

**BEFORE THE DIRECTOR OF THE
DEPARTMENT OF PESTICIDE REGULATION
STATE OF CALIFORNIA**

In the Matter of the Decision of
the Agricultural Commissioner of
the County of Butte
(County File No. ACP-BUT-20/21-005)

Docket No. 223

**Millennium Farms, LLC
3310 Pennington Road
Live Oak, California 95953**

Appellant/

Procedural Background

Under California Food and Agricultural Code (FAC) section 12999.5, county agricultural commissioners may levy a civil penalty up to \$5,000 for violations of California's pesticide laws and regulations. When levying fines, the Commissioner must follow fine guidelines established in California Code of Regulations (CCR), title 3, section 6130, and must designate each violation as Class A, Class B, or Class C. Each classification has a corresponding fine range.

After giving notice of the proposed action and providing a hearing on January 12, 2021, the Butte County Agricultural Commissioner (Commissioner) found appellant Millennium Farms, LLC (Appellant or Millennium Farms) committed two (2) violations of FAC section 12973. The Commissioner classified the violations as Class B in accordance with 3 CCR section 6130. The Commissioner set the fine for each violation at \$250, which is a total fine of \$500.

Millennium Farms appeals the Commissioner's civil penalty decision to the Director of the Department of Pesticide Regulation (Director). The Director has jurisdiction to review the appeal under FAC section 12999.5.

Standard of Review

The Director decides the appeal on the record before the Hearing Officer. In reviewing the Commissioner's decision, the Director looks to see if there was substantial evidence, contradicted or uncontradicted, before the Hearing Officer to support the Hearing Officer's findings and the Commissioner's decision. The Director notes that witnesses sometimes present contradictory testimony and information; however, issues of witness credibility are the province of the Hearing Officer.

The substantial evidence test requires only enough relevant information and inferences from that information to support a conclusion, even though other conclusions might also have

been reached. In making the substantial evidence determination, the Director draws all reasonable inferences from the information in the record to support the findings, and reviews the record in the light most favorable to the Commissioner's decision. If the Director finds substantial evidence in the record to support the Commissioner's decision, the Director affirms the decision.

Factual Background

Appellant owns and operates an orchard for the production of walnuts identified as site 4HSP-1 (hereafter referred to as "walnut orchard") in Gridley, California, which is in Butte County. (County Exhibit (Ex.) C1; Testimony of Amarjit Pamma (Pamma Testimony).) Appellant's walnut orchard shares a border with a peach orchard owned by Harminder Sohal and identified as SHOPPCH (hereafter referred to as "peach orchard"). (County Ex. C1.) The peach orchard is approximately 25 feet south of Appellant's walnut orchard. (County Ex. C1; Testimony of Eric Jennings (Jennings Testimony).) There is a shared dirt road running east and west between the orchards, with Appellant's walnut orchard on the north side of the road and Mr. Sohal's peach orchard on the south side of the road. (County Ex. C1; Jennings Testimony; Pamma Testimony.)

On April 13, 2020, around 1:00 pm, Appellant applied *Nu-Cop HB* (reg. no. 42750-132-AA, active ingredient copper hydroxide) and *Manzate Pro-Stick Fungicide* (reg. no. 70506-234-AA) to its walnut orchard. (County Ex. C1; Stipulations.) According to weather data collected from the East Biggs weather station located 6.5 miles north of the investigation site, on April 13, 2020, the wind was increasing from 11:00 pm to 2:00 pm, and was coming from the north and northwest with wind speeds from 9.8 miles per hour (mph) to 14.1 mph, and wind gusts from 18.5 mph to 22.5 mph. (County Ex. C1; Jennings Testimony.)

On April 15, 2020, around 2:00 pm, Appellant applied *Reckon 280 SL Herbicide* (reg. no. 88685-2-AA-84237, active ingredient glufosinate ammonium) and *Kalo Modified Vegetable Oil* (reg. no. 45989-50016-AA) to its walnut orchard. (County Ex. C1; Stipulations.) According to the East Biggs weather station, on April 15, 2020, the wind from 1:00 pm to 3:00 pm was coming from the southeast southwest, with wind speeds from 2.9 mph to 5.7 mph, and wind gusts from 9.8 mph to 12.5 mph. (County Ex. C1; Jennings Testimony.)

