

OISC Updates

Indiana Pesticide Review Board Meeting
August 20, 2025



OISC Updates

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- Under the Supervision Workgroup
- IPRB One-pager
- Rule Readoption
- Drift Cases
- Dicamba
- Other OISC Updates

Cory Cocanower
Carrie Campbell
Jim Hawbaker
Joe Long
Lisa Hanson
Terry Jungels
Fred Whitford
Leo Reed
Sarah Caffery

July 21 – Workgroup Meeting

Discussed difficulties

- Responsibility
- Differing Requirements
- Training
- Lack of Resources

Under the Supervision Workgroup

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Under the Supervision Workgroup

What do we have?

Current One-Pagers

- [Direct Supervision of Noncertified Applicators Using RUPs](#)
- [Training, Certifications & Licensing Requirements for Indiana Pesticide Users](#)

What can we do?

- How can we add clarity?
- What can we provide to the regulated community in terms of educational resources?

Direct Supervision

Noncertified Applicators Using Restricted Use Pesticides



Resources

Indiana Resources:
OISC's Supervision Website includes additional one-pagers and an FAQ. Please review our website if you have any additional questions.

OISC Supervision Website:
[Add QRCode and Quick Link](#)

Federal Resources:
[Federal Certification Standards for Pesticide Applicators](#)
[Add QRCode](#)

Still have questions? Contact OISC:

Regulations
Federal Requirements
40 CFR § 171.201

Indiana Law
IC 15-16-5

Who can use Restricted Use Pesticide (RUPs) in Indiana?
Individuals must be **at least 18 years old*** and either:

- A **certified and licensed applicator** (commercial applicator or private applicator); or
- A **noncertified applicator** working under the **direct supervision** of a certified applicator employed by the same organization.

What are the training requirements for the noncertified applicator?
One of the following **MUST** be completed annually:

- Worker Protection Standard training for Pesticide Handlers
- Pesticide Safety Training for Non-Certified Applicators Using RUPs at Non-Agricultural Sites

A fully certified trainer must conduct the training and be present the entire time.


What are the responsibilities of the supervising certified and licensed applicator (SCLA)?

1. The SCLA is legally responsible for all requirements and activities of the noncertified applicator.
2. The SCLA must keep training records for **two years** that include:
 1. Noncertified individual's name and signature
 2. Date of the training and training that was completed
 3. Name of the trainer
3. The SCLA must ensure that the noncertified applicator has:
 1. Access to product labeling **at all times** during use.
 2. Personal protective equipment is **available, clean, and is worn correctly.**
 3. Understandable site-specific instructions for application
 4. Daily proper operation verification of all mixing, loading, transferring, and application equipment.
 5. Means to immediately contact the SCLA
4. The SCLA must be physically present at the work site if required by the pesticide product label.

* An individual can use RUPs at 16 years of age ONLY if the noncertified applicator is using RUPs on a family-owned farm under the direct supervision of a private applicator who is an immediate family member. This individual CANNOT use RUPs that are fumigants, sodium cyanide, or sodium fluoroacetate. This individual CANNOT apply RUPs aerially. Training requirements and responsibilities listed above for the SCLA still apply.

Who am I?

Who is who for different pesticide applicators in Indiana.



Commercial Applicator	Private applicator
<p>Is a certified applicator who:</p> <ol style="list-style-type: none"> 1. Uses or supervised the use of RUPs 2. Uses GUPs or fertilizer materials for hire <p>For any purpose or on any property other than that identified in IC 15-16-5-30. (IC 15-16-5-7)</p>	<p>A certified and permitted applicator who uses or supervises the use of RUPs for purposes of producing any agricultural commodity on property owned, rented, or managed by the employer or the applicator, if applied without compensation on the property of another person. (IC 15-16-5-30)</p>
<p>Registered Technician A person who:</p> <ol style="list-style-type: none"> 1. Is not certified or licensed under IC 15-16-5; 2. Has registered with OISC; and 3. Is authorized to engage in the use of GUP or fertilizer materials for hire. <p>(IC 15-16-5-33)</p>	<p>Noncertified Applicator Individuals not certified or licensed who work under the direct supervision as required under 40 CFR 171.201 to use RUPs. (IC 15-16-5-10.5)</p>

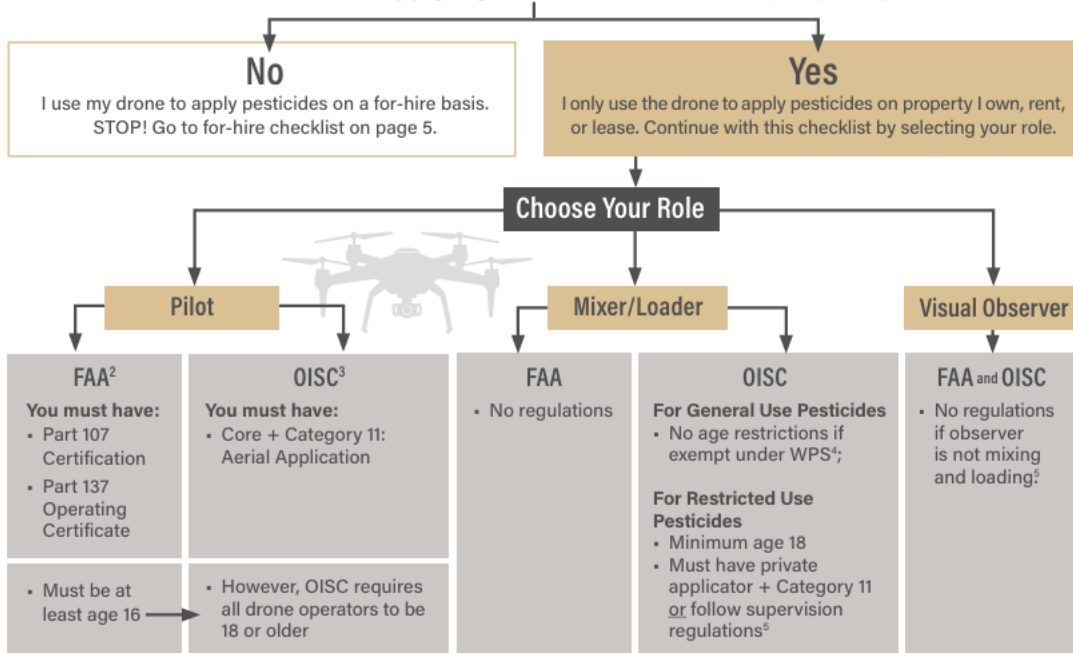
Check out additional one-pagers or our website for details on required training, recertification needs, and other helpful tips! An FAQ is also available.

