

# American Agronomic Stewardship Alliance (AASA)



PROGRAM UPDATE

# What is the AASA?

- A non profit association that develops stewardship practices for the safe handling and storage of bulk, refillables and packaged crop protection products.
- Developed and maintains an inspection checklist based on federal requirements.
- Hires third party inspectors that use the checklist to conduct inspections of ag retail facilities.
- Funded by manufacturers that purchase inspection reports to aid in their decision as to where products can be handled and stored safely and correctly (no cost to retailer).

# AASA Board of Directors

- Started with 6 Manufacturers – Now 5
- 5 Distributor & Retailer Reps
- 1 State Pesticide Control Official
- 1 National Association Representative



# Why The Need For An Industry Stewardship Program Like AASA?

- Reduce liability from potential spills and leaks by ensuring crop protection products are stored safely.
- Provide a single source for industry stewardship practices and inspection reports.
- Reduce the need for multiple company inspections.
- Source of information for our industry (manufacturers, distributors, retailers) on the USEPA Pesticide Container & Containment Regulations and other industry requirements.

# [www.aginspect.org](http://www.aginspect.org)



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## Welcome

### The American Agronomic Stewardship Alliance

The American Agronomic Stewardship Alliance (AASA) is a not-for-profit (501C (6)) organization that has taken the lead in developing a stewardship inspection program for agricultural retail facilities that store bulk, mini bulk, portable refillable containers (PRC's) and packaged crop protection products.

### Our Mission

"Dedicated to leading the agricultural industry in educating, developing & promoting safe stewardship and best management practices for storing, handling and repackaging crop protection products throughout the distribution and retail supply chain."

### Program Overview

# Industry Awareness of the Program

**STEWARDSHIP**  
AASA Initiative

## A Decade Of Service

Over its 10-year run, the American Agronomic Stewardship Alliance (AASA) has had a significant positive impact on product storage, safety and security.

BY KEVIN RUNKLE

**T**HIS year, 2013, marks the 10th anniversary of the American Agronomic Stewardship Alliance (AASA). Incorporated in 2004, the AASA Board of Directors is comprised of six basic crop protection product manufacturers, a variety of crop protection product distributors, agricultural retail representatives, one state pesticide control official and one national association industry representative — in all, totaling a 14-member board of directors. In 2007, the Illinois Fertilizer & Chemical Association (IFCA) was approached by the AASA board and given the opportunity/privilege of partnering with a truly great organization dedicated to educating, developing and promoting stewardship and best management practices within the agricultural retail sector.

If you are an agricultural retailer in the U.S. and store bulk crop protection products, you have been inspected by AASA to ensure your bulk storage facilities meet EPA and industry standards for operational area containment, employee training, portable refillable containers (PRCs) or mini-bulk, site security, tank labeling, record-keeping, bulk storage tanks, etc. This year's inspections began in June in the following states: Alabama, Arkansas,

office. Site-specific information for each agricultural retail location is kept as confidential business information, available only to the location. The AASA has compiled 10 years of general agricultural retail inspection data that contains a wealth of information available upon request.

### Two Years Later

Where is the industry now in terms of compliance with the EPA Pesticide Container & Containment regulations (PCC)? What report card grade would the industry receive for compliance with EPA PCC regulations? Regulations pertaining to containment structures (dikes and load pads) and anchoring and elevating pesticide storage tanks came into effect August 16, 2009. Regulations pertaining to portable refillable containers (PRCs), stationary bulk storage tanks and pesticide repackaging came into effect August 16, 2011.

Did you know EPA may only inspect a handful of retail locations to check compliance with the PCC rule then base the status of the entire industry's compliance efforts with the PCC regulations on those locations? This, of course, is not representative



Runkle is the director, regulatory services for the Illinois Fertilizer & Chemical Association, Bloomington, IL.

### A Partnership

IFCA, in partnership with AASA, is in a great position to show that our members and our industry are best served by proving to our government that we are not only capable, but willing to do what is necessary to ensure proper stewardship and utilization of our products. The AASA program is uniquely poised to help assure compliance and stewardship today and in the future. EPA established national standards for bulk pesticide management with the PCC regulations and AASA will continue to ensure the industry meets these standards.

As regulations become more promi-

"Dedicated to leading the agricultural

Crop protection storage, containment, and handling were carefully scrutinized as part of the AASA inspection process, helping to set a new benchmark of excellence at the retail outlet.

