

MACA Disposition Flow Chart & Ag-retailers

TPSA 2020 Conference

Becky Roark, Helena Agri-Enterprises, LLC

Pesticide Disposition Flow Chart

Combination Packaging only (see DOT definition if needed)



Pesticide Disposition Flowchart

- ▶ Developed by MACA's Distribution Committee
- ▶ Reviewed by TPSA board of directors
- ▶ Available as a resource from TPSA
- ▶ <https://tpsalliance.org/>
- ▶ Good guide for warehousing
- ▶ Ag-retailers should follow similar decision process for disposal of pesticides

Pesticide Disposition Flowchart

- ▶ Goal is always for proper use and application of pesticides
- ▶ Compliance with USEPA's pesticide regulations for sale or use
- ▶ Compliance with USEPA's solid and hazardous waste regulations for disposal
- ▶ Compliance with USDOT regulations for movement in commerce

What is Waste?

- ▶ Abandoned
- ▶ Disposed of
- ▶ Burned or incinerated
- ▶ Treated or stored before being disposed of

Solid Waste or Hazardous Waste

- ▶ Anything being “disposed” or “abandoned” is a solid waste *
- ▶ If a solid waste meets EPA’s criteria for characteristic waste (e.g., ignitable, TCLP) or is a listed waste (F, K, P/U), it is a Hazardous Waste when disposed
- ▶ Is there any relief?

Relief from the Waste Regulations/Rules

- ▶ *Not a solid waste if recycled - Commercial Chemical Products (e.g., formulated pesticides)
- ▶ Recycling Relief - 40 CFR 261.2
 - Unused products
 - Off-specification products
 - Any residue remaining in containers
 - Any residue or contaminated soil (spills)
 - Debris resulting from spill cleanup

Off-Specification Examples

- ▶ Recalls, cancellations or suspensions by USEPA
- ▶ Registration lapses - federal or state
- ▶ Damaged or defaced labels
- ▶ Pesticide registration transfers from one registrant to another - existing stocks





PFR-97 20% WDG

MICROBIAL INSECTICIDE

FOR ORGANIC PRODUCTION
FOR CONTROL OF INSECT AND MITE PESTS ON VEGETABLES, FRUIT AND OTHER FOOD CROPS



Net Contents: 4 x 5 pounds

Active Ingredient:	Beauveria bassiana (ATCC 20874)	20%
Other Ingredients:	(Formerly Paenizasporium fumosissimum)	80%
Total:		100%

*Contains 1 x 10¹⁰ CFU/g (equivalent to 1.4% technical grade active ingredient)

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

FIRST AID
If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. If product, diluted in accordance with the directions for use, gets on skin, medical attention is not required.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION
Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing spray mist. Causes moderate eye irritation. Avoid getting in eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

For outdoor non-greenhouse use, do not apply when bees are actively foraging. Do not apply directly to water, or to areas where surface water or rainfall may collect. Do not contaminate water when disposing of equipment washwaters or rinsate. Do not apply to areas where runoff may create a drift hazard. Do not apply to areas where runoff may create a drift hazard. Do not apply to areas where runoff may create a drift hazard.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.
Pesticide Storage: Keep unopened product refrigerated (50-55°F) and dry. Seal out moisture from unused material by closing the bag tightly after squeezing out excess air.
Pesticide Disposal: Residue resulting from the use of this product must be disposed of on the site of an approved waste management facility.
Container Handling: Non-refillable container. Completely empty bag into application equipment. Then dispose of empty bag at a sanitary landfill, or by incineration, or if certified by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY

Certis USA, L.L.C. warrants that the material contained herein conforms to the description on the label and that it is free from adulteration. The user assumes all risks of use, storage or handling of this material not in strict accordance with the directions given herein. This warranty does not constitute an implied warranty of MERCHANTABILITY.

