TOWN OF ORLEANS
DEPARTMENT OF PUBLIC WORKS HIGHWAY DEPARTMENT
RIGHT OF WAY VEGETATION MANAGEMENT PLAN

2022 THROUGH 2026

TABLE OF CONTENTS

SIGNATURE PAGE 2
MUNICIPAL ROADWAY VEGETATION MANAGEMENT PLAN

This Municipal Roadway Vegetation Management Plan submitted to the Massachusetts Department of Agriculture Resources pursuant to the Rights of Way Management Regulations (333 CMR 11.00) has been reviewed and is recommended for adoption in the below named municipality. The undersigned hereby acknowledges that the Municipal Roadway Vegetation Management Plan will be adopted and complied with.

MUNICIPALITY: Town of Orleans

PLAN TYPE: (circle one) Vegetation Management Plan VMP Yearly Operational Plan YOP

PLAN AUTHOR: Ronald Trudeau, DPW Manager

DEPARTMENT: Public Works

ADDRESS: 40 Giddiah Hill Rd, Orleans, MA 02653

PHONE NUMBER: (508) 240-3790 x 3107 FAX: (508) 240-3711

SIGNATURE, PLAN AUTHOR: _____

SIGNATURE, CHAIRPERSON, BOH: _____

SIGNATURE, CHAIRPERSON, CONSERVATION COMMISSION: _____ SIGNATURE,

CHIEF ELECTED OFFICIAL: _____

A copy of this document should be kept on file in the municipality offices. Please send the **original** to the Massachusetts Department of Agriculture Resources with the submitted Vegetation Management Plan/Yearly Operational Plan.

Massachusetts Department of Agriculture Resources, Pesticide Bureau, Right of Way Program, 251 Causeway Suite 500, Boston, Massachusetts, 02114-2151.

INTRODUCTION

The purpose of 333 CMR 11.00, Rights-of-Way Management (ROW), is to promote the implementation of integrated vegetation management techniques and to establish standard requirements and procedures necessary to minimize the potential for adverse effects on human health and the environment associated with the use of herbicides to maintain streets. The ROW regulations establish procedure, which guarantee ample opportunity for public and municipal agency review and input on the Vegetation Management Plans (VMP).

Upon receipt of this VMP, the Massachusetts Department of Agricultural Resources (MDAR) publishes a notice in the Environmental Monitor and local newspaper. Orleans Department of Public Works (ODPW) provides a copy of the proposed VMP and Environmental Monitor notice to the Board of Health, Conservation Commission, and the Town Administrator. The Department allows a 45-day public comment period on the proposed VMP beginning with publication of the notice in the Environmental Monitor and receipt of the VMP and Environmental Monitor notice by each municipality.

Public notification of herbicide application to the streets is made at least 21 days in advance of the treatment by a separate notice. Notice is made to MDAR, Town Administrator, chairman of the Board of Selectmen, the Board of Health, the public water supply, and the Conservation Commission of the municipality where the streets lie.

Any comments on this VMP should be directed to the plan author listed on page 2.

GENERAL STATEMENT OF GOALS AND OBJECTIVES

The goal of this VMP is for the management of nuisance vegetation (e.g., poison ivy) and other woody plants that interfere with pedestrian and traffic safety. This VMP is intended to establish the criteria whereby the ODPW will control vegetation along roads, sidewalks and highways in compliance with the ROW regulations (333 CMR 11.00). The goal of this VMP is to assume that the vegetation management practices along public roadways, sidewalks and highways are conducted in the most environmentally sound manner through an integrated program which will minimize the reliance upon herbicides. Vegetation management along roads is necessary to control unwanted vegetation, which poses a public nuisance, and to control all other obstructing woody growths that create a traffic and pedestrian hazard. The operational goal of this VMP is to utilize an integrated vegetation management program designed to maximize control of undesirable vegetation while minimizing the use of herbicides. In order of preference by ODPW the integrated vegetation management program will involve the use of cultural, mechanical and chemical control techniques to control undesirable vegetation in an ecologically sound manner. The choice of the target vegetation and appropriate control technique will be at the heart of the program. Achievement of this goal will be made through annual inspection by the ODPW of all public ways, and control of the areas as needed by the most environmentally sensitive means possible.

The ODPW will strive to reduce the manual labor associated with maintaining the areas of target vegetation with the VMP. This will enable the ODPW to focus on many other responsibilities that it has to undertake.