Still have questions? Contact OISC:

These graphics are in draft form and have not gone through the final review process.



Are You a **Farmer** Applying Pesticides to **Your Property Only**?¹



¹ Spreading treated seed, cover crops, or fertilizer-coated seed is exempt under pesticide regulations

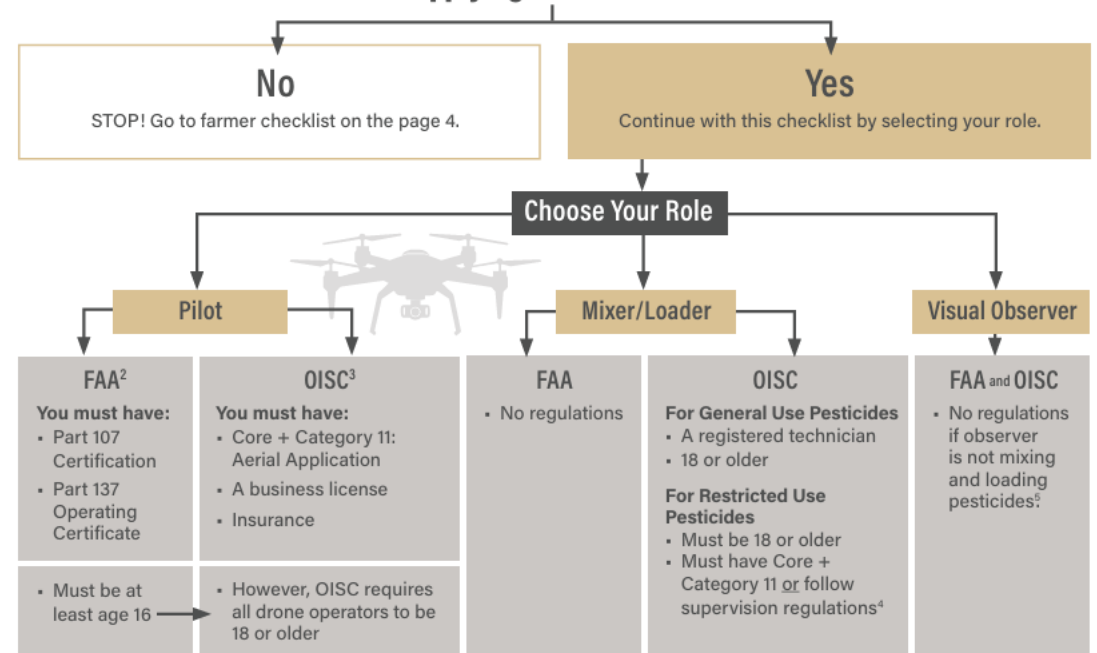
² FAA - Federal Aviation Administration

³ OISC - Office of Indiana State Chemist

⁴ Environmental Protection Agency (EPA) Worker Protection Standard (WPS)

⁵ Supervision requirements for non-certified employees: oisc.purdue.edu/pesticide/pest_fert_dist_licenses.html

Are You Applying Pesticides **For-Hire**?¹

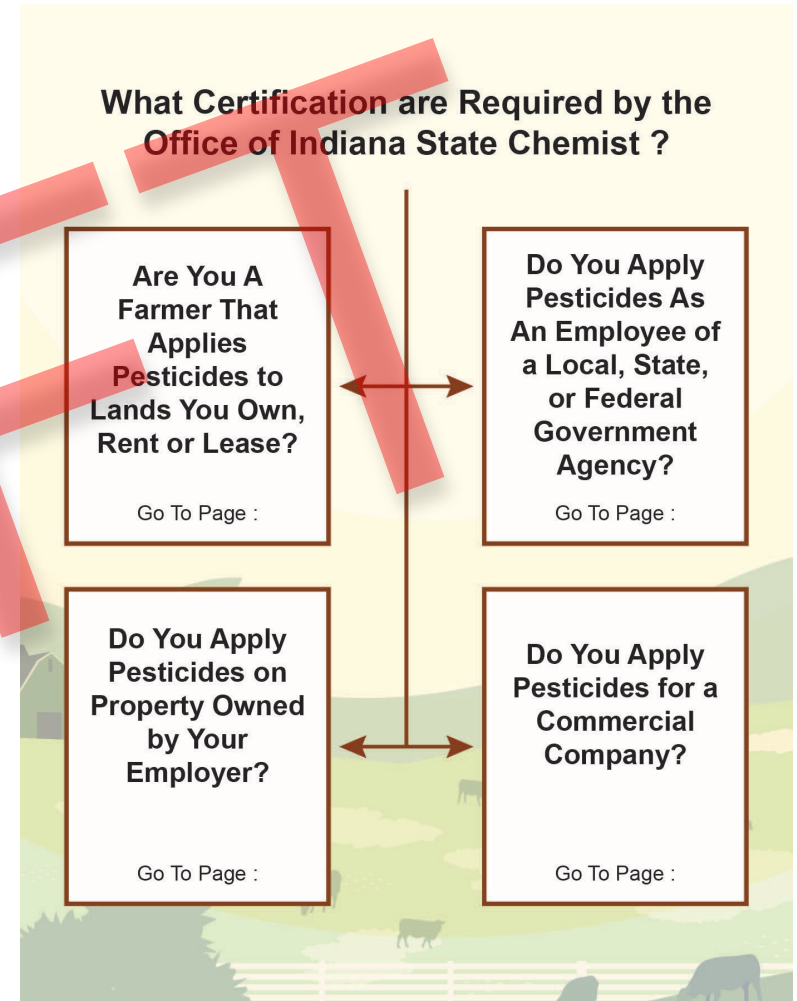


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² FAA - Federal Aviation Administration

