

The National Right-Of-Way Herbicide Applicator's Exam –
What Does It Mean For the Utility Industry?
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The Past –

The present requirement for a right-of-way herbicide applicator to enter the business varies by state. Exam content and certification standards vary greatly! The process is complex in some states and simple in others.

In most cases the individual state legislatures have given legal jurisdiction for pesticide law enforcement and certification to the state's Department of Agriculture or a similar regulatory agency. The states have developed, over the last 30 to 40 years, testing procedures for certification and licensing that reflect the individual states industry experience, educational philosophy, and institutional interests. By way of example, cotton growing states often have laws and certification/licensing regulations pertaining to 2,4-D, even where cotton has not been a viable crop for some time and 2,4-D use has waned to almost non-existence. In addition, many states department heads in the past have been entomologists and entomological questions have crept into the requirements for herbicide application certification. This is like having an aerospace engineering question on a civil engineering certification exam!

It ain't rocket science!

As the great physicist, Albert Einstein once quipped, "If you can't explain it simply, you don't understand it well enough".

The Future –

As one observer writes, "The concept of a national exam for appropriate pesticide categories is not a new one. The Environmental Protection Agency (EPA), in conjunction with National Association of State Departments of Agriculture (NASDA), has (already) developed a national core exam. In addition, a national aerial applicator exam will be released in the near future."

Purdue University has long been at the forefront of offering innovative certification training to the pesticide industry. Dr. Harvey Holt, professor of Forest Biology and Natural Resources, is recognized in this area having been instrumental in developing a National Railroad Contractor Certification Training and Testing Program that is now accepted by approximately forty states.

In 2008, Dr. Holt with Drs. Drew Martin and Fred Whitford, of Purdue Pesticide Programs, Purdue University Cooperative Extension Service, developed a project to produce a National Right-of-Way Herbicide Applicator Test Plan and Training Syllabus. Their first activity was to obtain funding from NASDA, derived from the cooperative agreement with the EPA; and then

convene a panel of industry subject matter experts, selected from across the USA, representing roadside, railroad, and utility rights-of-way applicators. Participants represented both public and private programs. Six observers representing state university cooperative extension services and state regulatory agencies, offered guidance to the panel. Representatives from the NASDA and the EPA were also involved.

Dr. Richard Herrett, Project Director for NASDA stated, “NASDA and EPA recognize the benefits of a national exam in evaluating the competency of applicators in the Rights-of-Way sector. Working with experts in the field to develop a rigorous exam that directly addresses the knowledge needed to safely apply pesticide, provides the States a robust tool.”

Over a series of three panel workshops the Purdue researchers directed the development of a certification test plan and training syllabus based on a right-of-way applicator occupational analysis. The objective was to break down the work of right-of-way herbicide application into the basic components of what an entry level worker does and what knowledge and skills are necessary to perform the job. Though the researchers and observers were careful not to inhibit the subject matter expert panelists; they frequently help guide the panel in terms of what knowledge and skills were “testable”.

Dr. Drew Martin guided the panel through a thought process of what the specific tasks that an applicator would need to accomplish in preparing to execute an herbicide application. In addition, the knowledge and skills one must possess to execute this application were identified. Finally, from these knowledge and skill sets the researchers were able to set objectives, from which a test question could be addressed. The entire process from cradle to grave was an intense inward look at the industry and what it required to be a professional herbicide applicator for rights-of-way weeds.

By way of example, “Managing spray drift” would be a specific task that a professional herbicide applicator would have to consider. Several “knowledge and skills” statements necessary to successfully manage spray drift would be:

- Knowledge of why is spray drift undesirable
- Knowledge of difference between spray drift and volatilization
- Knowledge of the relationship of spray droplet size and drift potential
- Knowledge of factors that increase droplet size
- Knowledge of techniques to minimize spray drift

These knowledge statements then served as a basis for developing measurable, drift learning objectives.

The final stage of the Purdue effort will be to draft a test plan and training syllabus that will be packaged so each individual state may incorporate this standard testing material into their

certification process. The National Association of Departments of Agriculture and The Environmental Protection Agency will endorse this effort once it is finalized.

What can you do?

If you frequently use or employ professional herbicide applicators within your area, you may lobby your state regulatory agency to incorporate this testing material into their licensing program.

If you are a member of a professional organization that is involved in vegetation management on rights-of-way, bring up the National Herbicide Applicators Test as a topic on the annual agenda.

If our efforts are successful, your professional applicators will then be enabled in the future to take a test that will be standardized between states and may be reciprocal between still others.

As one state regulator writes, “Due to cost of (independent) exam development, some states may elect not to undertake the process as often as others and some states may not be comfortable in revising an already existing exam.” He, however, points out, **“A National Right-of-Way Exam can assist both states and applicators in achieving their mutual goal of having competent applicators in the field.”**

“Everything should be as simple as it is, but not simpler” (Einstein).

This effort will go a long way toward simplifying the process of certification in our industry. In addition, it should enhance the future availability of professional applicators within your specific area.