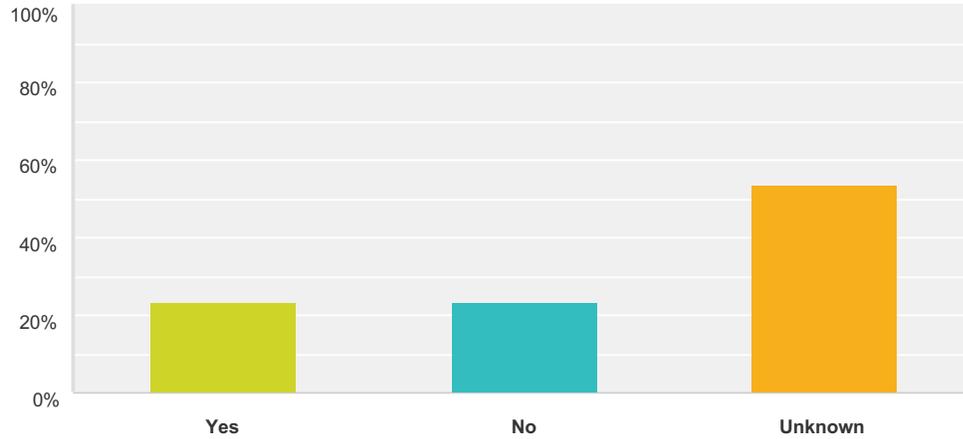
Answered: 42 Skipped: 5



| Answer Choices | Responses | |
|--|-----------|-----------|
| Yes, we already require all or some of the proposed sub-categories | 42.86% | 18 |
| Yes, we support categories if resources are adequate to develop the sub-categories | 26.19% | 11 |
| No, we do not support sub-categories for commercial applicators | 21.43% | 9 |
| We support the concept, but think it better addressed through label-mandated training requirements | 9.52% | 4 |
| Total | | 42 |

Q24 Would your State/Tribe/Territory be able to revise its state certification plan to be compliant in the time frame provided in EPA's Proposal?

Answered: 43 Skipped: 4



| Answer Choices | Responses | |
|----------------|-----------|-----------|
| Yes | 23.26% | 10 |
| No | 23.26% | 10 |
| Unknown | 53.49% | 23 |
| Total | | 43 |

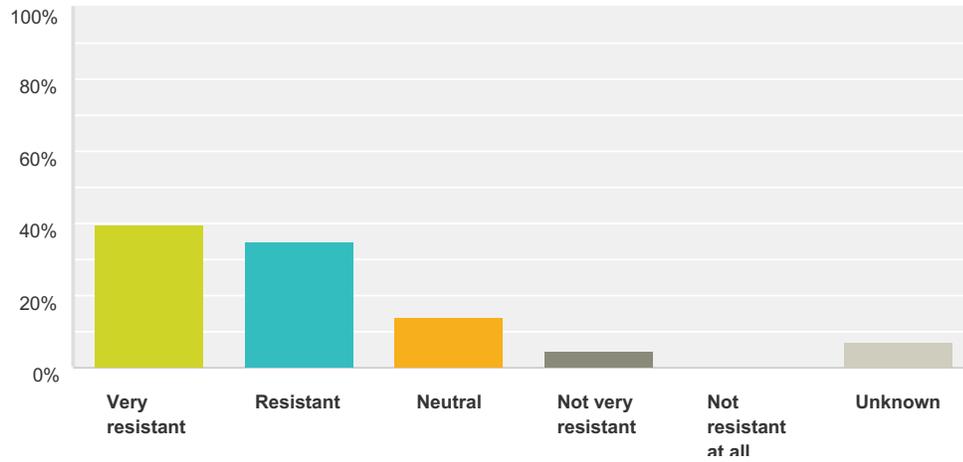
| # | If no, please explain: | Date |
|----|--|---------------------|
| 1 | We need a minimum of 7 years to implement after EPA's rule is adopted. It will take a couple years to propose and adopt laws and rules and then 2-3 years to re-build our licensing and recertification databases, then we would want to stagger in licensees as their current 5 year cycle completes to convert it to a 3 year cycle. | 11/24/2015 12:49 PM |
| 2 | In the over-all scheme of problems being addressed by our legislature, requiring a fix to a program that is already working will not be a high priority. | 11/24/2015 10:59 AM |
| 3 | Shift from CIC to CEU will take some time, along with needed adjustments in the state regulations. | 11/23/2015 3:49 PM |
| 4 | Will be dependent on the amount and depth of legislative/regulatory changes required. | 11/21/2015 10:55 AM |
| 5 | Absolutely not, we do not have the resources. | 11/20/2015 5:40 PM |
| 6 | The legislature and politics will drive this. | 11/20/2015 4:37 PM |
| 7 | Because of the major changes to program. Need to propose and successfully change statute and rule. Roll out new internal applications, processes and procedures. Educate regulated clientele to new requirements. Very time consuming. | 11/20/2015 4:07 PM |
| 8 | Many of the changes will depend on funding for implementation as well as statutory changes going through legislature which is beyond our control. | 11/20/2015 10:01 AM |
| 9 | Revision of MO's State Plan for Certification will not begin until the legislative process has been completed. We have no estimate of the length of time it will take to finalize amendments to the statutes and regulations. | 11/13/2015 2:58 PM |
| 10 | This will require law changes, rule and regulation changes, online information changes, developing new training materials, changing computer program | 11/12/2015 3:54 PM |
| 11 | Resources are not currently available to do this and everything else in that timeframe. | 11/12/2015 1:06 PM |