³ OISC - Office of Indiana State Chemist

⁴ Supervision requirements for non-certified employees: oisc.purdue.edu/pesticide/pest_fert_dist_licenses.html



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The Indiana Pesticide Review Board



The Indiana Pesticide Review Board was established in 1971 under the Indiana Pesticide Registration Law (IC 15-16-4) and consists of members appointed by the governor to four-year terms. The Board consists of representatives of the application industry, the pesticide manufacturing industry, scientists, extension educators, state environmental agencies and the public. Meeting publicly on a quarterly basis, the Board, through its diverse membership, is responsible for the review, analysis and interpretation of information related to the regulation of pesticides in Indiana.

Working in partnership with the Office of Indiana State Chemist (OISC), the following are examples by which the Board provides education, oversight and a public forum to ensure the safe and effective use of pesticides in Indiana:

- Serves as a sounding board for OISC through in-depth discussions by the Board members, the regulated community and the interested public who attend quarterly meetings.
- Provides an open forum for those desiring changes in OISC policies, rules and regulations.
- Responds to new and emerging pesticide issues.
- Establishes guidelines for the application, storage, transportation and disposal of pesticides and their containers.
- Helps to formulate clear and effective education programs for commercial, public and private pesticide applicators.
- Reviews state chemist enforcement actions through the administrative hearing process.
- Gathers information through subcommittees to assist OISC in formulating goals and policies.
- For further information on the IPRB visit the following link: <https://oisc.purdue.edu/pesticide/iprb.html>.

EDUCATION • OVERSIGHT • PUBLIC FORUM

Task from 181st IPRB Meeting

Create informational material to provide a better understanding of what IPRB does and how it operates.

IPRB One-Pager

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Progress Update

355 IAC 4

- **Rule 0.5** – Definitions
- **Rule 3** - Financial Responsibility of Commercial Applicators
- **Rule 7** - Renewal of Applicator Certification and Technician Registration

Straight Readoption (no edits)

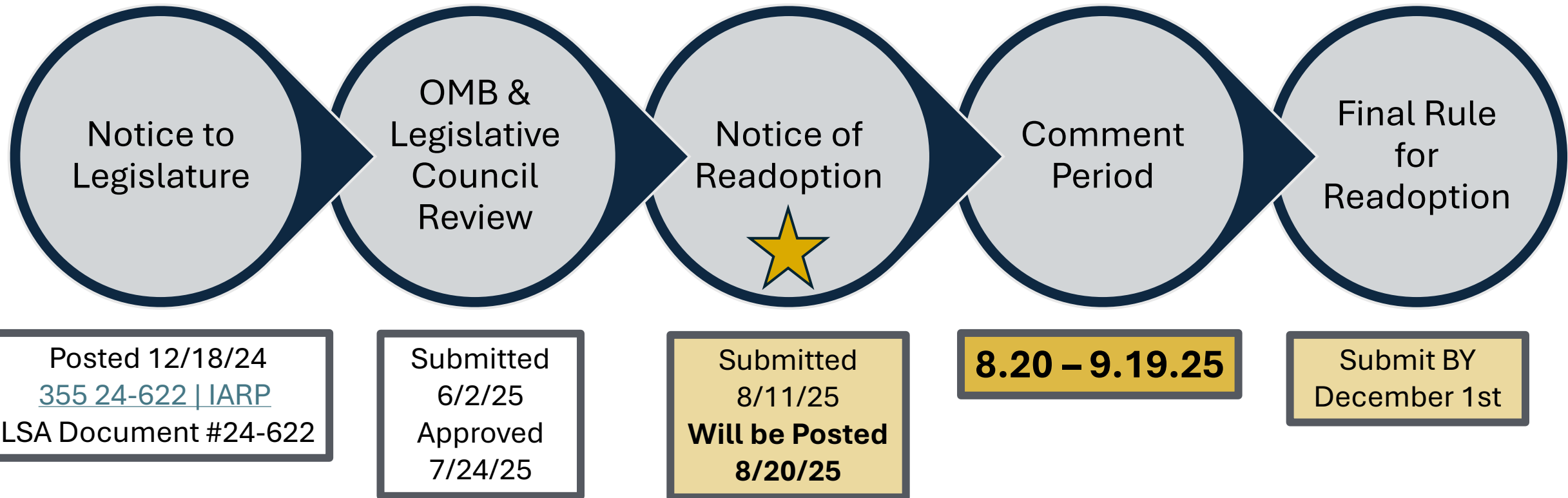
Rule Readoption

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Rule Readoption

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Current Progress for 355 IAC 4 – Rules: 0.5, 3 and 7



355 IAC 4 Comment Period

REQUEST FOR PUBLIC COMMENT

The Office of Indiana State Chemist is soliciting public comment on rules expiring under IC 4-22-2.6. Comments may be submitted in one of the following ways:

(1) By mail or common carrier to the following address:

LSA Document #25-XXX

Sarah Caffery

Office of Indiana State Chemist

175 S University Street, West Lafayette, IN 47907-2063

(2) By email to **publiccomments@groups.purdue.edu** PLEASE NOTE: Email comments will not be considered part of the official written comment period unless they are sent to the address indicated in this notice.

