

VERMONT DEPARTMENT OF ENVIRONMENTAL CONSERVATION
WATERSHED
 MANAGEMENT DIVISION



Notice of Intent (NOI)
for coverage under the Pesticide
General Permit (PGP) for
discharges from the application of
pesticides to waters of the State of
Vermont

Submission of this completed NOI constitutes notice that the Operator identified in Section B intends to be authorized to discharge pollutants to waters of the State, identified in Section C, under Vermont's Pesticide General Permit (PGP). Submission of this NOI constitutes notice that the party identified in Section B of this form has read, understands, and meets the eligibility conditions per Part 1 of the PGP; agrees to comply with all applicable terms and conditions of the permit; and understands that continued authorization under the PGP is contingent on maintaining eligibility for coverage. To be granted coverage, all information required on this form must be completed. Please read and ensure compliance with all permit conditions, including the requirement to prepare a Pesticide Discharge Management Plan (PDMP) prior to NOI submittal, except for applications made in response to a declared pest emergency situation, per Part 6 (defined in Appendix A) of the PGP.

A. Notice of Intent Status

1. Mark whether this is an original request for coverage under the PGP or if this is a change of information for a discharge already covered under the PGP. If this is a change of information, supply the NPDES permit tracking number for the discharge below.

Original NOI Submission NOI Change of Information Prior permit tracking number (if known): 2012-100

B. Operator Information

1. Name: First Brandon Leicester Salisbury Insect Control District

2a. Mailing Address: PO Box 188

2b. Town: Brandon 2c. State: VT 2d. Zip: 05733

3. Phone: 802-247-6779 4. Email: BLSGDistrict@gmail.com

5. Contact Name: Benjamin Lawton

6. Contact Phone: 802-247-3314 7. Contact Email: doctorben2@aol.com

8. Operator (Entity) Type: Federal State Local Insect
 Control District Other _____

C. Pest Management Area

1. Pest Management Area Name: Towns of Brandon, Leicester, Salisbury, Goshen , Pittsford , and Proctor

2. Pesticide Use Pattern(s):
 Mosquito & Other Flying Insect Pest Control Weed & Algae Pest Control
 Forest Canopy Pest Control Animal Pest Control

3a. Project location Address (include a location map): Entire Towns of Brandon, Leicester, Salisbury, Goshen , Pittsford , and Proctor

3b. Town: Brandon, Leicester, Salisbury, Goshen , Pittsford , and Proctor 3c. County: Rutland and Addison

4. Latitude: 5. Longitude:

6. SPAN: Enter the 11 - digit number that is printed on the property tax bill for the applicable parcel(s). Projects that involve more than 1 parcel shall list all applicable SPANs.

a. All SPANs in listed Towns e.

b.	f.
c.	g.
d.	h.

D. Receiving Waters

1. Name of receiving water(s): Otter Creek, Lake Dunmore, Fern Lake, Goshen Dam and tributaries. See map.

Coverage requested for all waters within location identified above

Coverage requested for all waters within location identified above except for:

Coverage requested specifically for the following waters within location identified above:

2a. Outstanding Resource Waters (See PGP, Part 1.1.2.2; Vermont Water Quality Standards Appendix H): No

2b. If yes, please provide name of Outstanding Resource Water(s):

2c. Provide a rationale for determination that pesticide discharge is necessary to protect water quality, the environment, and/or public health and that any such discharge will not degrade water quality or will degrade water quality only on a short-term or temporary basis. Please submit this information in a supporting document.

3. Discharges to Water Quality Impaired Waters (See PGP Part 1.1.2.1) Operators are not eligible for coverage under this permit for any discharges from a pesticide application to waters of the State if the waters are identified as impaired by a substance that is either an active ingredient of the pesticide designated for use or is a degradate of such an active ingredient.

Check one (provide supporting evidence for either on the location map):

Waters are not impaired by any substance that is either an active ingredient of a pesticide to be discharged or a degradate of such an active ingredient.

Waters are on a current state list as being impaired by a substance which is either an active ingredient of a pesticide to be discharged or a degradate of such an active ingredient; however, evidence is attached documenting that the waters are no longer impaired.

E. Public Notice Requirement

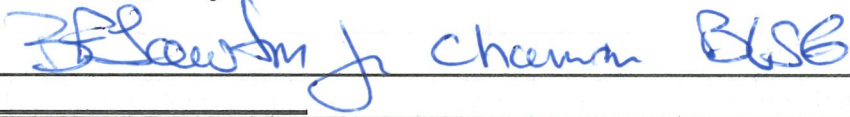
A copy of this complete NOI will be provided to the municipal clerk for posting in the municipality in which the project is located in accordance with the PGP, Section 1.2.4. If the project and the related discharge(s) are located within different municipalities, then the completed NOI will be filed with the municipal clerks within each municipality. The municipal clerk shall post the completed NOI. A copy of this NOI will also be posted on DEC's webpage.

Information for the Municipal Clerk regarding posting instructions can be found on Page 3 of this NOI.

E. Certification Relating to the Accuracy of the Information Submitted

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. I further certify that the applicant has sufficient title, right or interest in the property where the proposed activity occurs.

Operator: BLSG Board, Benjamin F. Lawton Title: Chair

Signature:  Date: 8/14/2017

INFORMATION FOR MUNICIPAL CLERK

10 V.S.A. §1263(b) provides for the public notice of an applicant's intent to discharge pollutants to waters of the State.

Please post this notice and instruction sheet in a conspicuous place for 10 days from the date received.