IDENTIFICATION OF TARGET VEGETATION

Target vegetation along roadways is limited to vegetation that poses a public nuisance and/or poses a risk to pedestrian or vehicular safety.

Public nuisance vegetation includes vegetation that grows along public roads, sidewalks and highways that could pose a threat to public safety.

The overwhelming majority of plant material to be controlled is grass and weeds. Under this VMP grass, weeds, vines and poison ivy growing within 10 feet of the ROW will be considered target vegetation.

In most instances grass is a desirable plant species. Along the shoulders of roads, grass growth will be encouraged and maintained through mechanical mowing. However, in some instances, grasses may grow in areas where control is best achieved by the use of herbicides.These areas include but are not limited to cracks in asphalt and along guardrails. In these instances, grass can become target vegetation. The main focus of this VMP is to control unwanted vegetation growing in between the newly placed brick pavers in the Main Street area.

The vegetation that hampers visibility or impedes movement along roads, sidewalks and highways is considered a risk to public safety. M.G.L. Chapter 87, section 5 authorizes the tree wardens to have control of all "public shade trees, shrubs and growths" along public ways. Mowing and/or hand cutting shall control most plants that interfere with traffic and visibility. However, due to topography, rate of growth, or physical characteristics, ce1tain plant species are best controlled by herbicides.

Tall growing species mostly include trees. Hardwood and softwood species that are capable of interfering with pedestrian and traffic safety are either selectively pruned, or ground cut.

INTENDED METHODS OF VEGETATION MANAGEMENT AND RATIONALE FOR USE

(INCLUDING VEGETATION CONTROL TECHNIQUES, EQUIPMENT PROPOSED FOR USE AND TIMING OF APPLICATIONS, AND ALTERNATIVE CONTROL PROCEDURES)

Roadway vegetation management involves mechanical methods (hand cutting, mowing, selective trimming and street sweeping) and chemical control (foliar herbicide treatments and cut stump treatments). The methods listed above will be chosen based on a variety of factors. The method chosen for a given vegetation problem will attempt to achieve a long term, low maintenance vegetation management program.

Street Sweeping

Street sweeping with the one ODPW's mechanical street sweeper will be used to keep debris and buildup of dirt along gutter lines to a minimum. The main core of the downtown streets is usually swept bimonthly during summer and fall months following a thorough sweeping of every street in town starting in the spring of every year. This operation will start as soon as the winter weather subsides.

Hand Cutting

Hand cutting consists of the mechanical cutting of target species using chain saws and brush saws. Target species are cut as close to the ground as practical. Hand cutting is used on those restricted sites where terrain, site size or sensitivity renders mowing impossible or impractical. Hand cutting may be used at any time of the year.

Mowing

Mowing consists of the mechanical cutting of target vegetation using machines. Depending upon the sources available, mechanical cutting may be made using a homeowner type push mower, a large rider mower, brush mower, hedge and string trimmers. Selection of specific equipment is based on terrain, target vegetation size and equipment availability. Mowing shall be used in most areas where terrain and target stem size permit efficient use of the equipment and especially in areas where herbicide use is prohibited by regulation. Mowing shall be the principle vegetation control measure on the shoulders of roads.

Foliar Treatments

Foliar treatments involve the selective application of a concentrated herbicide mixed to label recommendations applied to the foliage of the target vegetation. These applications will be done below 20 pounds per square inch at the nozzle with a battery-charged, 4-gallon backpack sprayer. A coarse spray pattern will be used to minimize drift.

Foliar applications will take place when plants are in full leaf and actively growing, and in accordance with the manufacturer's recommendation on the herbicide lowest label rate.

Selective Trimming

Selective Trimming consists of the mechanical pruning of the tops or encroaching limbs of tall trees, which may hamper access to the roadway. This trimming will be accomplished using aerial lifts mounted on trucks, or if terrain or obstructions prevent equipment access, by climbing crews.

