

Scott, David

From: Dennis Eby [deby@epix.net]
Sent: Tuesday, November 23, 1999 12:16 PM
To: bpi@agric.state.pa.us
Subject: - Private Applicators Fee Increase

This is a response to the article in the Nov. 99 PA Pesticide Highlights Newsletter. I've been farming for 20 years and it seems to me that to triple the cost for pesticide license in a year when the farm economy is it's lowest point in my 20 years. Not only did we face a drought this but even worse than the drought are the low prices for everything from corn, beans, eggs, pork, beef and milk. According to the article the entire population of PA benefits from the pesticide license program. Why do I need to finance the PA Pesticide Urban Initiative? It appears that if the public benefits then they should pay. With General fund surpluses, why make a few of us farmers shoulder the load for the general population.
Thanks, Dennis Eby, 334 Millwood Rd., Gap, PA 17527

Bureau of Plant Industry 717-632-8630
Div Health & Safety
2301 N Cameron, Harrisburg 17110-9408

^{Pesticide}
Penn State Applicators Program:

Nov 21, 1999

REF Rate increase:

I have always disapproved of a reason given for a rate increase as the excuse that there has not been one for _____ years.

300%, the increase you propose is indeed large. From \$10 to \$30 may not seem much to your bureaucrats who feed at the public trough--but to the farmers of Pa, many of whom are not making it or just making it, its another drain to big government.

It seems the Ridge administration has plenty of taxpayer money to waste on stadiums and discretionary spending (360 plus 320 million= 680 million), but as usual the farmer is being raped.

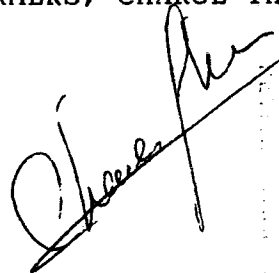
Why dont you get the money from the Pittsburgh Steelers owners?

→ OR SINCE MANY PRIVATE APPLICATORS ARE FARMERS, CHARGE THEM LESS ←

CC STEVE NICKOL (STATE REP)

CC: STEVE MAITLAND (STATE REP)

CC: TERRY PUNT (STATE SEN)



W. K. TRIMBLE JR
LAUREL FURNACE FARM
R. D. #3 BOX 54A
NEW FLORENCE, PA 15944
(412) 235-2013 ~~OR 2019~~

11-20-99

Bureau of Plant Industry.

To whom it may concern -

Come on! a 300%
increase in the fee for pesticide
license ???

True, costs have been
on the increase for many
things but - an increase
of this magnitude is another
real "swoop" at the Family
Farmer. Shame!!

W. K. Trimble Jr.

ORIGINAL: 2210



LYNWOOD LABORATORIES, INCORPORATED

945 GREAT PLAIN AVENUE • NEEDHAM, MASSACHUSETTS ~~02452~~ • ~~(617)~~449-6776
02492 781

November 16, 1999

Pennsylvania Department of Agriculture
Attention Pesticide Registration Fee Increase
Bureau of Plant Industry
Division of Health and Safety
2301 North Cameron St.
Harrisburg, PA 17110-9408

Gentlemen:

Relative to your request for comments regarding the proposed increase in pesticide registration fees, I suggest that a flat tax or fee is inherently unfair and that it has been unfair since its inception.

Specifically, to the point, a small business, such as mine, grossing several hundred to several thousand dollars a product pays the same fee as Johnson Wax, Ortho, etc. who realize several hundred thousand to millions per product.

What a great way to put us out of business.

Cordially yours,

A handwritten signature in black ink that reads "Irving L. Kanin". The signature is written in a cursive, flowing style.

Irving L. Kanin
President

ILK:cg

ORIGINAL: 2210

Aqua Specialists, Inc.

FILTER SALES & SERVICE
COMMERCIAL - RESIDENTIAL
CHLORINATOR SALES & SERVICE
COMPLETE POOL SERVICE & REPAIRS
POOL CHEMICALS SUPPLIES & EQUIPMENT

160 SILVER SPRING ROAD, P.O. BOX 123 • MECHANICSBURG, PA. 17055 • (717) 766-2541

(717) 763-9850

(717) 249-7006

FAX (717) 766-2615

Pennsylvania Department of Agriculture
Attention Pesticide Registration Fee Increase
Bureau of Plant Industry, Division of Health and Safety
2301 North Cameron Street
Harrisburg, PA 17110-9408

