

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 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.

**APPLICATOR'S MANUAL
FOR
WEEVIL-CIDE®
TABLETS, PELLETS AND GAS BAGS**

THESE PRODUCTS ARE ACCOMPANIED BY AN APPROVED LABEL AND APPLICATOR'S MANUAL. READ AND UNDERSTAND THE ENTIRE LABELING AND APPLICATOR'S MANUAL. ALL PARTS OF THE LABELING AND APPLICATOR'S MANUAL ARE EQUALLY IMPORTANT FOR SAFE AND EFFECTIVE USE OF THE PRODUCTS. CONSULT WITH YOUR STATE LEAD PESTICIDE REGULATORY AGENCY TO DETERMINE REGULATORY STATUS, REQUIREMENTS, AND RESTRICTIONS FOR FUMIGATION USE IN THAT STATE. CALL 1-609-392-8200/1-800-247-1557 IF YOU HAVE ANY QUESTIONS OR DO NOT UNDERSTAND ANY PART OF THIS LABELING.

RESTRICTED USE PESTICIDE
DUE TO HIGH ACUTE INHALATION TOXICITY OF
PHOSPHINE GAS

For retail sale to Dealers and Certified Applicators only. For use by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's certification. Refer to the directions in this Applicator's Manual for requirements of the physical presence of a Certified Applicator.

Aluminum Phosphide Fumigant
FOR USE AGAINST INSECTS WHICH INFEST STORED
COMMODITIES AND CONTROL OF BURROWING PESTS

Active Ingredient: Aluminum Phosphide.....	60.0%
Inert Ingredients.....	40.0%
Total.....	100.0%



KEEP OUT OF REACH OF CHILDREN
DANGER - POISON - PELIGRO

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta se le haya sido explicado ampliamente. **(TO THE USER:** If you cannot read English, do not use this product until the label has been fully explained to you.)

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CALL CHEMTREC 1-800-424-9300

Manufactured for: United Phosphorus, Inc.
423 Riverview Plaza • Trenton, NJ 08611 • 1-609-392-8200/1-800-247-1557 • www.upi-usa.com

EPA Registration Nos. 70506-13, 70506-14, and 70506-15
EPA Establishment No. 41876-1Y-1

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

These factors **must** be considered in putting together an 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 and circumstances at and around the site.

In addition to the plan, the applicator must read the entire label and the Applicator's Manual and must follow its directions carefully. If the applicator has any questions about the development of a FMP, contact United Phosphorus, Inc. for further assistance.

The FMP and related documentation, including monitoring records, must be maintained for a minimum of 2 years.

GUIDANCE FOR PREPARATION OF A FUMIGATION MANAGEMENT PLAN

20.1 PURPOSE
A Fumigation Management Plan (FMP) is an organized, written description of the required steps involved to help ensure a safe, legal, and effective fumigation. It will also assist you and others in complying with pesticide product label requirements. The guidance that follows is designed to help assist you in addressing all the necessary factors involved in preparing for and fumigating a site.

This guidance is intended to help you organize any fumigation that you might perform PRIOR TO ACTUAL TREATMENT. It is meant to be somewhat prescriptive, yet flexible enough to allow the experience and expertise of the fumigator to make changes based on circumstances which may exist in the field. By following a step-by-step procedure, yet allowing for flexibility, safe and effective fumigation can be performed.

Before any fumigation begins, carefully read and review the label and the Applicator's Manual. This information must also be given to the appropriate company officials (supervisors, foreman, safety officer, etc.) in charge of the site. Preparation is the key to any successful fumigation. If you do not find specific instructions for the type of fumigation that you are to perform listed in this Guidance Document, you will want to construct a similar set of procedures using this document as your guide or contact United Phosphorus for assistance. Finally, before any fumigation begins you must be familiar with and comply with all applicable federal, state and local laws. The success and future of fumigation are not only dependent on your ability to do your job but also by carefully following all rules, regulations, and procedures required by governmental agencies.

20.2 A CHECKLIST GUIDE FOR A FUMIGATION MANAGEMENT PLAN
This checklist is provided to help you take into account factors that must be addressed prior to performing all fumigations. It emphasizes safety steps to protect people and property. The checklist is general in nature and cannot be expected to apply to all types of fumigation situations. It is to be used as a guide to prepare the required plan. Each item must be considered.

A. PRELIMINARY PLANNING AND PREPARATION

1. Determine the purpose of the fumigation.
 - a. Elimination of insect infestation
 - b. Elimination of rodent infestation
 - c. Plant pest quarantine.
2. Determine the type of fumigation, for example
 - a. Space: tarp, mill, warehouse, food plant
 - b. Vehicle: railcar, truck, van, container
 - c. Commodity: raw agricultural or processed foods
 - d. Type of Storage: vertical silo, farm storage, flat storage
 - e. Vessels: ship or barge. In addition to the Applicator's Manual, read the US Coast Guard