FUMIGATION MANAGEMENT PLAN FOR PHOSPHINE FUMIGANTS

Fall 2004

The Fumigation Management Plan (FMP) must include the nine (9) items listed below. The Applicator is responsible for working with the owners and/or responsible employees of the structure and/or area to be fumigated to develop a FMP. The FMP is intended to ensure a safe and effective fumigation. The FMP must address characterization of the structure and/or area, and include appropriate monitoring and notification requirements, consistent with, but not limited to, the following:

1. Inspect the structure and/or area to determine its suitability for fumigation.
2. When sealing is required, 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, Applicator Manual and other relevant safety procedures with company officials and appropriate employees.
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 ventilation.
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 limit.
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.

These nine factors must be considered in developing a FMP. It is important to note that some plans will be more comprehensive than others. All plans should reflect the experience and expertise of the Applicator, the facility coordinator and circumstances at and around the structure and/or area. In addition to the FMP, the Applicator must read the entire label and Applicator Manual and follow its directions carefully. If the Applicator has any questions about the development of a FMP, the registrant should be contacted for further assistance. The telephone number for the registrant is in the Applicator Manual.

The FMP and related documentation, including monitoring records, must be maintained for a minimum of two (2) years. The Applicator needs to comply with any state recordkeeping time frame. State Regulatory Agency (SRA) requirements may be longer than two years.

The FMP must be devised to cover application and exposure period, ventilation and disposal of the fumigant, to minimize human exposure to phosphine and to help assure adequate control of the insect pests. The Applicator Manual provides guidelines for fumigating various types of structures and vessels. Some fumigation directions in the Applicator Manual state a FMP is to be
done while other fumigation directions do not mention a FMP. The Applicator must verify with the SRA if a FMP is needed for those fumigations in the Applicator Manual where a FMP is not mentioned as being required.

The Applicator Manual provides several pages of "guidance" for preparing a FMP. The Applicator needs to verify with the SRA if this section is considered guidance by the state or is mandatory language. If the state considers this section as guidance it is not required for the Applicator to do each guidance item mentioned. However, this section of the Applicator Manual is very beneficial in developing a FMP and provides valuable information on obtaining a successful fumigation.

Once a FMP is developed for a structure, that FMP can be referred to in future fumigations and FMPs unless major changes occur to the facility or fumigation procedure for that structure.