



The AASA Inspection Program: Overview, Observations & Resources



Presenters:

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Today's Topics

- Overview of the AASA Program and Site Inspections
- Observations & Trends
- Critical Requirements and Resources for Ag Retailers
- .5 CEU in IPM – scan code on final slide



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Website: aginspect.com

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Welcome

The American Agronomic Stewardship Alliance

The American Agronomic Stewardship Alliance (AASA) is a not-for-profit (501C (6)) organization that has taken the lead in developing a stewardship inspection program for agricultural retail facilities that store bulk, mini bulk, portable refillable containers (PRC's) and packaged crop protection products.

Our Mission

"Dedicated to leading the agricultural industry in educating, developing & promoting safe stewardship and best management practices for storing, handling and repackaging crop protection products throughout the distribution and retail supply chain."

Program Overview

Click [here](#) to view or download a 2-page, illustrative overview of the AASA program that also lists the top 10 items where facilities excel in compliance with federal regulations.





The AASA Inspection Program

The AASA Checklist



100 Questions
Focused on FIFRA
Bulk Pesticide
Storage/Transfer/
Repack
Requirements



We also include
best
management
practice
questions in the
checklist



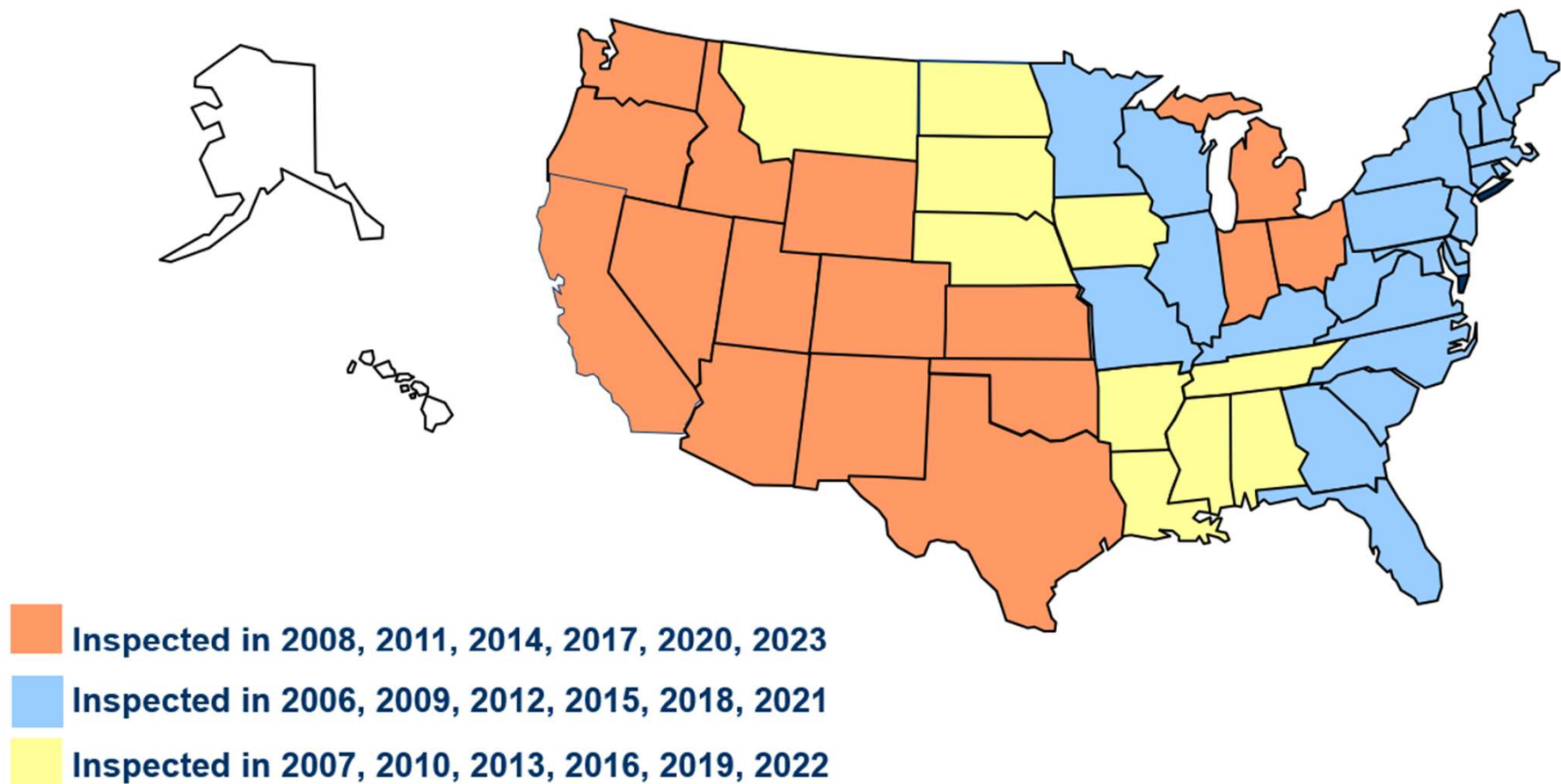
The registrants who ship to the facility and the facility personnel are only people who see the inspection reports. If major “misses” are noted the registrants and/or AASA may follow up with the facility to help address the issue.