EPA Reg. No. 70051-19
EPA Est. No. 70051-CA-001
Lot No:
Expiration Date:
101
2531597

Manufactured by
Certis USA, L.L.C.
9145 Clafford Road
Suite 175
Columbia, MD 21046
CERTIS

Item code: 190233
Package code: 515142
Art code: 031015



Thionex 3EC

INSECTICIDE

For Agricultural or Commercial Use Only
Not for use or storage in or around residential sites - see DIRECTIONS FOR USE/GENERAL INSTRUCTIONS for prohibited areas

ACTIVE INGREDIENT	% BY WT.
Endosulfan (Disochochlorohydroxymethano-2,4,3-benzodioxepin-3-one)	33.7%
INERT INGREDIENTS	66.3%
TOTAL	100.0%

*Contains Xylene Range Aromatic Solvent.
Contains 3 pounds of endosulfan per gallon.

**KEEP OUT OF REACH OF CHILDREN
DANGER-POISON
PELIGRO**

SEE OTHER PANELS FOR ADDITIONAL PRECAUTIONARY INFORMATION.
If listed on envelope or sign, or a sign on the jug, see the label for complete information. If you do not understand the label, find someone to explain it to you in detail.

FIRST AID
IF SWALLOWED:
• Immediately call a poison control center or doctor.
• Do not induce vomiting unless told to do so by a poison control center or doctor.
• Do not give any liquid to the person.
• Do not give anything by mouth to an unconscious or convulsing person.
IF ON SKIN OR CLOTHING:
• Take off contaminated clothing.
• Rinse skin immediately with plenty of water for 15-30 minutes.
• Call a poison control center or doctor for treatment advice.



Manufactured for:
**Makhteshim Agan
of North America, Inc.**
4515 Falls of Neuse Road
Suite 300
Raleigh, NC 27609
EPA 14076-01-01 (MDCR)

EPA Reg. No. 66222-63 EPA Est. No. 5069-GA-001
Net Contents: 2.5 gallons

ENGINEERING CONTROL STATEMENTS
When handlers use enclosed cabs or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR part 170.240 (2)(4-6)), the handler PPE requirements may be relaxed or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS
WEAR GLOVES: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing and shower if pesticide gets inside. Then wash thoroughly and put on clean clothing.

HAZARDS
Avoid contact with surface water to prevent runoff to aquatic organisms in wet areas or streams.

REMARKS
Do not apply where surface water is present. Do not apply to areas where surface water is present. Do not apply to areas where surface water is present.

STORAGE AND DISPOSAL
Standard, 40 CFR Use Directions for Use

9805 U.S.A. de France

Standard, 40 CFR Use Directions for Use

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Standard, 40 CFR Use Directions for Use

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Recalls or Suspensions by USEPA

- ▶ Normally, pesticides are returned to the registrant for disposal
- ▶ Registrant will provide return procedures/guidance
- ▶ Alternatively, retailer will ship for disposal
- ▶ Cannot be distributed or sold

Damaged or Defaced Labels

- ▶ Considered “misbranded” under FIFRA if distributed or sold
- ▶ Cannot be sold or distributed for use by others
- ▶ Must obtain the complete accurate label in order to USE - retailer can apply but cannot distribute it for use by others

Registration Issues & Registration Transfers

- ▶ Contact pesticide registrant to address registration issues, especially at the state level
- ▶ When registrant changes are announced, sell existing stocks BEFORE purchasing new
- ▶ “Orphan” registered pesticides - can they be relabeled with the new registrant’s label? Shelf life?
- ▶ Disposal?

Relabeling

- ▶ Facility must have an EPA Establishment Number
- ▶ 40 CFR 167.3
- ▶ *Produce* means to manufacture, prepare, propagate, compound, or process any pesticide, including any pesticide produced pursuant to section 5 of the Act, any active ingredient or device, or to package, repackage, label, relabel, or otherwise change the container of any pesticide or device

Relabeling

- ▶ Contract with the registrant authorizing relabeling of the pesticide
- ▶ Registrant must provide labels
- ▶ Relabeler adds EPA Est. No. to the newly applied label
- ▶ Include relabeled pesticides on the annual report (EPA Form 3540-16) submitted to USEPA by March 1

Disposal

- ▶ Follow company waste policy
- ▶ Take advantage of state-sponsored disposal programs
- ▶ TPSA website provides list of state contacts involved in pesticide disposal
- ▶ Determine proper waste classification of the pesticide

Disposal

- ▶ Confirm hazardous waste generator Site ID is up to date
- ▶ Determine facility's hazardous waste generator status and update if needed
- ▶ Work with reputable waste disposal company to arrange for transportation and disposal as waste

Questions?