On April 24, 2020, the Commissioner's office received a complaint from Mr. Sohal that he suspected Appellant's pesticide application drifted onto his peach orchard. (County Ex. C1.) On the same day, Investigator Ramon Jauregui, Supervising Agricultural Biologist, and Investigator Eric Jennings, Senior Agricultural Biologist, went to the orchard sites to investigate. (County Ex. C1; Jennings Testimony.) The investigators observed and photographed a line of dead grass along the south side of the common dirt road that runs between Appellant's walnut orchard and the peach orchard. (*Id.*) The investigators also observed and photographed leaf drop and yellowing leaves in the peach orchard. (*Id.*)

Investigator Jauregui called Eric Benzel, the pest control advisor for Appellant, and asked what pesticides had been applied to Appellant's walnut orchard in the previous few

weeks. (County Ex. C1.) Mr. Benzel said a spray of copper hydroxide was applied to the foliage and an application of glufosinate ammonium was applied to the orchard floor. (Testimony of Eric Benzel (Benzel Testimony); County Ex. C1.)

The investigators collected two (2) one-pound composite foliage samples from Mr. Sohal's peach orchard. The investigators collected one (1) one-pound composite foliage sample and one (1) one-pound composite sample of weeds from Appellant's walnut orchard. (Jennings Testimony; County Ex. C1.) The samples were provided to the California Department of Food and Agriculture's Center for Analytical Chemistry, Residue Lab in Sacramento, California, to be tested for pesticides. (County Ex. C1.) The foliage sample taken from the peach orchard tested positive for copper hydroxide at 49.3 microgram per gram (ug/g). (*Id.*) The foliage sample taken from Appellant's walnut orchard tested positive for copper hydroxide at 47.6 ug/g. (*Id.*) The sample taken from the peach orchard tested positive for glufosinate ammonium at 0.23 parts per million (ppm). (*Id.*) The sample taken from Appellant's walnut orchard tested positive for glufosinate ammonium at 140 ppm. (*Id.*)

Based on a pesticide use report submitted by Mr. Sohal, the investigators concluded none of the pesticides he had applied to the peach orchard contained the active ingredients copper hydroxide or glufosinate ammonium. (Jennings Testimony; County Ex. C1.) The only pesticide applications that Mr. Sohal reported were of *Propi-Star EC* (reg. no. 42750-211-AA, active ingredient propiconazole) and *Pro 90* (reg. no. 71058-50002, active ingredients alkyl phenol ethoxylate and propylene), which Mr. Sohal applied on April 9, 2020. (*Id.*) Appellant submitted a pesticide use report that confirmed *Nu-Cop HB* was applied to the walnut orchard on April 13, 2020, and *Reckon 280 SL Herbicide* was applied to the walnut orchard on April 15, 2020. (County Ex. C1.)

The registered label for *Nu-Cop HB* states under the heading Spray Drift Management on page 6, "Do not apply at wind speeds greater than 15 mph. Only apply if wind favors on target deposition (approximately 3-10 mph) and there are no sensitive areas within 250 feet downwind." (*Id.*) The label also states on page 2, "Do not apply when wind speed favors drift beyond the area intended for treatment." (*Id.*)

The registered label for *Reckon 280 SL Herbicide* states under the heading Spray Drift Management on page 5, "To avoid spray drift, do not apply when wind speed is greater than 10 mph or during period of temperature inversions. Do not apply when weather conditions, wind speed or wind direction may cause spray drift to non-target areas." (*Id.*) The label also states on page 6, "Do not apply under circumstances where possible drift to unprotected persons or to food, forage, or other plantings that might be damaged or crops thereof rendered unfit for sale, use or consumption can occur." (*Id.*)

On October 6, 2020, the Commissioner issued a Notice of Proposed Action (NOPA) charging Appellant with two (2) counts of violating FAC section 12973. (*See* Notice of Proposed Action.) The Commissioner proposed a fine for each violation at \$250, which is a total proposed fine of \$500. (*Id.*) Appellant requested a hearing. (County Ex. C5; Stipulations.)

On January 12, 2021, the hearing was held in Oroville, California before Scott Paulsen (Hearing Officer). (*Id.*)

Relevant California Regulations

Food and Agricultural Code section 12973 states:

Use to not conflict with label

The use of any pesticide shall not conflict with labeling registered pursuant to this chapter which is delivered with the pesticide or with any additional limitations applicable to the conditions of any permit issued by the director or commissioner.