USEPA Requirements

- AASA checklist includes * questions that are USEPA requirements

| Tank - Required | | |
|-----------------|---|-----------------------------------|
| 31.* | The tank is labeled which includes a product booklet | <u>Y</u> <u>N</u> |
| 31a.* | The tank is labeled with the net contents from the last delivery. | <u>Y</u> <u>N</u> |
| 31b.* | The correct EPA Establishment Number is affixed to the tank. | <u>Y</u> <u>N</u> |
| 32. * | The tank is free of visible stress cracks, punctures, corrosion, or defects and there are no signs of leakage | <u>Y</u> <u>N</u> |
| 33. * | The tank's profile is within the containment wall | <u>Y</u> <u>N</u> |
| 33b.* | The bulk pesticide tank within the containment unit is anchored or elevated to prevent flotation | <u>Y</u> <u>N</u> |
| 34. * | Type of vent used: P= Pressure Vacuum Relief <u>Vent</u> ; E= Emergency Relief Vent; O= Open Vent; D= Vented to a desiccant; N= Not Vented (Note: There could be more than one answer for each tank) | <u>P</u> <u>E</u> <u>O</u> D N |

History of AASA State Inspections



Inspection Program



[Download the 2022 Retail Facility Checklist](#)

This document provides general information and covers inspection of:

- Bulk Tanks and Containment
- Portable Refillable Containers and Repackaging
- Security
- Packaged Storage

[✎ Edit content](#) | [✎ Edit page](#)

AASA Inspectors



2022 AASA INSPECTORS



Matthew Bouta - DEKRA



Jim Bushore - DEKRA



Joshua Flynn - DEKRA



Mike "Buck" Gasner—DEKRA



Chuck Hilsenbeck - DEKRA



Jay Lais - DEKRA

[Download the 2022 AASA Inspector Photo Index](#)





Observations from AASA



OBSERVATIONS FROM AASA INSPECTORS 2020 – 2022

EMPLOYEE TURNOVER

The Covid era affected agriculture – many veteran retail managers and operations managers have retired.

LABOR & TRAINING

Difficult to find labor and experienced people to take over operations at retail facilities – loss of experience and historical knowledge of bulk pesticide operations and regulations.

CONTAINMENT - WHY?

AASA sees the need to ensure new operations personnel understand the reasons for the pesticide containment regulations and the importance of these systems to the facility and the entire industry.

AASA serves as a resource; pesticide manufacturer sales reps can serve as a resource too for assistance to retailers – many of them are also new!

Containment Systems for Stationary Bulk Pesticide Storage



Summary of the Rules

Title 40 - Protection of Environment

Chapter I - Environmental Protection Agency

Subchapter E - Pesticide Programs

Part 165 - Pesticide Management and Disposal

Subpart E - Standards for Pesticide Containment Structures

Authority: 7 U.S.C. 136 through 136y.

Source: 71 FR 47422, Aug. 16, 2006, unless otherwise noted.

§ 165.85 Design and capacity requirements for new structures.

