
THE PESTICIDE REVIEW

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Service Container Labeling

What are the requirements?



A service container is simply any container that holds a pesticide other than the original pesticide container. A number of items can qualify as a service container. Some examples of acceptable containers are backpack sprayers, B&G's, tip & pours, spray rigs, and bait stations.

What information is required to be on the service container label?

California Code of Regulations Section 6678 requires all service containers to have the following:

- 1) The name and address of the person or firm responsible for the container.
- 2) The identity of the economic poison in the container
- 3) The word "Danger", "Warning", or "Caution", in accordance with the label on the original container.

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Many companies use their business cards to create service container labels. Business cards are not only a convenient size, but also satisfy the requirement to identify the company and their address. To complete the service container label, a company can simply write the name of the chemical and its signal word on the back of the card and affix it to their service container. Prior to attaching the service label to the container, many companies laminate the card to make it waterproof. To attach the laminated card, a hole is punched in the corner of the card and a plastic tie is used to affix the label to the service container.

This option is an easy and inexpensive way to create service container labels. (It's also a good idea to make extra labels in case the original tag becomes worn or falls off)

Pesticide Containers

Section 6680: Prohibited pesticide containers

The ideal pesticide container is the product's original container. In most cases, the label with all the pertinent information is present on the original container. However, when applying pesticides, it's often necessary to transfer the chemical into application equipment and other acceptable service containers such as tip-and-pours.

It's important to **never** place or store pesticides in containers commonly used for food, drink, or household products. When inspecting storage sites we still find some companies using coffee cans to hold snail bait. This is not an appropriate container!

Proper containers also apply to measuring devices. Surprisingly, a few years ago we found a company using a baby bottle to measure out pesticides. The applicator stated their measuring cup broke and he had a baby bottle in his personal vehicle that had ounces marked on the bottle. This infraction is obviously not acceptable!

Inert Ingredients

*Pesticide manufacturers
secret ingredients.*

ACTIVE INGREDIENTS:	
Dimethylamine Salt of 2,4-Dichlorophenoxyacetic acid	33.2%
Diethanolamine Salt of 2,4-Dichlorophenoxyacetic acid	16.3%
INERT INGREDIENTS . . .	50.5%
TOTAL 100.0%	

When you read a pesticide label you have undoubtedly noticed the majority of the product's contents is listed as an inert ingredient.

So, what are inert ingredients?

Inerts are defined as any ingredient in the product not intended to affect the target pest. Inerts may act as carriers for the active ingredients, help them dissolve, make them easier to apply, and in some cases they help preserve the effectiveness of the active ingredients.

If they are part of the pesticide's ingredients, why aren't they listed?

The law does not require inert ingredients to be identified by name because of trade secret laws. If pesticide manufacturers or registrants listed out their "secret ingredients", it would allow other companies to copy their product formulation.

Inerts and public perception

A problem arises with the public's interpretation of the term "inert". Many people interpret inert to mean harmless. This, however, is not the case. Inert ingredients may not be designed to directly harm the target pest, but they may in fact be harmful. Sometimes inert ingredients are more acutely toxic to humans than the active ingredients. Due to the public's misconception of the word, in 1997 the U.S. EPA "requested" registrants replace the word "inert" on pesticide labels with the words "other ingredients".

Inert Categories

The U.S. EPA has categorized inert ingredients into four groups:

- #1 Substances known to cause long-term health damage and harm the environment
- #2 Chemicals suspected of causing health or environmental damage
- #3 Chemicals of unknown toxicity
- #4 Chemicals of minimal concern

In 1987, the U.S. EPA began extensive testing on new and existing inert ingredients found in pesticides, especially those products with inert ingredients in group #1. They also required group #1 inerts be labeled with the statement: "This product contains the toxic inert ingredient (name of the inert)". Further, new products containing group #1 inerts would not be registered unless a review indicated the risk of adverse effects to the environment or to humans would be decreased by the use of the material.

The US EPA lists inerts in group #2 as a "high priority for testing". The 60 chemicals listed under this group have been designated to undergo testing through the National Toxicology Program and the EPA Office of Toxic Substances.

The 800 inerts listed in group #3 are chemicals not thought to be of toxicological concern. When an inert doesn't fit the characteristics of the other three groups, it is placed in this list.

