

BULK PESTICIDE STEWARDSHIP

An Update from AASA on the Ag Retail Inspection Program



In This Issue:

- How AASA Operates
- Inspection Process
- Top 10 Areas of Compliance
- Emphasis Program

Who is the AASA?

The American Agronomic Stewardship Alliance (AASA) is a not-for-profit entity formed in 2004 to enable consistent, industry-wide inspections of bulk agricultural pesticide facilities. The program uses independent, third-party inspectors and a consistent compliance checklist to evaluate a facility's level of compliance with FIFRA regulations pertaining to the storage, containment and handling of agricultural pesticides and provides guidance resources to help facility personnel address deficiencies.

How Does the AASA Operate?

The AASA board is made up of representatives of pesticide registrants, distributors, ag retailers and advisers from federal and state pesticide regulatory agencies. Each year the Board reviews the 100 question compliance checklist that includes all FIFRA required elements pertaining to bulk pesticide storage and repackaging. The checklist also contains elements of industry best management practices. The board members, checklist and more info is available at www.aginspect.org.

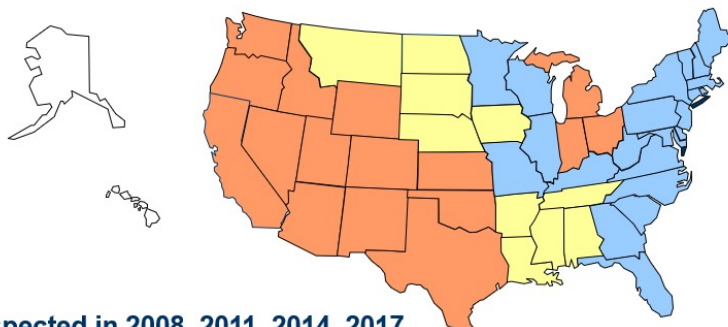
Each year, the pesticide registrants "request" an AASA inspection for the facilities who will receive a bulk pesticide delivery, to ensure the shipment can be safely delivered into and stored at a FIFRA compliant facility. Inspections occur between June-September each year, and 50 sites are selected for re-inspection as part of the quality assurance process.

Only the facility and the registrant who stores a bulk pesticide at the facility receive the inspection report. AASA compiles inspection statistics to measure overall industry compliance in order to focus on areas that need improvement.



"The inspector took the time to explain why he was there, what he was looking at and answered any questions I had. He measured all of our tanks and containment. We found two areas of compliance that I was able to address immediately. This program is very helpful to the industry.

- comment from ag retailer on AASA post-inspection survey



- Inspected in 2008, 2011, 2014, 2017
- Inspected in 2006, 2009, 2012, 2015, 2018
- Inspected in 2007, 2010, 2013, 2016, 2019

History of Inspections: AASA inspects bulk pesticide facilities on a 3 year cycle, with the regions inspected depicted in this map.

AASA inspectors receive annual training to ensure understanding of the requirements and consistency in the inspection process.

TOP 10 AREAS OF COMPLIANCE SUCCESS*

These results are based on AASA inspections of all US bulk sites from 2016—2018

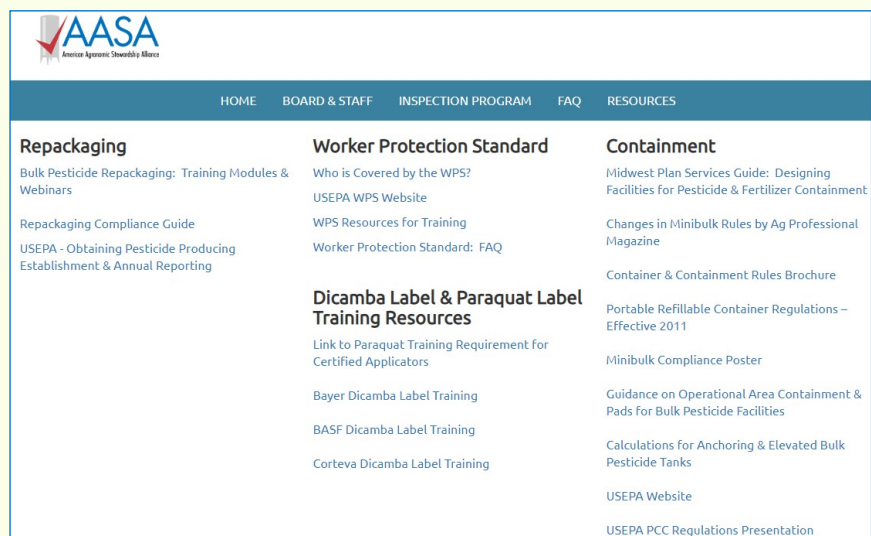
The % figures indicates the percentage of facilities in compliance at time of inspection