- (a) *For all new containment structures, what construction materials must I use?* These are the material specifications for a new containment structure:



- (1) The containment structure must be constructed of steel, reinforced concrete or other rigid material capable of withstanding the full hydrostatic head, load and impact of any pesticides, precipitation, other substances, equipment and appurtenances placed within the structure. The structure must be liquid-tight with cracks, seams and joints appropriately sealed.
- (2) The structure must not be constructed of natural earthen material, unfired clay, or asphalt.
- (3) The containment structure must be made of materials compatible with the pesticides stored. In this case, compatible means able to withstand anticipated exposure to stored or transferred substances and still provide containment of those same or other substances within the containment area.

AASA Inspection Summary: Containment

QUESTIONS FROM THE AASA CHECKLIST ON BULK PESTICIDE CONTAINMENT

% COMPLIANCE

Bulk containment is rigid material (i.e. concrete, steel, reinforced sealed block) & is liquid-tight

99%

Containment drains, valves, & cracks are permanently sealed

94%

Bulk dispensing & transfers occur are on rigid, liquid-tight containment

94%

AASA Inspects and Measures Tanks and Containment Structures

- The program calculates containment compliance based on the measurements
- Dikes or the entire building floor (curbed and/or sloped) can achieve the requirement
- We also look for cracks, integrity issues and tank anchoring/elevating





Transfer Area Containment

- Transfer of pesticides from the delivery truck into stationary bulk tanks or from bulk tanks to other containers or PRCs must occur over an impermeable surface which provides containment, whether it is indoors or outdoors.

AASA Resources Page – www.aginspect.com

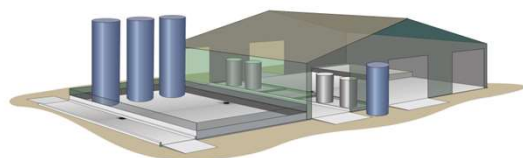
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Wisconsin Minimum Design and Construction Standards for Concrete Mixing and Loading Pads and Secondary Containment Structures

David W. Kammel

Professor, Biological Systems Engineering Department
University of Wisconsin Cooperative Extension

Published February, 2005



Repackaging

[Bulk Pesticide Facilities - Webinars on Compliance Topics \(Containment, Labeling, Repackaging, PRCs\)](#)

[Repackaging Compliance Guide](#)

[The Pesticide Stewardship Alliance \(TPSA\) Description of Pesticide Container and Uses](#)

[Procedures for PRC Inspection & Testing](#)

[USEPA - Obtaining Pesticide Producing Establishment & Annual Reporting](#)

[Fact Sheet on Bulk Repackaging](#)

[CropLife America Guidance for Safely Cleaning Refillable Pesticide Containers for Refilling or Rededication](#)

Worker Protection Standard

[USEPA WPS Website](#)

[WPS Resources for Training](#)

[Worker Protection Standard: FAQ](#)

Dicamba Label & Paraquat Label Training Resources

[Link to Paraquat Training Requirement for Certified Applicators](#)

[Bayer Dicamba Label Training](#)

[BASF Dicamba Label Training](#)

[Syngenta Dicamba Label Training](#)

Containment & Mixing/Loading

[USEPA Compliance Resources \(tables\) for Containment & Container Rules](#)



[Designing Facilities for Pesticide & Fertilizer Containment - Midwest Plan Service Booklet 1991](#)

[Wisconsin Design & Construction Standards for Concrete Mixing/Loading Pads & Secondary Containment - 2005](#)

[Guidance on Repairing Cracks in Containment](#)

[Changes in Minibulk Rules by Ag Professional Magazine](#)

[Container & Containment Rules Brochure](#)



Each table
summarizes
the
requirements
and lists the
sections to go
to for more
details



Pesticide Container and Containment Regulations At A Glance

The tables on this page provide an outline of many of the requirements of the regulations “Standards for Pesticide Containers and Containment.” This information reflects the requirements established in August 2006 and amended in October 2008 and September 2010. Our goal is to facilitate the public’s ability to determine who is subject to the rule and how to comply.

