

PIP-42 Prepared by **R.G. Bellinger**, Extension Pesticide Coordinator, & **R. Rowe**, Extension Program Asst.,  
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## ***Pesticide Recordkeeping Requirements for Private Applicators***

*In South Carolina, private pesticide applicators may be required to maintain records or display information on their pesticide applications under three different regulations. Each of these regulations requires that information or records be kept on a per application basis. A given application may be affected by more than one of these regulations. You must consult the regulations and individual pesticide labels for complete information.*

### **USDA Federal Pesticide Recordkeeping Requirement**

The Federal Food, Agriculture, Conservation and Trade Act (FACT) spells out recordkeeping requirements for Private pesticide applicators.

- Private pesticide applicators must keep records of their Restricted Use Pesticide (RUP) applications for a period of 2 years from the date of the application.
- Private Pesticide applicators must complete the record for an application within 14 days following the application.
- Specific recordkeeping elements under the FACT Act are:
  - the brand or product name,
  - EPA registration number of the pesticide applied,
  - the total amount of product applied,
  - the size of the treated area (or units),
  - the crop, commodity, stored product or site to which the pesticide was applied,
  - the actual location of any application, including any spot application,
  - the month, day and year of the application,
  - the certified applicator's name, and
  - the license number of the certified applicator.

### **South Carolina Chemigation Act (SCCA)**

- The SCCA affects ALL chemicals (fertilizers, plant growth regulators, pesticides—both general use and restricted use) applied to agricultural crops, nurseries, turf, golf courses, greenhouse sites, or land through irrigation equipment. This includes overhead irrigation, trickle or drip irrigation, etc.
- The ability to use pesticides in chemigation is on the individual product label. Many labels specifically prohibit use in chemigation.
- The SCCA affects any chemigator, whether or not the individual is a Certified Applicator.
- When the water supply used in chemigation is a public water supply, the applicator must comply with SCDHEC's State Safe Drinking Water Act.

### **EPA's Worker Protection Standard (WPS)**

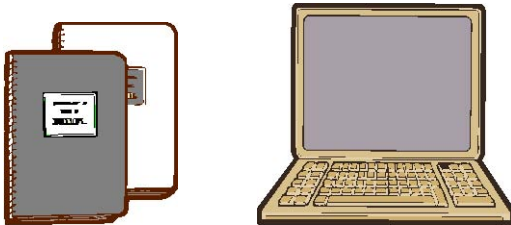
- The WPS does NOT have a recordkeeping requirement as such. However, it DOES require that certain information on individual pesticide applications be displayed for a specified time period: the Restricted Entry Interval (REI) of the pesticide +30 days, but it does not require ag employers or applicators to "maintain records" of applications. Some of the required information to be displayed is the same information required to be kept under the USDA Federal pesticide recordkeeping requirement.
- The WPS covers ALL pesticides (restricted use and general use) used in the production of agricultural plants. See the WPS and individual pesticide labels for additional information.
- The WPS affects agricultural employers (agricultural plant production: farms, nurseries, greenhouses, and forestry operations). It does not matter whether or not the ag employer is a Certified Applicator.

## Recordkeeping Tips & Additional Information

- Additional information on specific pesticide applications may be requested for related medical treatments, pesticide emergencies, or by customers/ clients under pesticide regulations.
- The USDA and some commercial companies have paper forms and software to assist you in your recordkeeping.
- Records for the various regulations do not have to be kept individually; you can keep a single, comprehensive set of application records, provided that you keep all required data elements. The records can be on paper, or in a computer file, or both.
- Under the SC Chemigation Act and the USDA Federal pesticide recordkeeping requirement, records must be maintained for two (2) years from the date of each application. Again, the WPS does not require application records to be maintained after the required display period.
- Tip: The recordkeeping regulations above vary in which of the pesticide identifiers they require, but because you may be required to display information or keep pesticide application records under more than one regulation, use all three pesticide identifiers any time you record application information. That way, you don't have to worry about which regulation you are keeping records for. They are all found on the pesticide label.

The three (3) identifiers are:

1. The BRAND (Trade) or PRODUCT name,
2. The COMMON CHEMICAL name (active ingredient name), and
3. The EPA Registration No.



- Tip: Occasionally the pesticide label does not have the common chemical name of the active ingredient on it, rather, it has the full chemical name. You can often find the common chemical name on the Material Safety Data Sheet (MSDS) for the product.

*An example: A pesticide product called "FURY INSECTICIDE" lists the active ingredient name on its label as: S-Cyano (3-phenoxyphenyl)methyl (+,-) cis/trans 3-(2,2-dichloroethenyl)-2,2 dimethylcyclopropane carboxylate. The MSDS provides, in addition to the chemical nomenclature, the common chemical name, in this case, zeta-cypermethrin.*

- Tip: The Clemson University Cooperative Extension Service encourages ALL pesticide applicators to keep good records of ALL their pesticide applications. Good application records not only meet regulatory requirements but provide information you can use to trouble-shoot application/control problems, or to duplicate control successes. You should keep any additional information in your records that would be useful to YOU, including weather information, such as temperature, wind speed and direction, etc.; method of application; nozzle tip size; spray pressure; application rate; ground speed; boom height; drop-spreader settings; etc.

*An example: If a pesticide label instructs you to "Apply only when the wind speed is less than 10 mph. ...wind speed must be measured adjacent to the application site on the upwind side, immediately prior to the application," you should not only make this measurement, but record it in your application record.*

- More detailed information on pesticide recordkeeping is available from your county Extension Pesticide Training Coordinator, the Department of Pesticide Regulation or the Clemson University Pesticide Information Program web site:

<http://entweb.clemson.edu/pesticid/saftyed/recordkp.htm>