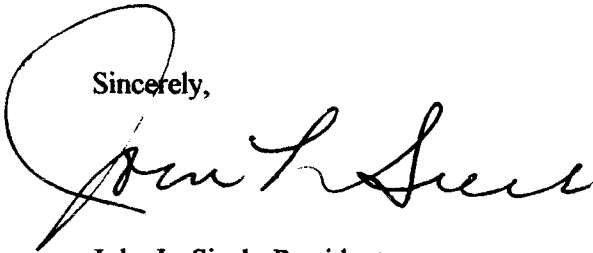
28-October-1999

Dear Mr. Lake,

Thank you for the opportunity to comment on the proposed fee increases. Obviously no businessman is anxious to face increased costs to doing business, particularly in a good economy where competition is strong and consumers are more bargain conscious than ever, but in the case of the swimming pool industry I feel the increases are particularly offensive. In my opinion and that of most people in my industry, it is unfair and absurd to include chlorine and other swimming pool sanitizers as "pesticides". The swimming pool industry comprises a tiny percentage of the "pesticide" industry and if included at all, should pay a proportionate fee.

Looking over the list of initiatives that the Department provides, you will find little if anything which relates to swimming pool maintenance, service and chemicals. Of the 845,000 pounds of pesticides collected and disposed of under the Chemsweep program, I venture to guess that there were no swimming pool chemicals. If the swimming pool service industry is to continue to be treated as a "pesticide" applicator then I feel the fee increases are disproportionate, unfair and levied at the wrong persons.

Sincerely,



John L. Sieck, President

JLS/kse



ORIGINAL: 2210

BPI

From: VResor@Chardonlabs.com
Sent: Monday, October 18, 1999 3:56 PM
To: - bpi@agric.state.pa.us
Subject: Comment on fee increase

While my company enjoys doing business in Pennsylvania, we wish the state government would do less for us, not more. We are not interested in government programs, whether they are funded by fees or tax dollars. Please, just don't do anything for us. Thank you.

Vince Resor
Technical Director

10/18/99 3:56 PM
VResor@Chardonlabs.com
bpi@agric.state.pa.us

**Drummer Boy Camping Resort
1300 Hanover Road
Gettysburg, PA 17325
800-293-2808**

RECEIVED

SEP 20 1999

**BUREAU OF
PLANT INDUSTRY**

September 16, 1999

Department of Agriculture
Bureau of Plant Industry
Division of Health and Safety
2301 N. Cameron St
Harrisburg, PA 17110-9408
Attn: Mr John Tancelosky

Dear Mr. Tancelosky;

I am a representative of the Pennsylvania Campground Owners Association (PCOA) and attended the Pesticide Advisory Board meeting yesterday. Unfortunately I had to leave the meeting at noon due to another commitment and was unable to listen to and comment on agenda item #7 regarding proposed fee increases. I hope you will accept these written comments on the subject and distribute them to the other Board members.

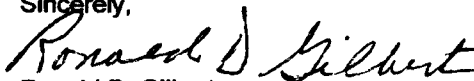
PCOA does not support the proposed fee increases for Pesticide Business Licenses and Commercial Certification for several reasons. Campground owners who operate swimming pools were drawn into the pesticide licensing and certification process in 1996 by the Department of Agriculture under what it believes was a very narrow focus of chlorine application for sanitation purposes. This process forced our members to undergo training and examination covering the entire spectrum of pesticide use including pools. There has also been a cost burden of \$55.00 annually. Now the cost burden is proposed to increase almost 250% to \$190.00. Reasons cited for the need to increase fees include Chemsweep and other recycling and support programs, which do not directly benefit PCOA members. The cost increases far exceed any increases in revenue experienced by our members in the operation of their businesses.

While PCOA opposes the proposed fee increases it does believe that the efforts of the Department relative to pesticide management and control are important and necessary. Our association holds numerous regional and statewide meetings where training takes place and would provide opportunity for voluntary training. Personally I hold the required license and certification and have found the training to be helpful and informative in all its aspects. Yesterdays' meeting was also interesting, although for the most part not applicable to my position as a campground operator.

The information level required by campground owners relative to pesticide use and control appears similar to that of the average person. If EPA eventually mandates that all Americans require training and or certification to use pesticides then campground owners would clearly apply. Until then PCOA feels that the licensing process represents undue regulation and that the fee imposition and escalation are not appropriate.

I regret not being able to express these views in person yesterday. I appreciate your attention and welcome your response to these comments.

