

The Why's and How-to's of Pesticide Recordkeeping

Cheri Janssen and Fred Whitford Edited by Arlene Blessing Purdue Pesticide Programs

Why keep pesticide records?

Keeping pesticide records is a good business practice and has numerous benefits, such as those listed below.

Aids in management decisions. Knowing the amount of pesticide actually used helps determine the amount to purchase each year. Excess pesticides are like money sitting on the shelf not generating interest. Recording the performance of pesticides (what worked or didn't work) assists with product selection. Records aid in planning crop rotations since some pesticides have restrictions on what crop can be planted the following year.

Provides liability protection. The label is the law. Pesticide records supply evidence that pesticides were mixed and applied in compliance with label directions.

Used to justify insurance claims. Claims adjusters often review pesticide application records in determining payment of insurance claims.

Requested in real estate transfers. The Indiana Responsible Property Transfer Act (IRPTA) requires the property seller to provide an Environmental

buyer and the buyer's lender 30 days before the property transfer. Pesticide records can be used in completing this document.

Disclosure Document (EDD) to the

Assists medical personnel in treatment of pesticide exposure. Pesticide records allow healthcare professionals to to administer treatment specific to that pesticide. Without necessary information only general medical assistance can be provided.

Needed to compile a Pest Management Plan.

Farmers working with the USDA Natural Resources Conservation Service (NRCS) in designated conservation priority areas may need to develop a pest management plan. The plan is submitted for cost-share incentives for conservation improvements. Pesticide records assist in the completion of a Pest Management Plan.

Required for restricted-use pesticides. Since 1993, private pesticide applicators have been required to record their applications of restricted-use pesticides. Keeping the required records prevents civil penalties issued by the Office of the Indiana State Chemist (OISC).

A pesticide is classified as restricted-use because of its risk to water and wildlife, its potential human toxicity, or the complexity of its designated use. A restricted-use pesticide can be identified from the pesticide label. Look for the words, "Restricted-Use Pesticide" inside a rectangular box at the top of the label. The statement, "For retail sale to and use only by certified applicators or persons under their direct supervision, and only for those uses covered by the certified applicator's certification" appears below the box.

Private applicator record requirements

Private applicators must be able to produce application records for all restricted-use pesticides (RUPs) for two years. All required information must be recorded within 30 days after each RUP application.

A private applicator's RUP records are legally accessible to OISC representatives and licensed healthcare professionals for the treatment of pesticide exposure.

OISC inspects records as part of routine inspections or complaint follow-up. OISC doesn't expect to start a large-scale inspection monitoring program; but if they continue to find violations, inspections will likely increase. OISC enforcement action ranges from a warning to a civil penalty fine of \$100 per each restricted-use pesticide application that is not recorded.

A specific record form is not required. Records may be kept as computer files, in a notebook, as invoices, or a combination of these. Commercial applicators must supply a copy of the RUP record to their customers within 30 days of application or agree to keep the records on file for the grower. Whatever the method, a private applicator must be able to make the required information available to OISC within a reasonable time frame.

Helpful information

Forms are not required—but they do help.

There are several sources of pesticide recordkeeping software. The following website lists many software packages: http://pested.unl.edu/pestbkmk.pested. If you do not have access to the Internet, contact a local agriculture extension educator for a paper copy of this

software list. Make sure that all of the required information is on whatever form or software that you use.

Additional items that are not legally required can be helpful with pest management decisions, such as weather conditions before, during, and after pesticide application; scouting observations; and problem areas or breakthroughs.

Records must be accurate and complete. Don't think a drift violation can't be proved if records aren't available—it can. Submitting false records during an investigation is a violation, even if you are absolved of pesticide trespass.

Ideas for keeping complete RUP records:

- Fill out as much of the record or form as possible before fieldwork begins. The field, crop, brand name, manufacturer, and EPA registration number are known before the application is made.
- Make a master list of all pesticide products to be used; include the chemical name, manufacturer, EPA registration number, target pests, and crops. Assign a code to each product. At the time of application, record the product code and add the location, date, rate, and applicator.
- Keep the pesticide label in vinyl page-holder. At the time of application add the date, rate, and location, directly onto the label. The information can be transferred to a more permanent record later.
- Ask your extension educator to review your records for completeness and accuracy.

Information required in an RUP record

- 1. Location
- 2. Applicator name and permit number
- 3. Date of application (month, day, year)
- 4. Crop
- Pest (example: weeds or velvetleaf; insect or rootworm)

- Acres treated
- 7. Rate (amount/acre)
- Total amount used
- 9. Brand name and formulation (if listed on the label)
- 10. Name of manufacturer
- 11. EPA registration number

New 12/2001