COMMENT PERIOD DEADLINE

All comments must be postmarked or time stamped not later than **September 19, 2025**

Rule Readoption

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Future Rule Needs

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Next Steps 355 IAC 4

3.k: Evaluation to determine if content of the rule would be more appropriately integrated into Indiana Code

6.b: 25% reduction by January 1, 2029

6.c: Implementation of streamlining of regulatory/permitting approval process

6.d: If rules have not been amended in the prior 8 years; they should be added to Indiana Code or agency must provide compelling justification

Executive Order
25-17

[EO-25-17.pdf](#)

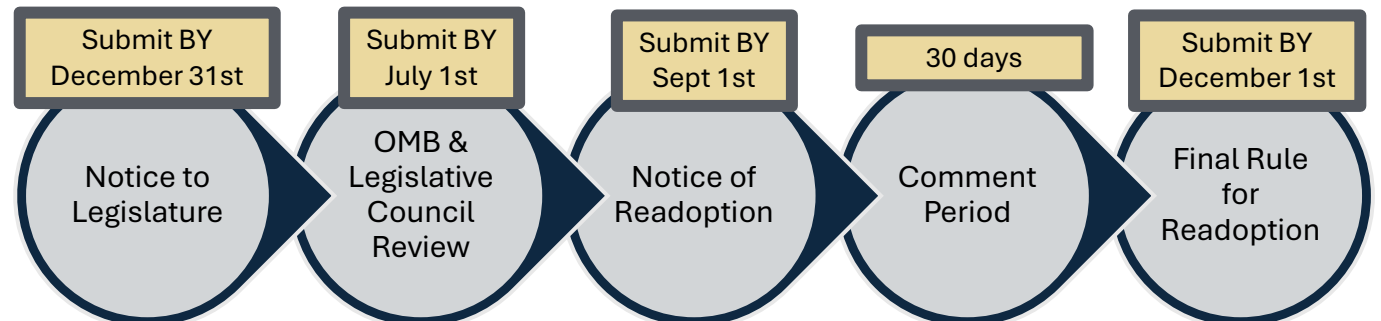
Future Rule Needs

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Next Steps 355 IAC 4

	Sept & Oct 2025	Nov & Dec 2025	Jan & Feb 2026	Mar & Apr 2026	May & June 2026	July & Aug 2026	Sept & Oct 2026
Rule Readoption (Full)		Submit Notice by 12/31/25				Submit to OMB & LCR by 7/1/25	Submit Notice by 9/1/25
Rule to Law	Organize meetings	Initial Meeting w/Groups	2nd Meeting w/Groups	3 rd Meeting w/Groups			Finalize Draft

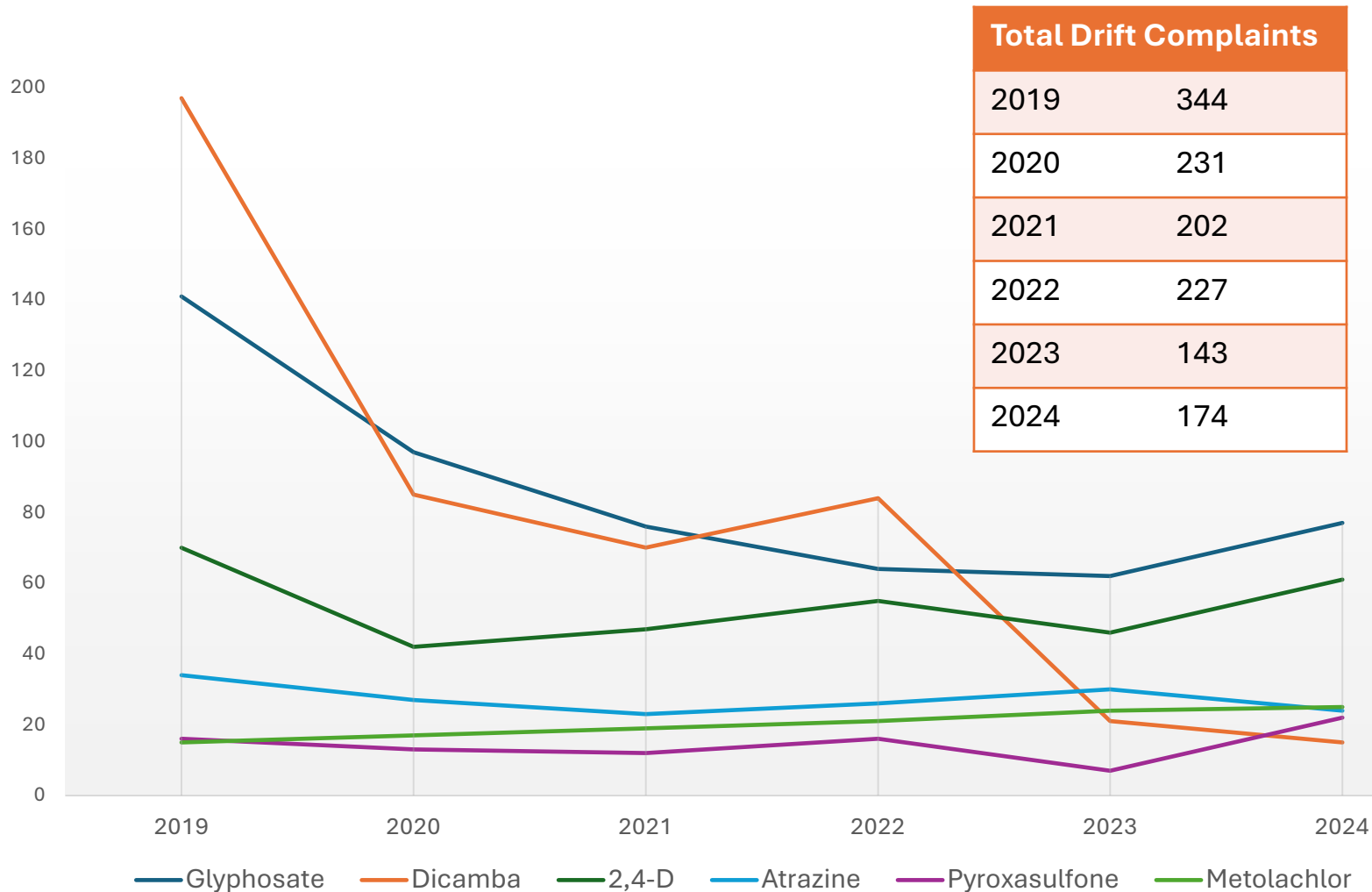
Basic Overview of Rule Readoption Timeline