Sincerely,



Ronald D. Gilbert
On behalf of Pennsylvania Campground Owners Association

Cc: Ms. Beverly Gruber
Executive Secretary
Pennsylvania Campground Owners Association
P.O. Box 5, New Tripoli, PA 18066

Original: 2210

IRRC

From: Wayne H. Duerr [whduerr@usaor.net]
Sent: Saturday, September 08, 2001 11:03 AM
To: IRRC
Subject: Raising of fees

Gentlemen and Ladies:

I believe that raising of fees is an attempt to have small volume farmers restricted from using any pesticide that requires a license. I heard a comment from a scientist on the ag committee at CDC say we should eliminate the small farmers and the accident rate will go down. It is believed that the small farmer is incapable of using the chemicals and equipment properly. Sometimes I use very little restricted chemicals and to have to pay more for my license is not right. What you are doing is forcing small farmers to use a service that the dept has more control over. I disagree with the raising of the fees. Wayne H. Duerr

2001 SEP 10 AM 8:38
OFFICE OF THE COMMISSIONER
REVIEW COMMISSION

ORIGINAL: 2210

IRRC

From: Jewett, John H.
Sent: Tuesday, September 11, 2001 8:21 AM
To: IRRC
Cc: Schalles, Scott R.; Sandusky, Richard M.
Subject: FW: #2210, "Final-omitted" Regulation #2-134, Department of Agriculture, Pesticide Licensure Fees

Please file under final comments for #2210.

-----Original Message-----

From: Wayne H. Duerr [mailto:whduerr@usaor.net]
Sent: Monday, September 10, 2001 8:00 PM
To: Jewett, John H.
Subject: RE: #2210, "Final-omitted" Regulation #2-134, Department of Agriculture, Pesticide Licensure Fees

In a past newsletter, the fee for the private license, was to triple. The increase was to partially fund disposal of "old" chemicals. Since this newsletter was the last I remember reading, I referred to the increases from that source. I realize that someone has to pay for the update classes, but many that I have attended sounded much like a commercial that perhaps the manufacture should bear some of the cost. If I am improperly informed I apologize.

-----Original Message-----

From: Jewett, John H. [mailto:jjewett@IRRC.STATE.PA.US]
Sent: Monday, September 10, 2001 9:19 AM
To: whduerr@usaor.net
Subject: #2210, "Final-omitted" Regulation #2-134, Department of Agriculture, Pesticide Licensure Fees

Wayne H. Duerr

Mr. Duerr:

Thank you for your comments dated September 8, 2001, on the fee increases. The final regulation from the Department of Agriculture would increase the following four fees:

- Pesticide Application Business' License
- Commercial Applicator's Certificate
- Commercial Pesticide Application Technician Registration
- Product Registration

The fee increases are not the same as those published by the Department in previous newsletters. You may want to contact the Department for additional information on its final regulation. The Department contact is listed as Lyle Forer and his office can be contacted at (717) 772-5200.

It would be very helpful if you could identify the specific fee increases that you oppose and how they would impact the small volume farmer.

Please send comments to:

Robert E. Nyce, Executive Director
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

RECEIVED
 2001 SEP 11 AM 8:37
 REVIEW COMMISSION

FAX: (717) 783-2664, E-mail: irrc@irrc.state.pa.us
<<mailto:irrc@irrc.state.pa.us>>

I hope this information is helpful. Thanks for your time and consideration.

John H. Jewett, IRRC



Great Lakes Associates, Inc.

1109 Waverly Ave.

Youngstown, Ohio 44509

330 / 792-3986 Fax: 330 / 792-1091

gla@cboss.com



Pennsylvania Department of Agriculture
Attention Pesticide Registration Fee Increase
Bureau of Plant Industry
Division of Health and Safety
2301 North Cameron Street
Harrisburg, PA 17110-9408

Dear Sirs:

We welcome the opportunity to participate in the comment process. It is too seldom that this is made available to us.

Great Lakes Associates, Inc. is a producer of industrial water treating chemicals. Included in these materials are several microbiocidal products and algaecides which are used for the protection of industrial and commercial cooling water systems from corrosion and fouling by bacteria, fungi and algae. We have at present eight Pennsylvania-registered products. In most jurisdictions, these are considered "Minor Use" products.

Because the nature of these systems and their contaminant flora is location-specific and varies greatly, technological considerations dictate that many of these materials are used in small amounts and in relatively few applications. We are what may be termed a "Small Entity". Most of these products are distributed in Pennsylvania at the rate of less than 50 packages per year, and some only 10 or less - most of these being five or fifteen gallon sizes. Therefore, the impact of any fees on the costs of the materials in many cases is quite substantial. Contrast this with the massive amounts of material and thousands of packages involved with the majority of the materials regulated.