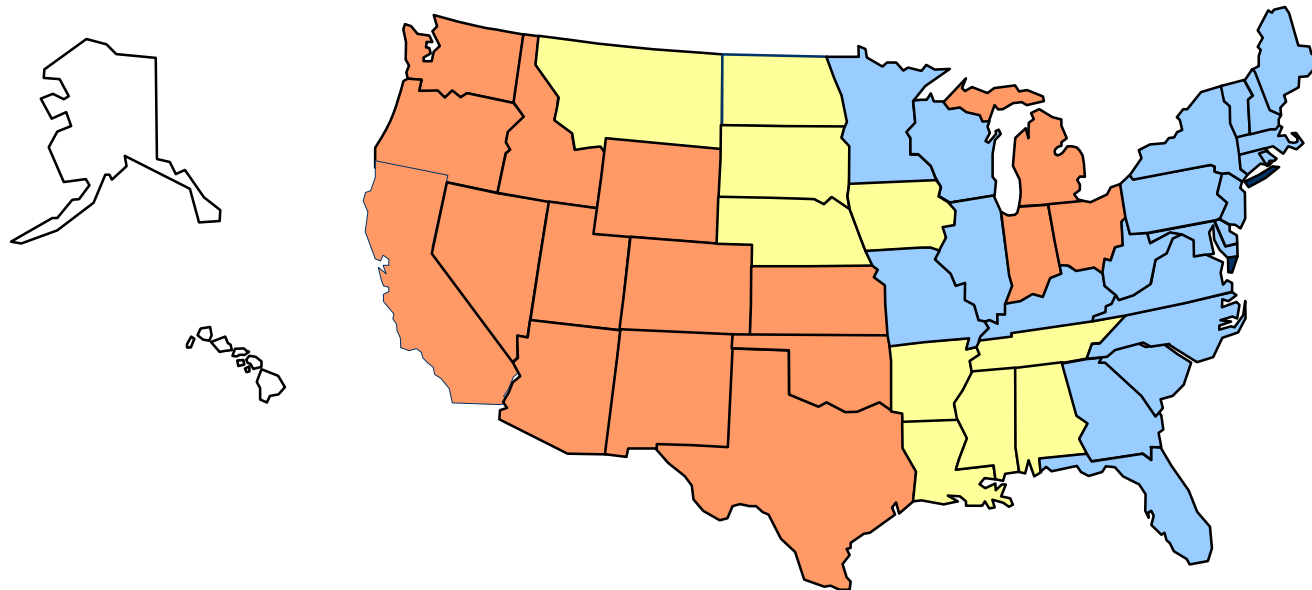


ment in the industry, the AASA inspection program assists agricultural

Approximately one-third of the states are inspected each year by indepen-

rectly interact with retailers nationwide to help them comply with state

# History of State Inspections



-  Inspect - 2004, 2007, 2010, 2013, 2016
-  Inspect - 2005, 2008, 2011, 2014, 2017
-  Inspect - 2006, 2009, 2012, 2015

# Inspectors Receive Annual Training





# The AASA Inspection Process

- Third party inspector makes an appointment to visit a facility- inspections conducted from June through September.
- Inspector inspects facility (we encourage facility personnel to participate).
- Copy of completed inspection checklist available upon request on day of inspection.
- AASA will mail a copy of the completed inspection report (as it appears in the database) to each facility.
- Facility reviews the report and sends any corrections to the AASA.

# Key Advantages

- A single checklist so facility managers have a clearer idea of industry expectations.
- Reduce duplicative inspections.
- The inspection is at no cost to the retailer
  - manufacturers pay for each report.
- A copy of its inspection report is mailed to each retailer.
- Individual facility inspection data is confidential.

## Last Inspection Cycle – All States: 2015, 2016, 2017

● Year	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>Total</u>
● # Sites	1605	1692	1338	4,635
● # Tanks	9924	10803	8072	28,799
● # Containments	2158	2290	1858	6,306
● # Bulk & PRCs	1475	1599	1189	4,263

# Containment: Pad Construction



# Containment: Dikes/Units

## Capacity, Location, Construction



# Containment: Storing Filled PRCs



# Inspection Summary: Containment

	Compliance %	
Tank secondary containment with 100% (indoor) or 110% (outdoor-uncovered) capacity	90%	
Tanks containment area is indoors or outdoors and covered	83%	
Bulk containment is rigid material (i.e. concrete, steel, reinforced sealed block) & is liquid-tight	97%	
Containment drains, valves, & cracks are permanently sealed.	79%	
Dispensing & transfers occur are on rigid, liquid-tight containment.	93%	
Filled PRCs are stored in or within containment	85%	





