



Andrew R. Madura
President

Mark Hager
Vice President

Shelley Phillips
Treasurer

Dear Maine Pesticide Board

I am writing today on behalf of over 21 members from across the State of the Educational Plant Maintenance Association of Maine. EPMA.

Todd Jepson a Director of Facilities from Scarborough wrote most of this letter, and he did so perfectly and with his permission I have used all of his points.

As President of EPMA, I want to formally request a change in the rules enacted by the Maine Board of Pesticide Control for the application of disinfectants in schools and on buses in Maine so that disinfectants have a sub-classification regarding the use of electrified (or electrostatic) spraying devices and do not require a pesticide applicator's license. I would like to thank Senator Richard Bennett of Oxford for taking the time to meet with a smaller group of us earlier this past spring.

In August of 2020, a group of School Facilities and Transportation Directors from around the state met to discuss the use of electrostatic sprayers to apply disinfectants in our schools and on our bus fleets to respond to enhanced cleaning and disinfecting protocols in the wake of the COVID-19 pandemic. At that time, we had been told that, due to a Maine law stating that the use of battery-powered (or electrified) spraying devices is only allowed if one holds a pesticide applicator's license, unlicensed school employees could not use these devices. Given the timing of learning this information, there was not enough time for us to become licensed before the start of school. As a result, Governor Mills, through her Executive Order dated August 26, 2020, granted a temporary exemption for the use of these very effective devices. Training was provided by the Maine BPC for anyone that would be using these new sprayers, and a "test" was required to be taken before being given approval to use them.

While we appreciate and understand that laws are put in place for a reason, most of us, as IPM coordinators for our school departments, also know that the increased demand for disinfection of surfaces, and no additional personnel to help with this increased workload, forces the need for us to utilize machines like these electrostatic sprayers. The devices have done several things to assist us in making our schools, buses, and school facilities safe:

1.) Because the particles are charged electronically, the particles seek to adhere immediately to surfaces. Compared to hand pump sprayers and spray bottles, the risk is LOWER, for airborne contamination and contaminated air quality. John Pietroski from the Maine Board of Pesticide Control could not answer the question as to the logic of how these devices work differently than the already approved hand pump sprayers and stated he did not have experience using an electrostatic sprayer for disinfectant use. He added that he had heard positive feedback from a few applicators. Mr. Pietroski, however, did point out that all disinfectants have potential to be harmful to the applicators and the public. The applicator needs to follow the disinfectant label and the equipment instructions. We abide by that knowledge and use that common sense daily.

2.) They reduce the amount of disinfectant needed to cover a surface, as the particles are smaller and adhere immediately. This reduces the overuse of chemicals that pump sprayers and bottles cause, thereby helping keep our budgets for disinfectants under control and treated areas safer by not over applying disinfectants.

3.) They allow more area to be covered more quickly and evenly by the same or fewer staff with less chemical. Most of us, as school facilities leaders, continue to be understaffed during this global pandemic, as we are being asked to perform more cleaning and disinfecting in the same amount of time.

The ongoing (and seemingly never ending) COVID-19 pandemic is an unprecedented situation that none of us has ever seen or experienced before. We hope to never have to deal with it again during our lifetimes. Our goals in fighting this pandemic are the same: ***To keep our students, staff, and community members safe.*** In no way do any of us want to flout the law or have an unreasonable exception made to randomly spray harmful chemicals. Therefore, we are asking for the exemption to be made for only the use of disinfectants in electrostatic spraying devices. Our staff members have been and will continue to be trained in safety matters including the appropriate, safe, and responsible ways to apply disinfectants to keep our schools and all of our facilities safe for all. We do not use these devices when staff, students or community members are present. Our staff members have safely used these devices ***without incident*** for nearly a year now. As the Delta variant continues its spread to unvaccinated and even vaccinated people in breakthrough cases, the need for continued use of these devices is all the more important.

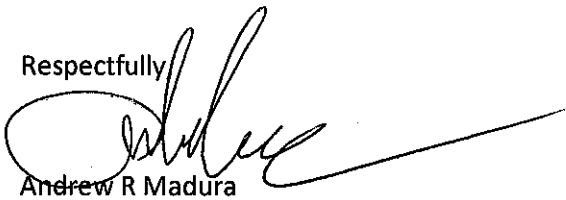
The distinction of microorganisms, (bacteria, viruses, etc.) as pests should be clearly defined to exclude surface disinfectants, as they are not the same as spraying poisons to combat other larger pests such as insects, rodents, or for the use of spray or granular use of pesticides, herbicides and fungicides on grass, ornamental plants, crops, and trees. I grew up on a potato farm in Aroostook County, and there is a ***big*** difference between the chemicals used on crops, lawns, and other plants compared to surface cleaning disinfectants. Yes, microorganisms are “pests” in that they are a nuisance that are a challenge to combat. However, classifying a sprayer, once electrified, as somehow more dangerous than what is already being carefully applied (in this case, disinfectants) when there is no scientific evidence, makes no sense and has yet to be explained by professionals as to how this somehow changes the disinfectants we are already using and will continue to use. The purpose and result are the same, if not arguably safer, when applying disinfectants using electrostatic sprayers. At the risk of sounding redundant, as spray droplets ***remain airborne for a shorter period of time*** compared to hand pump sprayers or misting spray bottles. Particles are charged and seek to find a surface to cling to much more quickly than the gravity or “drift” of traditional hand sprayers or spray bottles.

Please understand, these electrostatic sprayers are not just being used by School Custodians and School Bus Drivers but are also being used every day in Hospitals and Fire and EMS Departments all over the state to provide safe and effective disinfection to facilities and equipment, taking away this tool in our "toolbox" is very shortsighted.

We as an organization have offered and asked numerous times for a seat at the table to discuss and show how this equipment works and how to work safely and to date no one has taken us up on our offer.

Please allow for a rule change so that a permanent exemption or waiver can be made to this policy (for the use of electrostatic sprayers using approved disinfectants only) through the Maine Board of Pesticides Control, without the cumbersome process of licensure, so that we can continue to do our jobs in the best and safest way we know how and combat the spread of COVID-19 virus as well as other diseases, save money for our school districts and keep everyone safe and healthy.

Respectfully,

A handwritten signature in black ink, appearing to read 'Andrew R. Madura', with a long horizontal flourish extending to the right.

Andrew R Madura

President of the Educational Plant Maintenance Association of Maine [EPMA]

Cc: Governor Janet Mills

State of Maine Representatives & Senators