Were we a large agricultural product producer, I am sure that the economic implications of the proposed increases would hardly be of notice. The benefits derived from the initiatives financed by these fees are also not insignificant. However, upon inspection, it is difficult to identify any of these programs listed in the current proposal description (enforcement actions excepted) which apply to our products.

CHEMSWEEP does not apply because we do not warehouse product in Pennsylvania and all shipments are made directly to the end user, whereupon the product is soon placed in use.. thus we operate in a producer-to- user mode. This program seems to target materials distributed through sales and distribution made in other modes. I would expect the other companies in our industry are in a similar position.

Plastic Container Recycling may apply, but in general, the containers are triple-rinsed in order to recover material which is then applied to the systems being treated. The rinsed containers are generally disposed of along with the rest of the chemical containers from the facility. Segregation of and special treatment for pesticide containers alone would not be practical in many facilities. We must ask if there is a significant history of water treatment containers actually being recycled through this program.

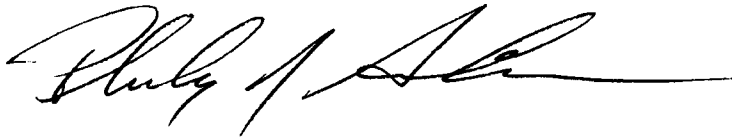
Management Plans and Ground Water Monitoring , Recertification Update Meetings and Training, Penn State Univ. Pesticide Educational Program, Pesticide Impact Assessment Program, Pennsylvania Pesticide Urban Initiative, Agromedicine Program, Pesticide Hypersensitivity Registry : These programs, valuable though they may be, apply, it seems, to many or all segments of the regulated markets except water treating chemicals.

In general, it appears to this writer that our industry should be declared exempt from the proposed increases in registration fees, as there is little evidence of any justification which actually relates to the business in which we engage or the products or methods of distribution thereof.

We do believe in a philosophy which would impose fees for governmental services based on equity between the regulators and the regulated. Some would view this as the regulated businesses receiving a benefit for the fees tendered. Under the present fee structure, as well as the new proposal, we believe that our industry, as well as any others which might be categorized as "Minor Uses", as well as all "Small Entities", are already inequitably forced to bear a far greater proportion of the costs of these non-beneficial programs than the parties actually benefitted. In terms of fees per pound of product we pay hundreds and thousands of times more than the major use producers.

To increase these fees to us and others in similar positions simply is neither equitable nor fair.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Philip J. Anderson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Great Lakes Associates, Inc.
Philip J. Anderson
Chief Chemist

cc: GLA Board of Directors

Donald Pease
RD 1, Box 86
Susquehanna, PA 18847

PA Dept. of Ag
2301 N Cameron St
Harrisburg, PA 17110

Dear Sirs

I am responding to proposed fee increase
of private pesticide applicator license.
I believe the increase to \$30 is
exorbitant. I do not use or request
your so claimed increased services.

Any increased services is Job
Proliferation by Gov. bureaucracy.

I am simply complying with
Gov. regulations you have no right
to triple the fee you charge me.

A Inate Taxpayer,

Donald E. Pease

PA licence #
030852

To whom this may concern

We are very disappointed that the pesticide Private Applicator License fee jumped from \$10 to \$30 for 3 year permit.

The price of milk did not increase much at

all in the last 12 year

If milk price would have gone up that ^{3 times} much we'd

be getting \$30 a hundredweight

for the milk, then we wouldn't complain, but milk prices didn't change much in 12 yr.

Also why do we have to pay this much ~~more~~ increase in price if we never used chemsweep ^{program}

I abided with the Pesticide Rules.

Please let me know what my license fee is that is

Due by 3-00 so I can pay it
D.D. no 853931 Adner & Zook

354 Center Church Rd
Garrett Pa 15542-8704

ORIGINAL: 2210

PA Department of Agriculture
Bureau of Plant Industry
Division of Health and Safety
2301 N. Cameron St.
Harrisburg, PA 17110-9408
August 17, 1999

RECEIVED
AUG 24 1999
BUREAU OF
PLANT INDUSTRY

To Whom It May Concern,

Your recent proposed fee increases are ridiculous! We realize that some type of increase may be necessary but certainly not a 300-400% increase. If we tried to increase our prices by this much to our customers we would be out of business immediately! I guess the difference is that our customers are not forced to pay this kind of increase. We are a small business not a government agency that sets its own regulations.

However, we are still your customers and would expect that the bureau of Plant Industry treat us with the same consideration and respect that we treat our customers.

We certainly hope you will change this proposed absurd price increase.

Thank you for your time.