Because this is a summary, many details are not included. Refer to the Code of Federal Regulations (40 CFR parts 156 and 165) for the full version:

- [Part 156, Labeling Requirements for Pesticides and Devices](#)
- [Part 165 Pesticide Management and Disposal](#)
- [Table 1: Overview of the Pesticide Container and Containment Structure Regulations \(pdf\)](#) (52.89 KB)
- [Table 2: Products Subject to the Nonrefillable Container, Refillable Container and Repackaging Regulations \(pdf\)](#) (32.34 KB)
- [Table 3: Nonrefillable Container Requirements \(40 CFR Part 165 Subpart B\) \(pdf\)](#) (37.91 KB)
- [Table 4: Refillable Container Requirements \(40 CFR Part 165 Subpart C\) \(pdf\)](#) (38.7 KB)
- [Table 5: Requirements for Repackaging Pesticide Products into Refillable Containers \(40 CFR Part 165 Subpart D\) \(pdf\)](#) (49.16 KB)
- [Table 6: Container Labeling \(40 CFR Part 156 Subpart H\) \(pdf\)](#) (109.7 KB)
- [Table 7: Standards for Containment Structures \(40 CFR Part 165 Subpart E\) \(pdf\)](#) (112.88 KB)





Concrete Containment – Crack Repair and Maintenance

This factsheet was prepared by the Minnesota Department of Agriculture to provide information for facilities who have constructed and have permitted concrete containment systems in Minnesota. This guidance is intended to supplement— not replace—Federal and State Laws and Rules.

Containment Evaluation

When conducting inspections of the safeguard (dike or load pad) areas, pay special attention to the following:

- Joint movement (floor, wall and wall/floor joints)
- Cracks: If cracks are present, try and determine whether they are active/moving (additional movement can be expected) or dormant/non-moving (little or virtually no movement in the future can be expected)
- Concrete defects, damage or corrosion.

Containment Repair Techniques

If joint movement and cracking is evident in the concrete floor or wall and dike integrity has been jeopardized, repairs must be made immediately.

Below are examples of repair techniques for a variety of concrete repair problems. Some manufacturers may have similar techniques and procedures specific to their products.

Dormant/Non-Moving Cracks

For very small non-moving hairline cracks, the required repair could be done by applying a pesticide/fertilizer compatible coating over the area creating a thin film or seal to prevent liquid movement through the area in question. The procedure of coating the entire secondary containment structure has also been recommended to help preserve concrete safeguards from deterioration from the substances they are intended to capture.

For small non-moving cracks that are larger than hairline cracks (1/4-inch or less), one possible solution is to apply a compatible coating on both sides of the crack and, while coating is still wet, work in a fiberglass-mesh cloth strip over the crack with a roller until the coating has soaked its way through the cloth. After the first coat is dry, apply a second

For moving cracks/joints greater than 1/4 inch wide, insert a backer rod prior to sealing. In some cases, the crack or joint may need to be routed (widened and/or deepened) slightly to accommodate proper placement of the backer rod. After the backer rod is in place, apply a flexible joint or crack sealant on top of the backer rod and into the sides of the joint or crack. Flexible sealant should be capable of expanding or contracting without pulling away from the concrete. If the sealant is not flexible, a moving crack or joint will reopen, lessening the effectiveness of the repair. The flexible sealant must also be coated with a compatible material if the compatibility of the sealant is questionable or unknown.

Wall/Floor Joints

There are several repair techniques adequate for wall and floor joints that are suspect. Examples:

- Caulk and cove corner joint;
- Caulk the corner joint, then cover with two layers of compatible coating material working fiberglass-mesh cloth into the first coat while wet (see small moving crack repair above).

Voids and Bugholes

All voids and bugholes should also be filled and patched when present to ensure dike integrity. Though they may not be cause for immediate concern, they can become problems in the future. A patching material recommended by the coating manufacturer should be used if the area is to be coated following patchwork.

