

2025 Pesticide Management Program Updates and Compliance Review

September 16, 2025

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CTPCA Annual Meeting



Connecticut Department of Energy and Environmental Protection

Agenda

- Staffing update
- PA25-33
- FIFRA Revisions
 - Pending Regulations
- Compliance Discussion



PMP Staff/Contacts

Certification & Business Registration, Approval of CEU's, eLicense Assistance

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Inspections/Enforcement

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All Topics

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PA25-33

Neonicotinoids/Rodenticides



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PA25-33 - Neonicotinoids

On and after October 1, 2027

No person shall use any neonic (labeled for use on plants) unless no other effective pest control option is available

- Eliminates lawn/golf course uses
- exceptions – agriculture, seeds, ornamental shrubbery, trees
- does not apply to any neonic not *labeled for use on plants* (indoor/structural pest control)



PA25-33 - Neonicotinoids

Permit will be required for lawn/golf course treatments (process to be developed)

Requires DEEP to consult with CAES to determine if no other treatment option is available before issuing any permit

CAES may consult with Pesticide Advisory Council to determine if a neonic is the only effective control option available



PA25-33 – 2nd Gen Rodenticides

Effective January 1, 2026

Any pesticide containing brodifacoum, bromadiolone, difenacoum, difethialone

- Includes all package sizes/homeowner

Reclassified to Restricted-use

Does not include a phase-in period to cycle product out of the marketplace.



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FIFRA Revisions



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FIFRA Revisions

Certification & Training Plan – EPA approved October 2023

Implementation Schedule

**Goal is to complete all required elements by 2028

Proposed regulations are drafted, circulating for agency management review

Regulations will be shared with stakeholders



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FIFRA Revisions

State must adopt regulations for six requirements of CFR

- 1) Adoption of core standards and commercial applicator (supervisor) category competency standards
- 2) Adoption of commercial applicator standards – aerial
- 3) Adoption of core standards and private applicator competency standards

** Requires updates to exams and study materials to meet competency standards



FIFRA Revisions – Cont'd

4) Commercial applicator recordkeeping requirements

* Add time in/out, size of the area treated, brand name of pesticide used

5) Training requirements for non-certified applicators (junior operators)

6) Adoption of minimum age 16 requirement for non-certified applicators supervised by private applicators



Compliance Discussion



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Compliance Discussion

RCSA 22a-66-5

Commercial Supervisor

- supervisory certificate shall be required for a commercial applicator who is responsible for
 - deciding whether or not pesticides are to be employed
 - how they are to be employed
 - what pesticides are to be used
 - the dosages and timing involved in such pesticide use
 - the methods of application
 - precautions to be taken in the use of such pesticides



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Compliance Discussion

RCSA 22a-66-5

Commercial Junior Operator

- An operator's certificate shall be required for a commercial applicator who actively uses pesticides in other than a supervisory capacity including but not limited to:
- (1) a person who applies, mixes or handles pesticides in other than completely closed containers;
- (2) a person who comes in contact with pesticides through drift for more than brief periods; or
- (3) a person who assists with the application of pesticides under the supervision of a holder of a supervisory certificate.

A junior operator may choose not to apply a pesticide if there are no pests present or if conditions present a potential increased risk of harm if pesticides are used



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Compliance Discussion

MOST FREQUENT COMPLAINTS

- Failure to pre-notify registered abutter
 - Timing, correct information
- Drift/Off-target application
 - Proximity to boundary/water body/granules on sidewalk or road
- Unlicensed applicator/Unregistered business
 - Absentee supervisors, sub-contractors



Compliance Discussion

MOST FREQUENT VIOLATIONS FOUND

Records lacking required information

- \$5,000/day penalty, revocation of certification, business registration

Supervisory Written Instructions lacking required info

- \$2,500/day penalty
- operator acting as supervisor - \$1,000/day penalty

Failure to pre-notify

- \$90/penalty

Pesticide misuse

- \$2,500/day penalty
- Allowing uncertified employees to be present during treatment (training)



Compliance Discussion

Commercial Supervisor Responsibilities 22a-58

- provide specific supervisory written instructions
- maintain a copy of each record of application they supervise
 - 5 Year Retention Period
- maintain a copy of supervisory written instructions as part of the permanent record
- submit annual pesticide use report
 - Individual responsibility, not the business
- **NEW Maintain and provide records of junior operator training



Written Instructions

Intent of law – Each supervisor to provide their own customer specific treatment instructions

Reality – businesses are relying on record keeping software that does not include written instruction format

- Incomplete written instructions
- written instructions from multiple supervisors covering multiple categories
- supervisor acting out of category (civil and/or administrative penalty)

Results – written instructions are overly broad giving junior operators too much decision-making authority

- Too many target pests/too many pesticide options
- operator acting as supervisor



Written Instructions

- the certified supervisor's name and certification number
 - Intent of law is for single supervisor to be identified
 - Supervisor cannot supervise in a category they do not hold
- the certified operator's name and certification number
 - Include all junior operators present/assisting with application
- the pest to be controlled
 - Business rule has always been no more than 5 target pests
- the pesticide to be used
 - Number of pesticide options should be limited
- directions for use of the pesticide, including but not limited to, the dilution rate of the pesticide to be used if other than a ready-to-use product
- method of application



Written Instructions

- the place (address) to be treated and the site or sites at the place that is to be treated
- Site shall be specifically designated so it is clear which of the instructions on the pesticide label are to be followed
 - Site should identify specific apartment(s) to treat
- written instructions may require further directions depending on the product label precautions and site-specific treatment limitations
- **NEW - Include labeling directions, precautions and requirements applicable to the specific use and site and how the characteristics of the use site might increase or decrease the risk of adverse effects



Application Records

- Name/Address of the customer
- Location of the application (address/place)
- Size of the area treated (square feet)
 - Each pesticide used
- Site(s) treated (each pesticide used)
 - Identify each apartment, rooms treated, pesticide(s) used
 - For outdoor treatments identify target species, area (front, side, rear, perimeter) treated



Application Records

- Time/Date of the application
- Brand or product name(s) of the pesticide(s) applied
- EPA registration number(s), total amount of each pesticide applied per location/application (dilute/rate)
- Name(s) and certification number(s) of the supervisor(s) and junior operator(s) involved in making the application
- **RCSA require Supervisory written instructions to be maintained as part of the permanent pesticide application record



Operator Training

Training required before Jr. Operator uses any pesticide

Must be conducted annually

Records of training – Name, Date, Trainer, Title or Description of Training

- The junior operator's printed name and signature
- The junior operator's certification number and issuing state
- The expiration date of the junior operator's certification
- The date the training requirement was met
- The name of the person providing the training
- The title or description of the training provided

Must provide training record upon request of DEEP inspector



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Operator Training

FIFRA required training - Continued

- training must be presented in a manner the trainee can understand
 - training must include specific information (use free training materials)
 - trainer must be certified to use RU pesticides or complete Train-the-Trainer
 - trainer must be present for the entire training and respond to questions
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- NOTE: RCSA requires employees to have Jr. Operator certification before ride-along, being present during treatment, handling application equipment and/or pesticide containers that have been opened.



Training Materials

- PERC – Pesticide Education Resources Collaborative
<https://Pesticideresources.org>

“Pesticide Safety Training for Noncertified Applicators Using RU Pesticides at Non Agricultural Sites”

English and Spanish language videos (33 minutes)

Connecticut Junior Operator = “Noncertified Applicator”

- Gemplers

Federal Worker Protection Standard “Handler Training Manual”

**DEEP Junior Operator Training Manual should not be relied upon to meet federal training requirement



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Questions?



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