- Update for 2024
- Current data for 2025

Drift Cases

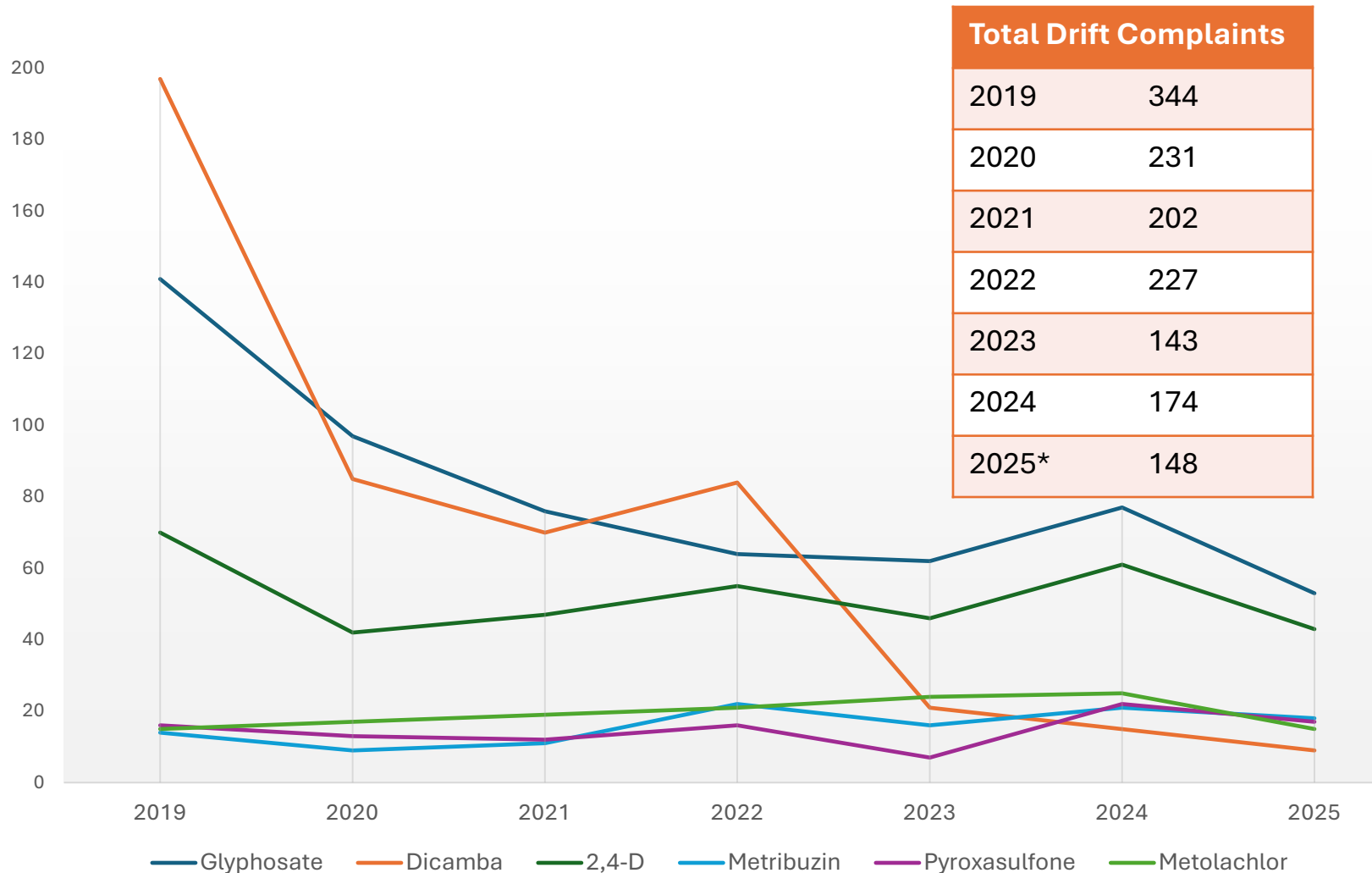
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Top 5 Active Ingredients Per Year	
2019	Dicamba (197) , Glyphosate (141), 2,4-D (60), Atrazine (34), Saflufenacil (22),
2020	Glyphosate (97), Dicamba (85) , 2,4-D (50), Atrazine (32), Metolachlor (17),
2021	Glyphosate (76), Dicamba (70) , 2,4-D (47), Atrazine (23), Metolachlor (19),
2022	Dicamba (84) , Glyphosate (65), 2,4-D (55), Atrazine (26), Metribuzin (22),
2023	Glyphosate (62), 2,4-D (46), Atrazine (30), Acetochlor (27), Metolachlor (24) + Dicamba (21 #6)
2024	Glyphosate (77), 2,4-D (61), Metolachlor (25), Atrazine (24), Pyroxasulfone (22)+ Dicamba (15 #9)

2024 Drift Cases

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Top 5 Active Ingredients Per Year	
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2023	Glyphosate (62), 2,4-D (46), Atrazine (30), Acetochlor (27), Metolachlor (24) + Dicamba (21 #6)
2024	Glyphosate (77), 2,4-D (61), Metolachlor (25), Atrazine (24), Pyroxasulfone (22) + Dicamba (15 #9)
2025*	Glyphosate (53), 2,4-D (43), Metribuzin (18), Pyroxasulfone (17), Metolachlor (15), + Dicamba (9 #9)

