

PESTICIDE USE PROPOSAL (PUP)

The Pesticide Use Proposal (PUP) must be completed and signed through all channels listed in the following instructions. Each state varies in the length of time that the PUP is valid, usually three to five years unless there is a change in the PUP. If a change is made then a new PUP must be completed and signed. If a pesticide is new or if a new situation occurs, then it is likely that the PUP will be valid for only one year. It has to be renewed before that pesticide treatment area can be treated again. Montana and the Dakotas have an electronic format that now must be completed and routed through proper channels.

Instructions for Pesticide Use Proposal Submissions

A pesticide use proposal (PUP) package contains the following:

1. A copy of the site-specific environmental assessment (EA) where each proposal was assessed.
2. Copies of labels of any chemicals and surfactants proposed for use.
3. Material Safety Data Sheets (MSDS) for any chemicals and surfactants proposed for use.
4. A properly and completely filled out proposal including any specific attachments.

The PUP is a Department of Interior form and its purpose is to enable the bureaus of agencies in the Department of the Interior to pass specific information about pesticide use on lands administered in those bureaus or agencies back to the Department. The form is designed to provide the site-specific information about chemical use on Bureau of Land Management (BLM) lands as required for Chemical EIS (Environmental Impact Statement) efforts. One proposal may not cover all the general weed problems in one Field Office. A proposal that provides site-specific information is more likely to meet Department, Bureau, and State Office standards for pesticide use than a proposal that generalizes about weed situations and potential pesticide use.

The following are instructions on how to fill out each section of the PUP. The examples in this information concerning specific labels and products are examples only! Consult current labels for up-to-date information.

Proposal Number

The proposal number is one used to track each proposal. Typically, each office keeps a log. The office Pesticide Coordinator assigns a unique number based on year, state, office code, and the number of proposals issued in that office each year. This number needs to be written on both pages of the proposal. The State Pesticide Coordinator will not approve a proposal without a current proposal number.

EA Number

This number cites the number of the EA (Environmental Assessment) in which this pesticide application was specifically addressed. This number needs to be written on

both pages of the proposal. The State Pesticide Coordinator will not approve a proposal without an EA number listed in this section of the proposal. The Colorado Record of Decision for the Vegetation Treatment in BLM Lands in Thirteen Western States Requires site specific analysis for all pesticide use. If you are using an Administrative Determination (AD), each proposal must have a unique AD number.

Location

Refers to the specific site (township, range, section, and portion of a section where the application will take place.) More than one site is possible per PUP, list the exact locations and the estimated acreage of each site to be sprayed on a separate page. Label the page with the proposal number and the reference number and attach the sheet to the PUP. In oil and gas fields, rather than listing the location of each pad, provide a location of the field and include a map. Estimate the number of acres to be sprayed in each field. Maps of the location(s) of each application are not necessary in other submitted proposals; however, they do provide a good framework for impact analysis, especially cumulative impact analysis across space.

Duration of Proposal

The State Pesticide Coordinator will approve proposals for up to five years. If more than one year's approval is desired, state the years in which the herbicide will be reapplied.

I. Pesticide Application (include mixtures and surfactants)

Mixtures of pesticides can be approved if at least one of the labels states that the mixture is compatible and if the mixture, or one of the chemicals in the mixture, is labeled to control the specific pest listed on the proposal.

Trade Name(s)

The trade name, also known as the brand name, is listed on the pesticide label. For example, tebuthiuron is the common name for the herbicide formulation Spike 20P which is commonly used for sagebrush control. "Spike" alone is not the trade name. The manufacturer also makes Spike 80W, Spike 5G, Spike 40P, and Spike Brush Pellets. Provide the information for any surfactants requested as well as for any chemicals.

Common Name(s)

The front page of every label has a section that identifies the pesticide's active ingredient. On the Spike 20P label, tebuthiuron is the common name. It is followed by the chemical name N-[5-(1,1-dimethylethyl)-1,3,4-thiazol-2-yl]-N,N'-dimethylurea. While chemical names are not a PUP requirement, common names are required for each PUP. The Banvel label lists its active ingredient as "dimethylamine salt of dicamba." The Record of Decision for the Vegetation Treatment of BLM Lands on Thirteen Western States shortened the common name to "Dicamba." Only those active ingredients listed in the Record of Decision as "Herbicides Approved For Use" can be approved by the State Pesticide Coordinator.

EPA Registration Number

All pesticides are registered with the Environmental Protection Agency (EPA). The registration number is one of the best ways a specific product can be identified. All pesticide labels have an EPA registration number; it is typically listed on the front page of a label. As with most other information on pesticide labels, EPA registration numbers can change. If you are not using older stocks of a pesticide material, and include both the old and the most recent labels in your proposal package.

Manufacturer(s)

The manufacturer is the company that produces the pesticide. The manufacturer's name is always listed on the front of the pesticide label.

Formulation

The type of formulation is listed on the label. Emulsifiable concentrates (EC), solutions (S), flowables (F), aerosols, invert emulsions, and fumigants are considered "liquid" formulations. "Dry" formulations include dusts (D), baits (B), granulates (G), pellets (P), wettable powders (WP), soluble powders (SP), microencapsulation (M or ME), and water-dispersible granules (WDG).