PUBLIC COMMENT

Public comments concerning this NOI must be submitted within 10 days of receipt of this Notice by the Municipal Clerk. Comments should address how the application complies or does not comply with the terms and conditions of the PGP. All written comments received within the timeframe described above will be considered by the Department of Environmental Conservation in its final ruling to grant or deny authorization to discharge under the PGP. Send written comments to:

Department of Environmental Conservation
Watershed Management Division
Main Building, Second Floor
1 National Life Drive
Montpelier, VT 05620-3522

Please cite the NOI permit tracking number in any correspondence.

SUBMITTING THIS FORM

To submit this NOI, forms may be mailed to:
Department of Environmental Conservation
Watershed Management Division
Main Building, Second Floor
One National Life Drive
Montpelier, VT 05620-3522

APPEALS

Renewable Energy Projects – Right to Appeal to Public Service Board

If this decision relates to a renewable energy plant for which a certificate of public good is required under 30 V.S.A. §248, any appeal of this decision must be filed with the clerk of the Vermont Public Service Board pursuant to 10 V.S.A. §8506 within 30 days of the date of this decision. The appellant must file with the Clerk an original and six copies of its appeal. The appellant shall provide notice of the filing of an appeal in accordance with 10 V.S.A. §8504(c)(2), and shall also serve a copy of the Notice of Appeal on the Vermont Department of Public Service. For additional information, see the Rules and General orders of the Public Service Board available at www.psb.vermont.gov or via telephone: (802) 828-2358. The address for the Public Service Board is 112 State Street, Montpelier, VT 05620-2701

All Other Projects – Right to Appeal to Environmental Court

Pursuant to 10 V.S.A. Chapter 220, any appeal of this decision must be filed with the clerk of the Environmental Court within 30 days of the date of the decision. The Notice of Appeal must specify the parties taking the appeal and the statutory provision under which each party claims party status; must designate the act or decision appealed from; must name the Environmental Court; and must be signed by the appellant or their attorney. In addition, the appeal must give the address or location and description of the property, project or facility with which the appeal is concerned and the name of the applicant or any permit involved in the appeal. The appellant must also serve a copy of the Notice of Appeal in accordance with Rule 5(b)(4)(B) of the Vermont Rules for Environmental Court Proceedings. Additional information is available at: www.vermontjudiciary.org or via telephone: (802) 951-1740. The address for Environmental Court is 32 Cherry Street, 2nd Floor, Suite 303, Burlington, VT 05401

A copy of PGP may be obtained from the Watershed Management Division's website at:

<http://dec.vermont.gov/watershed>

For Department Use Only

VERMONT DEPARTMENT OF ENVIRONMENTAL CONSERVATION AUTHORIZATION TO

DISCHARGE

A determination has been made that the proposed discharge to waters of the State of Vermont qualifies for coverage under the Vermont NPDES Pesticide General Permit (PGP). Subject to the terms and conditions of the PGP and the NOI, the Applicant is hereby authorized to discharge to waters of the State.

Dated this _____ day of _____, 2017

Emily Boedecker

Commissioner Department of Environmental Conservation

By: _____

Lakes and Ponds Management and Protection Program

Addendum to NOI submitted by First Brandon Leicester Salisbury Insect Control District

2c. Provide a rationale for determination that pesticide discharge is necessary to protect water quality, the environment, and/or public health and that any such discharge will not degrade water quality or will degrade water quality only on a short-term or temporary basis. Please submit this information in a supporting document.

Pesticide discharge is necessary for prevention of insect borne diseases including Eastern Equine Encephalitis, West Nile Disease and Zika virus and control of nuisance biting insects to allow the public to enjoy the public and private use of the amenities of their property and public amenities and the protection of the tourist economy. Applications follow the restrictions listed on the labels of the pesticides used.

With the recent advent of mosquito borne eastern equine encephalitis and west Nile virus, our mission is even more vital than in past years. Vermont has now recorded its first case of the zika virus although it is too early to predict whether this will become mosquito borne in Vermont's climate. Therefore, the district feels it is imperative that a pro-active mosquito suppression project be in place not only for the nuisance value but for public health protection.

Even with our best efforts at larval surveillance and eradication, some evade detection and hatch. Thus, a ground spraying adulticide program is an essential layer of protection.

The BLSG is the only municipal mosquito control district within the state that uses a full integrated pest control management (IPM) approach to control our mosquito population. Our larval program samples the 6000 acres of breeding sites along the Otter Creek water shed stretching from Pittsford to Salisbury.

- The district uses *Bacillus Thuringiensis* var. *israelensis* (BTI) which is effective in treating mosquito larvae.
- Vectobac is an effective larvicide at the early stages of development. It is to be applied at 5 lbs. per acre.
- *Bacillus sphaericus* will be used in highly organic/polluted waters for culex species.
- Methoprene will be used in areas that need residual activity (small pools that remain wet for long periods of time) and in storm drains.

This effort is partially supported by the State of Vermont which provides funds for the approved materials and the aerial applications. IPM also requires that citizens and town crews aid in reducing standing water sites. Keeping culverts open and ditches free of debris, eliminating old tires (or drilling holes in them for drainage), and collecting discarded bottles and cans aids in eliminating breeding sites.

An active district, the wise and judicious use of proper chemicals, and the active cooperation of municipalities and citizens are essential components of a successful mosquito control program.

BLSG INSECT CONTROL DISTRICT

PO Box 188

Brandon, VT 05733

802-247-6779

blsgdistrict@gmail.com

<https://blsgmosquito.wordpress.com>

PESTICIDE DISCHARGE MANAGEMENT PLAN (PDMP)

Problem Identification

The BLSG Insect Control District provides larvicide and adult surveillance during the months of April through October for the following towns: Brandon, Leicester, Salisbury, Goshen, Pittsford and Proctor. The District controls public health risk and nuisance mosquitoes through an Integrated Pest Management Program. The District is dedicated to improving the quality of our efforts through training, program development and continuous improvement.