*FY25 data is still being finalized. Numbers will change

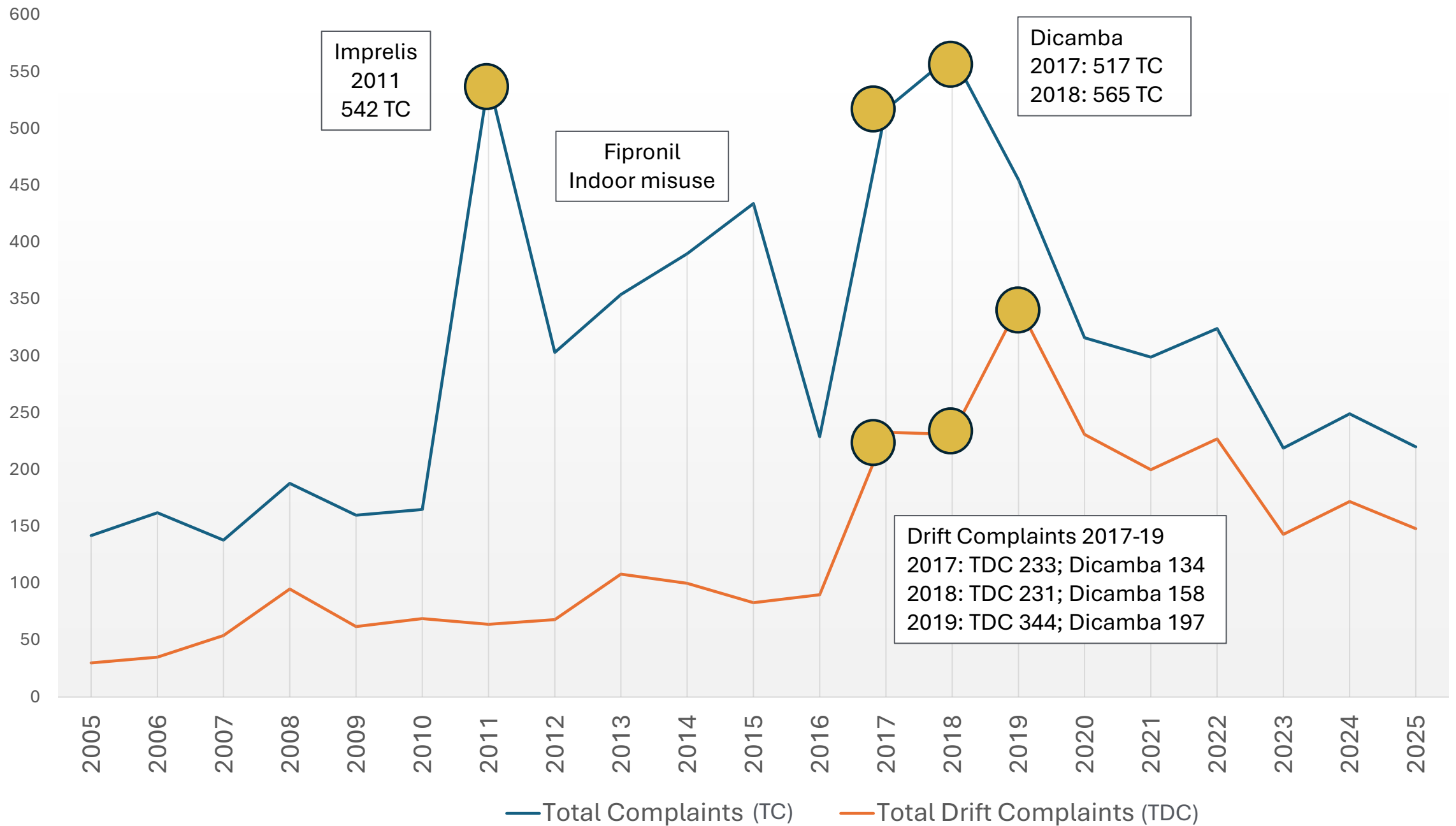
2025 Drift Cases

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- Indiana historical data
- Changes for OTT use
- Review of pending label revisions
- Comment period

Dicamba

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600

500

400

300

200

100

0

2016

2017

2018

2019

2020

2021

2022

2023

2024

2025

— Total Complaints (TC)

— Total Drift Complaints (TDC)

— Dicamba Drift (DD)

	TC	DC	DD
2016	229	90	5
2017	517	233	134
2018	565	231	158
2019	455	344	197
2020	316	231	85
2021	299	200	70
2022	324	227	84
2023	219	143	21
2024	249	172	15
2025*	220	148	9

*FY25 data is still being finalized. Numbers will change

Dicamba - Changes in OTT Use

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2016

Dec 2016, EPA approved the first OTT dicamba formulations for use on DT crops. Label very complex. Registration conditional for two years.

2017

Dicamba complaint numbers explode for top ten soybean producing states

2018

EPA conditionally registers OTT dicamba for another two years. Adds more label restrictions – add buffer zones, application timing restrictions

2019

Dicamba complaints continue to increase; EPA changes the label.

2020

Indiana establishes a June 20th application cut-off date. Reduction in dicamba cases seen in Indiana. Court vacated the registrations with OTT use; EPA issued a cancellation order. EPA issues new registration through 2025 with more restrictions.

2021 & 2022

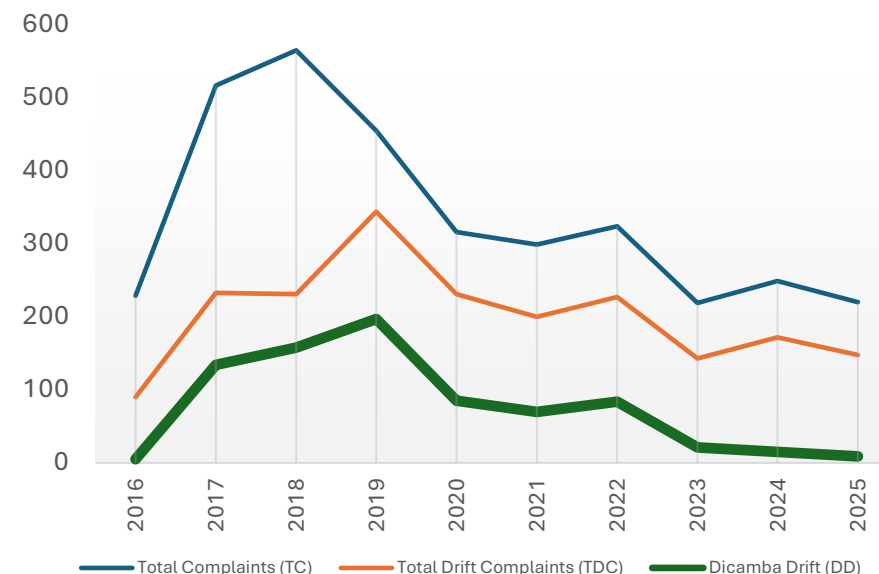
Dicamba complaints remain unchanged or worsen across the country. Indiana maintains June 20th cut-off date through Highly Volatile Herbicide determination.