When levying fines, the Commissioner must follow the fine guidelines set forth in California Code of Regulations, title 3, section 6130. Under section 6130, violations shall be designated as Class A, Class B, or Class C. A Class A violation is “a violation that caused a health, property, or environmental hazard.” (Cal. Code Regs., tit. 3, § 6130, subd. (b)(1)(A).) The fine range for a Class A violation is \$700 to \$5,000. (Cal. Code Regs., tit. 3, § 6130, subd. (c)(1).) A Class B violation is “a violation of a law or regulation that mitigates the risk of adverse health, property, or environmental effect...” (*Id.* at (b)(2).) The fine range for a Class B violation is \$250 to \$1,000. (*Id.* at (c)(2).) The Commissioner shall use relevant facts, including severity of actual or potential effects and the respondent’s compliance history when determining the fine amount within the fine range, and include those relevant facts in the Notice of Proposed Action. (Cal. Code of Regs., tit. 3, § 6130, subd. (d).)

The Hearing Officer’s Proposed Decision

At the hearing, the Hearing Officer received both oral and documentary evidence, and the County and Appellant had the opportunity to present evidence and question witnesses. Based on the evidence presented at the hearing, the Hearing Officer found the County presented sufficient evidence showing that on April 13, 2020, Appellant violated FAC section 12973 when it applied *Nu-Cop HB* in conflict with the label. (Hearing Officer’s Proposed Decision, p. 6.) The Hearing Officer noted that on the day of the application, winds speeds exceeded 15 mph, the speed allowable on the product label, and were blowing towards Mr. Sohal’s peach orchard located 25 feet from Appellant’s walnut orchard. (*Id.* at 5-6.) The Hearing Officer found there was no credible evidence to support Appellant’s assertion that Mr. Sohal applied a pesticide containing copper hydroxide, the active ingredient in *Nu-Cop HB*, to his own peach orchard. (*Id.* at p. 5.) While conflicting testimony was presented regarding the extent and location of leaf damage in the peach orchard, the Hearing Officer made a factual finding that the sample taken from the peach orchard tested positive for the *Nu-Cop HB* active ingredient, and there were signs of leaf yellowing and drop. (*Id.*)

As for the second violation, the Hearing Officer found the County presented sufficient evidence showing that on April 15, 2020, Appellant violated FAC section 12973 when it applied *Reckon 280 SL Herbicide* in conflict with the label. (Hearing Officer’s Proposed Decision, p. 7.) The Hearing Officer noted that on the day of the application, wind speeds

exceeded 10 mph, the wind speed allowed on the product label. (*Id.* at 6-7.) The Hearing Officer found there was no credible evidence to support Appellant's assertion that Mr. Sohal applied a pesticide containing glufosinate ammonium, the active ingredient in *Reckon 280 SL Herbicide*, to his own peach orchard. (*Id.* at p. 6.) Again, the Hearing Officer noted conflicting testimony regarding leaf damage was presented, but made a factual finding that the active ingredient of *Reckon 280 SL Herbicide* was detected in the sample taken from the peach orchard and there were signs of leaf yellowing and drop. (*Id.*)

The Hearing Officer found Appellant violated FAC section 12973 on two (2) counts. The Hearing Officer also found the Commissioner properly classified each violation as a Class B category, and the proposed fine of \$250 for each count, with a total fine of \$500 was appropriate. On February 10, 2021, the Commissioner adopted the Hearing Officer's proposed decision in its entirety. (*See* Notice of Decision, Order and Right of Appeal.)

Appellant's Contentions on Appeal

On appeal, Appellant argues the Commissioner's decision to fine it \$500 for two (2) violations of FAC section 12973 was incorrect for a number of reasons. (Notice of Appeal, dated March 1 and March 30, 2021 (Notice of Appeal¹.) Appellant argues there is evidence in the record that supports Mr. Sohal sprayed his peach orchard with products containing copper hydroxide and glufosinate ammonium but failed to report the applications. (*Id.*) In support of its assertion, Appellant argues that on the day of the *Reckon 280 SL Herbicide* application, the wind was coming from the southeast direction and the peach orchard is south of Appellant's walnut orchard, so the wind was not blowing toward the peach orchard. (*Id.*) Appellant also argues its witness Mr. Benzel testified the leaf damage appeared to be consistent throughout the entire peach orchard, and not limited to the first eight (8) rows. (*Id.*) Finally, Appellant asserts Investigator Jauregui was biased because he has a business relationship with Mr. Sohal. (*Id.*) As a result, Appellant asserts the Director should reverse the Commissioner's decision that Appellant violated FAC section 12973 on two (2) counts.