Method of Application

There are numerous types of pesticide application equipment, including hand sprayers, small motorized sprayers, generators, foggers, fumigators, dusters, wiper applicators, etc. If you will be using a sprayer attached to a type of aircraft, please state you will be using aircraft. Certain pesticides sprayed by aircraft require Washington Office approval because of the increased potential drift problems.

Maximum Rate of Application

The maximum rate of application refers to the maximum amount of pesticide in measurable amounts (use unit on label) and inactive ingredients that a label states can be used for specific target pest species listed as a pest on the proposal. The maximum amount of active ingredient is a ratio calculation. When calculating the rates of application, do not round numbers up. Rounding up may result in stating a number on your proposal that exceeds the label or BLM maximum. Refer to the EIS in your area for maximum rates.

Use Unit on Label

Typically, labels have several different species lists with different rates of application. For example, if a proposal states you will be using Escort™ herbicide to control common mullein, the maximum rate of application is one-half ounce per acre. The Escort™ label also states that four ounces of product may be used to control Kudzu. But this information is irrelevant for this proposal, since the target species is common mullein. Another example: if the target species on a proposal to use Banvel™ is bull thistle, the maximum rate of application use unit on label on pasture, rangeland and non-cropland areas is three pints. Bull thistle, a biennial, is in the list of biennials that Banvel™ will

control. The maximum amount of product that may be used for biennials on the label is three pints for those that are bolting.

Pounds of Active Ingredient Per Acre

Active ingredient (a.i.) is typically expressed as either pounds per acre (the labeled rate), pounds per gallon (liquid formulations) or as a percentage of active ingredient per pound of a dry formulation. Because of public concern over chemical use, there is a trend among the chemical companies to manufacture pesticides that require low rates in order to reduce releasing pesticides into the environment. In the ingredients section on a label of a liquid pesticide formulation, there is a statement about how many pounds per gallon of active ingredient may be found in that formulation. For example, the Banvel™ label states that this product contains four pounds per gallon of active ingredient. If the target species in the proposal to use Banvel™ is bull thistle, and the maximum rate of application use unit is three pints, then the maximum amount of active ingredient per acre is the amount of active ingredient contained in three pints of formulated Banvel™.

Using the table of weights and measures found in page 102, you can determine that three pints of Banvel™ is equivalent to 0.375 gallons of the formulated product (3 pints ÷ 8 pints per gallon). Then using the concepts found in Chapter 8, page 104 of this manual, this amounts to 1.5 pounds of the active ingredient dicamba.

$$0.375 \text{ gallons of Banvel}^{\text{TM}} = \frac{\text{x pounds of dicamba}}{4 \text{ pound dicamba per gallon}}$$

Then back multiply: 0.375 gallons times 4 pounds per gallon that equals 1.5 pounds of dicamba. Therefore, the maximum rate of application pounds of active ingredient per acre is 1.5 pounds **a.i.** for control of bull thistle. In other words, three pints of the Banvel™ formula contains 1.5 pounds of the active ingredient dicamba.

For dry formulations, the active ingredient will usually be expressed as a percentage of active ingredient per pound of the product. The Spike 20P™ label does state that the product contains 0.2 pounds of active ingredient per pound, but the Escort™ label simply states that, by weight, the active ingredient makes up 60 percent of the product. If you propose to use one-half ounce per acre the maximum amount of active ingredient that may be applied per acre is 0.3 ounces. See Chapter 8, page 105.

$$0.05 \text{ oz. Escort}^{\text{TM}} = \frac{\text{x pounds metsulfuron-methyl}}{60 \% \text{ a.i. per pound (0.60)}}$$

0.50 oz. of formulated Escort™ x0.60 a.i. per pound = 0.3 oz. of metsulfuron-methyl

Intended Rate of Application

Pesticide labels state a range of rates including the maximum amount of material that may be applied. Often, depending on the soil type, organic matter, the amount of soil moisture present, air temperature and humidity at the time of application, it is more cost-effective and environmentally sound to use less than that maximum amount of pesticides to control the pest. In this section, state the amount of pesticide you actually apply per acre. Table E2-3 of the BLM Environmental Impact Statement (EIS) list the maximum rates allowed on BLM lands. **The intended rate of application may not exceed the rates listed in table E2-3.** End of the Year reports require reporting the amount of active ingredient that has been applied per acre.