Group #4 inerts are considered to be of minimal concern. There are 300 substances in this group and they contain things such as glycerin, sucrose, and vanillin.

If you would like to review the list of chemicals in each of EPA's inert groups, visit their website at the following address:

<http://www.epa.gov/opprd001/inerts/lists.html>

Agricultural Licenses



Extensions for military leave

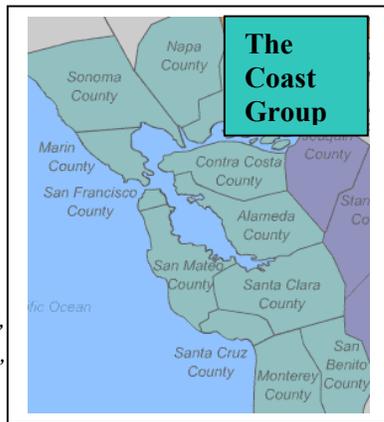
DPR has established a policy to allow a grace period for licensees called to active military duty. The time period for license renewal will be extended to the time served in active military duty; the maximum extension being 12 months after the license or certificate expires.

In order to qualify for this extension, the licensee must provide evidence of their call to active duty, and must show evidence of the time served.

The extension does not waive or reduce the required continuing education hours or renewal fee.

Local Counties Working Together

The Coast Group: Alameda, Contra Costa, Marin, Monterey, Napa, San Benito, San Francisco, San Mateo, Santa Clara, Sonoma, and Santa Cruz counties



Many of California's pesticide laws and regulations leave little room for interpretation. However, life doesn't always fit into a black and white mold, and sometimes unusual pesticide use situations require interpretation on the part of inspectors.

Sometimes an inspector will interpret a situation that is perceived by a pesticide applicator to be different than what is being done in another county. When an inspector is notified of a potential discrepancy, the inspector will typically contact the other county to research the issue. Many times we find the situation observed in the other county had other circumstances, which made the situation different and, therefore, justified a different conclusion. However, there are some instances when inspectors arrive at different conclusions for similar actions.

Contrary to what some believe, pesticide enforcement staff try to remain consistent from county to county. This is especially true for neighboring counties. Many pest control companies will work in several adjacent counties and we try to create a seamless transition from one border to the next.

In addition to inspector-to-inspector phone calls, we also hold regular quarterly pesticide meetings between counties in the Bay Area. (the "Coast Area Pesticide Enforcement Group"). The meetings maintain open channels of communication, foster uniformity, and are an opportunity to share information. In addition to these meetings, each region of the State is assigned a DPR Pesticide Use Specialist. The State liaison is another resource we use to maintain consistency statewide.

If you should find one county interpreting a situation differently than another, please let us know. Call your home county district biologist and ask them about it. Perhaps your concern will be a topic at the next quarterly meeting!

From The Question Pile...

Can copper naphthenate treated wood be brought inside?

Our February 2003 Newsletter featured an article detailing a recent DPR interpretation regarding the use of copper naphthenate on interior wood. We received an interesting question regarding the use of copper naphthenate from a structural pest control company:

"Can we treat the wood outside and then bring the treated wood into a crawl space and install it?"

We initially thought the answer to that question was "No". To assure we were consistent with other county interpretations, we contacted our DPR State Pesticide Use Specialist to verify our answer. On February 28, 2003 he provided the following e-mail response:

"Unfortunately the new prohibition of indoor applications applying to crawl spaces precludes the ability to pre-treat and then install in the crawl space. That would still be considered an indoor application and would be in conflict with the label."

Continuing education opportunities

We receive numerous requests about continuing education units (C.E. credits). Whenever we sponsor a seminar, (or if we hear of another county sponsoring an event), we post the seminar information on our website. You can find the continuing education information by going to: <http://www.sccagriculture.org> Click on "Pesticides Safety, Forms, & Education". Then scroll down to the paragraph titled "Pesticide Continuing Education". We also have links to the Structural Board and DPR's continuing education websites that list approved courses.

We are currently co-sponsoring an Irrigation and Fertilization Seminar this April 16, 2003. We have been approved for 2 C.E. credits for QAC, QAL, PCA, and Private Applicators. For more information, see the flier posted on our website.

If you have any questions, comments, or would like to suggest a subject for an article, please drop us a note at: 1553 Berger Dr. San Jose, CA 95112, or e-mail us at: sccagriculture@era.co.scl.ca.us