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FROM: Pesticide Control Program
SUBJECT: Record Keeping Policy
DATE: October 10, 2002

Since incorporating federal rules on record keeping into our own rules, there is an obvious need for policy guidance when it comes to amount of pesticide used. The new rules call for recording the total amount of concentrate used, and the total amount of diluent used. This is nice and neat as long as an applicator mixes and uses just enough for each job (which is probably what the U.S. Department of Agriculture was thinking when it devised the record keeping rules). However, record-keeping complications may arise when an applicator mixes up a specified amount, then uses it on a number of different applications. For example, if an applicator mixes 5ml of concentrate in 1 gallon of water, then uses only one pint of this mixture at the first customer, he must do the math to figure out that since there are eight pints in a gallon, he used $1/8^{\text{th}}$ of the concentrate (or 0.625ml) at the first customer. Then if only 10 ounces of mixture are used at the next job..... even more complicated math.

It is not useful or productive for applicators to perform math equations after each application to determine, for example, that 0.625ml of concentrate were used in 16 ounces (1 pint) of diluent. An inspector who is interested in that particular record must then do the math in reverse to get to the "5ml per 1 gallon" label direction for the purpose of checking for proper use. The desired result, and what the federal rule encourages, is for applicators to mix their dilutions properly, and then keep records to indicate that it was mixed and used properly.

Therefore, for pesticide application records, the policy on recording amount of pesticide used (for products that require mixing) is as follows:

For each application record, applicators may record the exact amount of concentrate, and the exact amount of diluent, for the "batch" of use dilution that was used for a particular application. This batch information will remain the same for each application record until the batch runs out and a new mixture is needed. This batch information, plus the amount of dilute mixture used for each application is the acceptable (and preferred) alternative to strictly recording the "amount of concentrate" plus the "amount of diluent" used for each application. With this information, an inspector has all

the information necessary to determine if the pesticide was mixed properly, and exactly how much concentrate & diluent were used on that application if this calculation needs to be done. An example of how to record amount used:

Customer	Batch (pesticide/diluent)	Mixture Used
Customer #1	5ml/1gal.	64 ounces
Customer #2	5ml/1gal.	32 ounces
Customer #3	5ml/1gal.	32 ounces

For pesticide concentrates that are sold, for example, as water soluble packets, applicators may record "1 packet/gal" under the "Batch" heading, as long as a written key exists as part of the application records that defines the amount of that pesticide that is in the packet.

Note: This policy concerns how to record amount of pesticide used when a particular pesticide product requires dilution with another substance, such as water, before using. For pesticides that come ready to use and require no mixing, such as some baits, gels, and granular formulations, the amount of this "ready to use" product used at each customer will be recorded on the application record. For example, in the chart above there will be no entry under the "Batch" heading since it is already "mixed" and ready to use; the amount of the product used at a particular customer would be entered under "Mixture Used".

For questions regarding this policy, please call the Pesticide Control Program at (609) 984-6568.