



STATE OF WASHINGTON

DEPARTMENT OF AGRICULTURE

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Q&A on Proposed Rule Changes - Pesticide License Classifications

WSDA is proposing to make rule changes on license classifications (license endorsements) for very specialized types of pest control operations. This proposal will create a “Limited-Specialty” classification that can address various areas of specialization.

For all licensed pesticide applicators (except Private Applicator), WSDA rules require that the licensee be certified, by taking an examination, in all pest control classifications in which they operate (WAC 16-228-1545(1)). Another way to say this is that you must pass exams and have endorsements on your license for all the types of pest control that you do. For example, if you are treating residential landscapes for insect and disease pests you must have the *Ornamental Insect and Disease* endorsement. If you are treating pests in houses you must have either the *PCO General* or the *PCO Structural* endorsement. A list of all endorsements (called license classifications in the rules) can be found in WAC 16-228-1545(3).

WSDA also intends to make two other minor changes to the license classification rules:

- Reorganize the classifications alphabetically in the rules, and
- Eliminate the “Soil Fumigation” classification, which has been replaced with the “Soil Fumigation RMM (risk mitigation measures)” classification.

What does WSDA expect to accomplish with this rule change?

Certain pest control operations are so specialized and unique that only a small number of individuals across the state perform that particular type of pest control. While these individuals need to be competent and become certified in their particular area of specialization, it doesn’t make sense to create a new license classification in rule just for them. WSDA intends to create a “*Limited-Specialty*” classification that will cover any area of specialization for which there is not a classification in rule. As with all license classifications, in addition to the laws and safety exam, WSDA will require that an individual conducting the specialized pest control operation pass an examination specific to their area of specialization. WSDA will track and post in the licensing database the particular area of specialization for which the licensee is certified.

I currently have the Soil Fumigation endorsement on my license, will I now be required to take the Soil Fumigation RMM exam?

The Soil Fumigation endorsement without risk mitigation measures (RMM) is obsolete. Those who have this category on their license must take EPA mandated training every three years in order to perform fumigations, as has been required since 2012. Your Soil Fumigation endorsement will be maintained in the WSDA licensing database even though the classification has been removed from the rules. You can continue to make soil fumigations with this endorsement, provided that you continue to meet EPA's training requirement. Those who have obtained the Soil Fumigation RMM endorsement are exempt from EPA's training requirement.

What determines whether a particular type of pest control operation fits into the “Limited-Specialty” classification or has its own unique classification in rule?

Any type of pest control operation that has 250 or less individuals certified (or in need of certification) will fall into the “Limited-Specialty” classification. Once the number of certified applicators in a particular specialized area exceeds 250, WSDA will have the discretion to create a new classification in rule to accommodate that particular type of pest control (it will no longer be a “limited-specialty” classification). Existing classifications in rule that have over 250 certified applicators will remain as distinct and separate classifications.

Are there existing license classifications in rule that will be moved into the “Limited-Specialty” classification once it is created?

Yes, there are several existing classifications that have a relatively small number of licensees. Existing specialized areas of pest control that will be moved to the Limited-Specialty classification are:

- Aquatic Anti-Fouling
- Interior Landscaping
- Livestock Pest Control
- Sewer Root
- Potato Sprout Inhibitor
- Structural and Turf Demossing

How will this rule change affect me if I already have an endorsement in one of the existing specialized areas?

The only change will be to WSDA's license database where, under the “endorsements” tab, your endorsement will be indicated as “Limited-Specialty” followed directly with your particular area of specialization in parentheses. For example, if you have the sewer root endorsement (once it gets moved into the new Limited-Specialty classification) it will show up in the database as:

Limited-Specialty (Sewer Root)

If you have a current license that has an existing endorsement that WSDA moves into the limited-specialty classification you will not need to take any new exams (you will be grandfathered in), nor will your recertification cycle or credits be affected by this change.

How will a prospective customer, the public, or a pesticide dealer know what my Limited-Specialty endorsement covers?

As indicated above, they will see your endorsement in the publicly accessible database as “Limited-Specialty” followed immediately by your particular area of specialization in parenthesis. For example: “Limited-Specialty (Potato Sprout Inhibitor)”.

Are there any new specialized pest control endorsements that will be created in the “Limited-Specialty” classification?

Yes, specialty endorsements will be created for the following two types of pest control operations that currently do not have a license classification in rule:

- (1) Sulfur Dioxide (SO₂) Fumigation of Wine Barrels and Corks: Sulfur dioxide is a federal restricted-use pesticide that requires a WSDA pesticide license to purchase and apply. Until now, WSDA has required individuals to take the “fumigant” exam to become certified. Since the fumigant exam is broader than and not totally applicable to SO₂ fumigations, WSDA will create a new endorsement under the Limited-Specialty classification with a new exam for this type of pest control. Any licensee who has been performing SO₂ fumigations under the fumigant endorsement will be grandfathered into this new Limited-Specialty classification. They will not be required to take a new exam.

- (2) Post-Harvest Treatment of Fruits and Vegetables: Individuals performing this type of pest control have been allowed to take the Laws & Safety exam and attend product-specific registrant training. A new endorsement will be created under the Limited-Specialty classification with a new exam for this type of pest control. Product-specific training will no longer be required by WSDA, though it is encouraged and the registrant may require it in order to purchase their product. Any licensee that has been certified for this type of pest control will be grandfathered into this new Limited-Specialty classification. They will not be required to take a new exam.

What do I need to do if I have an endorsement that will be moved into or created in the Limited-Specialty Classification?

You won't need to do anything on your part. Once the new Limited-Specialty classification is adopted into rule, WSDA will make the necessary changes to the

database. The only change that you will see is that your affected endorsement(s) will be in the Limited-Specialty classification.

Submit written comments by letter, e-mail or fax to be received no later than 5:00 p.m., November 10, 2016, to:

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