II. Pest (List specific target pest(s) and reason for application.)

When deciding which herbicide to use, it is critical to identify the target pest(s) so that the most useful and cost-effective application may be chosen. If target pests are not identified, the proposal will not be approved by the State Pesticide Coordinator. Pesticides are rigorously tested and their labels list a number of species that the product is known to control. If the specific target pest(s) are not listed on the label, attach documentation from a recent source stating that the product proposed is known to control the specific target species. For example, if you desire to control the target species of showy milkweed with Banvel™, you will note that the Banvel™ label lists several milkweeds, but not showy milkweed. *The 1993-94 Montana, Utah, Wyoming Weed Control Handbook* does list dicamba or Banvel with four pounds of active ingredient per gallon as known treatment for showy milkweed. Documentation must be attached for species not listed on the label, for approval of the proposal by the State Pesticide Coordinator. Documentation must also be supplied for mixtures if the mixture is not listed on the label as one that controls the specific target pest(s). The Western Society of Weed Science has published the *Weeds of the West* by Tom D. Whitson, Larry C. Burrill, Steven A. Dewey, David W. Cudney, B.E. Nelson, Richard D. Lee and Robert Parker that lists standardized common plant names. Chemical companies are also using the standardized names more often now when printing labels. Use the standardized common names of plant pest species or their scientific names in this section of the PUP. List the specific reason for this pesticide application.

III. Major Desired Plant Species Present

List the species that define the natural plant community at the site where the chemical is to be applied. If the natural plant community is not what the site is being managed for, also list the key management species, or state that you are managing for bare ground.

IV. Treatment Site

Describe the land uses in the treatment area, the stage of growth of the target pest species, the slope and soil type and other factors that relate to specific information found on the pesticide label.

Estimated Acres

Estimate the number of acres to be treated chemically at each specific site. (This will be included on an attached sheet when one pup covers more than one site.) The size of the acreage to be treated determines who the final authorizing official will be. This section of the PUP must be completed for approval by the State Pesticide Coordinator.

V. Sensitive Aspects and Precautions

Describe any sensitive areas, including wetlands and riparian areas, endangered, threatened, candidate and sensitive habitat, and distance to the treatment site. List measures to be taken to avoid impact to any sensitive areas. If an Administrative Determination is used and documented in the EA Number section of the proposal, this section of the PUP must be filled out before the State Pesticide Coordinator will approve the PUP.

VI. Non-target Vegetation

Since pesticides are not selective at a species level, there will be some loss of species that are considered desirable. Describe the associated and cumulative impacts and mitigations associated with the loss of non-target vegetation on the site of the pesticide application. If an Administrative Determination is used and documented in the EA Number section of the proposal, this section of the PUP must be filled out before the State Pesticide Coordinator will approve the PUP.

VII. Integrated Pest Management

Vegetation Treatment on BLM Lands in 13 Western States must take an integrated vegetation management approach. The techniques proposed for use in an integrated management program include: Preventive actions, biological control such as prescribed burning, cultural control, such as changing grazing time, numbers, or type of grazing animal, manual practices, such as hand pulling or mowing, chemical control, and restoration practices. Vegetation management priorities: preventive, non-chemical, combination of preventive, non-chemical and chemical, then sole chemical use in that order. Because of these priorities, please document what is being done besides this chemical application to manage undesirable species in the project area. If an Administrative Determination is used and documented in the EA Number section of the proposal, this section of the PUP must be filled out before the State Pesticide Coordinator will approve the PUP.

Originators Signature

The originator is the person who first asks for approval to do a chemical treatment. It may be a Bureau employee, such as a range conservationist, who will apply the chemical in an allotment that they manage. Or it may be an employee, such as a realty specialist, who fills out the form for a utility company when weed control is part of the approval for a permit. It may also be someone from outside the Bureau, such as a county weed supervisor or oil and gas company representative. It is always best if someone within the BLM provides guidance to our customers as they supply information required by the BLM and the Department of Interior.

Originators Company

If the project is initiated by BLM employees, the originator's company is not applicable. In all other cases, state the company or firm who holds the BLM permit, such as a Conoco, Moffat County, etc. This space is not intended to document an originator's contractor.

Certified Pesticide Applicators Signature

This is the signature of the person who will oversee the pesticide application on the ground. This person must be currently certified by the Bureau or must have a current state certification. There may be cases where a customer plans to contract out this pesticide application and does not know who the applicator will be at the time the proposal is submitted. A BLM Certified Applicator may then sign and require that the customer send a copy of the chosen applicators state certification to the BLM office's Pesticide\Weed coordinator. This must be done before the pesticide application takes place. The State Office Pesticide Coordinator keeps a list of currently certified BLM employees and will not approve a proposal if the Certified Applicators signature is missing or if signed by someone whose certified has expired.

BLM Office Pesticide\Weed Coordinator's Signature

This is the signature of the person in the Field Office who has been assigned the duty of reviewing that office's proposals before they are forwarded to the State Office. This person should also keep a file of copies of State Certification and is responsible for submitting Annual Pesticide Use Reports to the District Office.

Managers Approval

The Field Manager, or acting-manager must sign this proposal. The State Pesticide Coordinator will not approve any proposal that does not have a manager's signature.

State Pesticide Coordinator's Signature

This has been deleted from Colorado since the State Pesticide Coordinator has been delegated authority to sign as the acting Deputy State Director.

Deputy State Director's Approval

The Deputy State Director's acting will sign in this blank and check whatever the PUP was approved as is with modifications or is not approved. The original PUP and all labels and attachments will be returned to the Office requesting approval.

Washington Office Approval (IPM/Pesticide Specialist)

Deleted from the Colorado form since the Colorado Pesticide Coordinator signs for the Washington Office.