The Director's Analysis

A. There is substantial evidence in the record to support the Commissioner's decision that Appellant's application of *Nu-Cop HB* on April 13, 2020 was in conflict with the product label in violation of FAC section 12973.

On appeal, Appellant argues the evidence supports Mr. Sohal sprayed his peach orchard with a product containing copper hydroxide, the active ingredient in *Nu-Cop HB*, but failed to report the application. (Notice of Appeal.) Appellant argues the fact that the foliage sample taken from the peach orchard tested at a higher concentration (49.3 ug/g) for copper hydroxide than the foliage sample taken from Appellant's walnut orchard (47.6 ug/g) supports Mr. Sohal sprayed the peach orchard with a product containing copper hydroxide. (Notice of Appeal; County Ex. C1.) Appellant also asserts Mr. Sohal has a motivation to fail to report a copper

¹ Appellant submitted two separate letters to assert its arguments on appeal. The letters are dated March 1 and March 30, 2021. All of the letters are referred to collectively as "Notice of Appeal."

hydroxide application because Appellant believes Mr. Sohal sells his peaches to the Gerber baby food brand. (Notice of Appeal; Pamma Testimony.) Appellant did not offer evidence in support of this allegation besides Appellant's own testimony. (See Hearing Recording.) After reviewing the evidence and testimony presented, the Director finds there is substantial evidence in the record to support the Commissioner's decision that Appellant Millennium Farms violated FAC section 12973 when it made the *Nu-Cop HB* application on April 13, 2020 that conflicted with the product label.

FAC section 12973 states, "The use of any pesticide shall not conflict with labeling registered pursuant to this chapter which is delivered with the pesticide or with any additional limitations applicable to the conditions of any permit issued by the director or commissioner." Appellant does not deny that it made an application of *Nu-Cop HB* to its walnut orchard on April 13, 2020. (Stipulations.) The *Nu-Cop HB* registered label states, "Do not apply at wind speeds greater than 15 mph. Only apply if wind favors on target deposition (approximately 3-10 mph) and there are no sensitive areas within 250 feet downwind." (County Ex. C1.) The label also states on page 2, "Do not apply when wind speed favors drift beyond the area intended for treatment." (*Id.*) The peach orchard shares a border with and is located approximately 25 feet south of Appellant's walnut orchard. (County Ex. C1; Pamma Testimony; Jennings Testimony.) According to a weather station located 6.5 miles north of the investigation site, on the date of the *Nu-Cop HB application*, the wind was increasing from 11:00 pm to 2:00 pm, and was coming from the north and northwest with wind speeds from 9.8 mph to 14.1 mph, and wind gusts from 18.5 mph to 22.5 mph. (County Ex. C1; Jennings Testimony.) Therefore, there is evidence in the record to support that Appellant made the pesticide application around 1:00 pm when wind speeds were 9.8 mph to 14.1 mph, which is in excess of the 3 mph to 10 mph wind speed allowed on the *Nu-Cop HB* label, and the peach orchard was located only 25 feet away from the target deposition site.

While actual drift is not an element of a FAC section 12973 violation, there is evidence in the record that the *Nu-Cop HB* application did drift offsite and onto the peach orchard in violation of the label. The *Nu-Cop HB* label states, "Do not apply when wind speed favors drift beyond the area intended for treatment." (County Ex. C1.) There is evidence in the record to support that conditions favored drift beyond Appellant's walnut orchard at the time of the application, and the application did drift offsite and onto the neighboring peach orchard. The County did not offer an explanation for how the foliage sample taken from the peach orchard tested at a concentration of 1.7 ug/g copper hydroxide higher than the sample taken from Appellant's walnut orchard. (County Ex. C1; Jennings Testimony.) However, this evidence supports that copper hydroxide, the active ingredient in *Nu-Cop HB*, was detected in the peach orchard. While witness testimony was conflicted regarding the extent of the damage to the peach orchard, testimony and photographic evidence supports there were signs of leaf yellowing and drop in the peach orchard. (County Ex. C1; Jennings Testimony; Benzel Testimony.) According to Investigator Jennings, the brown spots visible on the peach tree leaves were consistent with copper damage that he has seen during previous investigations. (Jennings Testimony.) According to Mr. Sohal's pesticide use report, none of the pesticides Mr. Sohal had applied to the peach orchard contained the active ingredient copper hydroxide. (County Ex. C1.) Therefore, there is substantial evidence in the record to support the Commissioner's

decision that Appellant's application of *Nu-Cop HB* was in conflict with the label in violation of FAC section 12973.

