

Pesticide Inspector Residential Training Update

**AAPCO'S SPRING MEETING AND CONFERENCE
MARCH 2, 2025**

AMY SULLIVAN, PIRT ADMINISTRATOR

• PURPOSE

We provide pesticide educational training to enforcement staff of pesticide state lead agencies, territories, and tribes.

LET'S START WITH SOME THANK YOU'S

- ❖ PREP TEAMS THROUGH THE YEARS
- ❖ PESTICIDE SAFETY EDUCATORS
- ❖ NCDACS AND GDA PIRT HOSTS
- ❖ EPA OECA

PIRT Team



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ESA COMPLIANCE WORKSHOP, PHILADELPHIA, PA SEPTEMBER 2024



WORKSHOP MATERIALS

ESA Workshop- Charts to help guide the discussion

FIFRA Interim Ecological Mitigation (FIFRA IEM) Runoff/Erosion Mitigation Measures to be included on FIFRA Section 3 labels.

Potential inquiries for an inspector;

- (1) Is a runoff/erosion mitigation measure required by the Section 3 label? If so,**
- (2) monitor compliance with the mitigation measure(s) that has been selected.**

I. Is “runoff/erosion mitigation” measures required?

If the pesticide label contains a “Runoff/Erosion Mitigation” section, runoff/erosion mitigation is not required if any of these field/application parameters are in place.

Parameter	What can be collected, observed or recorded to monitor compliance?
Is the application occurring in a county that is less vulnerable to runoff?	Check the list of Counties With Reduced Runoff (xlsx)
Is the application area comprised of over 50% sand, loamy sand, or sandy loam soil?	
Does the application area have a slope $\leq 3\%$?	
Is the application occurring as a partial field treatment (i.e., banded application, spot treatment, or backpack/handheld/precision sprayer application)?	
Is the application incorporated via irrigation or as a soil incorporation?	
Does the treated field have subsurface or tile drains installed with controlled drainage?	
Does the treated field have a perimeter berm system?	

WORKSHOP PRODUCTS

These notes are divided into three parts for each topic: the main takeaways decided by the group for a topic, discussion of what evidence can be collected for each element listed on the “Discussion Guides for ESA 9.18.24” document, and the off topic discussions that resulted from the main discussion.

Topic 1-Mitigation Measures

Main Takeaways

For most of the SLAs in our groups, private applicators aren't required to keep application records for non-RUP pesticides. While we frequently cite pesticide records as a piece of evidence that can determine compliance, across much of the country private applicators don't have to keep these records. As recordkeeping is crucial to enforceable regulation, EPA needs to stress the relief point associated with mitigation tracking and lead with this in “how to comply” or other similar compliance documents.

Current mapping such as satellite imagery has emerged as potential evidence of mitigation measures like riparian buffer areas

We have to think differently about inspections, and the evidence that must be collected. Inspector observation and photos are key pieces of evidence to document compliance, and so they need to know what to look for. SLA inspectors require in-depth training on how to recognize and document mitigation measures.

Determining compliance with ESA label language will potentially double the amount of time an agricultural use observation or investigation will take. This means we have less time and resources to perform other duties as required

I.

“County vulnerable to runoff” based on rainfall? Where is the vulnerability calculated? Rainfall, slope, and soil type. Can be checked either online, or a saved recent copy.



*Summary of September 18-19, 2024 PIRT ESA Compliance Workshop in Philadelphia, PA
October 24, 2024*

Topic 1: Runoff and Erosion Measures

General Observations

- **Inspector Training Needs:**
 - **Challenges:** Inspectors need to be trained on using soil maps, determining slopes, and using tools like clinometers and Web Soil Survey. They also need to understand how to recognize and document various mitigation measures.
 - **Suggested Solutions:** Develop comprehensive training modules that include hands-on practice with these tools. Create job aids and visual guides to help inspectors identify and document mitigation measures accurately.
- **Documentation:**
 - **Challenges:** Accurate documentation is crucial but can be challenging due to the need for detailed observations, photos, and grower statements.
 - Records that belong to NRCS and the grower are not required to be shared with inspectors.
 - Verification of practices may be based on records or statements rather than visual inspection.
 - **Suggested Solutions:** Standardize documentation procedures and provide inspectors with templates and checklists. Encourage the use of digital tools for real-time data collection and photo documentation.
- **Topography Understanding:**
 - **Challenges:** Determining soil composition and slope, verifying subsurface drains, and defining berms.

