Recordkeeping for Restricted Use Pesticide Applications in Hawaii

August 2012

This is the replacement for the study guide titled Records for Pesticide Applications in Hawaii, May 12, 2009.

FOR PERSONS SEEKING CERTIFICATION BY
THE STATE OF HAWAII DEPARTMENT OF AGRICULTURE
TO BUY, USE, OR SUPERVISE THE USE OF
RESTRICTED USE PESTICIDES

This study guide was developed for the Pesticide Risk Reduction Education program, a program of the College of Tropical Agriculture and Human Resources, University of Hawaii at Manoa. Please direct any question or comment about this guide to:

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Acknowledgement
We gratefully acknowledge the comments offered by the staff of the State of Hawaii Department of Agriculture, Pesticides Branch.

Disclaimer
Do not rely exclusively on this study guide for legal guidance. It does not tell you everything you need to know about using a pesticide legally. It discusses only the main ideas of part of Hawaii’s pesticides regulation, which could have changed by the time you read this. To learn if the regulation is still the same, ask the State of Hawaii Department of Agriculture if it changed any part of the “Hawaii Administrative Rules, Title 4, Subtitle 6, Chapter 66 Pesticides”, especially section 4-66-62.

Where trade names are used, no endorsement is intended nor is criticism implied of similar suitable products not named.
Introduction

This study guide is about the State of Hawaii Department of Agriculture rules for making and keeping records of applications of restricted use pesticides in Hawaii.

Restricted Use Pesticides

There are two kinds of restricted use pesticides in Hawaii:

- Federal restricted use pesticides—These products have labels that bear a restricted use pesticide statement in a box near the top of the label’s front panel.

- State restricted use pesticides—These products have labels without the restricted use pesticide statement, but dealers who sell these pesticides can identify them.
Anyone who wants to buy, use, or supervise the use of a restricted use pesticide in Hawaii must be certified by the Hawaii Department of Agriculture as a private applicator or a commercial applicator. Private applicators handle restricted use pesticides for their own ranches, farms, nurseries, commercial forests, and other agricultural operations. Commercial applicators handle restricted use pesticides either for agricultural operations on a “for-hire” basis or for non-agricultural operations.

Certain chloropicrin products are sold as warning agents for use with a restricted use fumigant pesticide during a structural fumigation job. Because these warning agents are also classified as restricted use pesticides, applicators conducting these kinds of jobs in Hawaii must apply the Hawaii recordkeeping rules to each use of the chloropicrin product.

**Responsible Persons**

As a Hawaii-certified applicator, you are responsible for making and keeping a record for each application (in Hawaii) of a restricted use pesticide that you bought or otherwise acquired.

**Maintaining Records**

You must maintain each record for two years at the principle place of business.

**Inspection of Records**

The Hawaii Department of Agriculture’s pesticides inspectors may request and inspect your records during reasonable working hours. They must show you their government identification card at the start of the inspection.

**Recording Information**

The Hawaii rules do not require you to use any specific form. You may record and keep information on paper, computer, or other media.

Computer programs for recordkeeping are available. They can be useful for managing large numbers of records. However, use caution when choosing a recordkeeping program. If it was made for another state or for other purposes, it may not lead you to record all of the required information.

The sample form on the next page has spaces for all of the required information. Examples and notes for each information item are in the next section, INFORMATION TO RECORD.
## Restricted Use Pesticide Applications Records of

<table>
<thead>
<tr>
<th>1</th>
<th>Date &amp; Time of application</th>
<th>Brand or common name of pesticide product applied</th>
<th>EPA registration number of pesticide product</th>
<th>Formulation of pesticide product</th>
<th>Per cent active ingredient(s) in pesticide product</th>
<th>Dilution rate</th>
<th>Total amount of pesticide used</th>
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<td>Crop, commodity, stored product, or other site</td>
<td>Name of target pest</td>
<td>Total area covered</td>
<td>Restricted entry interval and whether posting and oral notification are required</td>
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</table>
Information to Record

Both private and commercial applicators must make a record for each application of any restricted use pesticide. The record must include the following items.