SUMMARY OF CONTROL TECHNIQUES

TARGET	TECHNIQUES	COMMENTS
Poison Ivy	Foliar	Must be growing within 10 feet of the roadway. Spot treatment will be made using the foliar applications in most cases, except no spray areas around sensitive areas
Grasses	Mowing	In most cases
	Foliar	Spot foliar application treatments of grass growing along curbs or in cracks where mowing is not practical.
Low growth	Mowing	In most cases, option for sensitive areas.
	Foliar	Terrain prevents mowing or hand cutting; rapid re-sprouting species.
	Hand cutting	Terrain prevents mowing and re-sprouting is not a concern; option for sensitive areas.
Tall growth	Selective trimming Foliar – No treatments over 12'	In cases where the visibility or interference does not warrant removal of entire vegetation; option for sensitive areas.
	Hand cutting	Terrain prevents mowing; mowing not effective due to stump size; species greater than 12 feet in height that will not re-sprout; option for sensitive areas.

JUSTIFICATION OF PROPOSED HERBICIDE APPLICATIONS

The goal of this VMP is for the management of nuisance vegetation (e.g., poison ivy) and other woody plants that interfere with pedestrian and traffic safety. Mechanical cutting and mowing in most instances will achieve the desired goals of controlling nuisance vegetation and vegetation that poses a risk. One of the reasons for choosing herbicide use versus mechanical control is the cost savings of labor associated with herbicide use. It is the authors experience and opinion that the amount of time spent trying to mechanically control the vegetation in these areas is more than double the cost effectiveness of using herbicides. The ODPW is highly taxed with requests and responsibilities to the town to maintain different facets of public works.

As previously noted, the control of public nuisance vegetation e.g.: (poison ivy) along the ROW is an objective of this VMP. Due to the low growing nature of poison ivy, and the fact that it grows along stolons, it is nearly impossible to control poison ivy through cultivation, hand pulling or mowing at the height generally used in roadside mowing operations. Moreover, the climbing characteristics of this plant: over stone walls, tree trunks and guard rails- make mechanical control out of the question for safety and economic reasons. Low growing vegetation that do not present a safety hazard that occupy the same ecological niche as poison ivy, maybe excluded from both chemical and mechanical control techniques. The ODPW will be using the recommended Sensitive Area Materials List.

Other Species

Woody vegetation (low and high growth species) growing along the rights of way that interfere with pedestrian or vehicles is controlled by a variety of techniques. Pruning or ground cutting using hand tools or chain saws primarily controls large woody vegetation. Depending upon the species of plant removed and its proximity to other vegetation, these stumps may be treated with an herbicide to prevent re-sprouting. Small woody plants that are growing along the road shoulder in an accessible location will be mowed along with the roadside grass on an annual basis. Woody plants that are growing over obstacles that would impede the mower, or have a viney growth habit so that they cannot be hand cut and chipped, or that grow very rapidly, will be eliminated through the use of foliar applied herbicides. These plants include but not limited to Japanese bamboo, multiflora rose, wild grape, and invasive bush honeysuckle. Primarily mowing will control grass. However, nuisance grass that may grow in between guard rails or cracks in asphalt may best be controlled by spot treatment of herbicides.

METHODS, REFERENCES AND SOURCES FOR IDENTIFYING SENSITIVE AREAS

(AND CONTROL STRATEGIES PROPOSED FOR SENSITIVE AREA)

Identifying Sensitive Areas

The general definition of *sensitive areas* regulated by 333 CMR 11.04 is as follows:

...any areas within Rights-of-Way, including No-Spray and Limited-Spray Areas, in which public health, environmental or agricultural concerns warrant special protection to further minimize risks of unreasonable adverse effects

Sensitive Areas regulated by 333 CMR 11.00 include the following: Water Supplies:

- Zone I's
- Zone H's
- IWPA's (Interim Wellhead Protection Areas)
- Class A Surface Water Sources
- Tributaries to a Class A Surface Water Source
- Class B Drinking Water Intakes
- Private Wells

Surface Waters:

- Wetlands
- Water Over Wetlands
- The Mean Annual High Water Line of a River
- The Outer Boundary of a Riverfront Area
- Certified Vernal Pools

Cultural Sites:

- Agricultural Areas
- Inhabited Areas

Wildlife Areas:

- Certified Vernal Pool Habitat
- Priority Habitat

Identification Methods

Two simple descriptions guide the complex identification of the *sensitive areas* defined in 333 CMR 11.04: *Readily identifiable in the field and Not readily identifiable in the field.*

Readily identifiable in the field areas will be identified, marked when appropriate, and treated according to all applicable restrictions listed in 333 CMR 11.00. Not readily identifiable in the field areas will likewise be identified, marked when appropriate, and treated when appropriate, but they are identified by the use of data marked on maps and collected included in the YOP and notification processes before the time of treatment.