**AASA Inspections are not meant as a substitute for state or federal inspections, but can enhance attention to FIFRA requirements and provide metrics and education to improve industry compliance.*

1. All portable refillable containers (PRCs) are equipped with an intact one-way valve and/or a tamper evident device (99%)
2. Bulk product storage is within properly sized and maintained containment (98%)
3. The bulk tank inlet/outlet valve is closed and locked when facility is unattended (98%)
4. All PRCs are regularly inspected and meet EPA/DOT requirements (97%)
5. The bulk tank inlet/outlet valve is lockable stainless steel (97%)
6. Bulk product dispensing and transfer to PRCs occurs on or within properly constructed and maintained containment (97%)
7. A written emergency response plan is available and current (96%)
8. Drains, valves and cracks in containment are permanently sealed (95%)
9. A written procedure is in place to ensure proper cleaning of PRCs (94%)
10. Containment for PRC product transfers has a minimum holding capacity (92%)

The AASA website at www.aginspect.org features resources for pesticide facilities including links to compliance guides, regulations and industry resources.

We welcome input from state regulatory personnel on our program and are happy to provide presentations about the AASA inspection program upon request. Please contact Jean Payne at 309.827.2774



The screenshot shows the AASA website interface. At the top is the AASA logo (American Agronomic Stewardship Alliance). Below the logo is a navigation bar with tabs: HOME, BOARD & STAFF, INSPECTION PROGRAM, FAQ, and RESOURCES. The main content area is divided into three columns of resources:

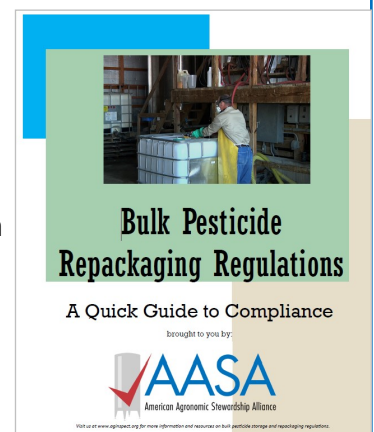
- Repackaging**
 - Bulk Pesticide Repackaging: Training Modules & Webinars
 - Repackaging Compliance Guide
 - USEPA - Obtaining Pesticide Producing Establishment & Annual Reporting
- Worker Protection Standard**
 - Who is Covered by the WPS?
 - USEPA WPS Website
 - WPS Resources for Training
 - Worker Protection Standard: FAQ
- Containment**
 - Midwest Plan Services Guide: Designing Facilities For Pesticide & Fertilizer Containment
 - Changes in Minibulk Rules by Ag Professional Magazine
 - Container & Containment Rules Brochure
 - Portable Refillable Container Regulations - Effective 2011
 - Minibulk Compliance Poster
 - Guidance on Operational Area Containment & Pads For Bulk Pesticide Facilities
 - Calculations for Anchoring & Elevated Bulk Pesticide Tanks
 - USEPA Website
 - USEPA PCC Regulations Presentation

Below the containment section, there is a section for **Dicamba Label & Paraquat Label Training Resources** with links to training requirements and specific training materials from Bayer, BASF, and Corteva.

Other Areas of AASA Emphasis: Repackaging

In 2017, AASA produced a compliance flyer specific to the bulk repackaging requirements and mailed it to over 5,000 bulk pesticide facilities in early 2018. This flyer, along with other resources, is available on the AASA website at www.aginspect.org under “Resources.”

AASA continues to place a special emphasis on our site visits to ensure each facility that repackages pesticides has current agreements readily available for all products being repackaged and distributed. AASA ensures both the registrants and the ag retail facilities are made aware of weaknesses discovered in the AASA inspections with regard to repack agreements.



The image shows the cover of a flyer titled "Bulk Pesticide Repackaging Regulations". The cover features a photograph of a worker in a yellow safety vest and blue shirt handling large white plastic containers in a warehouse setting. Below the photo, the text reads: "Bulk Pesticide Repackaging Regulations", "A Quick Guide to Compliance", and "brought to you by: AASA American Agronomic Stewardship Alliance". At the bottom, there is a small URL: www.aginspect.org for more information and resources on bulk pesticide storage and repackaging regulations.