

COMPLIANCE POLICIES TO AVOID VIOLATIONS PURSUANT TO THE ADMINISTRATIVE CONSENT AGREEMENT BETWEEN THE MAINE BOARD OF PESTICIDES CONTROL AND TRUGREEN

Pursuant to Section 45 of the of the Administrative Consent Agreement between the Maine Board of Pesticides and TruGreen, TruGreen submits the following policies to better comply with Maine pesticide regulations. In this regard, TruGreen is committed to compliance with law and has dedicated substantial resources to avoid violations. In this regard TruGreen has made corrections to its procedures as follows:

THE PESTICIDE NOTIFICATION REGISTRY, CMR 01-026, Chapter 28, Section 2 (D). TruGreen has a procedure to notify individuals on the Pesticide Notification Registry, but found that there was a gap in the process that resulted in the violation. The following outlines TruGreen's procedure for compliance with this law:

- Prior to making any pesticide applications in a given calendar year, TruGreen downloads the most updated Pesticide Notification Registry from the State's website.
- All registrants are entered into our database as "chemical sensitive parties."
- During the above listed data entry of each registrant a trigger distance is also entered. As a local policy in our branch office, we will use three times the State's regulation distance of 250 feet. We will use 250 yards.
- Upon our system scheduling any of our customers for a treatment of any kind, which occurs one business day in advance of the schedule date, an automatic check is performed against our database of "chemical sensitive parties," which will indicate whether any of our scheduled customers' properties fall within the trigger distance of any of the properties of the individuals listed in our database of "chemical sensitive parties."
- A report is then automatically generated which lists all "chemical sensitive parties" are required to be notified pursuant to CMR 01-026 Chapter 28, Section 2 (D), based on the next business day's scheduled work.
- Before the close of business on any given business day, the report generated above is reviewed and phone calls are placed by our staff to any registrant listed on the reported generated via the process above, to notify the registrant of any pesticide application scheduled for the next business day within our trigger distance of their registered property.
- As a further method of preventing un-notified pesticide treatments, any property for which we attempt to schedule any treatment to be performed the same business day as it is being scheduled, our system flags properties that fall within the trigger distance of all registrants' registered properties and disallows users from manually scheduling inside those trigger distances regardless of whether the work to be performed is expected to involve the application of pesticides or not.

Positive Identification, CMR 01-026 Chapter 20, Section 7 (A). TruGreen has expended significant resources in the purchase and installation of the Telogis software in our service trucks. This system is a GPS based system that directs trucks to the correct address. All customer addresses are geocoded at the time of sale, and Telogis routes the truck to the address. We have found that this system is very accurate, but like any system, there are occasional errors resulting in trucks being routed to the wrong address. TruGreen continues to

refine this system and look for enhancements to improve accuracy. Our IT Department is working on improvements on several fronts, including technology to photograph and store photographs of the home onto the customer's account which will be available on the service technician's tablet. Our IT department has been working with a major information systems vendor to adapt this technology to TruGreen's operation.