The individuals assigned the task of identifying and treating *sensitive areas* in the field will use the appropriate sources and methods from the following list:

Sources to identify sensitive areas not readily identifiable in the field include:

1) Massachusetts Department of Environmental Protection (DEP) Watershed Maps (1:25,000) that delineates the perimeter of public watersheds and the location of public wells
2) Massachusetts DEP Wetland Conservancy Maps (scale usually 1:1,000)
3) Municipal maps and records from Board of Health, Conservation Commissions, and water suppliers
4) Regional Planning Agencies maps and records
5) U.S. Fish and Wildlife Service National Wetlands Inventory Maps, available from the University of Massachusetts, Cartographic Information Research Services, Amherst
6) Town of Orleans watershed delineation map
7) Natural Heritage Atlas

The following is a description of how the sensitive areas will be identified for required protection:

1) Consult the appropriate reference materials and sources to determine the precise location of these areas
2) Place the boundaries of these sensitive areas on U.S. Geological Survey (USGS) topographical maps
3) Prior to commencement of herbicide application operations, the treatment crew will be provided a marked topographic map with which to identify boundaries of the sensitive areas
4) The treatment crew will deploy a crew or point person in advance of the main herbicide application operation to locate and flag these boundaries or the boundaries of the appropriate buffer zone
5) No spray areas have been identified as all locations within the watershed of the town of Orleans public water supply.
6) Orange pavement marking paint will be used to identify "No spray areas" on pavement, granite curbing and sidewalks. They will be marked with an orange line and the letters NSA
7) Qualified ODPW personnel will flag and mark the no spray areas prior to any spraying operation; crews will be provided with street maps with no spray areas clearly marked
8) Areas to be sprayed will be walked to determine sensitive areas

Sensitive areas readily identifiable in the field include surface water, inhabited areas, agricultural areas, and wetlands. The method used to identify these sensitive areas will be as follows:

1) Consult USGS topographic maps to locate any of these sensitive areas that maybe already be identified on these maps
2) Prior to commencement of herbicide application operations, the treatment crew will be provided the marked topographic map
3) The treatment crew will visually survey the area to be treated for any sensitive areas
4) Consult with the Town of Orleans Conservation Commission

SENSITIVE AREA RESTRICTIONS (333 CMR 11.04)

General

In any sensitive area:

- The minimum labeled rate of herbicide for the appropriate site, targeted pest, and application method shall be applied.
- Herbicides shall be applied selectively by low pressure foliar techniques or stem application only or other method approved for use by the Department of Agriculture Resources.
- Treatment in the limited spray areas require the use of herbicides from the Sensitive Area Materials list available at www.mass.gov/agr/pesticides/rightofway/index.htm.

Sensitive Area Restriction Guide (333 CMR 11.04)

Sensitive Area	Limited Spray or No-Spray Areas (feet)	Control Method	Time Between Treatment(s)
Public Ground Water Supplies	400'	Mechanical Only	None
Primary Recharge Area	Zone II or IWPA (1/2 mile radius)	Mechanical, Approved Herbicides*	24 months
Public Surface Water Supplies (Class A & Class B)	100'	Mechanical Only	None
	100'-400'	Approved Herbicides	24 months
Tributary to Class A Water Source, within 400' upstream of water source	100’	Mechanical Only	None
	100’-400’	Approved Herbicides	24 months
Tributary to Class A Water Source, greater than 400' upstream of water source	10’	Mechanical Only	None
	10’-200’	Approved Herbicides	24 months
Class B Drinking Water Intake, within 400' upstream of intake	100’	Mechanical Only	None
	100’-200’	Approved Herbicides	24 months
Private Drinking Water Supplies	50’	Mechanical Only	None
	50’-100’	Approved Herbicides	24 months
Surface Waters	10’	Mechanical Only	None
	10’-100’	Approved Herbicides	12 months
Rivers	10’ from mean annual high water line	Mechanical Only	None
	10’-200’	Approved Herbicides	12 months
Wetlands	10’	Mechanical Only	None
	100’ or with approved Wetlands Determination 10'-100' [per 310 CMR 0.05(3)(a) & 310 CMR 0.03(6)(b)]	Low-pressure Foliar, CST, Basal, Approved Herbicides	24 months
Inhabited Areas	100’	Approved Herbicides	12 Months
Agricultural Area(Crops, Fruits, Pastures)	100’	Approved Herbicides	12 Months
Certified Vernal Pools	10’	Mechanical Only when water is present	None
Ce1tified Vernal Pool Habitat	10’-outer boundary of habitat	No treatment without approval	
Priority Habitat	No treatment outside the 4 foot paved road exemption without approval of the Natural Heritage Endangered Species Program (NHESP)		