The use of adult mosquito monitoring devices and larval surveillance is key in determining the best course of action for each particular situation. Our larval and adult mosquito control consists of the two following habitats:

A. Urban

- Catch basins and Storm drains
- Residential containers
- Unmaintained pools and ponds
- Retention ponds
- Dense vegetation
- Drainage ditches
- Construction sites
- Open Fields
- Wetlands/Swamps
- Tires

B. Forested

- Flooded woodlots
- Roadside ditches
- Vernal Pools
- Woodland Pools
- Beaver Dam's
- Wetlands/Swamps
- Tires

Action Threshold(s)

Pest Problem Description:

With the recent advent of mosquito borne eastern equine encephalitis and west Nile virus, our mission is even more vital than in past years. Vermont has now recorded its first case of the zika virus although it is too early to predict whether this will become mosquito borne in Vermont's climate. West Nile has been detected in six counties (Addison, Caledonia, Chittenden, Franklin, Windham, and Windsor). Therefore, the district feels it is imperative that a pro-active mosquito suppression project be in place not only for the nuisance mosquitoes but for public health protection.

Even with our best efforts at larval surveillance and reduction, some evade detection and hatch. The action threshold for larval control is based on historical knowledge and gathered data. In addition to experience, the district monitors river gauges and weather conditions for optimum treatments. The district established surveillance protocols and surveying known mosquito breeding habitats. If larva counts of 10 per dip are seen on an average at a specific location a larvicide application is warranted. Proper weather conditions are necessary for a safe and effective treatment.

The BLSG is the only municipal mosquito control district within the state that uses a full integrated pest control management (IPM) approach to control our mosquito population. Our larval program samples 6000+ acres of breeding sites along the Otter Creek water shed stretching from Proctor to Salisbury.

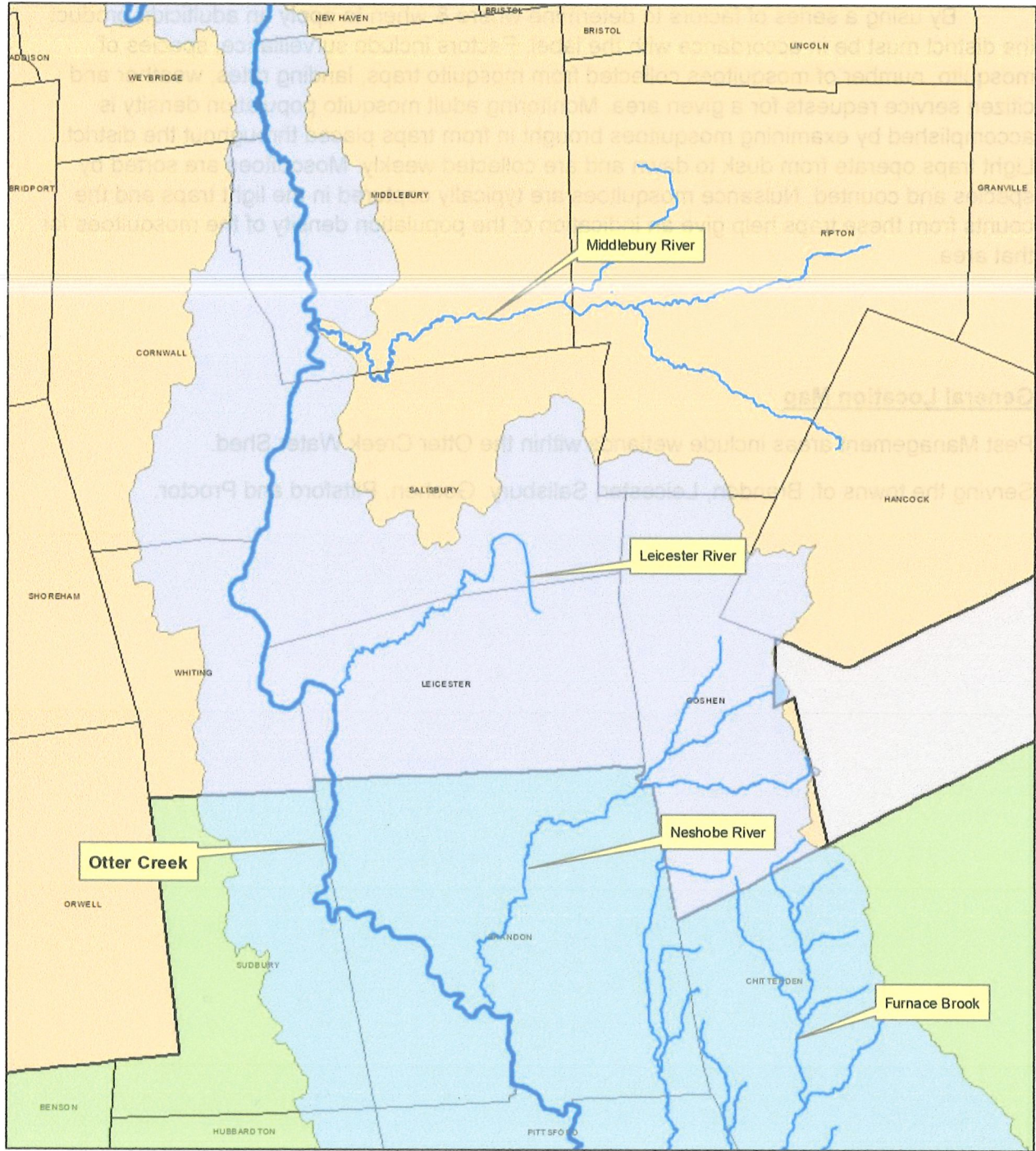
- The district uses *Bacillus Thuringiensis var. israelensis* (BTI) which is effective in treating mosquito larvae.
- Vectobac is an effective larvicide at the early stages of development and is applied at 5 lbs. per acre.
- *Bacillus sphaericus* will be used in highly organic/polluted waters for culex species.
- Methoprene will be used in areas that need residual activity (small pools that remain wet for long periods of time) and in storm drains.

