

# THE COMMONWEALTH OF MASSACHUSETTS

EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS



## Department of Agricultural Resources

251 Causeway Street, Suite 500, Boston, MA 02114  
617-626-1700 fax: 617-626-1850 www.mass.gov/agr



CHARLES D. BAKER  
Governor

KARYN E. POLITO  
Lt. Governor

BETHANY A. CARD  
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## **DIRECT SUPERVISION** **FREQUENTLY ASKED QUESTIONS**

### **When does Direct Supervision apply?**

Direct Supervision applies when someone with a Commercial Applicators License ("Core License") applies a Restricted Use Pesticide ("RUP"). The individual with a Core License must be working under the "Direct Supervision" of someone with a Commercial Certification license.

### **How do I know if Direct Supervision is applicable to me?**

The first thing you should do is review the pesticides that you use and determine which products are a RUP. If you are using RUP's, then you should review your staffs licensing to determine if anyone using the RUP's has a Core License. If someone does, then you need to follow the Direct Supervision regulations.

### **If someone with a Commercial Certification is making a RUP application does "Direct Supervision" required?**

No. Direct Supervision only required when someone with a Core License applies an RUP.

### **What is the Product Application Guidance Sheet ("PAG")?**

The PAG is a document that outlines the standard operating procedure that the company/Commercial Certification holder has developed for the use of a specific RUP.

### **Does a PAG need to be developed for all pesticides that are being used?**

No. A PAG is only required for RUP applications made under Direct Supervision.

### **Is a Direct Supervision required for the use of liquid termiticides by a Core License holder?**

Yes. Applications of liquid subsurface termiticides require a Commercial Certification or someone working under the Direct Supervision of an individual with a Commercial Certification and therefore Direct Supervision is required.

### **What is the copyright date of the Label Summary Sheet?**

The copyright date is the date in which the PAG was developed.

### **What do I do if the individual with a Commercial Certification providing supervision calls in sick or goes on vacation?**

You will need to assign a "back-up" Supervisor or ensure that RUP's are not applied that day. If you are assigning a "back-up" Supervisor, then this should be identified in the PAG and during the PAG review.

### **Does the Vehicle Inventory Log need to be kept for all pesticides?**

No. It is only required for RUP's and if the individual driving the vehicle has a Core License.

**Can the Vehicle Inventory Log be kept electronically?**

Yes. It can be kept in a manner that the company sees fit as long as it contains the required information.

**What does the Department mean by “Description of site treated”?**

The Department would like the applicator to be as specific as possible when describing the area that was treated.

For example:

- Wall void behind sink
- Whole exterior foundation
- Burrow hole next to foundation
- Spot treated for weeds on left side of yard

**How do I identify the possibility of an RUP use on a work order/invoice?**

The company should use a method which indicates that an RUP may be used on that job. This could be done in several ways such as but not limited to:

- Language on work order/invoice pointing out RUP may be used
- If RUP is listed on work/order, making it a bold or different color
- Coding the RUP's

The company's method should be discussed during the PAG review and should be indicated in the PAG.

**Does the Commercial Certification holder that is supervising have to review all the application records?**

The Direct Supervisor must review the RUP application record and sign off on it.

**Where can I find the Direct Supervision requirements?**

You can find the requirements at: [333 CMR 10: Certification and licensing of pesticide applicators | Mass.gov](#)