## Inspection Summary: Bulk Labeling

	<b>% Compliance</b>	
The tank is labeled with the net contents	<b>81%</b>	
The correct EPA Est. No. is affixed to the tank	<b>82%</b>	
The tank is labeled which includes a product booklet	<b>90%</b>	

# Tanks: Valves



# Security



# Containment Pad Capacity



# Inspection Summary- Valves, Security, Capacity



	% Compliance	
Tank inlet/outlet valve is lockable stainless steel	97%	
Tanks are inside a lockable fence or in a secured building.	88%	
Containment for bulk product transfers meets minimum capacity requirements.	90%	

# PRC: Bulk Transfers, Pad Construction & Maintenance



# PRCs: Intact One-Way Valve & or Tamper-Evident Device



## Inspection Summary- Portable Refillable Containers (PRCs)

	% Compliance	
Bulk product dispensing & transfers to PRCs occur on or within properly maintained, liquid-tight rigid containment.	96%	
PRCs have an intact one-way valve and/or tamper-evident device on all non-vent openings.	99%	
All PRCs are regularly inspected and meet <i>applicable</i> EPA/DOT packaging and/or leak proofness testing requirements	98%	
Written procedure in place to ensure PRCs are cleaned per manufacturer's instructions prior to changing product or formulation	96%	
.		



# Inspection Summary- Sampling of Encouraging Elements

	% Compliance	
Repackaging Agreements for bulk products are current & on file	99%	
Safety Data Sheets (SDS) are available to employees	99%	
Personal protective equipment (PPE) is available to employees	99%	
Containment for PRC product transfers meets minimum capacity requirement.	94%	
Written security plan is on file.	96%	

Retail Facility Checklist  
General Information

<b>Company Name:</b> C&S	<b>Street Address:</b> 10257 Highway 20-26
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<b>Contact:</b> Tom McIntyre/Client	<b>Telephone:</b> 2084594601	<b>City:</b> Caldwell	<b>State:</b> ID	<b>Zip:</b> 83605
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- |     |   |
|-----|---|
| 1.  | Dealer's EPA Establishment number: 51896-ID-018                                       |
| 2.  | Dealer's unique site/facility number: 0741069008544                                   |
| 3.  | Inspector will attach the bulk Site Map.  |
| 29. | NFPA 704-diamond signs are posted at the site and clearly visible to first responders |
| 30. | A written security plan is on file  |

General Facility Information Scored

- |     |  |
|-----|--|
| 53. | The facility and surrounding area is neat and free of all debris   |
| 55. | Does the pesticide product storage facility prohibit eating, drinking, or smoking in operational areas?  |
| 57. | Written documentation of the clean out procedure provided by the registrant and the results of individual tank clean out operations, are kept on file. If "N", Explain |

General Disclaimer: The purpose and intent of this document is to provide minimum standards and guidelines for evaluating the stewardship practices at a retail pesticide product storage facility. This document outlines the "fundamental principles" of product stewardship currently agreed upon by member companies of American Agronomic Stewardship Alliance and does not provide an inclusive list of all recommended or "best" practices.

This document should not be considered or relied upon as the sole basis or reference for evaluating site compliance at any particular facility and does not reflect all of the laws or regulations that local, state, or federal authorities may impose on facilities. The practices listed in this document are designed to complement, and be implemented in conjunction with, applicable regulatory requirements. Since regulations can change over time, it is the facility operator's responsibility to ensure that his or her facility complies with all current and applicable regulations.

This document is not meant to supersede or replace any FIFRA, EPA, DOT, OSHA or individual registrant requirements. Each registrant must provide guidelines and procedures specific to their authorized refill operations for storage and handling of their bulk products.

American Agronomic Stewardship Alliance assumes no liability to any person or entity for any injury or damage, direct or consequential, which may be incurred from the use or application of any of the standards, whether in whole or in part, in any combination, by any particular facility. American Agronomic Stewardship Alliance assumes no responsibility for the suitability of any standards as a result of inconsistency with or changes in the law or otherwise.

Inspection Date: 8/16/2017  
Retailer Signed By: Brent Herre  
Inspector: Chuck Hilsenbeck

2017

## AASA Postcard Survey—Return Rate 31%

Did the inspector make an appointment?—92% Yes

Was the inspector courteous and professional?—100% Yes

How long did the inspection take?