Selecting a Coating or Sealant

It is important to note that there are many repair methods and techniques available for dealing with a variety of concrete damage or deterioration. When selecting a coating or sealant, the following must be considered:

Containment & Mixing/Loading

[USEPA Compliance Resources \(tables\) for Containment & Container Rules](#)

[Designing Facilities for Pesticide & Fertilizer Containment - Midwest Plan Service Booklet 1991](#)

[Wisconsin Design & Construction Standards for Concrete Mixing/Loading Pads & Secondary Containment - 2005](#)

[Guidance on Repairing Cracks in Containment](#)

Bulk Transfer and PRC Fill Containment



- USEPA requires transfer pads to have **750-gallon** containment capacity
- This can be accomplished with permanent or portable containment systems
- AASA inspectors measure and inspect transfer areas to ensure adequate containment capacity and integrity



Repackaging from Bulk to PRCs

All facilities that repackage from bulk to portable refillable containers must have a current

REPACK AGREEMENT from the Pesticide Manufacturer

Ideally, this agreement is readily available in the facility's office.

If you can't locate your agreement, contact your product sales representative immediately.

REPACKAGING AGREEMENT for BAYER PESTICIDES

This Repackaging Agreement for Bayer Pesticides and its Exhibits (collectively, this "Agreement") is entered into on January 1, 2021 ("Effective Date") between Bayer CropScience LP, a Delaware corporation with offices at 800 North Lindbergh Boulevard, St. Louis, Missouri 63167 ("Bayer"), and _____, with offices at _____ ("Customer"). Bayer and Customer may be referred to individually as a "Party" and collectively as the "Parties".

Customer has received certain Bayer registered pesticide products in package or bulk form ("Products") and desires to repackage the bulk Products for resale. Bayer and Customer agree as follows:

1. AUTHORIZATION FOR THE REPACKAGING OF BULK PRODUCTS. Subject to Customer's compliance with the terms of this Agreement, Bayer grants Customer a non-exclusive authorization to repackage bulk Products into portable refillable containers that meet the standards set forth in 40 CFR Part 165 Subpart C ("Containers"). Customer must repackage bulk Products in compliance with the guidelines set forth in this Agreement, including any guidelines set forth in the Exhibits (collectively, the "Guidelines") and any other instructions that Bayer may communicate from time to time. Bayer may, in its sole discretion, modify the Guidelines at any time and will provide Customer with written notification of any modifications.

Repack Agreements Contain Important Items:



Bulk Delivery Guidelines



Type of refillable containers
that can be used



Container inspection and
clean-out procedures



Authorization for Label Use

Repackaging Compliance Guide

(on AASA Resources page)



Bulk Pesticide Repackaging Regulations

A Quick Guide to Compliance

brought to you by:



Visit us at www.agninspect.com for more information and resources on bulk pesticide storage and

YOUR USEPA ESTABLISHMENT NUMBER (EPA Est. No.)

Any facility where a pesticide is produced (including repackaged for sale or distribution) must be registered with the USEPA. When you register, you must provide the name and address of your company, the type of ownership, and the name and address of each location where repackaging will occur. USEPA will then issue you an EPA Establishment Number (EPA Est. No.) which can only be used by that specific facility.

For repackaging facilities, the EPA Est. No. will be formatted as a five digit code, the state abbreviation where the facility resides and a three digit facility location code. The EPA Est. No. must be placed on every portable refillable container (PRC) by a person at the repackaging facility. The EPA Registration Number (EPA Reg. No.) is the product specific registration number that belongs to registrant (the manufacturer of the product); that number must also appear on every pesticide label.

AUTHORIZATION TO REPACKAGE

The repackaging facility must have a current, written authorization (a repackaging agreement) from the registrant (manufacturer) to repackage and use the manufacturer labels. The repackaging facility must keep a copy of the document on file and make it available upon request to an authorized EPA or State representative. The repackaging facility must maintain the agreement for the period of time for which it is valid and for three years after that. If the repackaging facility is sold or transferred, a new authorization in the new company name must be obtained from the registrant (manufacturer).

LABELING ON BULK STORAGE TANKS AND PRCs

The bulk pesticide storage tank must display the most current product label, the registrant's (the manufacturer's) EPA Est. No. and the net contents of the tank at the time it was filled.

Before distributing or selling a pesticide product in a portable refillable container (PRC), you must ensure that the label for the pesticide is securely attached to the PRC so that it can be expected to remain affixed during foreseeable conditions and periods of use. You must ensure the net contents and EPA Est. No. for your facility also appears on the PRC label.

