



**Wyoming
Department of Agriculture**

Dave Freudenthal, Governor
John Etchepare, Director

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November 16, 2006

**RE: Docket ID No. EPA-HQ-OPP-2006-0631. Recordkeeping Requirements for
Certified Applicators Using 1080 Collars for Livestock Protection**

The Wyoming Department of Agriculture submits the following comments in reference to Docket ID No. EPA-HQ-OPP-2006-0631.

The Department recognizes the need to properly maintain records regarding the application and use of all pesticides. As the requirement for additional recordkeeping and reporting of use of Livestock Protection Collars (LPC) has been in place for 23 years, the Department does not contest the renewal of this ICR.

However, the Department does strongly encourage EPA to maintain confidentiality of the certified applicators, their addresses or other personal information contained within any report made to the Agency. In support of this position, the Department references the following state law:

Wyoming Statute § 11-6-104(b) states “Any information regarding the number or nature of rodents or predators legally taken within the state pursuant to this section shall only be released in its aggregate form. The identity of any person legally taking a rodent or predator within this state is solely for the use of the responsible agency or appropriate law enforcement agency, shall not be released without the individual's written consent and is not a public record for purposes of W.S. 16-4-201 through 16-4-205.”

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Hank Uhden".

Hank Uhden
Manager – Technical Services Division