2023

New label from EPA includes state-specific collateral labeling. OTT dicamba has a June 12th cut-off date.

2024

February 2024, Court vacated 2020 registration. EPA issued existing stock order.



[EPA Announces Proposed Decision to Approve Registration for New Uses of Dicamba, Outlines New Measures to Protect Human Health, Environment | US EPA](#)

July 23, 2025:

EPA Announces Proposed Decision to Approve Registration for New Uses of Dicamba, Outlines New Measures to Protect Human Health, Environment

Dicamba

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EPA Proposed Decision

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[Regulations.gov](https://www.regulations.gov) – direct link for EPA-HQ-OPP-2024-0154

Memorandum Supporting Proposed Decision to Approve Registration for the Uses of Dicamba on Dicamba-Tolerant Cotton and Dicamba-Tolerant Soybean

IV. Evaluation C. Incident Assessment (page 19)

...

*The Agency found that reported incidents involving dicamba continued during the 2022, 2023, and 2024 seasons but at a lower rate than previous years. **The factors that contributed to incidents were generally consistent with findings in the 2021 memorandum. The majority of incidents continue to be associated with non-DT soybean, but reports also included dicamba exposure on specialty crops, ornamental plants, home gardens, and trees, as well as university and registrant research and soybean seed production fields...***

Report: [EPA Releases Summary of Dicamba-Related Incident Reports from the 2021 Growing Season | US EPA](#)
FAQ about Report: [Dicamba 2021 Report on Dicamba Incidents | US EPA](#)

EPA Proposed Decision

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Memorandum Supporting Proposed Decision to Approve Registration for the Uses of Dicamba on Dicamba-Tolerant Cotton and Dicamba-Tolerant Soybean

VI. Proposed Regulatory Decision A. Rationale and Risk Mitigation (page 23)

...

*EPA identified **on-field chronic risk to terrestrial invertebrates, mammals, and birds and acute risk to on-field birds and aquatic-phase amphibians**. ... dicamba does pose risks of concern to certain plants. EPA identified on-and off-field risks of concern for non-listed terrestrial and wetland plants, and aquatic non-vascular plants. These off-field risks also include the potential for dicamba to volatilize in certain conditions and damage, for example, ornamental gardens, desirable trees, or a neighbor's soybean field if not planted with seed with the dicamba tolerant trait. **The impacts of offsite movement of dicamba to non-users may be substantial. High value crops may suffer yield and quality losses, organic growers could lose organic certification, research and crop breeding programs could be disrupted, and plantings in residential areas and landscapes could be damaged.** Offsite movement of dicamba has resulted in conflict between neighbors. EPA is proposing mitigation to ensure dicamba stays on the treated field, addressing offsite movement. EPA is proposing that these mitigations be on the product labels to reduce the risks (costs) while also considering the benefits of the use.*

...

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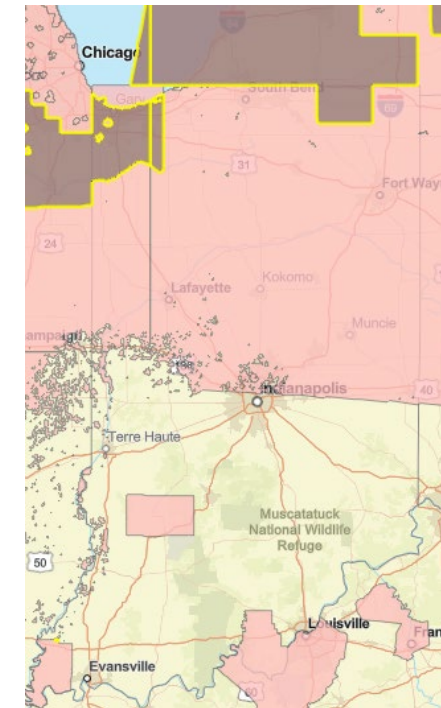
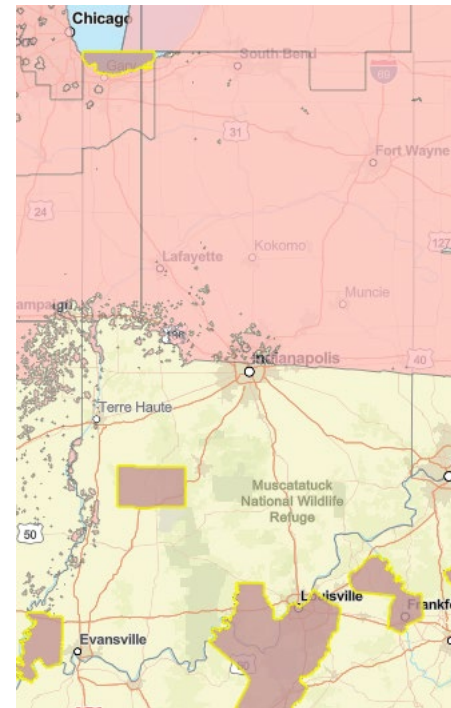
Memorandum Supporting Proposed Decision to Approve Registration for the Uses of Dicamba on Dicamba-Tolerant Cotton and Dicamba-Tolerant Soybean

