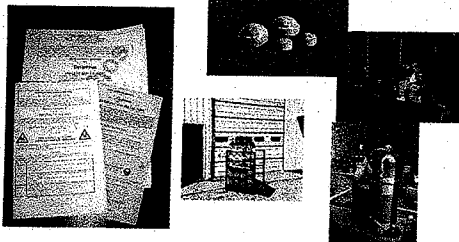


**Phosphine
Label Changes
& FMP
Fumigation Workshop
2009**

Nathan Stocker
Fumigation Service & Supply, Inc.
Westfield, Indiana

▪ Phosphine Label Changes:



www.DegeschAmerica.com

▪ Phosphine Label Changes:

▪ All existing pesticides must undergo periodic re-registration by U.S. EPA

- Phosphine RED published December 1998 with 15 RMM's
- Coalition formed January 1999 to address concerns
- Comments, data gathering, scientific research and EPA education led to draft label acceptance in January 2002
- State regulator proposals and registrant responses in 2002 and 2003 produced this latest version

www.DegeschAmerica.com



New Restricted Use Statement

A Certified Applicator must be physically present, responsible for, and maintain visual and/or voice contact with all fumigation workers during the application of the fumigant. Once the application is complete and the structure has been made secure the certified applicator does not need to be physically present at the site.



New Restricted Use Statement

A Certified Applicator must be physically present, responsible for and maintain visual and/or voice contact with all fumigation workers during the initial opening of the fumigation structure for aeration. Once the aeration process is secured and monitoring has established that aeration can be completed safely the certified applicator does not need to be physically present and trained person(s) can complete the process and remove the placards.




INCIDENT REPORTING

The registrant of the label must be informed by telephone of any adverse incident to human health or the environment involving their product so that records required by EPA can be maintained.




THEFT OF PRODUCTS

The user must immediately report the theft of any phosphine fumigants to the local police department

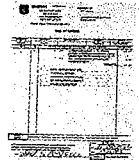


DANGER/PELIGRO
PHOSPHINE GAS




- Placards must withstand adverse weather conditions.
- Placards must have the name of the fumigation company.
- 24-hour emergency telephone number.
- Placards must contain the EPA registration number of the product.

20.1 Transport Designations -
 The following transport designations apply to aluminum phosphide



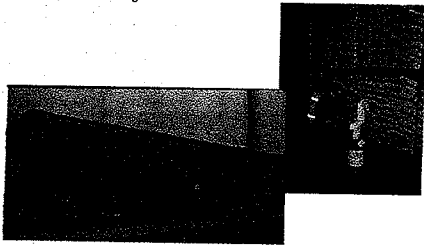
20.2 Transportation Exemption:
 Exemption: DOT-E 10753

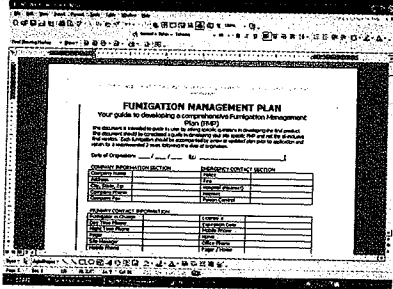


- Sealing:
Requirements of the new label are far more detailed..



- Phosphine Label Changes:
 - Fumigation Management Plan – FMP
 - Rail Car Rufings