Sincerely,
A very concerned business owner

Holiday Pines Campground
R.D.#1 Box 324
Loganton, PA 17747
Telephone: 570-725-2267
Fax: 570-725-2257

August 4, 1999

Mr. John Tacelosky
PA Dept. of Agriculture
Bureau of Plant Industry
Division of Health & Safety
2301 N. Cameron Street
Harrisburg, PA 17110-9408

Dear Mr. Tacelosky,

As you are aware, there are proposals by the Department of Agriculture to increase the Business License fee and the pesticide Commercial Certification fee. These proposals are absolutely the most ridiculous proposals as they apply to private campgrounds in Pennsylvania.

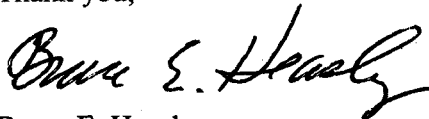
My wife and I purchased our campground one year ago. The size (76 sites) is smaller than the average (@110 sites) campground. The additional costs and burden this would cause is outrageous. If this bureaucracy really believes that public safety is in jeopardy, where have they been when it comes to enforcing or even clearly informing the public? How many chlorine application problems have there been at privately owned campgrounds in Pennsylvania? I am in total agreement with the need for pesticide regulations for "real" pesticides. However, living in a rural/agriculture area I have seen many pesticide application problems but have yet to see any real corrective action taken. Do bureaucrats believe they can correct the real problems by adding this additional unnecessary burden to our industry?

I find it particularly absurd that a tripling of these fees is required. Can anybody tell us what improved service the public or we will receive as a result of this increase?

You may or may not be aware that the inclusion of campgrounds in the original program was not well received. These ridiculous proposals will certainly cause a major negative impact and reactions by all campground owners/operators in Pennsylvania.

I will respectfully close by asking for your help and support to prevent these changes.

Thank you,



Bruce E. Heasley
Owner
Holiday Pines Campground

ORIGINAL: 2210

Fee

Date: August 3, 1999

PA Dept of Agriculture
Bureau of Plant Industry
2301 North Cameron Street
Harrisburg, PA 17110-9408

Attn: Pesticides

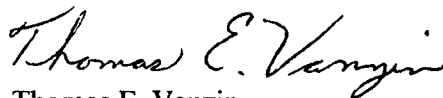
Dear Sir,

This note conveys my opposition to the proposed certification fee increase. Because of my individual situation where I am currently in a position not involving pesticide use, my employer does not reimburse my certification fee. Therefore, it is a personal expense. I maintain the certification for two primary reasons. The initial is that someday I may have the need for the certification again with my current employer. Secondly, I do not wish to sit again for the core or category exams. I rationalize the annual \$30 expense based upon these two reasons. I do not believe I can rationalize an annual fee of \$90.

I support no increase to the fee structure. If some fee increase is required, consider a reduced fee structure from that which is proposed. Additionally, please consider a reduced fee for those in a "hold" status from the certification fee that would be charge for active applicators.

Your consideration of my position is appreciated.

Sincerely,



Thomas E. Vanzin
862132

ORIGINAL: 2210



RECEIVED

AUG -2 1999

BUREAU OF
PLANT INDUSTRY

Latrobe Industrial Park
R.D. #6 Box 19
Latrobe, Pennsylvania 15650
412/539-3226
FAX 539-3914

July 29, 1999

PA Department of Agriculture
Bureau of Plant Industry
Division of Health and Safety
2301 N. Cameron Street
Harrisburg, PA 17110-9408

Re: Increased Fees Proposed

You have got to be kidding! Triple and quadruple increases?

I realize that an increase is apparently due and possibly doubling the fees would be adequate. The proposed fees are a little much along with all the other increases in business operations.

Please give this your utmost consideration before acting on it.

Sincerely,

SPECIALTY SPRAYING, INC.

A handwritten signature in cursive script that reads "James M. Walter".

James M. Walter
President

rs



- TREE & SHRUB SPRAYING
- PROFESSIONAL LIQUID LAWN CARE
- VEGETATION CONTROL

ORIGINAL: 2210

July 28, 1999

PA. Department of Agriculture
Bureau of Plant Industry
Division of Health and Safety
2301 N. Cameron Street
Harrisburg PA 17110- 9408

Your proposed increase of fees is excessive. An increase of 300 to 400% is out of line. The proposed increase are an unfair added business expense. The unlicensed applicators receive little to no penalties for any wrong doing and escape the added cost of your proposed increase.

If an increase in revenue is needed, perhaps licensing the unlicensed applicators would be appropriate.