B. There is substantial evidence in the record to support the Commissioner's decision that Appellant's application of *Reckon 280 SL Herbicide* on April 15, 2020 was in conflict with the product label in violation of FAC section 12973.

Appellant argues glufosinate ammonium detected in Mr. Sohal's peach orchard was a result of a product that Mr. Sohal sprayed but failed to report in the pesticide use report. (Notice of Appeal.) Appellant asserts that on the day of the *Reckon 280 SL Herbicide* application, the wind was coming from the southeast direction and the peach orchard is south of Appellant's walnut orchard, so the wind was not blowing toward the peach orchard. (*Id.*) Appellant further argues its witness Mr. Benzel's testimony that the leaf damage appeared to be consistent throughout the entire peach orchard, and not limited to the first eight (8) rows, supports Mr. Sohal made an application of glufosinate ammonium. (*Id.*) Finally, Appellant asserts there is visible evidence in photographs taken by investigators Jennings and Juaregui that Mr. Sohal made an herbicide application to the floor of his peach orchard. (*Id.*) After reviewing the evidence and testimony presented, the Director finds there is substantial evidence in the record to support the Commissioner's decision that Appellant Millennium Farms violated FAC section 12973 when it made the *Reckon 280 SL Herbicide* application on April 15, 2020 that conflicted with the product label.

"The use of any pesticide shall not conflict with labeling..." (Food & Agr. Code § 12973.) Appellant does not deny that it made an application of *Reckon 280 SL Herbicide* to its walnut orchard on April 15, 2020. (Stipulations.) The registered label for *Reckon 280 SL Herbicide* states, "To avoid spray drift, do not apply when wind speed is greater than 10 mph or during period of temperature inversions. Do not apply when weather conditions, wind speed or wind direction may cause spray drift to non-target areas." (County Ex. C1.) According to a weather station located 6.5 miles from the site, on the day of the *Reckon 280 SL Herbicide* application, from 1:00 pm to 3:00 pm the wind was coming from the southeast southwest, with wind speeds from 2.9 mph to 5.7 mph, and wind gusts from 9.8 mph to 12.5 mph. (County Ex. C1; Jennings Testimony.) Therefore, there is evidence in the record to support that Appellant made the pesticide application around 2:00 pm when wind gusts were 9.8 mph to 12.5 mph, which is in excess of the 10 mph wind speed allowed on the *Reckon 280 SL Herbicide* label, and the peach orchard was located only 25 feet away from the target deposition area.

While actual drift is not an element of a FAC section 12973 violation, there is evidence in the record that the *Reckon 280 SL Herbicide* application did drift offsite and onto the peach orchard in violation of the label. The *Reckon 280 SL Herbicide* label states, "Do not apply when weather conditions, wind speed or wind direction may cause spray drift to non-target areas." (County Ex. C1.) There is evidence in the record to support that conditions favored drift beyond Appellant's walnut orchard at the time of the application, and the application did drift offsite and onto the neighboring peach orchard. At the hearing, Investigator Jennings testified that while the wind data reports a southeast southwest direction, wind swirls can cause pesticides to drift in other directions when roads are being sprayed with a fine mist. (Jennings

