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# THE PESTICIDE REVIEW

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## Common Illegal Pesticides



The following products are routinely found in the retail trade and we thought you would find this article of interest. The following excerpts were taken from EPA's website.

<http://www.epa.gov/pesticides/health/illegalproducts/>

Illegal naphthalene moth repellent products -- mothballs -- pose a hazard to young children. Mothballs can be easily mistaken for candy, or simply tempt young children to touch and play with them. Recent studies have linked naphthalene to illnesses, including nasal cancer. Widespread sale and distribution of these products make illegal mothballs a particular concern.

Illegal Insecticide Chalk, also known as "Miraculous Chalk" or "Chinese Chalk." You may have seen the chalk in a neighborhood store or sold on the street for about \$1 a box. It is mostly imported illegally from China and often bears a label in both English and Chinese. Sometimes the manufacturer claims that the chalk is "harmless to human beings and animals" and "safe to use." These claims are untrue and dangerous. Because insecticide chalk looks just like regular chalk, children often take it in their hands, write with it and put it in their mouths. The active ingredient in Insecticide Chalk is a



chemical called deltamethrin, which is one of the most toxic pesticides of its kind. Insecticide chalk should be avoided at all times.

Overexposure to some chemicals found in samples of insecticide chalk can provoke serious health effects, including vomiting, stomach pains, convulsions, tremors, and loss of consciousness. Serious allergic reactions are also possible. Several children have been hospitalized after eating insecticide chalk.

Illegal Pet Products, including foreign-labeled, unregistered versions of the common pet products Advantage and Frontline, have been illegally imported and sold throughout the U.S. Though registered for use in other countries, some foreign-labeled versions have omitted important warnings, especially those pertaining to children, that are required in the U.S. English and Australian products often give doses in metric units, which can cause Americans to accidentally over-dose or under-dose pets.

"Tres Pasitos" is imported illegally from Mexico and other Latin American countries. Its name means "three little steps" in English, because after eating it, this is all mice can muster before dying. The active ingredient in "Tres Pasitos" is a chemical called aldicarb. EPA considers aldicarb to be a very toxic chemical - and one that should never be used in the home.

Children are especially vulnerable to poisoning by aldicarb when it is sprinkled around the home to control roaches, mice and rats. Exposure to high amounts of aldicarb can cause weakness, blurred vision, headache, nausea, tearing, sweating, and tremors in people. Very high doses can kill people, because it can paralyze the respiratory system. What "Tres Pasitos" does to pests, it can also do to you.

\* If you should find illegal pesticides for sale, call your local agricultural commissioner. We will alert DPR and they will stop the sale of these products.

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# Monthly Summary Use Reports

*Some of the quirks with monthly reporting*

Structural and agricultural pest control companies are required to submit monthly pesticide use reports to the agricultural commissioner's office by the 10<sup>th</sup> day of the month following use. For the most part, use-reporting requirements are straightforward; however, there are a few nuances between structural and agricultural pest control. The following questions about use reporting were posed by pest control companies:

## Structural Pest Control

Does the Structural Pest Control Board monitor structural stamps?

The Structural Pest Control Board requires structural companies to affix a structural board stamp to each use report. Structural companies can purchase these stamps by the 1/2 sheet (10 stamps) for \$60.00, or by the full sheet of 20 stamps for \$120.00. Unfortunately, there is no cost savings for bulk purchases.

On occasion, a structural board inspector visits our office and looks through our files. Among other things, they look to ensure we monitor companies and their submission of stamped use reports.

What if a structural company doesn't do any work during a particular month?

Structural companies are only required to affix a structural stamp to their use reports when they apply pesticides. If a company submits a negative use report for a month, they do not need to affix a stamp to the report.

Does a structural company with multiple branch offices need to send in multiple reports?

No. Structural pest control companies can send in one report summarizing all of their company's use. For example, if a company has 3 branch offices performing work in a county, they can combine all three office's pesticide use and affix just one sticker to the report. Section 8505.17 of the Structural Pest Control Act states:

"...Each pesticide use report or combination of use reports representing a registered structural pest control company's total county pesticide use for the month shall have affixed thereto a pesticide use stamp issued by the board..."

Do structural companies have to record the number of applications for each pesticide they use?