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|----|--|---------------------|
| 12 | It will take longer than 60 days for the rule change process, which would effect the certification plan. | 11/12/2015 7:50 AM |
| 13 | Legislative action to revise state statute and rules will be a multi year process. It will likely take longer than timelines in the proposed rule. | 11/11/2015 3:51 PM |
| 14 | It is unknown what the final rule will propose so it is not possible to predict the timeframe. We will comment that a two year time frame for the agency to approve the plans is excessive and not effective to provide timely feedback to states trying to develop plans. We were only given 90 days to evaluate this proposed rule therefore the agency should have a goal of reviewing plans and getting back to states within 90 days in order to facilitate making any needed adjustments and resubmitting to meet the 4 year timeline. State programs can not be left in limbo for a two year period while a new plan is under review. | 11/11/2015 12:17 AM |
| 15 | After the plan is rewritten and approved, legislation would need to be revised and computer programs rewritten, if the legislators approve the changes. That would take 4 years to get the plan revised and approved. 2 years to get the legislation changed. It is unknown how long to get the C&T programs rewritten. We are currently waiting for our legacy program to be rewritten in newer language. States typically struggle to retain IT staff and getting major programming written can take multiple years. All told, it would probably take about 10 years to get the changes implemented in our state. | 11/10/2015 7:04 PM |
| 16 | As the rule is constructed, we expect significant push back from decision makers, they may decide to let EPA have the program back. This would delay the development of a plan. | 11/10/2015 5:18 PM |
| 17 | My guess is that with the substantial legislative changes, even if we elected to move forward, it would require more time. | 11/10/2015 5:13 PM |

Q25 Assuming implementation of the proposed rule as written, what level of resistance to the changes do you anticipate in your State/Tribe/Territory?