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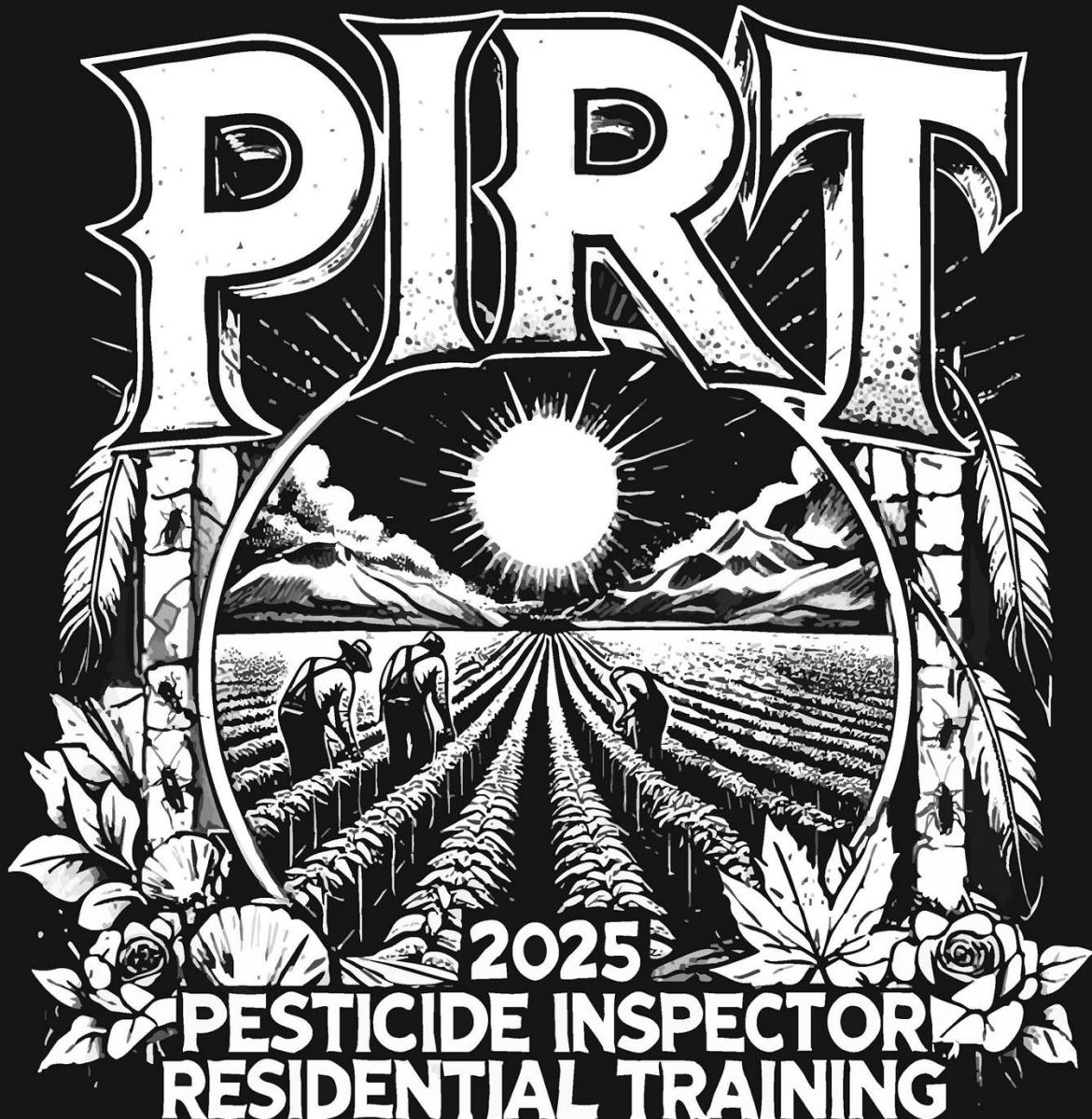
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2025 U.S. TOUR

THE FIRST RODEO

BASIC STRUCTURAL
FEBRUARY 3-6, 2025 | DECATUR, GA

WORKER PROTECTION
MAY 12-15, 2025 | GRAND RAPIDS, MI

TRIBAL
JULY 21-24, 2025 | POLSON, MT

BASIC INSPECTOR
OCTOBER 6-9, 2025 | BURLINGTON, VT



Basic Structural PIRT

Decatur, GA February, 2025



BASIC STRUCTURAL PLANNING GROUP

- Derrick Lastinger – Georgia Department of Agriculture
- Ryan Okey – Clemson University
- Bonnie Rabe – Rollins Inc.
- Allison Cuellar – Texas Department of Agriculture
- Dave Huber – Vermont Agency of Agriculture
- Sharon Dobesh-Beckman – US EPA Region 7
- Kevin Ulrich – US EPA OPP, Registration Division
- Michael Bauman – US EPA OECA