*Massachusetts Approved herbicides for sensitive sites

OPERATIONAL GUIDELINES FOR APPLICATORS RELATIVE TO HERBICIDE USE

All applicators must be licensed and under onsite supervision by a certified applicator with a category 40 Rights-of-Way. In addition to the applicable rules and regulations, applicators will adhere to the following operational guidelines:

Weather

Herbicide applications will be restricted during certain adverse weather conditions, such as rain and wind. Herbicide applications will not be made during periods of moderate or heavy rainfall. Foliar applications are effective in light mist situations, however; any measurable rainfall that creates runoff will wash the herbicide off target. If foliar applications are interrupted by unexpected rainfall, the treatment will not resume until the rain ends and active leaf runoff has ceased. Cut stump treatments will not be made during measurable precipitation and will not resume until precipitation has ceased.

Excessive wind can create drift during foliar applications. Significant herbicide drift can cause damage to desirable vegetation on or off the roadside. Cut stump treatments are much less affected by wind because they are applied in such a close proximity to the ground.

To minimize off target drift, the applicator will comply with the following restrictions:

a. During periods of winds, which are strong enough to bend the tops of the main stems of tree species on the roadside, the applicator will periodically observe the application of the foliar treatment to insure that there is no significant movement of the herbicide moving off target, the application will immediately stop until the wind has subsided enough to permit further applications.

b. All herbicide solutions to be used for a foliar application will contain low drift agents. Low drift agents will be added to the foliar herbicide solution as per the low-drift agent label. In moderate wind conditions, as per herbicide label recommendations, more low drift agent may be added, at the discretion of the applicator to decrease drift.

c. Foliar treatments will not be made to target vegetation that exceeds twelve feet in height.

Equipment Calibration

Foliar application equipment will be calibrated at the beginning of the season, prior to touch-up application, and in accordance with manufacturer's recommendations. Foliar application equipment will be calibrated to maintain pressures not exceeding twenty psi at the nozzle. Applicator nozzles will be adjusted to apply a cone spray pattern. Foliar application equipment will be adjusted to apply a coarse spray pattern when using the backpack sprayer to apply to smaller areas.

Sensitive Area Restrictions

The ODPW has defined sensitive areas where there exists a no-spray area where herbicide use is prohibited and a limited spray area where herbicide use is allowed under ce1tain conditions. In areas around sensitive areas where herbicides use is allowed, only the minimum labeled rate of application for the control of target species can be applied.

INDIVIDUALS DEVELOPING AND SUBMITTING THE PLAN

A Town employee will perform the herbicide treatments, and no outside contractor will be involved. That person is Ronald E. Trudeau Jr. DPW Manager, Department of Public Works, a Massachusetts licensed ce1tified applicator in category 37- Turf since 1981 and licensed certified applicator in category 40- Rights of Way since 1997. He holds an Associates of Science Degree from the Stockbridge School of Agriculture at the University of Massachusetts in Amherst, Massachusetts. He majored in Turfgrass Management and graduated in 1981. He has been employed by the town since February 2019. He can be reached at (508) 240-3790 x 3107.

Supervising the VMP is Director of Department of Public Works & Natural Resources, Tom Daley, who is a registered Professional Engineer and holds both a Bachelor of Science in Civil Engineering. He has held this position for 7 years. He has also worked for other municipalities. He can be reached at (508) 240-3790 x 3106.

DESCRIPTION OF INTEGRATED Vegetation MANAGEMENT PROGRAMS

(OR OTHER TECHNIQUES/PROGRAMS TO MINIMIZE THE AMOUNT AND FREQUENCY OF HERBICIDE APPLICATION)

Integrated Pest Management (IPM) as it applies to roadside maintenance involves utilizing a variety of techniques to control unwanted vegetation in the most ecologically based manner. This includes cultural controls that will reduce the use of vegetative management. One cultural control that the Town has been undertaking is hand pulling of weeds in the town's perennial gardens located at the town green. If and when used, herbicide use will be minimized through timing of applications to maximize control, and avoiding unnecessary application schedules while protecting non-target organisms and environmentally sensitive sites. The specific components of the roadside IPM program include:

Monitoring - All roadsides will be surveyed prior to any scheduled treatment program. Monitoring will be made by foot or by vehicle. Monitoring of areas may also be the result of requests from the public.