Sincerely,



Dennis C. Baldwin
Lawn Doctor of North East Reading



ORIGINAL: 2210

RUSTIC MEADOWS CAMPING AND GOLF RESORT, INC.

1980 TURNPIKE ROAD, ELIZABETHTOWN, PA 17022

TEL: (717) 367-7716 FAX: (717) 367-3412 EMAIL: RUSTICMEADOWS@msn.com

LINDA S. SCHMIDT-PRESIDENT

KARL F. SCHMIDT-VICE PRESIDENT

7/24/99

Mr. John Tacosky
PA Dept. of Agriculture
Bureau of Plant Industry
Division of Health and Safety
2301 Cameron St.
Harrisburg, PA 17110-9408

Dear Mr. Tacosky,

I have just read that the Dept. of Agriculture intends on raising the fees associated with pesticide licensing. I am opposed to any such increase. The notion that any such increase in fees will improve public safety is absurd. Just as ridiculous as the whole idea of pesticide licensing for the swimming pool operators.

We take chlorine readings a minimum of twice a day for our pool, record these, submit them to the Dept. of Health. We have an independent lab test the pool water weekly, who in turn reports their finding to the Dept. of Health. All of these reports are kept of file for years. We are inspected by the Dept. of Health each year. During this inspection chlorine readings are taken and recorded. We then must maintain a separate record for chlorine use/applications and subject ourselves to additional inspections by your department. We carry a bathing permit, a business-pesticide license, an electrical permit, and I personally have a pesticide license, all just to operate a swimming pool. Because of new regulations from the Dept. of Health that I can't possibly afford to comply with, I am forced to eliminate public swimming hours. The public swimming fees helped offset some of the cost associated with operating the pool. NOW, your department wants to triple the license fees I have to pay. I also have to have a pesticide license for my little Par 3 golf course. I have to take time out of running my business to go to school each year in order to maintain enough credits to keep my pesticide licenses.

I don't have a staff that handles it. We are a husband/wife team, trying to make a living for our family. It seems that every year more and more burden is placed on businesses in higher fees (that come out of my pocket), additional licensing requirements (that take my time) and more rules and regulations (that are redundant and typically impossible to understand). If I were to try a 300% increase in my rates, my customers would laugh and move on. I don't have that choice with your fee increase. I have to pay. Period. It seems to be another way to increase revenue without calling it a tax. It certainly isn't going to improve my business. I doubt its really going to matter much to those who refuse to comply now. It just doesn't make sense and it certainly isn't fair, by a long shot.

Sincerely,

Karl Schmidt

1241 Hex Highway
Hamburg, PA 19526
Nov. 20, 1999

Bureau of Plant Industry
Division of Health and Safety
2301 North Cameron St.
Harrisburg, PA 17110-9408

To whom it may concern: Re: Pesticide license fee increase.

I wish to respond to your proposed license fee increase. I realize all of the services provided are costly to the program, however I do believe that an across the board fee increase of the magnitude is unfair to small farmers as myself. It will be a matter of us small farmers subsidizing those who require more - most - of your services.

In 1999 I planted 2.5 acres of corn and 4 acres of soybeans. This was the extent of my pesticide usage. Further I don't spray my alfalfa, I don't believe in it. At one time I had hoped to farm in the methods known as Organic Farming, but find that I cannot economically compete.

My suggestion is: Place a surcharge on Pesticides at the point of purchase to recover the costs of administering your services. In this manner those who require the most services will pay their fair share.

In years to come, I will be raising less grains and mchay and will be using even less herbicides. To hire the work done is not an alternative as I will be the last served because I would be too small an account, I've had experience. Further, I cannot sell my farm for development as I donated my Development Rights to the Berks Co. Conservancy. I have most of my fields fenced for grazing purposes.

Please give earnest consideration to my suggestions.

Respectfully yours
Harold R. Stoult

RECEIVED
NOV 23 1999
DIVISION OF HEALTH AND SAFETY
BUREAU OF PLANT INDUSTRY
HARRISBURG, PA 17110-9408

ORIGINAL: 2210

Scott, David

From: pauln@centralsolutions.com
Sent: Wednesday, December 29, 1999 11:10 AM
To: bpi@agric.state.pa.us
Subject: Increasing of Pesticide Registration Fees

Dear Sir or Madam:

Thank you for the opportunity to respond to the proposed increase in the product registration fee.