1. Brand name or common name of pesticide product.
   Search the pesticide label for this information. The brand name is the name of the product. It’s printed in big bold letters near the top of the label’s front panel.
   
   **EXAMPLES:**
   - Diazinon 4E Sprayable Insecticide
   This is an example of a brand name.
   - Diazinon
   This is an example of a common name.

2. EPA registration number of pesticide product
   Search the pesticide label for the EPA Reg. No. or EPA Registration Number. It’s usually located on the label’s front panel just below the list of ingredients.

   **EXAMPLES:**
   - 4-678
   - 123-9876
   - 456-9867-123

3. Type of formulation of pesticide product
   Identify the formulation when you use the product, or search the pesticide label for this information. Abbreviations for the formulation such as E, WP, or WDG may be part of the brand name, as in “Diazinon 4E Sprayable Insecticide”.

   **EXAMPLES:**
   - Powder
   - Wettable powder (W or WP)
   - Water-soluble powder
   - Liquid
   - Emulsifiable concentrate (E or EC)
   - Flowable (F)
   - Aqueous suspension
   - Water-soluble liquid
   - Liquefied gas
   - Gel
   - Granular (G)
   - Water-dispersible granules (WDG)
   - Dry flowable (DF)
   - Pellets
   - Tablets
   - Bait blocks

Sometimes you can determine the formulation by studying the product’s material safety data sheet (MSDS). Look through the MSDS for the “appearance” of the product as described in section 2 ‘Hazards Identification’ or section 9 ‘Physical and Chemical Properties’.
4. Per cent active ingredient of pesticide product

Search the pesticide label for this information. It’s usually on the front panel in the ingredients list. If a product contains two or more active ingredients, record each percentage.

**EXAMPLES:**
- Mevinphos 23%
- 1,3-dichloropropene 60.8% + chloropicrin 33.3%

5. Scientific or common name of target pest

**EXAMPLES:**
- *Cyperus rotundus*
  This is an example of a scientific name.
- Purple nutsedge
- Drywood termite
- Burrowing nematode
- Slugs
- Black rat

6. Dilution rate

**EXAMPLES:**
- 1½ cups per 20 gallons water
- 1 fluid ounce per 1 gallon diesel/water mix
- 1.25 pounds per 42 gallons water
- 1% mixture with water
- Not diluted

7. Total amount of pesticide product used

**EXAMPLES:**
- 5 fluid ounces
- 1½ cups
- 12.3 pounds
- 2 packets (2 oz.)
- 13 tubes (13 grams)

8. Total area covered

**EXAMPLES:**
- 2,350 square feet
- 1.375 acres
- 36,415 cubic feet
- 98 linear feet

9. Time and date of application

   Record the time you finished the treatment.
10. Address or location of treated site

Record enough detail so that you could point out the treated site to an inspector two years later. If the location could be confused with nearby sites treated at different times, give distinguishing details in a note, sketch, map, GPS coordinates, or some combination of these.

**Examples:**
- Residence at 12-345 Puakea Rd. Kaneohe 96744
- Greenhouse #4 benches 1-9
- Pasture between Quarry Rd & Hwy 120

11. Name and certification number of certified applicator

The certification number appears on the wallet-sized card that you get from the Hawaii Department of Agriculture when you become a certified applicator.

12. Crop, commodity, stored product, or other site treated

**Examples:**
- Banana orchard
- Poinsettias
- Grass seed
- Lumber
- Pasture
- Ditchbank
- Animal cages
- Sewer line

13a. Restricted entry interval

Search the pesticide’s labeling for this information.

If the product is for treating agricultural plants, look for the number of hours or days either in the specific instructions for the agricultural crop, or in the box of statements beginning with the phrase **AGRICULTURAL USE REQUIREMENTS.**

If the product is for fumigating soil, find the number of hours or days listed as the **entry restricted period.**

If the product is for fumigating buildings or commodities in sealed containers, look for a specific number of hours of ventilation or a specific “ppm” of the remaining fumigant gas, or a combination of both.