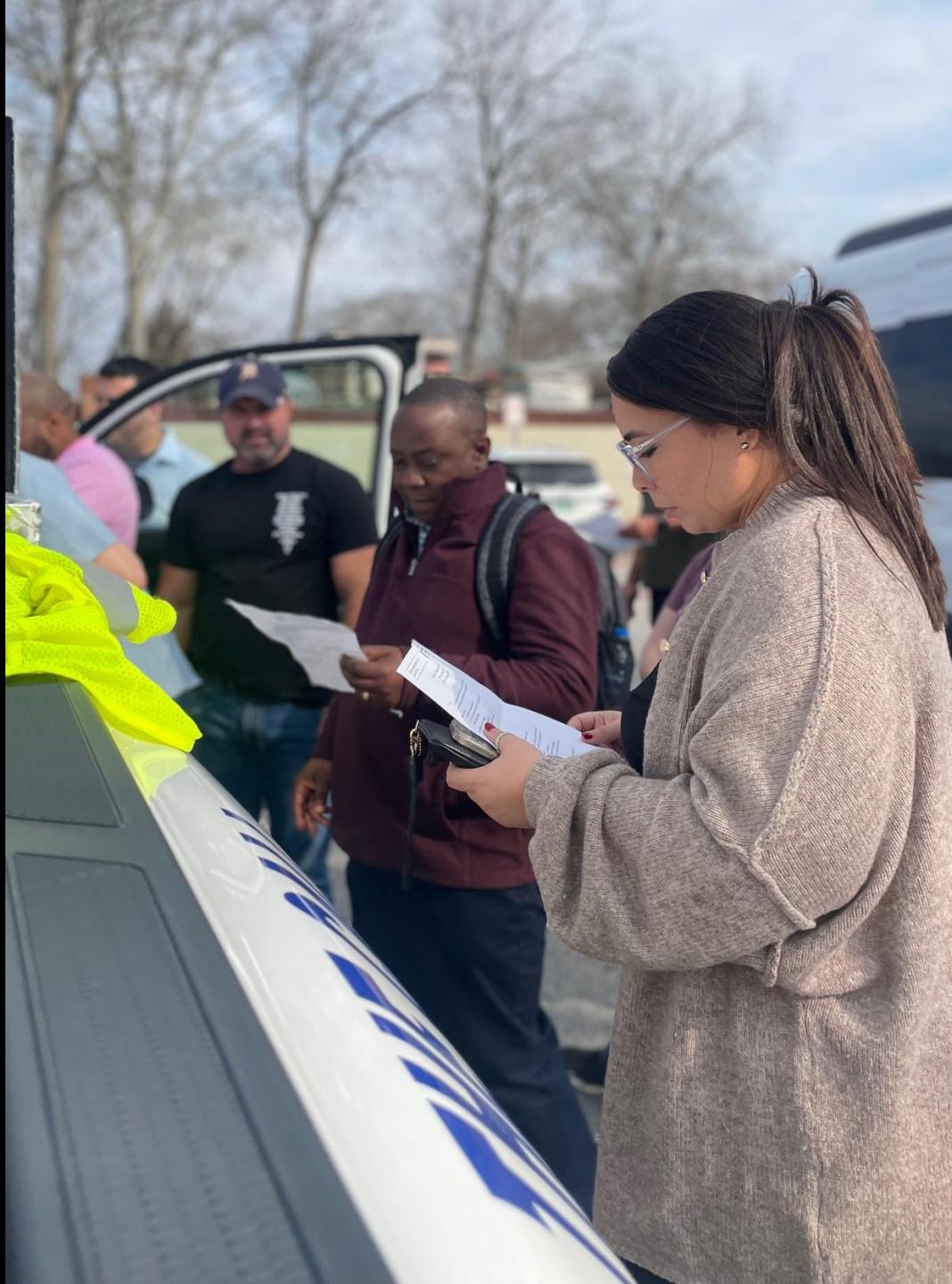


3/5/2025

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Worker Protection Standard PIRT

Grand Rapids, MI May 2025

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- Antonio Castro-Escobar – Michigan Department of Agriculture
- Ernesto Lugo – Arizona Department of Agriculture
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ANY QUESTIONS?

THANK YOU!

<https://www.nasda.org/nasda-foundation/nasda-foundation-epa-pirt/>

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