States’ perspective on Certification & Training Final Rules

Ples Spradley
University of Arkansas, Division of Agriculture
The big issue for most states, including Arkansas, was always the proposed recertification standards. The final rule significantly reduced those concerns.

EPA listened to the states’ concerns and made some very appropriate changes (imho). Thank you!
Overall

• There will be some issues I am sure, but in Arkansas we work very well with our State Plant Board and we can make it all work.

• Most PSEPs are optimistic.

• The dialog between PSEP and SLA will have to improve in some states.

• The heavier burden for implementation may be on the SLA’s in many cases.
Private Applicator Competency

• Probably not an issue for most states.
• Personally, I welcome the push for enhanced private applicator competency
• AR has a testing option but it is rarely utilized.
• I have wanted to do something to verify competence of our private applicators and the new regs give us a good reason to proceed.
Administration Requirements

• Online training is inevitable and most states are moving in that direction.

• States will need guidance on i.d. and proctoring online exams.
Additional Categories for Private Applicators (aerial, soil fumigation, and non-soil fumigation)

• Additional work for many states to develop study materials and exams, BUT

• Don’t forget that there is a National Aerial Applicator’s Study Guide (NASDA) and an test developed to accompany the study guide.

• Also a soil fumigation study guide (NASDA)
This has come up more than once:

• A big concern for some states is that state law will have to be opened to make even small changes. What else might change in the law during that process?
• Minimum age requirement may be a driver for opening state law.
Non-certified Applicators: Training and Supervision

• Not the issue I initially thought it would be.
• Will be definitely be an problem in some states but many have addressed this over the years.