VI. Proposed Regulatory Decision A. Rationale and Risk Mitigation (page 24)

ESA – Bulletins – PULAs

- 3-6 Points Required
 - 3 points for all uses
 - 6 points required in PULAs
 - PULAs are not available yet

[Bulletins Live! Two -- View the Bulletins | US EPA](#)



Limitations for Selected Area

Pula ID: 52
Event Name: Dicamba - 2020
Application Month: August 2025

*PULAs connected to
2020 Dicamba labels

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Memorandum Supporting Proposed Decision to Approve Registration for the Uses of Dicamba on Dicamba-Tolerant Cotton and Dicamba-Tolerant Soybean

VI. Proposed Regulatory Decision A. Rationale and Risk Mitigation (page 24-25)

EPA has also identified risks of concern from volatility associated with the use of OTT dicamba products on DT cotton and DT soybean. EPA is proposing that the labels would include measures to mitigate direct effects of volatility on terrestrial and wetland plants and prey, pollination, habitat and/or dispersal (PPHD) effects to listed species that rely on plants. With the implementation of the proposed mitigations on the labels, as described below in Table 8, the likelihood of impacts to terrestrial and wetland plants would decrease. These volatility mitigation measures are expected to address the initial prediction of population-level impacts to generalist species as well as reduce the likelihood of damage to other economically and socially valuable species.

EPA Proposed Decision

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[Regulations.gov](https://www.regulations.gov) – direct link for EPA-HQ-OPP-2024-0154

Memorandum Supporting Proposed Decision to Approve Registration for the Uses of Dicamba on Dicamba-Tolerant Cotton and Dicamba-Tolerant Soybean

VI. Proposed Regulatory Decision A. Rationale and Risk Mitigation (page 26)

Table 8. Proposed options for application of OTT dicamba products at varying temperatures

... The Agency acknowledges that the proposed addition of varying amounts of VRA and requirement to follow certain requirements for different actual and forecasted temperatures is more complex than what would typically be required on an herbicide label...

To minimize volatility

- Require use of a pH buffering VRA
- ONLY 3 specific VRAs

Air Temperature*	Rates of OTT dicamba product + Required VRA**
< 75°F	0.5 lb dicamba + 20 fl oz VRA
≥ 75°F - < 85°F	0.5 lb dicamba + 40 fl oz VRA
≥ 85°F - < 95°F	0.5 lb dicamba + 40 fl oz VRA) PLUS 40% reduction in area treated*** OR No tank mix partners****
≥ 95°F	No application allowed

* Maximum temperature must be forecasted by NOAA/National Weather Service not to exceed what's noted for both the day of application and the day after application.

** VRAs approved for use include VaporGrip Xtra Agent, Sentris, and Suralta.

*** Remaining untreated 40% of field may be treated the third day after initial treatment. Do not apply these products to the untreated part of the field the day of or the day following initial treatment.

**** A DRA and VRA are always required to be in the tank with the proposed OTT dicamba products.

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Memorandum Supporting Proposed Decision to Approve Registration for the Uses of Dicamba on Dicamba-Tolerant Cotton and Dicamba-Tolerant Soybean

VI. Proposed Regulatory Decision A. Rationale and Risk Mitigation (page 27)

Table 8. Proposed options for application of OTT dicamba products at varying temperatures

*... Many cotton and soybean **growers may find it difficult to achieve the proposed 40% reduction** in area treated due to equipment constraints... The Agency recognizes that to make a standalone application of dicamba means that a separate application of another herbicide may be required for control of grass weeds. **These separate applications would increase the costs of control as they would require increased fuel, labor, time, and equipment usage.** However, EPA found that applications in higher temperatures are not only likely to occur but are also important for certain growing areas, especially soybean and cotton production areas in the Southern US....*

EPA Proposed Decision

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[Regulations.gov](https://www.regulations.gov) – direct link for EPA-HQ-OPP-2024-0154

Memorandum Supporting Proposed Decision to Approve Registration for the Uses of Dicamba on Dicamba-Tolerant Cotton and Dicamba-Tolerant Soybean

VI. Proposed Regulatory Decision A. Rationale and Risk Mitigation (page 26)

...

*Previously registered OTT dicamba products restricted applications to 1 hour after sunrise through 2 hours before sunset to prevent applications at times of day when temperature inversions often occur. **The proposed label restrictions will allow applicators to determine if a temperature inversion is actually occurring**, allowing for more flexibility in application timing while still protecting against offsite movement. ...*

VI. Proposed Regulatory Decision C. Proposed Label Requirements (page 28)

*... **Inversions: Do not spray during a temperature inversion.** Temperature inversions restrict vertical air mixing, which causes small, suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.*

Comparison to Previous Label

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2022	2025 Proposed
Application cutoff date <ul style="list-style-type: none">On label: June 30On Collateral label: June 12 or V4	No cutoff date Temperature range requirements & restrictions – Table 8
Four applications possible – max 2.0 lbs of dicamba/acre	Two applications possible – max 1.0 lb of dicamba/acre
DO NOT spray if sensitive areas, crops or residential are adjacent downwind	same
240-ft downwind buffer required	240-ft downwind buffer can be reduced up to 75% - Table 9
Inversions: DO NOT spray during an inversion; do not spray one hour after sunrise or two hours before sunset.	DO NOT spray during an inversion. <i>(Then provides details on how to determine an inversion. See previous slide)</i>
ESA – Bulletins Live Two review required	ESA – BLT review required + min. 3 points; 6 points in PULA

Dicamba – What's Next?

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Submit Comments

- [Regulations.gov](https://www.regulations.gov) – direct link for EPA-HQ-OPP-2024-0154
- Comments are due by Sept 6

Wait for final approval

- Education & Outreach
- Prep OISC Field & Lab

- C&T Update
- Website
- Database

Other OISC Updates

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Thanks!

Sarah K Caffery
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