By using a series of factors to determine where & when to apply an adulticide product the district must be in accordance with the label. Factors include surveillance, species of mosquito, number of mosquitoes collected from mosquito traps, landing rates, weather and citizen service requests for a given area. Monitoring adult mosquito population density is accomplished by examining mosquitoes brought in from traps placed throughout the district. Light traps operate from dusk to dawn and are collected weekly. Mosquitoes are sorted by species and counted. Nuisance mosquitoes are typically captured in the light traps and the counts from these traps help give an indication of the population density of the mosquitoes for that area.

General Location Map

Pest Management areas include wetlands within the Otter Creek Water Shed.

Serving the towns of: Brandon, Leicester, Salisbury, Goshen, Pittsford and Proctor.



Map Author: Michelle Smith, VACD LTP Tech



Legend	
	Otter Creek Mainstem
	Otter Creek Watershed
	VT County Boundaries

Water Quality Standards

Waters (Otter Creek, Leicester River, Neshobe River, Middlebury River) are not impaired by any substance which is either an active ingredient in the pesticide to be discharged or an degradate of such an active ingredient.

Pest Management Options Evaluation

Prior to first pesticide application staff evaluate the location considering impacts to water quality, non-target organisms, feasibility, weather and cost effectiveness.

Options (one or combo):

1. No action
2. Prevention
3. Mechanical or physical methods
4. Cultural methods
5. Biological control agents
6. Pesticides

Pest Management Options (PMO)	Surveillance / Threshold	Application Method
No Action (Larval)	<ul style="list-style-type: none">• Dip sample shows no signs of larvae present• Larvae predators present in habitat• Inclement weather in the forecast	N/A
No Action (Adult)	<ul style="list-style-type: none">• Inclement weather in the forecast• Environmental conditions• Mosquito population below threshold	N/A

<p>Pesticide Application (Larval)</p>	<ul style="list-style-type: none"> • Weather or environmental conditions • Rainfall producing standing water in forested areas • Larval surveillance conducted by dip samples of standing water and containers holding water containing 1- • 5 larvae per dip on average 	<p>Hand or truck application of either granular or ingot product using the minimum application rate as required per the product label.</p>
	<ul style="list-style-type: none"> • Seasonal temperature and precipitation changes warrant the beginning of larval control in catch basins and off road sites <p>Inspecting catch basins and other sources of stagnant water for breeding and larval activity</p> <p>Institutional knowledge and experience</p> <p>Inspecting known mosquito breeding habitats</p>	
<p>Biological Application (Larval)</p>	<ul style="list-style-type: none"> • • Impounded waters only • Environmental conditions • Larval surveillance conducted by dip samples of water containing 10 larvae per dip on average • Institutional knowledge and experience <p>Property checks for evidence of mosquito breeding and larvae in pools, ponds, fountains and any other container with the ability to hold water</p>	<p>Introducing mosquito larvae eating fish species to impounded waters.</p>
<p>Source Reduction - Urban</p>	<ul style="list-style-type: none"> • Property checks for mosquito breeding and larvae in pools, ponds, fountains and any other container with the ability to hold water • Larval dip counts looking for presence of container breeders 	<p>Removing and or emptying containers that hold water.</p>

<p>Source Reduction - Forested</p>	<ul style="list-style-type: none"> • • Weather conditions • Environmental conditions • Rainfall producing standing water in forested areas • Institutional knowledge and experience <p>Inspecting known mosquito breeding habitats</p>	<p>Flood prevention, removing and or emptying containers that hold water, ditch clearing, debris removal, increasing flow of water.</p>
<p>Pesticide Application ULV (Adult Control)</p>	<ul style="list-style-type: none"> • WNV, SLE, EEE or other vector/mosquito borne disease • positive mosquito pool reported. • Vector mosquito borne virus positive human, bird or other animal reported within the district or its border • High count or significant increase of public health risk mosquitoes in trap collection (daily average greater than 15 mosquitoes per trap) • Resident complaints of mosquitoes. High count or significant increase of nuisance mosquitoes in trap collection (daily average greater than 15 mosquitoes per trap) • Combination of precipitation and temperature per institutional knowledge and experience 	<p>Ground ULV application via hand or truck mounted equipment applied in accordance with the recommended rate per product label.</p>
<p>Pesticide Application Barrier (Adult Control)</p>	<ul style="list-style-type: none"> • • Resident complaints of mosquitoes • Public gatherings and events • Any combination of light trap counts, gravid counts, WNV or other positive pools of mosquitoes, dip samples or environmental and weather conditions <p>Areas inaccessible to truck ULV</p>	<p>Backpack sprayer applied to vegetation in accordance with the recommended rate per product label.</p>

Public Relations and Education	<ul style="list-style-type: none"> • Continual 	<ul style="list-style-type: none"> • Media Relations • Public Information • Website • Intergovernmental Agency Relations • Community Outreach
--------------------------------	---	--

Response Procedures

Spill Response procedures

The following are the procedures for spill response management.

Vermont Regulations for Control of Pesticides require Operators to immediately report pesticide accidents to the Vermont Agency of Agriculture at (802)-828-2431.

