

## **What's new in the Proposed Pesticide Applicator Certification and Training Regulations?**

The EPA is proposing stronger standards for the certification and training of pesticide applicators who apply restricted-use pesticides, also requirements for the direct supervision of applicators using restricted-use pesticides and a number of other requirements that Connecticut law already addresses. The biggest impact the regulation changes will have on Connecticut pesticide applicators are the training requirements and recertification requirements. A complete comparison of the proposed regulations to the current federal regulations can be found at this link: [http://www2.epa.gov/sites/production/files/2015-08/documents/certification\\_rule\\_detailed\\_comparison\\_chart.pdf](http://www2.epa.gov/sites/production/files/2015-08/documents/certification_rule_detailed_comparison_chart.pdf)

Applicators who wish to comment to EPA regarding these proposed changes are urged to do so by November 23, 2015. To comment, please see docket number [EPA-HQ-OPP-2011-0183](http://www2.epa.gov/sites/production/files/2015-08/documents/certification_rule_detailed_comparison_chart.pdf) at [regulations.gov](http://www2.epa.gov/sites/production/files/2015-08/documents/certification_rule_detailed_comparison_chart.pdf). After the public comment period, EPA will review and consider the public comments, and where needed, will change the proposed requirements. EPA will draft the final regulation which will be reviewed by the U.S. Department of Agriculture and the Office of Management and Budget. When these reviews are complete, the EPA will issue the final regulation.

The following is a synopsis of the changes Connecticut pesticide applicators should be aware of:

-Private applicator competency remains the same with the exception of a 3 year recertification requirement also requiring core training credits be earned.

-Establishes new categories for private and commercial applicators performing: aerial application, soil fumigation and non-soil fumigation and predator control categories. CT already requires certification for aerial applications and soil and non-soil fumigation. The materials used for predator control are generally not used in CT and will therefore have a minor impact if any.

-Requires that all exams to be closed book and proctored.-Strengthens security and effectiveness of exam administration. Requires presentation of identification for initial and recertification exams and training sessions.

-Enhances the Competence of Noncertified Applicators. Noncertified applicators must receive annual training on safe pesticide application and protecting themselves and others from pesticide exposure (similar to WPS handler training). Exemption from training requirement for those with valid WPS handler training and those who have passed the commercial core exam.

-Establishes Qualifications for Training Providers. Noncertified applicator training can only be provided by one of the following: a currently certified applicator, a State-designated trainer of certified applicators, or a person who has completed a train-the-trainer course under the WPS. CT has no train-the-trainer courses. Generally, certified applicators must conduct the training in CT.

-Establishes Qualifications for Certified Applicators Supervising Noncertified Applicators. Supervising applicators must:

- Be certified in the category in which they supervise applications.
- Ensure noncertified applicators under their supervision have satisfied the training requirement
- For specific applications, provide a copy of all applicable labeling to the noncertified applicator and provide specific instructions related to the application.
- Ensure means for immediate communication between the supervisor and supervisee are immediately available.

-Expands Commercial Applicator Recordkeeping to Include Noncertified Applicator Training. Require commercial applicators to maintain records of noncertified applicators' training that include: the trained noncertified applicator's printed name and signature, the date of the training, the name of the person who provided the training, and the supervising commercial applicator's name.

-Establishes a Minimum Age for Certified Applicators. Persons must be at least 18 years old to be certified as a commercial or private applicator. CT already requires this.

-Establishes a Minimum Age for Noncertified Applicators Using RUPs. (Generally in CT these would be people working on a farm, all others would have to be certified.) Persons must be at least 18 years old to qualify as a noncertified applicator using RUPs under the direct supervision of a commercial or private applicator.

-Requires all applicators to renew their certification (recertify) at least every 3 years.

-Recertification Requirements:

One continuing education unit (CEU) is 50 minutes of active training time. To renew their certification, commercial applicators must earn 6 CEUs covering core content and 6 CEUs per category of certification, or they must pass written exams for core and each category of certification.

To renew their certification, private applicators must earn 6 CEUs covering the general private applicator certification requirements and 3 CEUs per category of certification, or they must pass written exams for general private applicator certification and each category of certification.

Applicators must earn at least half of the required CEUs in the 18 months preceding the expiration of their certification.