Wisconsin Department of Agriculture, Trade and Consumer Protection

Dicamba Frequently Asked Questions

Updated: February 2019

Training

1. **Who needs mandatory dicamba training?**

   Individuals using these dicamba products:

   - Engenia (EPA Registration number 7969-345, BASF is the registrant)
   - XtendiMax with Vapor Grip Technology (EPA Registration number 524-617, Monsanto is the registrant)
   - FeXapan with Vapor Grip Technology (EPA Registration number 352-913, DuPont is the registrant)

   These products are Restricted Use Pesticides and can only be purchased and used by certified applicators (private applicators and commercial applicators). Prior to applying or using any of these three dicamba products, the applicator must become certified and complete dicamba training. This training requirement applies to applications made to soybeans and to applications on any other crops listed on these product labels.

   IMPORTANT: Only these three dicamba products are approved for post-emergent use on dicamba-tolerant soybeans in Wisconsin. Using other dicamba products is illegal.

2. **Do mixers, loaders, handlers, and spray equipment cleaners need training?**

   Yes, people responsible for any part of the application process which includes mixing, loading, application, or cleaning dicamba application equipment must attend the training. The training is required whether you are a certified applicator or not. Workers that only transport unopened dicamba containers are not required to be trained.

3. **Do individuals who mix/load XtendiMax, FeXapan or Engenia need to be a certified pesticide applicator?**

   Individuals that mix and load the new dicamba pesticides must be a certified pesticide applicator. People certified as a mixer/loader in WI category 24.0 can NOT MIX/LOAD the new dicamba because they are not certified applicators as per ATCP 29.28, the new label language in effect requires anyone handling the product to be a certified applicator.

4. **Do I need to complete the label mandated training before I purchase these products?**

   No, certified applicators (both private and commercial) do not need to complete the label training to purchase the products, but must complete the training before applying the products. Pesticide dealers are not required to see the proof of training prior to selling the product to certified applicators.

5. **Who can provide dicamba training?**

   A list of online trainings are available at https://fyi.uwex.edu/pat/dicamba-auxin-training/ and https://datcp.wi.gov/Pages/Programs_Services/Dicamba.aspx. DATCP will accept an in-person training hosted by the respective registrants for the products named above. You will need to keep a copy of your completion certification from the training you attend.

6. **Will dicamba training from another state count as dicamba training in Wisconsin?**

   Yes, a dicamba training specific to these three products offered by another state is acceptable. You will need to keep a copy of your completion certification from the training you attend.

7. **Is training one-time or do I need training every year?**

   Dicamba training is required annually. Even if you received mandatory dicamba training last year, you must complete it again this year and next year to be able to legally apply these products.

8. **Will my applicator certification or license be amended to show that I've received training?**

   No. You are responsible for retaining your training information. Pesticide dealers are not required to see the proof of training prior to selling the product to certified applicators. Proof of training is required for completing your application records.

Record Keeping

1. **Am I required to document application parameters and conditions beyond keeping a record, as required by the label and Wis ATCP 29 Adm Code?**

   No, legally you are only required to keep a record to document required elements like application start and end times, temperatures, wind speeds, wind directions, nozzles, boom height, ground speed, etc. If DATCP investigates a complaint involving your application, we will ask for a copy of your complete application records, and will verify the accuracy, including but not limited to, wind speeds and directions. If you choose to support your records with such things as time and date stamped photographs of weather recording instruments at boom height, those supplemental materials will be considered during the investigation.

2. **Will DATCP check my records?**

   DATCP has the authority, under ATCP 29.33, to inspect your records of pesticide purchases, applications, and as part of any dicamba application of these products, the proof of training record. The practice of checking records is associated with a misuse investigation, and WDATCP reserves the right to routinely inspect RUP sales and application records for compliance.

3. **Have the dicamba record keeping requirements changed for 2019?**

   Yes, in 2019, records must also now include the target crop planting date and the buffer distance calculation. Wisconsin law requires that you complete your records on the day of application and keep them for 2 years from the date of application.

4. **The newer product labels require that I keep a record of when I checked a sensitive crop/specialty crop registry for the presence of nearby sensitive crops or sites. Can I also use that site to check for the presence of nearby non-DT soybeans?**

   In 2018, the location of row crops like non-DT soybeans could not be mapped in DriftWatch. However, effective January 1, 2019, a new FieldWatch feature called **CropCheck** will allow growers to map row crops like soybeans, cotton and corn that may be sensitive to some nearby pesticide applications. Access CropCheck through www.driftwatch.org. Please keep in mind that DriftWatch is not a regulated/required site by DATCP. This site is merely a tool to help you and growers are not required to enter their crops onto DriftWatch by DATCP.

Restrictions

1. **Are there any application timing restrictions on the use of these products?**

   Yes, these products may be applied pre-plant, at-planting, pre-emergence, and post-emergence (in crop) in dicamba-tolerant soybeans. However, for post-emergence use, the 2019 labels prohibit application later than 45 days after planting or the R1 growth stage whichever comes first for the target soybean crop. Applications can only be made from one hour after sunrise until 2 hours before sunset. Additionally, no applications are permitted at night.