<30 min.— 9% 30-59 min.—50% ≥60 min.—41%

Did the inspector provide feedback? Y—91% N—2% N/A— 7%

Did the inspector inform you that you will receive a copy of the inspection? Yes—99%

Has the AASA Inspection Program been helpful? Yes – 98%

# COMMENTS

- 70 Cards referenced inspectors has nice, courteous, friendly, informative, and professional.
- We do our best to be compliant already. I never know what papers are required to keep on file.
- Not sure when they left, after they came in and talked to me for 10 minutes they did their stuff and I didn't see them again.
- Appointment would have been nice.
- Provided useful info. Courteous with criticism. All pro.
- We thought this was great & might even help us with insurance.
- Didn't put stickers on 2 tanks in fert. Barn – Roundup & Aventine
- Guy was knowledgeable but just needs to do his job, instead of talking about it.

# 2017 QUALITY ASSURANCE INSPECTION PROGRAM

- **43 RETAIL FACILITIES IN SIX STATES WERE SELECTED AT RANDOM.**
- **POST OFFICE LOST 7 INSPECTION REPORTS!**
- **253 TANKS, 62 CONTAINMENT UNITS(DIKES) & 49 CONTAINMENT PADS WERE CHECKED**
- **ALL INSPECTION COMPANIES WERE CHECKED**

# 2017 QUALITY ASSURANCE INSPECTION PROGRAM

<u>STATE</u>	<u>SITES</u>	<u>TANKS</u>	<u>DIKE</u>	<u>PAD</u>
INDIANA	8	60	11	9
KANSAS	10	36	16	10
MICHIGAN	5	37	5	5
OHIO	5	30	8	8
OKLAHOMA	5	20	8	5
TEXAS	10	70	14	12
<b>TOTAL</b>	<b>43</b>	<b>253</b>	<b>62</b>	<b>50</b>

# 2017 QUALITY ASSURANCE INSPECTION PROGRAM: INSPECTOR PERFORMANCE

- **WORK ON:**

- **EPA LABELING REQ. ( EPA EST.NO./NET CONTENT)**
- **CHECKING LINES TO THE POINT OF DELIVERY TO BE SURE THEY ARE LABELED**
- **IDENTIFYING DEDICATED vs. COMMON MANIFOLD DELIVERY SYSTEMS**
- **MEASURING CONTAINMENTS – USE INSIDE DIMENSIONS**

# To get copies of AASA Summaries

- Contact AASA in writing ([www.aginspect.org](http://www.aginspect.org))
- We will provide national summary of your state only
- Summaries only—no identifiable sites



# AASA Special Emphasis in 2017

## **Bulk Repackaging Compliance:**

Repack Agreements are in place and current;

Cleanout Procedures are documented & followed;

Tanks are Labeled with Current Labels & Net Contents

# In 2017, AASA Assisted with a SEP on Repackaging Compliance



## Bulk Pesticide Repackaging Regulations

A Quick Guide to Compliance

brought to you by:

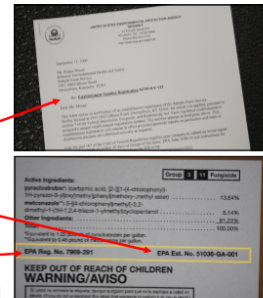


# Two Page Guide on Key Elements of the Repackaging Requirements

## YOUR USEPA ESTABLISHMENT NUMBER (EPA Est. No.)

Any facility where a pesticide is produced (including repackaged for sale or distribution) must be registered with the USEPA. When you register, you must provide the name and address of your company, the type of ownership, and the name and address of each location where repackaging will occur. USEPA will then issue you an EPA Establishment Number (**EPA Est. No.**) which can only be used by that specific facility.

For repackaging facilities, the EPA Est. No. will be formatted as a five digit code, the state abbreviation where the facility resides and a three digit facility location code. The **EPA Est. No.** must be placed on every portable refillable container (PRC) by a person at the repackaging facility. The EPA Registration Number (**EPA Reg. No.**) is the product specific registration number that belongs to registrant (the manufacturer of the product); that number must also appear on every pesticide label.