Emergency Actions:

A person responsible for the application, storage or handling of a pesticide upon knowledge of an accident involving such pesticide shall immediately take actions intended to protect human health and the environment, including but not limited to emergency containment measures and the following:

1. Ensure appropriate personal protection is taken (PPE)
2. Utilize supplied spill kit
3. Stop spill from spreading
4. Stop spill at the source
5. Inform Director of Operations as to nature of incident
6. Director of Operations will document all info regarding incident
7. Conclusions as to whether spill is of the size where further notification is required will be determined



VERMONT DEPARTMENT OF ENVIRONMENTAL CONSERVATION
WATERSHED MANAGEMENT DIVISION
 LAKES & PONDS PROGRAM

24 Hour Adverse Incident Notification Report Form

For authorizations to discharge under the **Pesticide General Permit**

Submission of this form satisfies the provisions within Pesticide General Permit, Section 6.4.1.1 Adverse Incident Notification Required. This form must be submitted within 24 hours, when an Operator observes or is otherwise made aware of an adverse incident resulting from the discharge of pesticide residue into waters of the state

A. Permittee Information

1. Operator Name:		2. Permit Number:	
3. Is the operator a: Decision Maker Operator Both			
4. Name:			
5a. Mailing Address:			
5b. Town:		5c. State:	5d. Zip
6. Phone:		7. Email:	
8. Authorized Pesticide Use Pattern(s):			
Mosquito & other flying insect pest control		Animal pest control	
Weed & algae pest control		Forest canopy pest control	

B. Adverse Incident Information

1. Please select one:		2. Date of the incident:	
This incident was observed		Otherwise made aware of the incident	
3. Latitude:		4. Longitude:	
5. Waterbody ID: DEC's Waterbody ID ArcGIS webpage:			
6. Common name of the waterbody:		7. Town:	
8. Pesticide Trade Name:		9. EPA Registration #:	
10. Active Ingredient:		11. Application Rate:	

Please include a copy of the product label and material safety data sheet. If needed, please explain application rate and provide calculations.

C. Certification

Adverse Incident Response Procedures

An adverse incident is defined as an event that causes, or has the potential to cause, unexpected or unwanted effects involving the safety of device users (including patients) or other persons.

If an Operator observes or is otherwise made aware of an adverse incident which may have resulted from a discharge from a pesticide application, the Operator must immediately notify Misha Cetner at (802)490-6199, misha.cetner@vermont.gov 24 hours of the Operator becoming aware of the adverse incident and must include the following information:

1. The caller's name and telephone number
2. Operator name and mailing address
3. If covered under an NOI, the NOI NPDES permit tracking number assigned by the Department
4. The name and telephone number of a contact person, if different than the person providing the notice
5. How and when the Operator became aware of the adverse incident
6. Description of the location of the adverse incident
7. Description of the adverse incident identified and the pesticide product, including EPA pesticide registration number, and approximate volume for each product applied in the adverse incident area
8. Description of any steps the Operator has taken or will take to correct, repair, remedy, clean up, or otherwise address any adverse effects
9. If know, the identity of any other Operators authorized for coverage under this permit for discharges from the pesticide application activities that resulted in the adverse incident


If an Operator is unable to notify the Department within 24 hours, the Operator must do so as soon as possible and provide an appropriate rationale to the Department for why the Operator was unable to provide such information within 24 hours.

An Adverse Incident Report will be filled out by the BLSG, and submitted:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Operator

Signature:

 Chairman BLSG

Date:

8/14/2017

Submit this form to:

**Vermont Department of Environmental Conservation
Watershed Management Division – Lakes & Ponds
1 National Life Drive, Main 2
Montpelier, VT 05620-3522**

***Direct all correspondence to: Misha Cetner, Pesticide General Permit Coordinator, email:
misha.cetner@vermont.gov or (802) 490-6199***

Revised May 2016 Page 1 of 1

Public Notice:

Notification involves public notice prior to an application. Posting involves the proposed treatment areas, date, time and the pesticides to be used. Postings can be found on the BLSG webpage with a phone number and other contact information for the public to contact the District with any questions. (Attached Documentation)

Public Notice of Intent to Apply Mosquito Adulticides

On or after May 15th, the BLSG Insect Control District may be making ground applications of mosquito adulticides along the public right of ways in the towns of Brandon, Leicester, Salisbury, Goshen and Pittsford to control mosquitos. In the past years, mosquitos in these towns have been found to carry West Nile Virus and Eastern Equine Encephalitis, both of which can be deadly to humans and animals. Applications of malathion or synthetic pyrethroid insecticides will be made with ultra-low volume truck-based sprayers.

If you wish to Opt Out and not have your property treated: please send a written request annually to **BLSG, PO Box 188 Brandon, VT 05733**. Please provide your 911 address and a property map, which delineates your property boundaries on the public right of way. A representative from the district will contact you to assist in marking your property as a no spray zone. Opt out needs to be renewed yearly!

The BLSG hotline is 802-247-6779 and will receive request for treatment as needed during the season.

Further information or comments about adulticiding activities or application exclusion requests can be obtained from:

BLSG Insect Control District
Will Mathis • 802-247-6779
<https://blsgmosquito.wordpress.com>

Additional information available at <https://www.epa.gov/mosquitocontrol>

Public Notice of Intent to Apply Mosquito Larvicides

Local mosquito control districts may be making ground and aerial applications of *Bacillus thuringiensis israelensis (BTI)*, *Bacillus Sphaericus (BS)*, and Spinosad to surface waters where mosquito larvae are present. These are bacterial insecticides used against mosquito larvae. Ground applications of Agnique (biodegradable, alcohol ethoxylated, AE) or Cocobear (Mineral oil) may also be applied in selected wet areas. These are monomolecular films that prevent adult emergence and can be used against mosquito pupae. Methoprene may also be used to prevent adult mosquito emergence. These applications will occur in the towns of Brandon, Leicester, Salisbury, Goshen and Pittsford. Pesticide applications beginning on or after April 8, 2017. Exclusion requests need to be renewed yearly. Please send a written request to **BLSG, PO Box 188 Brandon, VT 05733**.

