



Mr. Jack Housenger, Director  
Office of Pesticide Programs  
US EPA Headquarters – William Jefferson Clinton Building  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

January 5, 2017

Dear Director Housenger:

I am writing to you regarding the recently published revised rule for the certification standards for pesticide applicators. As you are aware, the Association of American Pesticide Control Officials (AAPCO) represents the state lead agencies responsible for the effective implementation and enforcement of FIFRA, and our association submitted extensive comments to the federal docket on the proposed rule. This letter is intended to thank you and the agency for listening to our concerns, which were reflected in the significant changes made to the final rule, compared to the proposed rule.

While agreeing with the agency that the time was right to revise applicator certification standards, AAPCO members were taken aback by the extent and reach of the proposed changes. We were also very surprised with the disparity found in the economic assessment, and continue to be concerned about the true cost burden to state agencies, land grant universities and the applicators we regulate. The final rule does address many of these concerns, and comments received to date seem to be that states believe the revisions are “doable”, given funding restrictions from state and federal sources.

I would like to bring to your attention the outstanding work of folks in the Worker Protection Branch that worked hard on both the proposed and final rule. Kevin Keaney oversees an exceptional group comprised of Nancy Fitz, Richard Pont, Carolyn Schroeder, Michelle Arling, and Jeanne Kasai (and perhaps others of whom I am not aware), and I commend their efforts to maintain a positive working relationship with AAPCO’s C&T Rule Work Group throughout the rule development. Without their dedication, diligence and willingness to consider our concerns, I believe the rule would have been nearly impossible to implement in the field. Instead, the final rule that was published includes many reasonable revisions that most states appear to be able to accept. It should be noted that nearly all states believe they will need to revise both state statutes and regulations, so the extended period of time the final rule gives us to do that is greatly appreciated.

In closing, I would like to thank you and the agency for respecting our co-regulatory partnership during this rule-making process. We look forward to future opportunities to work together to ensure pesticides are available for use while enhancing human and environmental health protections.

Sincerely,

**Dennis W. Howard**

Dennis W. Howard  
AAPCO President  
Maryland Department of Agriculture

cc: Amy Bamber, AAPCO Executive Secretary