Testimony.) Investigator Jennings also testified, contrary to what Appellant asserts, there was no evidence Mr. Sohal recently made an herbicide application to his peach orchard's floor. (*Id.*) Investigator Jennings testified the strips of brown in the orchard did not appear to be due to a recent application, but there was evidence of a recent herbicide application on the road between Appellant's walnut orchard and the peach orchard. (*Id.*) According to Mr. Sohal's pesticide use report, none of the pesticides Mr. Sohal had applied to the peach orchard contained the active ingredient glufosinate ammonium. (County Ex. C1.) The sample taken from the peach orchard tested positive for glufosinate ammonium, the active ingredient in *Reckon 280 SL Herbicide*, at 0.23 ppm. (County Ex. C1; Jennings Testimony.) While the extent of the damage in the peach orchard is contested, testimony and photographic evidence supports there were signs of leaf yellowing and drop in the peach orchard, which is a sign of herbicide drift. (County Ex. C1; Jennings Testimony; Benzel Testimony.) Therefore, there is substantial evidence in the record to support the Commissioner's decision that Appellant's application of *Reckon 280 SL Herbicide* was in conflict with the label in violation of FAC section 12973.

C. Appellant's assertion that Investigator Ramon Jauregui had a conflict of interest with the investigation is without evidentiary support.

On appeal, Appellant states Investigator Jauregui was "rude and threatening" on the day of the inspection, and he "has had business dealings with Mr. Sohal in the past." (Notice of Appeal.) Appellant feels "this is inappropriate and something should be done in regards to this." (*Id.*) It is unclear if this is a general complaint about Investigator Jauregui or if Appellant is alleging he has a conflict of interest that affected the investigation; however, in an abundance of caution, the Director will address this as an allegation of a conflict of interest.

There is a lack of evidentiary support for Appellant's allegations that Inspector Jauregui had business dealings with Mr. Sohal that would cause Inspector Jauregui to have an interest that would conflict with the investigation. Appellant made similar allegations at the hearing, but Investigator Jauregui was not present due to illness so he could not respond to Appellant's allegations. (Jennings Testimony.) Appellant did not offer evidentiary support for its allegation that Investigator Jauregui has business dealings with Mr. Sohal that would affect the integrity of the investigation. Appellant only offered testimony that Mr. Sohal and Investigator Jauregui have a business relationship and "are like family." (Testimony of Gurvinder Pamma.) Therefore, there is no evidence to support Inspector Jauregui had a conflict of interest that affected the integrity of the investigation.

D. The Commissioner's decision to classify the two (2) violations as Class B violations and issue a \$500 fine was appropriate.

When levying fines, the Commissioner must follow the fine guidelines set forth in California Code of Regulations, title 3, section 6130. On appeal, Appellant does not challenge the class or fine amount set by the Commissioner; however, the Director finds there is substantial evidence to support the Commissioner's decision that each violation was a Class B violation and the fine of \$250 for the two (2) violations, totaling a \$500 fine is appropriate. A Class B violation is "a violation of a law or regulation that mitigates the risk of adverse health,

property, or environmental effect..." (Cal. Code Regs., tit. 3, § 6130, subd. (b)(2).) FAC section 12973 states, "The use of any pesticide shall not conflict with labeling registered pursuant to this chapter which is delivered with the pesticide or with any additional limitations applicable to the conditions of any permit issued by the director or commissioner." The purpose of FAC section 12973 is to require users to follow product label instructions in order to mitigate the risk of adverse health, property, or environmental effect. Therefore, there is substantial evidence to support the Commissioner's decision that Appellant's violation of FAC section 12973 was a Class B violation, because it was a violation of a law that "mitigates the risk of adverse health, property, or environmental effect." (Food & Agr. Code § 12973.) The fine range for Class B violations is \$250 to \$1,000. (Cal. Code Regs., tit. 3, § 6130, subd. (c)(2).) The Commissioner fined Appellant \$250 for each of the two (2) violations, the lowest end of the Class B fine range, with a total fine of \$500. The Director finds the \$500 fine is a reasonable exercise of the Commissioner's discretion given the evidence in the record.

Conclusion

The Director affirms the Commissioner's decision that Appellant violated FAC section 12973 and the violation qualified as a Class B violation. The total fine is upheld.

Disposition

The Director affirms the Commissioner's decision and levy of fines. The Commissioner shall notify Appellant of how and when to pay the \$500 in total fines.

Judicial Review

Under Food and Agricultural Code section 12999.5, Appellant may seek court review of the Director's decision within 30 days of the date of the decision. Appellant must file a petition for writ of mandate with the court and bring the action under Code of Civil Procedure section 1094.5.

**STATE OF CALIFORNIA
DEPARTMENT OF PESTICIDE REGULATION**

Dated: MAY 24 2021

By: Val Dolcini
Val Dolcini, Director