

8/23/2021

Raymond Connors
Manager of Compliance
90 Blossom Ln,
Augusta, Maine 04333

Dear Mr. Connors:

Mosquito Squad of Southern Maine (MSSM) is responding to the violations in preparation for the Board of Pesticide Control meeting on August 27th.

Our main goal is compliance with Maine Law. We understand the serious nature of these violations. The violations cited are a result of process flaws and the non-environmental administrative incidents were a result of training and work order template issues. We have put together a remediation and action plan to minimize the chances of these incidents happening in the future.

Summary of Violations and MSSM response

- 2018 Wrong Property Treated
 - Background – Pesticide application to wrong property in Gorham, Applicator identified wrong property.
 - Remediation/Action Plan
 - After this incident, we are executing an improved process to properly identify the target treatment house. The steps are as follows:
 - Applicator Training
 - Pull up to the property and identify by house number and description
 - Knock on door – Confirm with homeowner
 - Check electric meter # (For some properties we can not access the meter #)
 - Call Customer and confirm house
 - Call Operation Supervisor to make confirmation
 - If it can't be confirmed by any of the above methods , then no treatment occurs
- 2018 Unlicensed applications
 - MSSM had inadvertently assumed the applicator performing the applications was licensed.
 - The BPC had requested work orders for a few towns. We proactively increased the number of towns requested as we found additional unlicensed applications. We identified and provided to the BPC 170 unlicensed applications treatments. The applicators used either only their first name or their initials on the work order vs full name. There was absolutely no intent on our part to perform

unlicensed applications. Since this incident over 3 years ago, we have performed thousands of treatments, always with a licensed applicator(s).

- Please see Exhibit A which contains correspondence with the BPC in 2018
 - It should be noted that the applicator in question had been working for us for a month with a licensed applicator so was well trained, in addition, before any applicator is allowed to perform treatments, one of our master applicators holds training sessions for the new applicators. This involves 4 hours of classroom training and approximately 40 hours of field training with an assigned trainer.
 - Remediation/Action Plan
 - We have a process to track our licensed applicators as well as people scheduled for testing. Since 2018 we have licensed over 15 applicators.
 - in 2019, we hired Eugene Meserve (Retired BPC Inspector) as a consultant to review our current processes to ensure compliance including required work order information, facility and administrative practices. Eugene made several suggestions which were implemented. (For example, he recommended we add the electric meter # to our work order template) which we promptly added.
- July 2019 and June 2020 – Pesticide Application Record missing information
 - Background – Pesticide Application Record missing information
 - On these specific instances we were unaware that we were missing information on the work orders.
 - Inspector was given a printed work order which does not contain all required information, the electronic copy of the same work order has the majority of required information such as full name, license #, application rate, etc. Each electronic work order is available to the BPC upon request.
 - It is our understanding the calibration logs for backpack blowers do not need to be on site in the trucks. These calibration logs are kept in our office.
 - Remediation/Action Plan
 - We have recently hired an external consultant who specializes in looking at state law to make sure we meet all compliance issues. Based on his input, we now have an enhanced work order that we believe is compliant with Maine Law. We are currently training all of our applicators to make sure all required information is on the completed work order.

- We have migrated to a new software platform that will easily allow us to format the work order template to include full applicator names and licenses numbers. It will also provide better reporting.
- June 2020 – Lack of sufficient notification for registry
 - Background – Registry member was notified but not enough notice given
 - Remediation/Action Plan
 - Since this incident, we have tightened our process and have a staff member reviewing 3 days every week , the registry notification list against our customer base
 - We also have in our software system , a registry notification flashing when an abutting customer is brought up in our system. This is automatically brought up during the routing process to notify the registry member

Summary Action Plan

- Leveraging an external consultant to help ensure we meet all compliance issues.
- Automate several fields for work order template like name, license, target pest, etc..
- Training all of our applicators to properly fill out the new revised work orders
- Asked our BPC inspector (Alex Peacock) to review our revised work order template which he has agreed to do.
- Adding an audit process for completed work orders. This will be done on a regular basis for each applicator.
- Holding an applicator training session on Maine compliance laws for each new applicator.
- Revised work order available upon request.

You can expect our complete cooperation with your agency going forward as it has always been our intention to fully comply with Maine law.

Please let us know if you require any further information which would assist in quickly resolving this matter.

Thank you for your consideration in this matter.

Sincerely,

Erik Hanson
Mosquito Squad of Southern Maine

Exhibit A

BPC correspondence 9/20/18
from Mosquito Squad of Southern Maine
(MSM)

Mosquito Squad of Southern Maine terminated two employees named Jason [REDACTED] and Casey [REDACTED] due to performance issues on the 7th of September 2018. We were under the assumption Jason was properly licensed and that is why he and Casey were allowed to perform treatments for our company.

In early summer 2018 I received a list from our office in New Hampshire, the office in New Hampshire does most of the backend work including licensing information. The list came directly from the BPC in early summer of 2018 and listed all of our licensed applicators plus Jason [REDACTED] and one other non-licensed person. In retrospect, we believe the list was made up of licensed applicators and the additional non licensed people had tests scheduled.

From this point until the complaint we wrongfully assumed Jason [REDACTED] was licensed.

In addition many of our other technicians have come forth and said Jason [REDACTED] told them he was licensed.

Mosquito Squad of Southern Maine takes responsibility for this oversight and have refined the processes to make sure this never happens again.

Please call Erik Hanson at 207-370-8425 with any further questions.

Exhibit A - BPC sent to
2018 LIST - M5SM

Mosquito Squad

Last name	First Name	Middle Name	Suffix	Role	Responsible Individual	Primary Contact	Actions
	JASON				Employee		View
	ERIK	S			Employee		View
	SCOTT	E			Administrator		View
	BENJAMIN				Employee		View
	OLIVER				Employee		View
	MARK				Employee		View
	THOMAS				Employee		View
	ALEX				Employee		View
	William				Employee		View
	SETH				Employee		View
	Terrell				Employee		View
	Corey				Employee		View
	WILLIAM						

* Last Name taken off LIST