



# Requirements for Pesticide Dischargers Below Thresholds Checklist

**Pesticide NPDES Permit Program**  
 National Pollutant Discharge Elimination System (NPDES)

*Doc Type: Permitting Checklist*

**Instructions:** This checklist provides a summary of permit requirements. Be sure to read your permit for complete details and responsibilities. Consider printing this page and using it as an easy-reference checklist.

If you are discharging pesticides in, over, or near waters of the state but are below the Thresholds that would require you to submit a Notice of Intent, you are automatically covered by the permit and you must follow these requirements.

## 1) Minimize Pesticide Discharges

- Use the lowest effective amount and application frequency necessary to control the pest while maintaining compliance with the label.
- Use appropriate pest management measures, such as manufacturer specifications, industry standards, recommended industry practices, and other prudent provisions to control the pest and minimize the discharge.

## 2) Monitor

Confirm that pesticide discharges are minimized.

- If conducting post-application surveillance, decision-makers shall assess areas for possible Adverse Incidents (see Step 6).

## 3) Report Adverse Incidents

See Step 6 for more detailed reporting information. If you are aware or are made aware of an Adverse Incident – such as distressed or dead plants or animals – which may be the result of your pesticide application, you must:

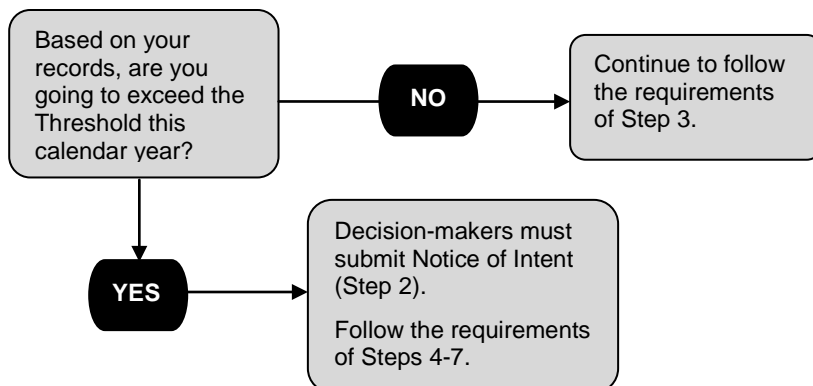
- Immediately notify the Minnesota Duty Officer at 651-649-5451 or 800-422-0798.
- Submit an Adverse Incident Report within 15 days. The Minnesota Pollution Control Agency (MPCA) has developed an *Adverse Incident Report* form for you to use (see Step 6).
- If you determine that the adverse incident was not a result of your pesticide application, submit a justification letter or e-mail to the MPCA within 15 days.

**Note:** *These Adverse Incident reporting requirements are in addition to those required by Federal Insecticide, Fungicide, and Rodenticide Act.*

## 4) Keep Records

You can substitute records developed for other obligations, such as FIFRA and state or local pesticide programs, if all requirements of this permit are satisfied. Keep a file with the following records:

- A copy of any Adverse Incident reports.
- Your rationale for determining that reporting of an identified Adverse Incident is not required (more info in Step 6).
- Up-to-date records of acres treated, linear miles treated, and/or gallons of pesticides applied. Record this data in the same units as the Threshold (acres, miles, or gallons). This will help you determine if and when Thresholds will be reached.



## 5) Corrective Actions

Make changes if any of the following situations occur, ensuring that the situation is eliminated and will not be repeated in the future:

- You discover that you are using more pesticides or are applying them more often than needed to control the pest.
- You report an Adverse Incident.
- A spill or leak occurs.
- You become aware (or MPCA concludes) that your control measures are not sufficient for the discharge to meet applicable water quality standards.
- An inspection or evaluation of your activities reveals that changes are necessary.

Make necessary changes to pest management measures before the next pesticide application or as soon as possible.

## Applicators' Responsibilities

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Applicators are any entity who perform the application of a pesticide or who has day-to-day control of the application (i.e., they are authorized to direct workers to carry out those activities). In addition to the requirements above, Applicators must also:

### 1) Minimize Pesticide Discharges

- To the extent not determined by the Decision-makers, use the lowest effective amount and application frequency necessary to control the pest while maintaining compliance with the label.
- Calibrate, clean, and repair equipment regularly. Regular maintenance minimizes leaks and spills and ensures the correct amounts of pesticides are applied.
- Assess weather conditions in treatment area (temperature, wind speed, and wind direction).

### 2) Monitor

Confirm that pesticide discharges are minimized.

- During application, conduct spot-checks if safe and feasible for possible Adverse Incidents (see Step 6).

### 3) Keep Records

In addition to the records above, the Applicator must also keep records as required by the Minnesota Department of Agriculture and supply them to their customers:

- Name of target pest
- Applicator's name, including license number and company name.
- Application dates & times
- Name of the pesticide used, EPA registration number and dosage used.
- Location of site, including number of units treated.
- Temperature, wind speed, and wind direction at time of application (if applicable).
- Name of target pest
- If visual monitoring occurred during application, and if not, why not, and if monitoring identified any adverse incidents.

### 4) Corrective Actions

- In addition to the above corrective actions, Applicators must make changes if equipment is not being maintained regularly.