Buffer

1. **The 2019 labels still have mandatory buffer requirements. Non-sensitive crops and areas are important because they are acceptable for use as part of the calculation for the out-of-field buffer area. What are non-sensitive crops and areas?**

   Non-sensitive crops and areas include paved or gravel surfaces; roads; mowed and/or managed areas adjacent to fields, such as roadside rights-of-way; areas covered by the footprint of a building, silo, shade house, feed crib, or other manmade structure with walls and a roof; agricultural fields that have been prepared for planting; and planted agricultural fields containing asparagus, corn, dicamba-tolerant soybeans, sorghum, proso millet, and small grains *(the applicator is responsible for ensuring that the crops are dicamba-tolerant)*.

2. **Are there still prohibitions against spraying when wind is blowing toward sensitive crops and plants?**

   Yes, the 2019 Engenia label states, “DO NOT apply when wind is blowing in the direction of neighboring sensitive crops or residential areas.” The 2019 labels for FeXapan and XtendiMax both state, “DO NOT apply this product when the wind is blowing toward adjacent non-dicamba tolerant sensitive crops; this includes non-dicamba tolerant soybean and cotton.” Although the Engenia label specifies the need to protect residential areas while the FeXapan and XtendiMax labels do not, the label-posted list of sensitive crops subject to this wind direction application restriction includes the catchall term “other broadleaf plants.” Therefore, these protections must be applied to both sensitive plants and crops on both agricultural and residential properties. The downwind application prohibition applies to both.

3. **Are the 2019 buffer requirements the same as on the 2018 labels?**

   No, there are several significant changes. First, mowed and/or managed areas adjacent to the field, such as roadside rights-of-way, may now be included as part of the buffer calculation. Second, in 2019, it is specifically the applicator’s responsibility to confirm that the neighboring/adjacent crops are in fact dicamba-tolerant before considering them as non-sensitive crops. Lastly, a 57 foot omnidirectional (all sides) infield buffer must be maintained in counties where dicamba-sensitive endangered species are present.

4. **Where can I find which counties for Wisconsin have dicamba-sensitive endangered species present that the 57 foot omnidirectional buffer is enforced?**

   In certain counties where threatened and endangered species may be present, you must provide a 57 foot omnidirectional infield buffer. Before using any of these products, you must consult an endangered species bulletin for the month you plan to apply. The bulletins are available at http://www.epa.gov/espp/.

5. **What is an example of a field that is required to include a 57 foot omnidirectional infield buffer?**

6. **Are the sizes of the downwind buffers the same in 2019 as they were in 2018?**

   Yes, the applicator must always maintain a 110-foot (or 220-foot) downwind buffer between the last treated row and nearest downwind field/area edge (in the direction the wind is blowing). Applicators can still use out-of-field non-sensitive crops and areas in the total buffer distance calculation.

7. **Is a buffer required on just one downwind side of a dicamba-treated field?**

   Sometimes yes, but often times downwind buffers are required on several sides. Applicators should remember that buffers will often be required on two or more downwind sides of a target field if wind direction is not constant and non-target sites are not positioned completely perpendicular to one another. A 45-degree wind direction would require a buffer on two downwind sides.

8. **If I own a wooded lot downwind of my target field, do I need a downwind buffer?**

   Yes, regardless of who owns the wooded lot, it is label-defined as a sensitive uncultivated area that my harbor a sensitive plant species. Therefore, even an adjacent wooded lot that you own or control is required to have a downwind spray buffer.

Temperature Inversion

1. **These new dicamba labels prohibit application during a temperature inversion. How can I determine if a temperature inversion exists in or near my target field prior to application?**

   Just like other weather measurements, there is no one official method to determine if temperature inversion conditions exist in a field. However, temperature inversion indicators can include nights with limited cloud cover and light-to-no wind, ground fog, smoke not rising, dust hanging over a road, or the presence of dew or frost. Just like other weather data documentation, a time, date, and GPS-stamped photograph taken in the field from your smartphone can serve to supplement and support your determination that an inversion did not exist, if DATCP is requested to investigate. In addition, tools to help you identify the likelihood of a temperature inversion can include smoke bombs/grenades in the target field, phone apps like the Pocket Spray SmartTM and RRXtend Spray App, and Inversion Tester by Spoton®. (PLEASE NOTE THAT MENTION OF ANY SPECIFIC EQUIPMENT OR DATA SOURCE IN THIS DOCUMENT DOES NOT SUGGEST ENDORSEMENT OR APPROVAL BY DATCP.)

Sensitive/Susceptible Crops

1. **Is there a list of sensitive crops and plants?**

   Yes, the labels provide a partial list of these crops and plants. Sensitive plants include, but are not limited to: plants in both agricultural and residential areas such as non-DT soybeans and cotton, cucumber and melons (EPA crop group 9), flowers, fruit trees, grapes, ornamentals including greenhouse-grown and shade house-grown broadleaf plants, peanuts, peas and beans (EPA crop group 8), peppers, tomatoes, and other fruiting vegetables, potato, sweet potato, tobacco, other broadleaf plants, and including plants in a greenhouse.