I acknowledge that your agency has not increased pesticide fees in 10 years. However, to increase the fee from \$100.00 per year to \$175.00 is an unreasonable jump, and causes me to question why a more moderate increase was not instituted in the past. A gradual increase is much easier to handle than increasing the fee by a staggering 75%. As co-owner of a small business, this kind of irrational increase has an impact on our cash flow, and makes it far more difficult to compete with large companies which can easily absorb such increases.

I more moderate increase over time would allow me to pass on some of that to my customers as a part of doing business. I cannot, however, pass on a 75% increase, as I would see a mass exodus of customers - and understandably so. Imagine if you would, going to the store and finding a 75% increase of goods you're need to purchase to survive. Would this seem unreasonable? How about going to the gas pump tomorrow and being forced to pay \$2.00 per gallon?

Understand please, that my company manufacturers disinfectants which help prevent the spread of communicable diseases that pose a threat to human health. Keeping my costs down allows me to ensure that health care agencies all over the nation will have products available at a reasonable price.

I realize my one voice will likely not change your position. I do ask, however, that your agency consider more moderate increases in the future by proactive planning. Otherwise, small businesses will suffer, and the larger corporations will pass on your increased fees to the end-users in Pennsylvania. As a result, you'll lose the availability of excellent products at a competitive price. While this may not be a tremendous concern to you currently, it will be the next time you or a loved one visits a hospital or long-term care facility.

Thank you very much for allowing me the privilege of expressing my position.

Sincerely,

Paul Nobrega
Vice-President / Treasurer
Director of Regulatory Services

ORIGINAL: 2210

Scott, David

From: Mary Ann [betz6@paonline.com]
Sent: Saturday, December 18, 1999 9:07 AM
To: bpi@agric.state.pa.us
Subject: Pesticide Applicator's License

I would like to comment on your proposed fee increase for a private pesticide applicator license. I realize an increase is needed to cover increased services by your department. However, I feel your proposed increase to \$30.00 is ver drastic.

As a small family farmer, my costs to operate have greatly increased and the amount I receive for my products continues to drop. My budget cannot absorb a license increase of 300%!

A bigger portion of your monies needed should come from other sources such as commercial applicator licenses and pesticide product registrations. Another possibility would be make some department budget cuts.

I would not be opposed to a 50% or \$5.00 increase in the private pesticide applicator license. In closing, I suggest you make fee proposals sooner and for a smaller increase instead of waiting until 21 years have passed.

Sincerely,

Douglas A. Betz

ORIGINAL: 2210

Scott, David

From: Andrea Long [amtlong@paonline.com]
Sent: Monday, December 20, 1999 7:24 PM
To: bpi@agric.state.pa.us
Subject: - pesticide application fee increase

Mr. Dave Scott

I currently hold a commercial buisness license and I am a certified applicator in category 7 applications. I am one person, trying to make a

part time business successful. I am specializing on local athletic fields.

This effort is aimed at improving local playing fields for young athletes.

As you are well aware of, the monies available to support local programs is not abundant.

I feel a good IPM program is an integral part of field management.

Therefore

licensing is a must

for me. The increase in licensing fees would be a great hardship on me,

a

small part time business man.

I would like to suggest a graduated fee to coincide with the quantity of

annual applications.

This would allow me, and perhaps others, to continue making informed, responsible pesticide applications

Gene Long

Long Specialties

Bu 4105.

COZYLANE FARM
Harold L. Brown
R.R. 1, Box 9
Liberty, PA 16930

Dec. 16, 1999
Liberty, Pa.

I would like to comment on the proposed fee increase for a private applicator to thirty dollars (\$30) for a 3 year permit.

I can understand your costs may be on the rise, but when milk prices just went back to 1978 prices and the state just went through a drought, how can you justify such a fee increase.

The Board needs to realize everything costs more and the farmer is getting less for his products.

We have 12 farmers + wives on our Liberty-Tronic PFB Advisory Council and no one agrees with a permit increase.

Thank you

Harold L. Brown

ORIGINAL: 2210

Scott, David

From: Jan Meneley [agbio-1@indra.com]
Sent: Wednesday, December 15, 1999 8:22 AM
To: bpi@agric.state.pa.us
Subject: fee increase

Dear State of Penn,

Thank you for opportunity to comment on pesticide registration fee increase.

We register a biological fungicide, Mycostop. It certainly does not pollute or in any way contaminate the environment.

It would help if Pennsylvania and other states would support biological alternatives to chemicals by not continually assessing them with groundwater fees, clean-up fees, or fees for any other problems caused by chemicals.

Biologicals are niche products and expenses are already high based on \$ sales. Additional fees discourages further development.