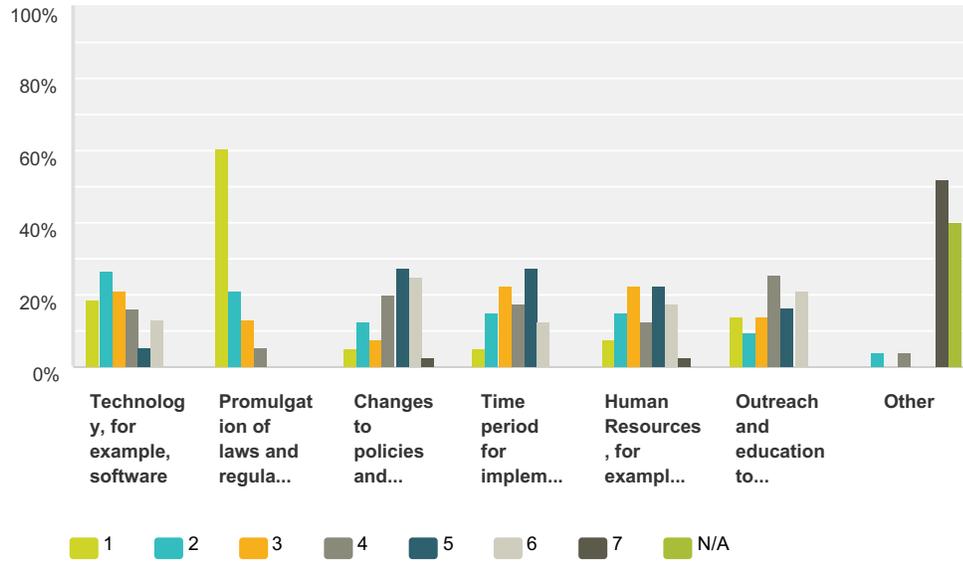
Answered: 43 Skipped: 4



| Answer Choices | Responses | |
|----------------------|-----------|-----------|
| Very resistant | 39.53% | 17 |
| Resistant | 34.88% | 15 |
| Neutral | 13.95% | 6 |
| Not very resistant | 4.65% | 2 |
| Not resistant at all | 0.00% | 0 |
| Unknown | 6.98% | 3 |
| Total | | 43 |

Q26 Please rank your State/Tribal/Territory challenges for implementing the proposed rule as written assuming financial resources were adequate where 1 is the MOST challenging and 7 is the LEAST challenging:

Answered: 43 Skipped: 4



| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | N/A | Total | Score |
|---|--------------|--------------|-------------|--------------|--------------|--------------|--------------|--------------|-------|-------|
| Technology, for example, software | 18.42% 7 | 26.32% 10 | 21.05% 8 | 15.79% 6 | 5.26% 2 | 13.16% 5 | 0.00% 0 | 0.00% 0 | 38 | 4.97 |
| Promulgation of laws and regulations | 60.53% 23 | 21.05% 8 | 13.16% 5 | 5.26% 2 | 0.00% 0 | 0.00% 0 | 0.00% 0 | 0.00% 0 | 38 | 6.37 |
| Changes to policies and procedures | 5.00% 2 | 12.50% 5 | 7.50% 3 | 20.00% 8 | 27.50% 11 | 25.00% 10 | 2.50% 1 | 0.00% 0 | 40 | 3.63 |
| Time period for implementation | 5.00% 2 | 15.00% 6 | 22.50% 9 | 17.50% 7 | 27.50% 11 | 12.50% 5 | 0.00% 0 | 0.00% 0 | 40 | 4.15 |
| Human Resources, for example, state/federal personnel resources and expertise | 7.50% 3 | 15.00% 6 | 22.50% 9 | 12.50% 5 | 22.50% 9 | 17.50% 7 | 2.50% 1 | 0.00% 0 | 40 | 4.10 |
| Outreach and education to regulated industry | 13.95% 6 | 9.30% 4 | 13.95% 6 | 25.58% 11 | 16.28% 7 | 20.93% 9 | 0.00% 0 | 0.00% 0 | 43 | 4.16 |
| Other | 0.00% 0 | 4.00% 1 | 0.00% 0 | 4.00% 1 | 0.00% 0 | 0.00% 0 | 52.00% 13 | 40.00% 10 | 25 | 1.53 |

Q27 Do you have any other comments, questions, or concerns relative to the EPA's C&T Rule Proposal?

