

# CHALLENGES

Pam Hodge  
Wilbur-Ellis Company  
Safety, Security, Regulatory & Environmental Office  
Union Gap, WA

## TIME LINE

- Optimal time for testing containers
  - Same time as season
    - Rinse generated from cleaning to test

## COST

- Retrofitting or replacing
  - One location
    - +100 in 2010
    - 2 – 300 in 2011
- Rinse water disposal
  - Increase storage required
  - Increase in disposal

## MAN POWER

- Will require a minimum of one or more additional employees to complete records and testing

## GROWERS & RETAILERS

- Training compliance
- Don't want to charge for extra costs
- Retailers – ordering pre-filled totes/containers

## REPACK AGREEMENTS/LABELS/CONTAINER LISTS

- Need these immediately

## — CLARIFICATION

- Need EPA to clarify and simplify requirements as well as dispel misinformation