Sincerely,
Jan Meneley
President
AgBio Development Inc.
9915 Raleigh St.
Westminster, CO 80031

ph: 303-469-9221

ORIGINAL: 2210

Cutman, Kathleen

From: Ammons, Jasmine
Sent: Tuesday, December 07, 1999 9:03 AM
To: Cutman, Kathleen
Subject: FW: PDA Email

-----Original Message-----

From: nobody@Jupiter.state.pa.us [mailto:nobody@Jupiter.state.pa.us]
Sent: Friday, November 26, 1999 7:58 PM
To: jammons@state.pa.us
Subject: PDA Email

Below is the result of your feedback form. It was submitted by
Wayne H. Duerr () on Friday, November 26, 1999 at 19:58:06

Contact_StreetAddress: 3660 Buffalo Creek Rd

Contact_City: Avella

Contact_State: PA

Contact_ZipCode: 15312

Contact_HomePhone: 724-948-3365

Contact_Email: whduerr@usaor.net

Comments: I think the increase from \$10.00 to \$30.00 for a private applicators liscense is excessive.

George Stanislaw
Bolivar Pa
15923

Dec 10-99

Dear Sir:

Pesticide Advisory Board

In regard to you raising the
fee to 30.00 for 3 yrs.

I object to it as where is our
prices for our product

milk corn wheat beef & etc

You may not know it but us
farmers are fading fast & ~~now~~
our younger generation are not
take over

Your truly

George Stanislaw

PS, was a dairy farmer
no beef & grain

300 A Plus

Westmoreland Co

Original: 2210



MOOSE
BRAND

Reg. TM

MAPLE HILL FARMS

OFFICE: P.O. BOX 648, LEWISBURG, PA 17837-0648 — 717-524-0791
Donald R. "Moose" Craul

NURSERY: WILLIAM PENN DRIVE & AIRPORT ROAD, LEWISBURG, PA 17837 — 717-524-0791
Jeff Craul

PLANTATION: R.R. 3, BOX 357, WELLSBORO, PA 16901-9468 — 717-724-1792
Dave Craul

Bureau of Plant Industry
Div. of Health and Safety
2301 North Cameron St.
Harrisburg, PA 17110-9408

Nov. 27, 1999

Good Morning

We acknowledge receipt of Nov. '99 issue PA Pesticide Highlights.

Just couldn't let it go by - without writing ("Don't Grize-Krite") the 300% increase in Private Applicator Fees!! You are - or were - saddled with same problem the Game Comm had with hunting license increase - You let it go too long before requesting the increase & now takes a 300% increase.

You should be complimented on Chem-Sweep & Plastic Container recycling. It is Controlled garbage disposal!

Biggest complaint now is the increase when Ag profits are at the waist (Actually non-existent in some areas) Timing is poor after 2 yrs of drought & then some areas getting hammered with heavy rain and flash flooding.

Overall economy appears to be in down good shape --- much of it at expense of very poor Ag prices. Some prices same or lower than 10 or 20 yrs ago

C'est la vie!!

Sincerely

DR Moose Craul

cc: Dep Sec Relding (PAID 0805)

Pennsylvania's Oldest-New Nursery - Founded 1955
Growers of fine Fir, Spruce, Pine, and Deciduous Trees
Plantations 10 miles southeast Wellsboro, Pa.



ORIGINAL: 2210

Scott, David

From: Wayne H. Duerr [whduerr@usaor.net]
Sent: Friday, November 26, 1999 7:57 PM
To: 'bpi@agric.state.pa.us'
Cc: - 'The PA Dept of Agriculture'

I believe the proposed fee increase is excessive, this is a 300% increase which is more than I pay for restricted chemicals in many cases. A increase from \$10.00 to \$15.00 would BE more reasonable. I try to minimize the amount of restricted chemicals that I use unless absolutely necessary. I have heard statements made by people on Agricultural safety advisory boards that most of the accidents occur on small farms because the small farms cannot afford the new safety regulations. This appears to BE a step in the direction to reduce the use of chemicals by small farmers that ARE harder to police.

ORIGINAL: 2210

Scott, David

From: George & Joyce Race [geojoy@netzero.com]
Sent: Wednesday, November 24, 1999 4:20 PM
To: bpi@agric.state.pa.us
Subject: - increase for a persicide permit..are you insane?!?!?!?

A 200% increase for a pesticide permit for three years? From 10-30...?What is the need for the increase?Farmers don't even get a 1/2% increase in wages, yet you expect them to pay more for this?

George Race
Concerned Farmer

NetZero - Defenders of the Free World
Get your FREE Internet Access and Email at
<http://www.netzero.net/download/index.html>