



Georgia Structural Pest Control Commission

Notice 17-04

Alternate Application Technique (AAT) Guidance Policy

This policy provides guidance on how to comply with Rule 620-6-.04(3) the minimum adequate treatment for pesticide product applied as an alternate application technique (AAT) for subterranean termite control. The guidance conforms to the control measures in the Rules of the *Georgia Structural Pest Control Act*. These Rules were amended September 1, 2017.

The alternate application technique is a minimum standard control measure for subterranean termites defined by rule as an alternate method of application of termiticide. An AAT must be approved by the Commission prior to being used for subterranean termite control.

Commission accepted and approved AAT Termiticides

The Commission will respond to requests from registrants to consider a new application technique under the AAT rule.

Approval by the Commission requires the following criteria are met:

1. U.S. EPA registered termiticide is labeled for stand-alone structural protection;
2. Termiticide has efficacy data supporting the use of such an application technique; and
3. Efficacy data is reviewed and approved by the Commission.

The final decision will be posted by GDA. The Commission, at its discretion, may accept, reject, cancel, suspend or modify any application, at any time, for approval as an alternate application technique.

Minimum treatment standards for AAT applications

Application of a termiticide using an approved AAT must include:

1. All treatment areas specified under Rule 620-6-.04 subparagraphs:
 - (1)(a) Comprehensive soil termiticide application,
 - (1)(b) Defined soil termiticide application, or
 - (2)(a) Pre-construction soil termiticide application; and
2. Application in a manner consistent with the label and labeling of the termiticide.

The applicator would follow the pesticide label for how to treat the required areas including specifications for trenching, rod hole spacing, or quantity of finished dilution to apply and would be in compliance as long as all required treatment areas were included.

Example: Trenching of soil along outside foundation walls to a minimum of 6 inches is an example of a minimum treatment standard specified in the defined soil termiticide application rule. To comply with this standard under the AAT rule, treating this area (outside foundation walls) is still required, however, the applicator would refer to the pesticide label for specifications on the trench – a minimum depth of 2 inches deep and 4 inches wide would be allowed if that is what is stated on the label.

WDO Contract Rule

The WDO Contract Rule requires a written contract to the property owner for each job of WDO protection or control. The specific type of control measure to be performed is a required element. The specific type of control measure must specify alternate application technique. For example, if an AAT is made to meet the defined treatment standards then the contract should state, "defined soil termiticide alternate application technique".

List of commission accepted and approved AAT Termiticides

Termidor HE High-Efficiency Termiticide U.S. EPA Registration No. 7969-329 (SPCC approval 10-10-17)

Termidor HP High Precision Termiticide U.S. EPA Registration No. 7969-354 (SPCC approval 02-13-18)

Termidor HP II High Precision Termiticide U.S. EPA Registration No. 7969-400 (SPCC approval 02-13-18)

Frequently Asked Questions (FAQ's)

1. Is the garage or carport slab required to be treated (drilling & injecting) for preventive termite treatments where the slab joins any part of structure as required by the defined soil termiticide minimum treatment standard for Termidor HP II? Under the AAT for defined soil termiticide minimum treatment standard for the use of Termidor HP II, this area is only required to be treated when an active infestation is present in this area.
2. Under a retreatment warranty contract, if there is an infestation, how does the retreatment rule 620-2-.01(ae) apply? The retreatment rule requires a partial treatment of all areas of at least (10) ten feet in both directions from the point of termite activity. This treatment would include drilling and treating slabs and voids in the area of infestation.
3. For an initial post-construction AAT defined soil termiticide treatment that is addressing an active infestation, are interior areas required to be treated? Interior areas are required to be treated at the site of termite activity and at least 2 feet in two or more directions radiating from the site.
4. For Termidor HP II, what is required to comply with the pesticide use record keeping rule for the amount of pesticide applied and the concentration of pesticide applied?
 - amount of pesticide applied
 - HT mode: total ounces of formulation or the equivalent amount in total finished gallons at 0.125%
 - SA mode: total amount of finished gallons at 0.125%
5. Can the Official Waiver Form be used? Only in situations where it is not possible or practical to meet the minimum treatment standards. For the "Type of Treatment" section on the Waiver Form, indicate Alternate Application Technique.
6. Why was the language in Rule 620-6-.04(3)(f) amended to include the language "*except the area beneath concrete slabs of earth filled porches as specified in 620-6-.04(1)(b)5(iii)*"?

The AAT rule was originally approved by the commission to allow for consideration of new technologies while still ensuring termiticide products are efficacious here in Georgia. The Commission reviews each product submitted for consideration as an AAT based on the rule stating treatments for products applied as an AAT are to meet the indicated areas to meet minimum standards but are also allowed to be made consistent with the label directions. When utilizing an AAT approved product, the required areas of treatment are noted in the minimum treatment standards but the approved label dictates how those areas must be treated.

Because AAT approved products include differing requirements for how areas such as surfaces abutting the structure are allowed to be treated (i.e. requiring drilling and subslab injection versus hydraulic trenching around the areas), the rule was amended to allow for treatment to be performed in the manner allowed by the label for treatment of these areas including earth filled porches which required a specific treatment method under the standard defined treatment Rule 620-6-.04(1)(b)5(iii).



Georgia Structural Pest Control Commission

It is critical that you review and understand the label requirements when utilizing products under the AAT rule and all products.

7. Can I use all current AAT approved termiticide products to complete a defined soil treatment around attached slabs and earth filled porches? No.

- Termidor HPII is the only product which has label directions allowing for treatment around attached slabs and earth filled porches when the applicator is using the Termidor HP unit in the HT (Hydraulic Trench) Mode to establish the exterior perimeter treated zone.
- Termidor HP is also labeled for use with the Termidor HP unit but the label directions require the SA Mode be utilized for completion of any exterior perimeter areas where exterior concrete structures including porches adjoin the foundation. It specifically states, "For abutting dirt-filled porches (partial or full), the sub-soil must be treated by drilling and subslab injection treatment."
- Termidor HE label directions require standard treatment (drilling and subslab injection) of the entire surface that is to be covered beneath the concrete slab including porches and is not for use with the Termidor HP unit.

SPCC: Notice 17-04

Issued: 10-10-17

Revised: 11-12-19