Further information or comments about the larviciding activities or application exclusion requests can be obtained from:

BLSG Insect Control District
Will Mathis • 802-247-6779
<https://blsgmosquito.wordpress.com>

The Vermont Agency of Agriculture oversees the permitting of these mosquito larvicides and can be reached at 802-828-1319. For more information see the following website: http://agriculture.vermont.gov/plant_pest/mosquitoes_ticks/mosquitoes

Pesticide Discharge Management Plan

for:

BLSG Insect Control District

Towns of Brandon, Leicester, Salisbury,
Goshen, Pittsford, Proctor

Decision-maker(s):

BLSG Insect Control District

PO Box 188

Brandon, VT 05733

802-247-6779

blsgdistrict@gmail.com

PDMP Contact(s):

BLSG Insect Control District

Chairman

Vise Chair

Director of Operations

PDMP Preparation Date:

08-14-17

Pesticide Discharge Management Plan Template

Introduction

Any Decision-maker who is required to submit a Notice of Intent (NOI), as required in the Pesticide General Permit (PGP) Part 1.2.2, must submit a Pesticide Discharge Management Plan (PDMP) by the time the Notice of Intent (NOI) is filed, with the following exception:

- Any application is made in response to a Declared Pest Emergency Situation.

To assist in the development a PDMP, the Vermont Department of Environmental Conservation (DEC) has created this electronic PDMP template. This template is designed to provide guidance through the PDMP development process and to help ensure it addresses all the necessary elements stated within the PGP. Incorporation, by reference, any procedures or plans in other documents that meet the requirements of the PGP is acceptable.

While this template covers the PDMP elements that the PGP requires, it is strongly recommended to customize this template as necessary.

Using this Template

Each section of this template includes instructions and space for project information. Please read the instructions for each section before you complete that section. If additional space is required to complete a section, please provide additional pages citing the section the information is related to.

Tips for completing this Template:

- Multiple pest management areas and use pattern(s) may be described in the same PDMP.
- Pest management area(s) may be as large or small as necessary.
- Incorporate by reference any procedures or plans in other documents that meet the requirements of the permit. Attached a copy of any portions of any documents that you refer to in the PDMP.
- Consider adding permit citations in the PDMP when addressing a specific permit requirement.

In the event of a conflict between this template and any corresponding provision of the PGP, the permit is the final authority.

SECTION 1: Operator Information

Instructions (see PGP Part 1.0):

— Describe the Pest Management Area(s) and identify the type(s) of Pesticide Use Patterns, Operator type, and if there will be a discharge to water quality impaired waters.

Note: An “Operator” is defined in Appendix A of the PGP to mean any entity associated with the application of pesticides that results in a discharge to Waters of the United States that meets either of the following two criteria: (1) any entity who performs the application of a pesticide or who has day-today control of the application (i.e., they are authorized to direct workers to carry out those activities); or (2) any entity with control over the decision to perform pesticide applications including the ability to modify those decisions. Operators identified in (1) above are referred to in the permit as Applicators while Operators identified in (2) are referred to in the permit as Decision-makers. As defined, more than one Operator may be responsible for complying with this permit for any single discharge from the application of pesticides.

A “Pest Management Area” is defined in Appendix A of the PGP to mean the area of land, including any water, for which an Operator has responsibility for and is authorized to conduct pest management activities as covered by the PGP permit (e.g. for an Operator who is a mosquito control district, the pest management area is the total area of the district). The Pest Management Area could include contiguous and non-continuous sites.

1. Provide a description of the Pest Management Area(s):

Pest Management areas include the following towns: Brandon, Leicester, Salisbury, Goshen, Pittsford and Proctor.

2. Identify the Pesticide Use Patterns for this Pest Management Area that trigger the requirement to develop a PDMP. (check all that apply). Note: Decision-makers, that are a large entity, are required to develop a PDMP if they are required to submit an NOI. See Part 5.0 of the PGP for exceptions.

A. Mosquitoes and Other Flying Insect Pests

- B. Weeds and Algae
- C. Animal Pests
- D. Forest Canopy Pests

3. Operator Type (check one):

- a. Federal Government
- b. State Government
- c. Local Government
- d. **Mosquito control district (or similar)**
- e. Irrigation control district (or similar)
- f. Weed control district (or similar)
- g. Other: If other, provide brief description of type of Operator:

SECTION 2: PDMP Team

Instructions (see PGP Part 6.1.1):

List the Decision-maker, person or organization that prepared the PDMP and/or responsible for revising the PDMP, and the person or organization that will prepare and address corrective actions, adverse incident, and spills. Indicate respective responsibilities, where appropriate.

1. Decision-maker: *Any entity with control over the decision to perform pesticide applications including the ability to modify those decisions.*

Company or Organization Name: BLSG Insect Control District
Address: PO Box 188
Brandon, VT 05733
802-247-6779
blsgdistrict@gmail.com
Pest Management areas include the following towns: Brandon, Leicester, Salisbury, Goshen, Pittsford and Proctor.

2. PDMP Contact: *Person(s) who should be contacted regarding PDMP questions.*

BLSG Chairman of the Board
PO Box 188
Brandon, VT 05733
802-247-6779
blsgdistrict@gmail
Pest Management areas include the following towns: Brandon, Leicester, Salisbury, Goshen, Pittsford and Proctor.