Record Keeping - In addition to the record keeping requirements of the Pesticide Board regulations, a log of areas surveyed will be kept for future planning and reference. Areas maintained either through mechanical or chemical control would be recorded.

Control Tactics- The decisions to use one of the vegetation control techniques will depend on evaluating the specific situation. Emphasis will be given to the control tactic that will address the vegetation problem in the most environmentally sound manner and in a way to minimize vegetation control in the long term.

A. Cultural Controls
    1. Mulching
    2. Hand pulling of weeds
B. Mechanical Controls
    1. Selective pruning
    2. Grounds cutting
    3. Mowing
    4. Street Sweeping
C. Chemical Controls
    1. Foliar treatments achieve by applying with low-pressure backpack sprayer

DESCRIPTION OF ALTERNATE LAND USE PROVISION OR AGREEMENTS

(THAT MAY BE ESTABLISHED WITH INDIVIDUALS, STATE, FEDERAL OR MUNICIPAL AGENCIES THAT WOULD MINIMIZE THE NEED FOR HERBICIDE, INCLUDING THE RATIONALE FOR ACCEPTING OR DENYING ANY REASONABLE REQUEST MADE BY AN INDIVIDUAL.)

Every effort will be given for alternative land use options. However, there are specific criteria to be met for adoption of alternative land use options. First, the alternative land use option must control the undesirable vegetation in a similar manner, ecologically and efficaciously as allowed in this VMP. For example, a common practice of abutters to roadways is to mow and maintain road shoulders. In this instance, the monitoring program would reveal that the area does not warrant vegetation control. A written agreement with landowners for alternative vegetation control methods will be obtained. This agreement would clearly specify that ODPW would not treat vegetation in these areas and outline the landowner's responsibilities for vegetation control.

REMEDIAL PLAN-to ADDRESS SPILLS AND RELATED ACCIDENTS

All mixing and loading of herbicides will be conducted at the central facility where the herbicides are stored. Only the amount of herbicide necessary to carry out the vegetation control, based on the monitoring results, will ensure that there will be no waste and minimize potential problems. The vehicle carrying out the spray operation will be equipped with a bag of absorbent, activated charcoal, leak proof containers, a broom and a shovel in case of minor spills. A clipboard log of the herbicides on the vehicle will be kept on the vehicle. Herbicide labels, fact sheets and the YOP will be carried on site by the applicator.

As soon as any spill is observed, immediate action will be taken to contain the spill and protect the spill area. The cause of the spill must be identified and secured. Chemical spills may be either herbicide or gas and oil from the spray equipment. Spill containment will be accomplished by covering the spill with adsorptive clay or other adsorptive material or, for large spills, building clay or soil dikes to impede spill progress. Absorbing pads and snakes will also be used to contain and absorb spills. The crew members will place appropriate barriers, flagging and stay on location until completely clean. If a fire is involved, care will be taken to avoid breathing fumes from any burning chemicals.

In the event of a spill, information on safety precautions and clean up procedures may be gathered from the following sources:

- Herbicide label
- Herbicide SDS sheet
  Herbicide manufacturer
  Neudorff North America – 443-221-3732
  E-mail – info@neudorff.ca
-

Massachusetts Pesticide Bureau (617) 626-1781

- Massachusetts Department of Environmental Protection Incident Response Unit (617) 556-1133 or (888) 304- 1133
- Massachusetts Department of Public Health,
- Bureau of Environmental Health (Toxicology Program) (617) 624- 5757
- ChemTree (800) 424-9300
- Orleans Police and Fire Departments Emergency # 911.

Minor spills will be remedied by soaking up the spill with adsorptive clay or other adsorptive material and placing it in leak proof containers for proper disposal. Dry herbicides, such as granules, will be swept up or shoveled up directly in leak proof containers for proper disposal all contaminated soil will be placed in leak proof containers, removed from the site and disposed of properly. Activated charcoal will be incorporated into the soil at the spill location at a rate of seven pounds per thousand square feet to inactivate any herbicide residue. All spills of reportable quantities will be reported to the Department of Environmental Protection and the Pesticide Bureau.