Answered: 27 Skipped: 20

| # | Responses | Date |
|----|---|---------------------|
| 1 | Questions 6-8 - We support only the competency standards for PA's and CA's related to exams - answers are not associated with recertification. Question 19 - We would require CEU's for subcategories only if required, we'd rather not do this at all, or at least only require CEU's within EPA's 10 Broad categories. Most Commercial applicators in WA have 3-5 categories or more (over 7,000) and it will be virtually impossible for them to take all the courses they'd need to in just 3 years and also prohibitively expensive. This will likely push many to re-test and to not train or test in extra categories as they've done in the past - to prove their competency. | 11/24/2015 12:49 PM |
| 2 | Adoption, as proposed, will likely create a no-win situation for us. Inability and/or unwillingness to make all of the changes will likely mean loss of primacy and the associated loss of grant funding will further hamstring the program. In addition, crippling our state program would mean that EPA would have to implement a certification program here. Since our regional office is already operating short-handed, I don't believe they have the resources to do so. | 11/24/2015 10:59 AM |
| 3 | Second priority above would be changing an educational training program build with a CIC Continuing Instruction philosophy over to a CEU. There would be several changes needed to implement. | 11/23/2015 3:49 PM |
| 4 | Completion of 50% of CEUs in last 18 months of certification period will be hard to track both for the SLA and the certified applicators. If this concept moves forward, we'd prefer to see an annual (calendar-year based) CEU requirement. | 11/21/2015 10:55 AM |
| 5 | It is not feasible or realistic to attain and develop justifiable comments or contact stakeholders in allotted time frame. When Richard Pont told EPA Region 4 Pre-SFIREG attendees that the EPA administration would only allow an extended time period of 30 days beyond the original comment period, I knew the EPA had an agenda to slip these proposed rules in with the WPS final rule in hopes that individuals would not have the appropriate time to develop comments that would be pertinent for all involved. | 11/20/2015 5:40 PM |
| 6 | The 30 day extension for comment on this rule is a shame. This rule has been in place since the 70s. They have been working on it for over 20 years in some form or another. What's the rush? The economic impact needs to be brought to the industries attention as they will ultimately pay. This may silently creep into existence without anyone being aware. | 11/20/2015 4:37 PM |
| 7 | Minnesota has great concerns about several key portions of EPA's proposal. We believe that not only would these proposals negatively impact the ability to deliver quality of certification and recertification training, reduce the effectiveness of certification and training in general, push applicators to rely much more on retesting to accomplish recertification, create a major new impact on program operation and financial burden on states and in fact increase the risks of restricted use pesticide usage to human health, and the state's water and other natural resources. | 11/20/2015 4:07 PM |
| 8 | Identification for exams and training is long overdue! | 11/20/2015 3:49 PM |
| 9 | We do believe that there is some value in the proposed changes but sweeping changes across all of the states may not be the best approach. Why are all states being targeted to make these changes when our program is already running sufficiently as is. The Florida Department of Agriculture and Consumer Services will be submitting formal comments on the proposed rule and we hope that they will be carefully considered and evaluated before the final rule. | 11/20/2015 10:01 AM |
| 10 | When developing these proposed changes, EPA has not accurately estimated the economic impact to applicators or the costs for states to implement. And, while EPA's goal is better informed applicators and safer RUP applications, many of the proposed changes such as increased CEUs in a shorter certification cycle will lead to more applicators opting to retest rather than attend training and thereby becoming less informed with the most recent technologies and pesticide applicator information. | 11/20/2015 9:00 AM |
| 11 | For clarification, Q#15, Virginia does not require CEUs rather that applicators attend 1 recertification course every 2 years (renewal cycle). For questions regarding sub-categories, certification in a specific category in Virginia includes the appropriate specific application methods as well as pest control. For example, Category 1C - Fumigation of soil and agricultural products includes soil fumigation application methods as well as specific pest information. They are not independent categories. | 11/17/2015 1:07 PM |

