EPA Proposal to Revise the Certification of Pesticide Applicators Rule

Notes for VA-Certified Commercial Applicators

On August 5, 2015, EPA issued a proposal to revise the Certification of Pesticide Applicators rule. The proposed revisions have been published in the Federal Register, and are available online at www.regulations.gov, under docket ID # EPA-HQ-OPP-2011-0183. EPA is accepting comments on the proposal until January 22, 2016.

Most of the proposed federal-level changes do NOT affect VA-certified Commercial Applicators. However, here is a list of those that will, if the rule goes into effect “as is”:

- All certified applicators must recertify every 3 years...but...most VA-certified applicators will need to spend more time at recertification programs due to proposed contact time/credit requirements:
  - 50 minutes of active training time = one continuing education unit (CEU).
  - To recertify, commercial applicators must earn 6 CEUs covering core content and 6 CEUs per category of certification (or retake and pass written exams for core and each category) on a 3-year cycle.
    - If a person is certified in only one Commercial Applicator category, they will need 12 X 50 minutes = 10 hours of continuing education in 3 years (6 Core CEUs + 6 category-specific CEUs). This works out to just under 7 hours in two years (4 Core CEUs + 4 category-specific CEUs).
    - If a person is certified in two CA categories, they will need 18 X 50 minutes = 15 hours of continuing education in 3 years (6 Core CEUs + 12 category-specific CEUs). This works out to 12 X 50 = 10 hours in two years (4 Core CEUs + 8 category-specific CEUs).
    - Currently, most VA-approved CAR courses involve ~ 6 hours of actual instruction. Many are approved for more than one category.

- Applicators must earn at least half of the required CEUs in the 18 months preceding certificate expiration date.
- Recertification program participants must present identification (government issued w/picture).
- Depending on how the rule is interpreted, VA-certified Commercial Applicators may need to make and keep records of training for prospective Registered Technicians.
  (40 hours minimum on-the-job training: 20 hours Core manual content instruction or self-study and 20 hours handling w/ direct, onsite supervision)

As a result, VDACS Office of Pesticide Services may need to modify course approval and training tracking procedures. Agencies and organizations that offer continuing education opportunities will see an increased demand for programs.

For additional information on the rulemaking:


For technical questions, contact Michelle Arling: arling.michelle@epa.gov / (703) 308-5891

As per EPA: constructive, usable comments address both what is problematic and why. Agency staff noted that one thoughtful comment with an explanation from an individual carries more weight than hundreds of “form” letters.