



# Arizona Department of Agriculture

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August 6, 2008

Ms. Debra Edwards  
Director, OPP  
USEPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue, N. W.  
**Mail Code:** 7501P  
Washington, DC 20460

Dear Ms. Edwards:

SFIREG through the POM committee has been involved in the development of stewardship language for the active ingredient picloram. The EPA has issued direction to the registrants of this active that part of the stewardship effort will be company provided training. This will be implemented through label required language. We appreciate the opportunity that we have had to be involved in this effort and wish to continue working with both the EPA and the registrants. This letter is sent not knowing how far along this effort is and wanting to ensure we are on record as saying we strongly believe this needs more work and request this not be finalized until issues currently of concern to the states can be resolved.

States are responsible for enforcing label requirements, and this would include any label statements requiring training offered by a registrant. We strongly prefer this stewardship effort not involve any enforceable label requirements on applicators to participate in registrant-sponsored training. Instead, the registrant should be responsible for reporting training efforts to the EPA at agreed times that is off scope of normal certification, which appears to be the intent, additional training, not just another opportunity for CE training.

We also share concerns about this limiting the scope of training applicators will receive. In Arizona if this product were used, the registrant would come to us and request CEU approval. Applicators could then attend the company training and get all the CEUs they need to renew their certification. This is defeating to the purpose of certification for RUP products because it is missing, as examples, laws, IPM, safety, and pest management. This is not something that should be mandated by the label.

There are several other issues as well that are of concern to the states. We hope to continue further discussion of all these issues. Jim Gray of POM will continue to be the point person for the states. Please contact me if I can answer any questions. I can be reached at the number above or at [jpeterson@azda.gov](mailto:jpeterson@azda.gov). Thank you for considering this issue and for involving the states.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Peterson".

Jack Peterson  
Associate Director, ESD and SFIREG Chair

CC: Jim Gray, POM  
Maureen Serafini, AAPCO  
Ples Spradley, AAPSE