

# Adam Compton

Helena Chemical Company



# Environmental Concerns:

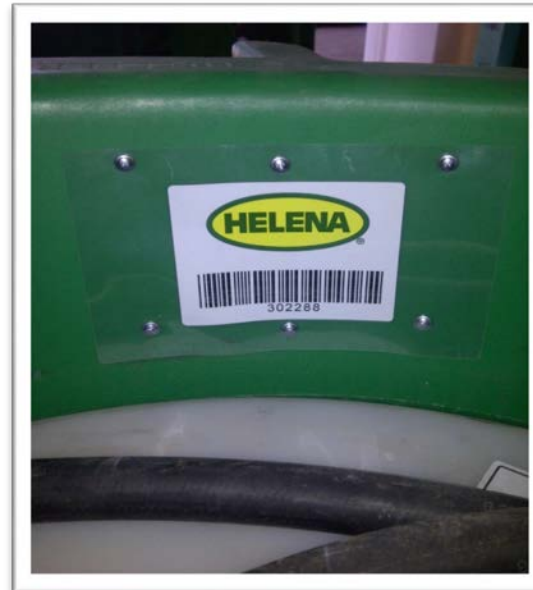
Bulk container contamination consequences:

- ▶ Destroy crops
- ▶ Create legal liability for company and farmer
- ▶ Reputational risk to the company, farmer and industry

How does Helena Chemical  
prevent bulk container  
contamination?

# Refillable Containers

- ▶ Product Label (Most Current)
- ▶ Net Contents
- ▶ Location's EPA establishment number
  - ▶ Site specific (5905 - State - 01)
- ▶ Unique Serial Number
  - ▶ Helena Tracking Label



# Refillable Containers

- No limits on size
- Must wash PRC between uses unless tamper evidence and/or one-way valves are in tact and filled with the same product.
- Must have registrant's cleaning instructions and repackaging authorization on hand.
- EPA Est. # and net contents must be on the product label affixed to the tank.
- Records must be kept for each inspection and fill.



**Engenia**  
Herbicide

**Engenia**  
Herbicide

**KEEP OUT OF REACH OF CHILDREN  
CAUTION/PRECAUCION**

See complete First Aid, Precautionary Statements, Hazardous Properties, Classification of Toxicity, Handling, and Disposal on the product label or on the manufacturer's label file, available at [www.danisco.com](http://www.danisco.com).

Net Contents: 2 x 2.5 gallons

**Engenia**  
Herbicide

**Engenia**  
Herbicide

**Engenia**  
Herbicide

**Engenia**  
Herbicide

**Engenia**  
Herbicide

**Engenia**  
Herbicide

**Engenia**  
Herbicide

**Engenia**  
Herbicide







11/13/2008





# Key Requirements for Refillers

- ▶ Repackage only into compliant refillable containers
- ▶ Clean container between uses unless
  - ▶ all tamper evident devices and one-way valves are intact and
  - ▶ you are refilling with the same product.
- ▶ Keep records for each refill

# Staying in compliance

- American Agronomic Stewardship Alliance (AASA)
- 3 year rotation of audits
- Audits conducted on best management practices for storing, handling and repackaging crop protection products throughout the distribution and retail supply chain

# Communication and Education with Customers

- ▶ Field Days and Grower meetings
  - ▶ Invite vendors
  - ▶ Educate on sprayer clean out procedures and application procedures
- ▶ Online Dicamba training with customers
- ▶ Provided spray nozzles for Dicamba to customers (EPA mandated) and assisted with on site installment/application



# ► Questions