3. This PDMP was prepared by: *Person(s) responsible for developing and revising the PDMP.*

BLSG Director of Operations
PO Box 188
Brandon, VT 05733
802-247-6779
Blsgdistrict@gmail.com

Pest Management areas include the following towns: Brandon, Leicester, Salisbury, Goshen, Pittsford and Proctor.

4. Please include any additional team members and their responsibilities.

Team Member Name(s)	Individual Responsibilities
BLSG Chair	-
BLSG Vice Chair	-
BLSG Director of Operations	-

SECTION 3: Problem Identification

3.1 Pest Problem Description

Instructions (see PGP Part 6.1.2):

— Describe the pest problem, including identification of the target pest(s), source of the pest problem, and source of data used to identify the problem in Parts 3.2.1, 3.2.2, 3.2.3, and 3.2.4 of the PGP.

Note: The response will be one or more paragraphs, depending on the nature and complexity of the project. The source of the pest problem may be unknown. DEC does not expect the Decisionmaker(s) to conduct long term studies to determine the source of the pest problem.

1. Provide a brief summary of the pest problem in the table.

Summary of Pest Problem

Target Pest <i>Note: Use common name</i>	Source of the pest problem	Data Source (e.g. survey conducted in 2016)
Mosquito & Biting Flies	Wetlands within the Otter Creek Water Shed.	Yes – CDC Light Trap/Larval Count Data Sheets

2. Provide a description of the pest problem.

Mosquito & Biting flies: Class: Hexapoda Order: Diptera Family: Culicidae/Tabanidae Genus: Varies (Larvae & Pupae) a small slender midge-like fly. Mosquitoes are categorized in two main groups, nuisance mosquitoes and public health risk mosquitoes. The bite of an adult female mosquito can transmit a number of diseases including, malaria, encephalitis, west nile, zika etc.

3.2 Action Threshold(s)

Instructions (see PGP Part 6.1.2):

— Describe the action threshold(s) for pest(s) in the pest management area, including data used in developing the action threshold(s) and method(s) to determine when the action threshold(s) has been met.

Note: An action threshold is the point at which pest populations or environmental conditions necessitate that pest control action be taken based on economic, human health, aesthetic, or other effects. An action threshold may be based on current and/or past environmental factors that are or have been demonstrated to be conducive to pest emergence and/or growth, as well as past and/or current pest presence. Action thresholds are those conditions that indicate both the need for control actions and the proper timing of such actions.

1. Provide a summary of the action threshold(s) in the table. **Summary of Action Threshold(s)** Attached Document

Target Pest	Action Thresholds
Mosquito Larva Adult Mosquito	10 per white dip cup 15 per trap/net sweep

2. **Provide a description of the action threshold(s).**

Pest Management Objective: To prevent and reduce mosquitos and biting flies from exceeding the action threshold.

Target Pest: Mosquito & Biting Flies

Action Threshold: 10 per white dipper cup. 15 per trap/net sweep

Basis for the action threshold: preventing nuisance mosquitos and biting flies from exceeding tolerable levels.

Method to determine when the action threshold has been met: Field surveillance including larval and adult mosquitoes. Samples collected include: larva and adults.

3.3 General Location Map

Instructions (see PGP Part 6.1.2):

- Provide a general location map (e.g., U.S. Geological Survey (USGS) quadrangle map) that identifies the geographic boundaries of the area to which the plan applies and location of the waters of the State
- To improve readability of the map, some detailed information may be kept as an attachment to the site map and pictures may be included as deemed appropriate.

Include a copy of the general location map for this facility as an attachment labeled **3.3 General Location Map**. Attached Document.

3.4 Water Quality Standards

Instructions (see PGP Part 6.1.2):

- Document waters impaired for pesticide(s) or any degradates for which there may be a discharge. Note: Operators are not eligible for coverage under the PGP for any discharges from a pesticide application to waters of the State if the water is identified as impaired by a substance which either is an active ingredient in that pesticide or is a degradate of such an active ingredient, per PGP Part 1.1.2.1.
- Indicate the location of all waters, including wetlands, on the general location map.
- Document any Outstanding Resource Waters and any water(s) impaired for a specific pesticide or any related degradates to which there may be a discharge.

Note: Decision-maker is not required to make a water quality standard (WQS) determination. Vermont's Water Quality Standards are available at:

http://dec.vermont.gov/sites/dec/files/documents/wsmd_water_quality_standards_2016.pdf

If applicable, provide a summary of waters impaired for pesticides. Attached Document.

SECTION 4: Pest Management Options Evaluation

Instructions (see PGP Part 6.1.3):

- Document your evaluation of the pest management options, including combination of the pest management options, to control the target pest(s) in the following sections:
 - No Action
 - Prevention
 - Mechanical/Physical Methods
 - Cultural Methods
 - Biological Control Agents
 - Pesticides
- In your evaluation, you must consider the impact to water quality, impact to non-target organisms, feasibility, and cost effectiveness.

Note: All six pest management options may not be available for a specific use category and/or treatment area. However, the PDMP must include documentation of how the six pest management options were evaluated. The PGP does not require the use of the least toxic alternative or that non-pesticide methods be tried first. Combinations of various pest management options are frequently the most effective Pest Management Measures over the long term. The goal should be to emphasize long-term control rather than a temporary fix. "Pest Management Measure" is defined to be any practice used to meet the effluent limitations that comply with manufacturer specifications, industry standards and recommended industry practices related to the application of pesticides, relevant legal requirements and other provisions that a prudent Operator would implement to reduce and/or eliminate pesticide discharges to waters of the State.