ANNUAL PRODUCTION REPORT

Each repackaging facility must submit a report to USEPA by March 1 on the pesticides repackaged at that establishment the previous year, even if the amount repackaged is zero. The report must contain:

1. The name and address of the establishment;
2. Amount of each pesticide produced (repackaged for sale or distribution that year);
3. Amount of each pesticide sold or distributed the previous year, and the amount of each pesticide estimated to be repackaged during the current year.

The repackaging facility must keep a written log of the product name, EPA Reg. No., amounts per batch and batch identification of all pesticides repackaged.

APPROVED CONTAINERS AND CLEAN OUT PROCEDURES

Each repackaging facility must ensure they are only repackaging into portable refillable containers (PRCs) that are approved by the registrant (manufacturer). The Repackaging Agreement will list the types of approved containers. If the tamper evident devices and/or one way valves are not intact, or if you introduce a different product into the container, the container must be cleaned according to the manufacturer's instructions prior to being refilled. You must also clean the containers before disposal or recycling.



[illegible]

1503 gallons
Net Contents

AASA Inspection Summary: Bulk Tank Labeling

| | % Compliance | |
|--|--------------|--|
| The tank is labeled with the net contents | 79% | |
| The correct EPA Est. No. is affixed to the tank | 81% | |
| The tank is labeled which includes a product booklet | 89% | |
| | | |

Establishment
Number must be
on the bulk tank
label; the est # in
this case is the
manufacturer's
establishment #.

TOUCHDOWN
TOTAL

Herbicide

Nonselective Foliar Systemic Herbicide for Weed Control

Active Ingredient:
*Glyphosate: N-(phosphonomethyl) glycine 36.5%

Other Ingredients: 63.5%

Total: 100.0%

*Contains 500 grams per liter or 4.17 pounds per U.S. gallon of glyphosate acid.

KEEP OUT OF REACH OF CHILDREN.
CAUTION
See additional precautionary statements and directions for use inside booklet.

EPA Reg. No. 100-1169

EPA Est. 100-LA-001

PRODUCT ID.
22565

syngenta

Causes moderate eye irritation. Harmful if inhaled. Avoid breathing spray mist. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

CAUTION

| FIRST AID | |
|------------------------|---|
| If in eyes | <ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice. |
| If inhaled | <ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.• Call a poison control center or doctor for further treatment advice. |
| If on skin or clothing | <ul style="list-style-type: none">• 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 swallowed | <ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give anything by mouth to an unconscious person. |

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

HOT LINE NUMBER
For 24 Hour Medical Emergency Assistance (Human or Animal) Or Chemical Emergency Assistance (Spill, Leak, Fire or Accident), Call
1-800-888-6372

Personal Protective Equipment (PPE)
Some of the materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for category A on an EPA chemical resistance category selection chart.

Applicators and other handlers must wear:

- Long sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material such as polyethylene or polyvinyl chloride
- Socks and shoes

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Control Statements
When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

User Safety Recommendations
Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards
Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash waters.

Physical and Chemical Hazards
Do not store, mix or apply this product or spray solutions of this product in unlined steel (except stainless steel), galvanized steel containers, or sprayer tanks. This product or spray solutions of this product will react with these containers and tanks and produce hydrogen gas which may form a highly combustible mixture. This gas mixture could flash or explode, causing serious personal injury. If ignited by spark, open flame, lighted cigarette, welder torch, or other ignition source.

Spray solutions of this product should be mixed, stored and applied using only stainless steel, fiberglass, plastic, or plastic-lined steel containers.

CONDITION WARRANTY

NOTICE: Read the Limitation of Warranty. The terms of the purchase price.

The Directions for use are to be followed to eliminate all injury, ineffective control, or damage to crops or other plants which are beyond the control of SYNGENTA and its subsidiaries.

SYNGENTA warrants the label and is subject to the instructions under this product under conditions SYNGENTA, and MAKES NO WARRANTY PURPOSE OF THE PRODUCT.

In no event shall SYNGENTA be liable for special, consequential, or punitive damages. SYNGENTA DISCLAIMS LIABILITY FOR THE PRODUCT OF THE FOREGOING.

SYNGENTA and the foregoing may not be representative of the entire product.