Column D on the Monthly Summary Pesticide Use Report requires companies to fill in the number of applications for each pesticide used during the reporting month. This reporting requirement can be found in both Title 3 of the California Code of Regulations, Section 6627, and the Business and Professions Code, Section 8505.17(c). However, fifteen years ago, DPR and the Structural Pest Control Board decided to exempt structural pest control companies from having to report the number of applications of non-restricted pesticides and category 2 and 3 pesticides. Even though the requirement can still be found in law, as a matter of policy, structural companies only have to break down the number of applications of category 1 and restricted pesticides they use each month. This exemption can be found in Enforcement Letter 90-13. (Please be aware structural companies still have to record the total number of applications they performed in a month. They are only exempted from breaking it down by pesticide.)

## Agricultural Pest Control

Can Agricultural Pest Control Companies submit one use report for multiple branches?

This is a subject that needs to be asked of each county. Agricultural companies do not have a code section exempting them from reporting from each location like their structural counterparts. Agricultural companies have to comply with 3CCR Section 6627, which states:

"The report shall include the following: (1) The name and address of the person who or business / organization which applied the pesticide(s)."

It has also been a long-standing policy that each agricultural pest control location reports their use individually. If you should have questions about group reporting and want to see if it's possible for your company, you should talk to each county agricultural commissioner's office.

When are production agricultural use reports due?

If a pest control company applies a pesticide to a production agricultural site, the use report is due **7 days** after the completion of the application. This requirement can be found in 3CCR Section 6626(b).

# Pesticide Storage on Service Vehicles

*When do you need to post and lock your service vehicle?*



Pesticide storage on service vehicles is an interesting subject. Pesticide products need to be locked or in the direct line of sight of a responsible person. The confusing portion of this subject is when we look at the requirement to post service vehicle storage areas.

## Container Control:

Structural pest control companies are regulated by a code section that specifically addresses pesticides being carried on a truck or other vehicle. Title 16, California Code of Regulations §1983(c) states: "When any pesticide or preparation thereof is carried on a truck or other vehicle, a suitable storage space shall be provided thereon. Under no circumstances shall such storage be left either unlocked or unattended when containing any pesticide or preparation thereof."

Agricultural companies have to follow Title 3, California Code of Regulations §6670, which requires pesticides, emptied containers, and equipment that holds or has held a pesticide to be secured in a way that won't present a hazard to people, animals (including bees), food, feed, crops, or property.

In general, if the pesticide container or piece of equipment isn't physically in your possession or line of sight, then you should properly secure them by locking them in an appropriate storage area.

## Storage Posting:

Title 3, California Code of Regulations §6674 states:

*Signs visible from any direction of probable approach shall be posted around all storage areas where containers that hold, or have held, pesticides required to be labeled with the signal words "warning" or "danger" are stored. Each sign shall be of such size that it is readable at a distance of 25 feet and be substantially as follows:*

DANGER  
POISON STORAGE AREA  
ALL UNAUTHORIZED PERSONS KEEP OUT  
KEEP DOOR LOCKED WHEN NOT IN USE

Looking at Section 6674, it would seem that all storage areas that hold or have held a category 1 or 2 pesticide would be required to be posted. Especially since the code section states "all storage areas". However, in 1988 DPR issued an interpretation on this code section exempting certain storage areas from this posting requirement.

ENF 88-31 states:

"Posting of pest control service vehicles which contain pesticides is generally not required provided:

1. The primary use and purpose of these vehicles is to transport and apply, rather than store pesticides.
2. The vehicle is not a fixed pesticide storage site.
3. Pest control vehicles are identified, as required, with descriptive language that denotes pesticide activity and uses as specified in Title 3, CCR, Section 6630.
4. Service containers and pesticides are attended or locked at all times, as specified in Title 3, CCR, Section 6670 and 6672.

An exception to this would apply in the case of an operator who does not have a fixed storage facility and whose pest control service vehicle is the exclusive area for storing pesticides. In this case, posting of the vehicle is required providing the pesticides involved are labeled with the signal words "warning" or "danger."

In other words, if you have a fixed storage site at the office, you are not required to post your service vehicle. If, however, you do not have a fixed storage site at the office and you store category 1 or 2 materials on your vehicle, you are required to post.

Confused? To make things easy, our County recommends you post anything that holds a pesticide regardless of the category and where the storage area is located. In the case of vehicle storage, if you are ever in a vehicle accident, emergency crews will know you are carrying pesticides and where they are located on your service rig.

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