1. Provide a description of the pest management options (include impact to water quality, impact to nontarget organisms, feasibility, cost effectiveness and any relevant previous Pest Management Measures). Attached Document.
 - Target Pests:
 - No Action:
 - Prevention:
 - Mechanical/Physical Conditions:
 - Cultural Methods:
 - Biological Control Agents:
 - Pesticides:
2. Provide a summary of Pest Management Measures that will be or are implemented to meet the technology-based effluent limitations.

Target Pest: Mosquito & Biting Flies

Pest Management Measures: Attached Document.

Section 6: Signature Requirements

Instructions (see PGP Part 6.1.5):

— The following certification statement must be signed and dated to certify that the PDMP is in accordance with the PGP Appendix B, Subsection B.11.

Note: This certification must be re-signed whenever necessary to address any of the triggering conditions for corrective action in Part 7.1 or when a change in pest control activities significantly changes the type or quantity of pollutants discharged.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the application of pesticides, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Chairman BLSG

Signature: Chairman BLSG BK

Date: Aug 14, 2017

Repeat as needed for multiple Decision-makers at the site.

Section 5: Response Procedures

5.1 *Spill Response Procedures*

5.1.1 Spill Containment

Instructions (See PGP Part 6.1.4):

- Document the procedure for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases to Waters of the United States.
- Employees who may cause, detect, or respond to a spill or leak must be trained in these procedures and have necessary spill response equipment available. If possible, one of these individuals should be a member of the PDMP team.

5.1.2 Spill Notification

Instructions (See PGP Part 6.1.4):

- Document the procedure for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies.

5.2 *Adverse Incident Response Procedures*

5.2.1 Responding to an Adverse Incident

Instructions (See PGP Part 6.1.4):

- Document the procedures for responding to any adverse incident resulting from pesticide applications.

5.2.2 Notification of an Adverse Incident

Instructions (See PGP Part 6.1.4):

- Document the procedures for notification of the adverse incident, both internal to the Decision-maker's agency/organization and external. Contact information for state/federal permitting agency, nearest emergency medical facility, and nearest hazardous chemical responder must be in locations that are readily accessible and available.

PDMP Plan Modifications

Instructions (see PGP Part 6.2):

- You must modify your PDMP whenever necessary to address any of the triggering conditions for corrective action in Part 7.1 or when a change in pest control activities significantly changes the type or quantity of pollutants discharged. Changes to your PDMP must be made before the next pesticide application that results in a discharge, if practicable, or if not, no later than 90 days after any change in pesticide application activities. The revised PDMP must be signed and dated in accordance with the PGP, Appendix B, Subsection B.11.
- You should include significant changes in the activities or their timing on the project, changes in personnel, updates to site maps, and so on.

: PDMP Availability

Instructions (see PGP Part 6.3):

- You must retain a copy of the current PDMP, along with all supporting maps and documents, at the address provided in Section B of the NOI. The PDMP and all supporting documents must be readily available, upon request, and copies of any of these documents provided, upon request, to EPA; a State, Territorial, Tribal, or local agency governing discharges or pesticide applications within their respective jurisdictions; and representatives of the U.S. Fish and Wildlife Service (USFWS). DEC may provide copies of your PDMP or other information related to this permit that is in its possession to members of the public.
- Any Confidential Business Information (CBI), as defined in 40 CFR Part 2, may be withheld from the public provided that a claim of confidentiality is properly asserted and documented in accordance with 40 CFR Part 2; however, CBI must be submitted to DEC, if requested, and may not be withheld from those staff within EPA, FWS, and NMFS cleared for CBI review.

ATTACHMENTS

Attach the following documentation to the PDMP when necessary:

Attachment A – Corrective Action Log Template

Attachment B – PDMP Amendment Log Template

Attachment C – Subcontractor Certifications/Agreements Template

Attachment D – Delegation of Authority Template

Attachment E – Annual Reports and Other Record Keeping

Attachment C Subcontractor Certifications/Agreements Template

SUBCONTRACTOR CERTIFICATION PESTICIDE DISCHARGE MANAGEMENT PLAN

Project Number: _____

Project Name: _____

Decision-maker(s): _____

As a subcontractor, you are required to comply with the PDMP for any work that you perform for the above designated project. Any person or group who violates any condition of the PDMP may be subject to substantial penalties or loss of contract. You are encouraged to advise each of your employees working on this project of the requirements of the PDMP. A copy of the PDMP is available for your review.

Each subcontractor engaged in pesticide activities in the pest management area that could impact Waters of the United States must be identified and sign the following certification statement:

I certify under the penalty of law that I have read and understand the terms and conditions of the PDMP for the above designated project.

This certification is hereby signed in reference to the above-named project:

Company: _____

Address: _____

Telephone Number: _____

Type of pesticide application service to be provided: _____

Signature: _____

Title: _____

Date: _____

Attachment D – Delegation of Authority Form Template

DELEGATION OF AUTHORITY

I, _____ (name), hereby designate the person or specifically described position below to be a duly authorized representative for the purpose of overseeing compliance with environmental requirements, including the PGP, for the _____ project. The designee is authorized to sign any reports, other documents required by the permit.

_____ (name of person or position)

_____ (company)
_____ (address)
_____ (city, state, zip)
_____ (phone)

By signing this authorization, I confirm that I meet the requirements to make such a designation as set forth in Appendix B, Subsection B.11.A of PGP, and that the designee above meets the definition of a “duly authorized representative” as set forth in Appendix B, Subsection B.11.B.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the pest management area, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: _____

Company: _____

Title: _____

Signature: _____

Date: _____

Attachment E Annual Reports and Other Record Keeping

The following is a list of records you should keep at your site and available for inspectors to review:

- Copies of Annual Reports
- Records as required in PGP Part 8.2

Please check your permit for additional details.