If the product is for treating outdoor sites that are not for agriculture, read carefully for something less specific, like ‘…until spray has dried’ or ‘…until the dust has settled’.

**Examples**
- 12 hours
  - This example is from the label statement about treating a field of crop plants: “Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.”
- Until spray dried
  - This example is from the label statement about treating a golf course: “Do not enter or allow others (including children or pets) to enter treated areas until sprays have dried.”
- 10 air exchanges of ventilation
  - This example is based on the label statement about treating a greenhouse: “Entry (including early entry that would otherwise be permitted under the WPS) by any per-
son—other than a correctly trained and PPE-equipped applicator who is operating ventilation equipment or responding to an emergency—is PROHIBITED in the entire greenhouse (entire enclosed structure/building) from the start of the application until the greenhouse is ventilated as follows: (1) 10 air exchanges; (2) 2 hours of mechanical ventilation (fans); or (3) 4 hours of passive (vents) ventilation.”

- **[fumigant name] 3 ppm or less, after 6 hours ventilated with fans**

  This example is based on several label statements about fumigating a building.

13b. Whether posting and oral notification are required

Record “Yes” if the product’s labeling has a statement like this:

*Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.*

This kind of statement is called a *double-notification* requirement because it calls for both an oral warning to the workers and putting up warning signs.

**EXAMPLES**

- No
- Yes

14. Any other information that the head of the Hawaii Department of Agriculture deems to be necessary

The head of the Hawaii Department of Agriculture did not require any other information, as of July 31, 2012.

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**Recordkeeping Aids Managers**

In addition to meeting Hawaii recordkeeping requirements, you can use your pesticide application records to recall details that will better your chances of making time- and money-saving decisions, such as:

**Meeting buyer requirements**—Produce and grain buyers may require information about pesticides used to treat the crops.

**Helping secure funding**—Some lending institutions and buyers request field records to evaluate potential environmental liability when making land sales or loans.

**Aiding treatment for pesticide medical emergencies**—Doctors and veterinarians need accurate and timely information about a pesticide that could be affecting their patients.

**Improving crop rotation decisions**—When deciding which crop to plant next, a grower’s choices could be limited by restrictions listed on the labeling of pesticides used to treat the current crop. Heeding those restrictions ensures adequate time for the pesticide residue to break down so that little or none will remain in the soil when the next crop is planted. This will lower the risk of the residue either harming the next crop (if it cannot tolerate the residue) or appearing as illegal residue in the next food or feed crop.

**Improving pesticide rotation decisions**—A strategy for delaying onset of a pest’s resistance to a pesticide involves alternating applications of pesticides that have different effects on the pest (different modes of action). Managers can review their records to recall what pesticides they already used and then choose a pesticide with a different mode of action if another treatment is necessary.

**Determining the effect of a pesticide treatment**—Managers can review their records to learn if the dosage, dilution, or timing of a pesticide treatment may have helped or hindered their pest control efforts.
For More Information

You may direct your questions or comments about recordkeeping requirements to an *environmental health specialist* at one of these Hawaii Department of Agriculture offices:

Kauai, Oahu, and Molokai — Call (808) 973-9424 or 973-4909 (Honolulu office).

Lanai, Maui, and Hawaii — Call (808) 333-2844 or 974-4143 (Hilo office).

Reference

Pesticide Risk Reduction Education is a program of the College of Tropical Agriculture and Human Resources of the University of Hawaii at Manoa. It receives funding from the U.S. Environmental Protection Agency via the U.S. Department of Agriculture’s Pesticide Safety Education Program. Its staff provides study guides, short courses, and a newsletter for Hawaii’s applicators of restricted use pesticides. These education and training activities support the State of Hawaii Department of Agriculture’s program for certification of applicators of restricted use pesticides.

Pesticide Risk Reduction Education
http://pestworld.stjohn.hawaii.edu/epp/pat.html

Certification of Restricted Use Pesticide Applicators
http://hawaii.gov/hdoa/pi/pest/pesticide-applicator-certification-recertification