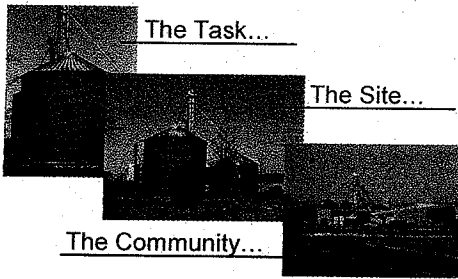


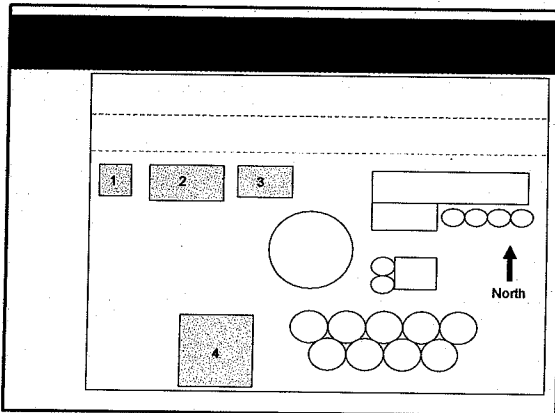
www.FumigationZone.com

1. Inspect the structure and/or area to determine its suitability for fumigation.
2. Consult previous records for any changes to the structure, seal leaks and monitor any occupied adjacent buildings to ensure safety.
3. Prior to each fumigation, review any existing FMP, MSDS, Applicators Manual and other relevant safety procedures with company officials and appropriate employees.



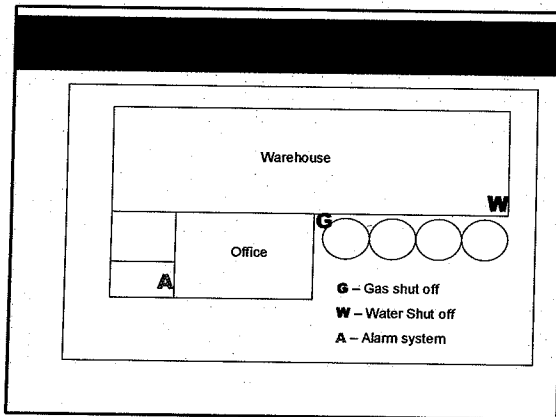
Fumigation Consideration...





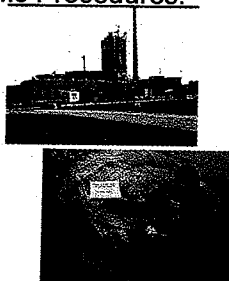
▪ **HazCom:**

- 1) MPP, Inc. – Bill Springer – 317 / 555-1212
- 2) Simon Builders – Paul Beck – 317 / 555-2121
- 3) Mathis Tool – Simon Craig – 317 / 582-1627
- 4) Bennett Gaskets – Brent Smith 317 / 582-6846



▪ **Fumigation Specific Procedures:**

- Bins / Silos
- Warehouse
- Building / Structure
- Rail Car
- Container / Trailer
- Tarp
- Spot / Equipment



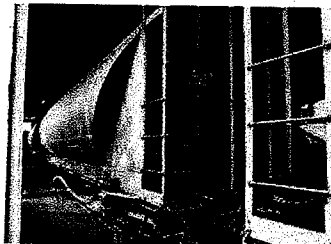
4. Consult company officials in the development of procedures and appropriate safety measures for nearby workers that will be in and around the area during application and aeration.
5. Consult with company officials to develop an appropriate monitoring plan that will confirm that nearby workers and bystanders are not exposed to levels above the allowed limits during application, fumigation and aeration. This plan must also demonstrate that nearby residents will not be exposed to concentrations above the allowable limits.



6. Consult with company officials to develop procedures for local authorities to notify nearby residents in the event of an emergency.
7. Confirm the placement of placards to secure entrance into any structure under fumigation.
8. Confirm the required safety equipment is in place and the necessary manpower is available to complete a safe and effective fumigation.



9. Written notification must be provided to the receiver of a vehicle that is fumigated in transit.




0.3-15ppm = Full face canister mask

Above 15ppm or unknown concentration = SCBA

- Site Specific Procedure
- Increased Monitoring
- Increased Record Keeping

Rail Car Rulings

- New label accepts trained individuals.
- States Requiring at least one licensed fumigator per site:
 - California
 - North Carolina
 - Vermont
 - West Virginia



Rail Car Rulings

- States requiring each operator to be licensed:

Colorado	Nebraska	Tennessee
Connecticut	Nevada	Texas
Louisiana	New York	Wyoming
Michigan	Oklahoma	Wisconsin
Minnesota	South Dakota	

All other states accept existing label. Be aware that some states can change ruling or other governing bodies could apply.

Rail Car Rulings

- Include instructions for:
 - Cleaning
 - Disposal