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|-----------|---|----------------------------|
| <p>12</p> | <p>THIS PROPOSAL IS AN UNFUNDED MANDATE, CAUSING UN-NEEDED ADDITIONAL FINANCIAL BURDEN ON CERTIFIED PRIVATE APPLICATORS, CERTIFIED COMMERCIAL APPLICATORS, AND SMALL AND LARGE BUSINESS OWNERS. PLUS IT REQUIRES THOUSANDS OF DOLLARS OF WORK TO BE COMPLETED BY MDA AND THE UNIVERSITY OF MO EXTENSION SERVICE WHEN NEITHER ENTITY HAS THE MONEY OR HUMAN RESOURCES TO DEDICATE TO SUCH AN UNNECESSARY, UNREALISTIC FEDERAL OVER REACH. MISSOURI IS NOT CONVINCED THAT THERE IS URGENT NEED OR CAUSE TO WARRANT THIS OVER REACHING FEDERAL ATTEMPT TO FORCE MAJOR AMENDMENTS TO STATE STATUTES AND REGULATIONS. AS MISSOURI REFLECTS ON OUR HISTORICAL DATA, WE CANNOT IDENTIFY AREAS OF CONCERN WHERE THESE PROPOSED REGULATIONS WOULD ACTUALLY AMOUNT TO AN IMPROVEMENT OR REDUCTION IN RESTRICTED USE PESTICIDE MISUSE BY CERTIFIED APPLICATORS OR THOSE WHO USE RESTRICTED USE PESTICIDES UNDER THEIR DIRECT SUPERVISION. ADDITIONALLY, THE MANDATED RULE REQUIRING THE USE OF CONTINUING EDUCATION UNITS (CEUs) QUITE FRANKLY IS RIDICULOUS, WHEN THERE IS NO EVIDENCE PROVING THAT A COMMERCIAL APPLICATOR WHO COMPLETES SIX (6) CEU HOURS {1/2 OF THE REQUIRED 12 CEUs} WITHIN THE LAST EIGHTEEN (18) MONTHS OF HIS 36 MONTH EXPIRATION PERIOD IS SMARTER, MORE INTELLIGENT, OR BETTER ABLED TO COMPREHEND DIRECTIONS FOR USE FOUND ON A PESTICIDE LABEL THEREBY, MAKING THIS COMMERCIAL APPLICATOR LESS OF A RISK FOR MISUSING PESTICIDES THAN A COMMERCIAL APPLICATOR WHO ATTENDS AN EIGHT (8) HOUR RECERTIFICATION TRAINING PROGRAM/COURSE IN THE THIRD (3rd) YEAR OF CERTIFICATION PERIOD. THE INCLUSION OF "PRESENCE OF POLLINATORS" UNDER THE COMMERCIAL AND PRIVATE APPLICATOR STANDARDS IS OBLIVIOUSLY EPA'S ATTEMPT TO PUSH INTO REGULATION SPECIAL INITIATIVES. TWO ISSUES WITH THIS CONCEPT: 1ST - THE PROPOSED STANDARDS LISTS FISH, WILDLIFE AND OTHER NON-TARGET ORGANISMS BUT, IT DID NOT SPECIFICALLY LIST BIRDS OR PROTECTED MIGRATORY BIRDS, I ASSUME BECAUSE BIRDS ARE WILDLIFE. WOULDN'T POLLINATORS BE COVERED UNDER THE STANDARDS BECAUSE THEY'RE CONSIDERED WILDLIFE OR AT LEAST NON-TARGET ORGANISMS. EXCEPT FOR THE EXISTANCE OF AN EXECUTIVE ORDER, WHY ARE POLLINATORS GIVEN SPECIAL ATTENTION WHEN OTHER WILDLIFE AND NON-TARGET ORGANISMS ARE JUST AS IMPORTANT? DOES EPA REALLY BELIEVE THAT GENERAL USE PESTICIDES ARE NOT HARMFUL TO POLLINATORS? IF GENERAL USE PESTICIDES ARE NOT AS HARMFUL AS RESTRICTED USE PESTICIDES WHY ARE MP3s NEEDED? IF GENERAL USE PESTICIDES ARE HARMFUL TO POLLINATORS THEN WHY ISN'T EPA REQUIRING SPECIFIC CERTIFICATION TRAINING FOR USERS OF GENERAL USE PESTICIDES? MOST OF THE HARMFUL INSECTICIDES ARE GENERAL USE PESTICIDES. 