## AUTHORIZATION TO REPACKAGE

The repackaging facility must have a current, written authorization (a repackaging agreement) from the registrant (manufacturer) to repack and use the manufacturer labels. The repackaging facility must keep a copy of the document on file and make it available upon request to an authorized EPA or State representative. The repackaging facility must maintain the agreement for the period of time for which it is valid and for three years after that. If the repackaging facility is sold or transferred, a new authorization in the new company name must be obtained from the registrant (manufacturer).



## LABELING ON BULK STORAGE TANKS AND PRCs

The bulk pesticide storage tank must display the most current product label, the registrant's (the manufacturer's) **EPA Est. No.** and the net contents of the tank at the time it was filled.

Before distributing or selling a pesticide product in a portable refillable container (PRC), you must ensure that the label for the pesticide is securely attached to the PRC so that it can be expected to remain affixed during foreseeable conditions and periods of use. You must ensure the net contents and **EPA Est. No.** for **your** facility also appears on the PRC label.



## ANNUAL PRODUCTION REPORT

Each repackaging facility must submit a report to USEPA by March 1 on the pesticides repackaged at that establishment the previous year, even if the amount repackaged is zero. The report must contain:

1. The name and address of the establishment;
2. Amount of each pesticide produced (repackaged for sale or distribution that year);
3. Amount of each pesticide sold or distributed the previous year, and the amount of each pesticide estimated to be repackaged during the current year.

The repackaging facility must keep a written log of the product name, **EPA Reg. No.**, amounts per batch and batch identification of all pesticides repackaged.



## APPROVED CONTAINERS AND CLEAN-OUT PROCEDURES

# January 25 Webinar

## Audience Details Report ?

Report Run on: 01/26/2018 03:16:03 PM

Event 1175371 - Staying ahead in Bulk Pesticide Management Documents Required of Pesticide Repackage Establishments

Live Start Time: 01/25/2018 01:01:07 PM

Live End Time: 01/25/2018 01:53:19 PM

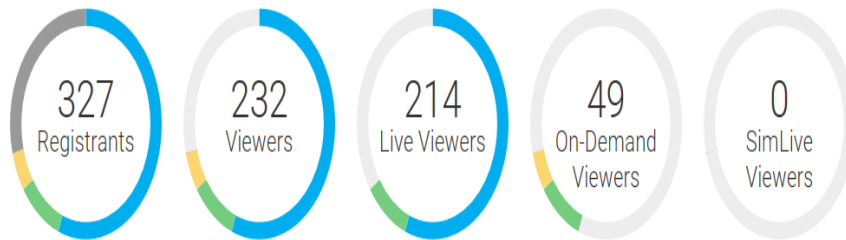
Created: 12/13/2017 10:38:31 AM by ccraine

Cost Centers:

Download This Report As:

[EXCEL \(XLSX\)](#) [CSV](#)

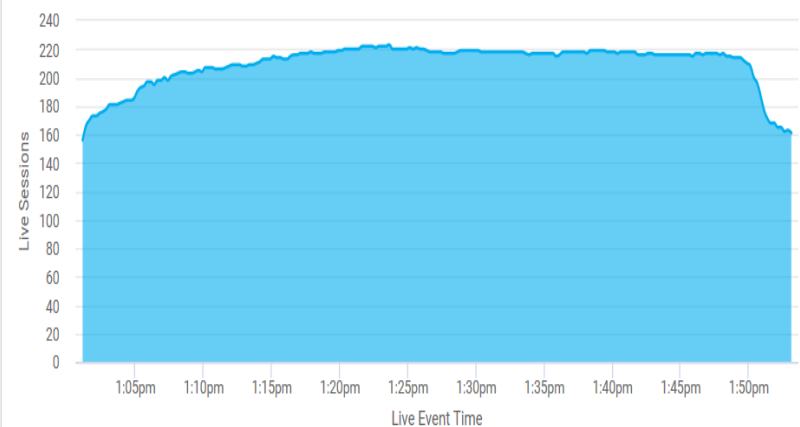
### Audience Totals



● Live	183	56%	● SimLive	0	0%
● Live + OD	31	9.5%	● Live + OD + SimLive	0	0%
● OD	18	5.5%	● Live + SimLive	0	0%
● OD + SimLive	0	0%	● No Show	95	29.1%

### Attendance During Live Event

Click and drag to zoom in. Hold down shift key to pan.



# For Additional Information

- Visit [www.aginspect.org](http://www.aginspect.org) for:
  - Contact Information
  - Inspection Checklist
  - FAQ
  - Inspector Credentials and Photographs