2016

Compliance Priorities for Right-of-Way (ROW) Applicators

1. **Supervise unlicensed applicators and registered technicians. Remember non-licensed/non-registered applicators require on-site supervision by a certified applicator. On-site supervision means the physical presence of the supervising certified applicator at the worksite under circumstances that permit continuous direct voice contact with the non-certified individual. Registered technicians are individuals that have passed the pesticide core exam, submitted an application for a credential and received the credential from OISC. Registered technicians don't require on-site supervision, but must have**
    a. **a site assessment fact sheet or site specific instructions,**
    b. **a label for each pesticide product used that day,**
    c. **voice communication with their certified applicator and**
    d. **label mandated PPE and instructions on its proper use.**

2. **Provide applicator employees with the label mandated Personal Protective Equipment (PPE). Have a policy in place that provides escalating penalties for failure to use correct PPE. Know that many common ROW and turf herbicides require the applicator to wear a long sleeved shirt, long pants, shoes, socks, chemical resistant gloves and eye protection. Remember, long sleeves that are rolled up and safety glasses that are on top of the head provide little to no protection to the applicator and therefore do NOT meet the PPE label requirement. Riding on application equipment does NOT lessen the PPE requirements unless specifically stated on the label.**

3. **Keep your Indiana pesticide credentials current. All for-hire businesses and their employees that apply herbicides in Indiana, whether headquartered in-state or out-of-state, must have current Indiana pesticide credentials and must comply with the supervision requirements in item #1 above.**

4. **Become familiar with the runoff restriction language on ROW herbicides. Label requirements on many products are being expanded in an effort to keep some of the newer highly active herbicides on target, in order to protect non-target vegetation and water. Examples of such restrictions include:**

    "A careful evaluation of the potential for off-site movement from the intended application site, including movement by treated soil by wind or water erosion, must be made prior to using this product…if prevailing local conditions may be expected to result in off-site movement and cause damage to neighboring desirable vegetation or agricultural crops, do not apply this product."

    "Certain species may, in particular, be sensitive to low levels of this product including but not limited to, conifers (such as Douglas fir, Norway spruce, ponderosa pine and white

pine), deciduous trees (such as aspen, Chinese tallow, cottonwood, honey locust, magnolia, poplar species, redbud, silver maple and willow species) and ornamental shrubs (such as arborvitae, burning bush, crape myrtle, forsythia, hydrangea, ice plant, magnolia, purple plum and yew).”
“Do not apply this product in areas where the roots of desirable trees and/or shrubs may extend unless injury or loss can be tolerated. Root zone areas of desirable trees or vegetation are affected by local conditions and can extend well beyond the tree canopy.”

“Do not apply this product if site-specific characteristics and conditions exist that could contribute to movement and unintended root zone exposure to desirable trees or vegetation unless loss or injury can be tolerated.”

5. **Become familiar with Indiana’s Pollinator Protection Plan available at http://oisc.purdue.edu/pesticide/p3_activities.html as well as the new pollinator protection language on labels for the neonicotinoid group of insecticides. This group of insecticides is highly toxic to bees and other pollinators and is frequently applied to ornamentals. In an effort to protect pollinators, the US EPA has required new restrictions for the application of neonicotinoid insecticides as well as possibly other insecticides. An example of a new label restriction is, *do not apply this product while bees are foraging*.**