2ND - IS THIS A SIGN OF WHAT CAN BE EXPECTED IN FUTURE EACH TIME A SPECIAL INITIATIVE ARISES. CONCERNING APPLICATION METHOD-SPECIFIC CERTIFICATION CATEGORIES OR SUB-CATEGORIES, MISSOURI FOR INSTANCE ESTABLISHED NEARLY FORTY (40) YEARS AGO A FUMIGATION PEST CONTROL CATEGORY AND CERTIFICATION IN THIS CATEGORY BY A COMMERCIAL APPLICATOR ALLOWS THE APPLICATOR TO USE FUMIGANTS ACCORDING TO LABEL DIRECTIONS IN THE STATE OF MISSOURI. NOW, ISN'T THE PROPOSED REQUIREMENT FOR TWO SEPARATE CATEGORIES NON-SOIL AND SOIL FUMIGATION CONTRARY TO SECTION 2 (ee) OF FIFRA IN THAT, SECTION 2 (ee) ALLOWS COMMERCIAL AND PRIVATE APPLICATORS THE ABILITY OF "EMPLOYING ANY METHOD OF APPLICATION NOT PROHIBITED BY THE LABELING UNLESS THE LABELING SPECIFICALLY STATES THAT THE PRODUCT MAY BE APPLIED ONLY BY THE METHODS SPECIFIED ON THE LABELING"? IT MAKES MORE SINCE TO REQUIRE THE PESTICIDE REGISTRANT TO PROVIDE SPECIAL PRODUCT SPECIFIC TRAINING AS PART OF THE PESTICIDE REGISTRATION AND FOR MISSOURI TO CERTIFY THE COMPETENCY OF COMMERCIAL APPLICATORS IN A CATEGORY OF FUMIGATION PEST CONTROL. THIS RULE CLOSELY APPROACHES A LINE DICTATING MANDATORY RECIPROCITY AND ANY IDEA OF MANDATORY RECIPROCITY FOR A SELECT BUSINESS SECTORS (AERIAL APPLICATORS, RIGHT-OF-WAY APPLICATORS, ETC.) WILL BE AN INFRINGEMENT OF MISSOURI'S STATE RIGHTS TO REGULATE AS MISSOURI SEES BEST. MANY STATES DON'T SHARE THE SAME ENTHUISAM FOR RECIPROCITY AS OTHER STATES DO BECAUSE, RECIPROCAL CERTIFICATIONS CAN LEAD TO AN INCREASE IN VIOLATIONS OF STATE LAWS. RECIPROCITY IS OFTEN AN ADMINSTRATION NIGHTMARE TO HANDLE BECAUSE OF THE DIFFERENCES BETWEEN LAWS OF EACH STATE AND IT THEN BECOMES A HEADACHE FOR THE ENFORCEMENT OF THOSE LAWS AND FOR CONDUCTING REGULATORY COMPLIANCE INSPECTIONS AND USE INVESTIGATIONS. THEREFORE, RECIPROCITY SHOULD NOT BE MANDATED IN FEDERAL RULE REQUIRING STATES TO ADDRESS THE MATTER IN THEIR STATE PLANS FOR CERTIFICATION BUT, RATHER IT SHOULD BE LEFT UP TO EACH STATE AND ADDRESSED ON THE STATE LEVEL BETWEEN AGREEING STATES.</p> | <p>11/13/2015 2:58 PM</p> |
| <p>13</p> | <p>Comments are currently being prepared and will be provided on or prior to 23 Dec 2015.</p> | <p>11/13/2015 10:46 AM</p> |
| <p>14</p> | <p>It is critically important for EPA to re-examine the economic assessment using state involvement, since there are a number of factors and assumptions in the assessment that are either factually incorrect, or absent from the overall estimated impact. It has come to my attention that a number of states that have been able to actually review the EA have determined the potential cost to industry exceeds EPA's estimate by factors of 10 to 20 times more than what the EA shows.</p> | <p>11/13/2015 8:33 AM</p> |
| <p>15</p> | <p>We think that this will drive people not to become license and will operate as an unlicensed operator.</p> | <p>11/12/2015 3:54 PM</p> |