2. **Do sensitive crops include adjacent or neighboring organic crops?**

   Yes, although certified organic crops are not listed on the label as an example of a sensitive crop, the fact remains that any pesticide residues in these crops, whether damaging or not, might make these crops unfit for sale, use, or consumption as organic. Therefore, certified organics are sensitive crops. The restriction prohibiting application when wind is blowing toward the certified organic crop within ½ mile does apply.

3. **I have seen the term sensitive areas on these labels. What are sensitive areas?**

   Sensitive areas are different from sensitive crops or sensitive residential areas. Sensitive areas include bodies of water and nonresidential, uncultivated areas that may harbor sensitive plant species. Sensitive areas also include endangered species protection areas. Applicators are required to consult http://www.epa.gov/espp/ to determine if they intend to apply in a county with dicamba-sensitive endangered species.

Tank Mix

1. **I have a spray injection system that allows me to keep dicamba and other on-sprayer herbicides and adjuvants in separate tanks. The point of injection for each tank is at the spray boom. Can I use the same spray system for dicamba and other herbicides or adjuvants if those other products are not on the list of label-approved tank mixes?**

   No, you can't use the injection spray system to circumvent the tank mix restrictions. Even very small amounts of dicamba left in spraying systems have caused significant cross contamination and non-target impact issues.

2. **Is there any guidance on what to do or not do with these dicamba products that have been mixed for application but then the weather changes abruptly, preventing legal application?**

   You may be able to store a mixed load for 24-48 hrs without any problems provided you agitate it every 4 to 8 hours. Don't add a water conditioner unless an approved product is on the label. If you need to spray elsewhere, store the dicamba as a hot load (pump it into a storage tank, labeled appropriately) and clean out the sprayer before spraying a sensitive crop with a different product. If weeds get to be bigger than 4 inches, make sure all your sprayer application parameters are on label to give the herbicide the best chance to work and don't expect 100% control. The pesticide label is the law. Follow label directions for storing a mixed load and/or contact the pesticide registrant to receive directions.

Weather-Measurement Equipment

1. **What weather measurement methods and equipment are acceptable for meeting the label requirements for measuring boom-height temperature, wind speed, and wind direction, both at the start and the end of each application?**

   There is currently no official or authorized equipment, method, or data source for taking and documenting weather conditions in the field at the time of application. Wind and temperature can be measured with hand-held devices that have been calibrated (tested) to ensure their accuracy. Document your measurements on your dicamba-specific pesticide application record. Although not required, written records can be made more supportable by taking a legible time and date stamped photograph of the measurement device and readings in use in the field. Most photographs taken with smart phones can provide a record of time, date, and GPS coordinates. When DATCP investigates an off-target movement complaint, we will utilize the most credible weather data available.

Pesticide Dealer

1. **Is a pesticide dealer license needed to sell or offer to sell the new dicamba products?**

   Yes, the new dicamba products are classified as RUPs. DATCP issues Restricted Use Pesticide Dealer/Distributor Licenses to businesses that offer for sale or sell RUPs to an end-user for use in the state of Wisconsin.

2. **What are a pesticide dealer's responsibilities for selling or offering the new dicamba products for sale?**

   Pesticide dealers may only offer for sale or sell these products to persons that hold a valid Commercial or Private Applicator certification or to a licensed pesticide application business. Dealers must keep records of their purchase, sale, and distribution of these products for two years.

Rain

1. **What is the requirement for applying one of the new RUP dicamba products followed by irrigation or predicted rain?**

   The labels prohibit application if rainfall is predicted within 24 hours. Rainfall and irrigation are essentially considered the same, so irrigation should not occur until 24 hours after the application. The intent is to avoid runoff of the chemical that could result in uptake by non-target species.

Tank Cleanout

1. **Must I cleanout my spray equipment every day when using the RUP dicamba products?**

   No. The labels require specific procedures for cleaning the spray system before using the RUP dicamba after another type of spray mix, and immediately after using dicamba before switching tank mixes. This is to avoid contaminating the RUP dicamba spray mix with other chemicals that might affect the volatility of dicamba, and to avoid carrying dicamba over to a sensitive crop in the next load or applications. RUP dicamba labels require applicators to ensure that spray equipment is clean before using the product and after the product is applied. Cleaning equipment prior to loading with dicamba assures that nothing left in the sprayer will negatively impact the performance of the dicamba or the crop being treated. Note: DATCP also advises applicators that all transportation equipment hauling pre-blended dicamba loads to the field are also potential sources of contamination and should be treated the same as spray equipment when it comes to cleaning before changing product mixes.

2. **How should I record how and when the spray system cleanout was done when using the same RUP dicamba product for multiple loads and/or over several days?**

   The RUP dicamba labels require you to record how and when the equipment was cleaned, every time you clean it. At minimum, the spray system must be cleaned before the first load of RUP dicamba is applied and after the last continuous RUP dicamba application is completed. Equipment does not need to be cleaned after every application or every load IF your spray mixes are identical and are all made with allowed tank mix partners/products applied to the treated soybeans. In that case, you could document cleanout dates and procedures of the first and last applications, and include all required pesticide application records for fields sprayed in between.

Sources

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