

0070107 – LEGAL REQUIREMENTS AND RESPONSIBILITY TO THE PUBLIC-  
INSECTICIDES AND HERBICIDES  
RESPONSE TO COMMENTS FROM INDUSTRY REVIEW

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Henry D. Smith, P.E.  
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Comments:

With regard to the attached specification change (0070107); is there an internet address or link where the products registered with the Florida Department of Agriculture are listed? If so can it be included in the specification?

Thanks

Response: <http://www.flpesticide.us/>

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Joseph Restino  
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Comments:

In 7-1.7 it is required that the employee applying the insecticide and herbicide possess a current Florida Department of Agriculture Commercial Applicator license with categories of licensure in Right of Way Pest Control and Aquatic Pest Control.

We do not feel it necessary to link Pest Control licensure with the application of pre-emergent herbicides. Can we make 1-1.7 less general and more specific to 339-3?

If not, we do not agree with the change the way it is presented.

JR

Response: Persons with FDACS Applicator licenses are the most qualified people to handle these herbicides. Mishandled, herbicides can be very dangerous to individuals and to the environment. I would not recommend changing this requirement. Using herbicide to treat soils as required in Section 339-3 deserves the same level of precaution.

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Lori E. Williams, M.E., P.E.  
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Lori E Williams/D2/FDOT

Comments:

We have an issue with the sentence "The use of restricted products is prohibited."  
It is my understanding that we do use, and want, products that are considered "restricted" but the personnel are required to be licensed. That is what the licences gives us, the ability to use restricted products.

The use of restricted products should not be allowed by unlicensed people. Perhaps there is another category of chemicals that should be disallowed, but we think the specification for "restricted" is in error.

Thanks

Response: Though licensed applicators are the only persons who can use restricted herbicides, it is FDOT's standard to avoid using restricted herbicides, even by licensed applicators. If a restricted herbicide is needed for a specific job, the department can make an exception to the standard.