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| 16 | Where is the data to support that in Ohio, there is a need to change our certification requirements? If USEPA has concerns about a particular State's certification program, they should address it with that State and not punish the States in which there is no data to support these changes. | 11/12/2015 1:06 PM |
| 17 | I am concerned that EPA has under estimated the economic impact the proposed rules on Commercial and private applicators, as well as, State and Tribal Regulatory Programs. | 11/12/2015 12:51 PM |
| 18 | Question 15 would not let me enter my specific credit requirements. The range on commercial applicators is 2-18 credits over a 3 year period | 11/12/2015 9:45 AM |
| 19 | For question 15 - no CEU's required for private applicators. For commercial applicators 9-30 CEU's are required depending on the category of certification. | 11/12/2015 7:50 AM |
| 20 | What funding will EPA have available to States/Tribes/Territories to aid in implementing these mandatory changes? | 11/12/2015 6:47 AM |
| 21 | What occurs if state legislative action to update statutes and rules cannot meet the timelines proposed by EPA? | 11/11/2015 3:51 PM |
| 22 | More specific comments will be submitted to docket. In general, we would like to see some of the very specific requirements left up to the states. It is not feasible nor does it produce a viable rule by trying to fix every inadequacy in the federal rule in one large cumbersome action. While based on our own experience, we can appreciate the hurdle rule changes can be for EPA, we hope the agency can also appreciate the hurdles states will have to face with so many potential changes to implement at a minimum, rule changes, and at an extreme, statutory changes. Decide what is most important in terms of actually having an effect on increasing competency and leave other things still present but less specific to allow flexibility to be left to the states which the agency can still have input on when evaluating the state plans. For example if a state wants to retain a 5 year certification period then perhaps they are allowed to do so with additional ceus to be the same as a 3 year (10 every 5 years) or they have some other additional proposed aspect to their program. This may then require them to only make a rule change rather than a law change which is much more precarious and difficult politically to accomplish. Consider the adaptability of pollinator protection plans and how that helped to accomplish acceptance by multiple stakeholders with various viewpoints and agendas. Granted they are voluntary and certification plans are required but if the rule is not so specific but still establishes an effective baseline states already can or with little change can meet (seems we have adequate programs now), then the certification plans can be a similar type of tool which allow the agency to recognize the strengths of a particular state's program based upon what the state knows are the competency issues for those applicators in their state. When we can direct our resources based on our own needs/issues then we can better focus on important areas with less, but still adequate, focus on others. The proposed rule dilutes the focus with so many varying and substantial revisions. Some of the revisions we agree are important and agree with, but others seem to provide no impact on applicator competency. Revising or removing those items will ultimately help us justify the actually necessary adjustments to those we answer to within our agency, our industries and state governments. Thank you for the opportunity to provide input. | 11/11/2015 12:17 AM |
| 23 | I was just announced that EPA will provide a 30 day extension to the comment period. This is still not nearly enough time to provide comments to ensure a comprehensive review and feedback to EPA. I would suggest that AAPCO and ASPCRO request that EPA extend the comment period an additional 60 days beyond the proposed deadline. Question 15 doesn't allow a correct representative answer of our CEU requirements, see below: Private: 7 CEUs (CORE) - 30 min per session Commercial: 7 CEUs (CORE) - 30 min per session AND 2 CEUs Turf and Ornamental and Residential/Commerical; 1 CEU all other pest management categories (1 hour per session) | 11/10/2015 6:07 PM |
| 24 | Because Texas has had a CEU program for decades AND, because we have a huge number of pesticide applicators we are in a position to provide a great deal of feedback and input to the recertification process. However, like a majority of the other states, because of dwindling resources and shrinking state budgets, we have not been able to participate in contributing to this debate for the last several years on a national scene. Texas marched into this recertification process in the 1990's, kicking and screaming, but at the end of the day, we feel it has had positive outcomes. That said, we feel that what EPA is proposing is too onerous and requires too much change too fast. Such changes must be done incrementally and show measurable positive results. | 11/10/2015 5:39 PM |
| 25 | It would drive approximately 1/3 of our applicators into taking the test over and over again without any opportunity for engagement with the SLA or PSEP. It would force more on-line training, which is not necessarily bad, but would make face to face training too expensive. | 11/10/2015 5:18 PM |
| 26 | Regarding #26-All of those issues are of equal difficulty, assuming much of the rule passes as written. The cost for our state to implement would be very, trying to pass the legislation could be near impossible and the FTE cost would rise. | 11/10/2015 5:13 PM |
| 27 | None at this time. | 11/10/2015 5:10 PM |