To be used

Use this Product - Agricultural

Protection

Information

STO

Do not

Pesticide

Keep

Pesticide

Wastes

approval

Contai

Reseal

offer

instruc

For R

Before

dent,

and b

leak

CONT

Another example of pesticide
manufacturer's EPA Est # on
bulk tank label



RESTRICTED USE PESTICIDE
due to ground and surface water concerns and oncogenicity concerns. Users must read and follow all precautionary statements and instructions for use in order to minimize potential for atrazine to reach ground and surface water.
For retail sale to and use only by Certified Applicators, or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

☐ EPA Est. 524-IA-1 ☐ EPA Est. 33270-IA-01
☒ EPA Est. 11773-IA-1 ☐ EPA Est. 33261-IN-001

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ST. LOUIS, MISSOURI 63167 U.S.A.

GET THE
Xtra
ADVANTAGE

HARNNESS[®]
XTRA
Herbicide by Monsanto

Pre-emergence herbicide for weed control in
Production Seed Corn, Silage Corn
and Popcorn.
See detailed instructions in label booklet

36021Y4-1/53

RESTRICTED USE PESTICIDE
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HARNNESS[®]

RESTRICTED USE PESTICIDE
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HARNNESS[®]

Harness[®] Xtra

13

4:35 PM

Must be
written on the
tank label



Portable Refillable Container Labels

For PRCs, the **retailer's**
EPA establishment
number must be on
the product label



Bulkpesticiderules.org

Repackaging

Bulk Pesticide Facilities - Webinars on Compliance Topics (Containment, Labeling, Repackaging, PRCs)

Repackaging Compliance Guide

The Pesticide Stewardship Alliance (TPSA)
Description of Pesticide Container and Uses

Procedures for PRC Inspection & Testing

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Refillable Pesticide Containers for Refilling or
Rededication



The screenshot shows the homepage of Bulk Pesticide Rules. At the top is a navigation bar with links: EPA, Resources, Training Modules, Webinars, Glossary, and Contact. A search bar is located in the top right corner. The main content area features a large banner with the text "Bulk Pesticide Rules" and a grid of five video thumbnails for Training Modules 1 through 5. The thumbnails are titled: "Proper Documentation for Pesticide Repackaging Establishments Training Module #1", "Labeling Requirements that Apply to Repackaging Pesticide Containers Training Module #2", "Achieving Proper Containment for Bulk Pesticide Tanks at Repackaging Locations Training Module #3", "Design, Managing and Cleaning Bulk Tanks Training Module #4", and "Pesticide Transfer Requirements and Managing Portable Refillable Containers (PRCs) Training Module #5". Below the grid, the text "Training Modules 1 - 5 Are Now Available" is displayed, followed by a "More Info" button. On the right side of the page, there is a sidebar with the "Bulk Pesticide Rules" logo and a paragraph of text explaining the purpose of the training modules.

Bulk Pesticide Rules

EPA Resources Training Modules Webinars Glossary Contact

Proper Documentation for Pesticide Repackaging Establishments Training Module #1

Labeling Requirements that Apply to Repackaging Pesticide Containers Training Module #2

Achieving Proper Containment for Bulk Pesticide Tanks at Repackaging Locations Training Module #3

Design, Managing and Cleaning Bulk Tanks Training Module #4

Pesticide Transfer Requirements and Managing Portable Refillable Containers (PRCs) Training Module #5

**Training Modules 1 - 5
Are Now Available**

[More Info](#)

Bulk Pesticide Rules

To address concerns regarding the management of bulk pesticides, a free five-part series of Training Modules has been developed to support the EPA's Container and Containment Rule, last revised in 2010. Webinars will also be hosted to reinforce best practices of Bulk Pesticide Management. This site will serve as a central resource for all efforts in support of these EPA Goals.

Bulk Pesticide Rules

[EPA](#)[Resources](#)[Training Modules](#)[Webinars](#)

Proper Documentation for
Pesticide Repackaging Establishments
Module #1

Labeling Requirements that
Applicable to Repackaging Pesticides
Training Module #2

Achieving Proper Containment
Bulk Pesticide Tanks at Repackaging
Training Module #3

Module One – Proper
Documentation for Pesticide
Repackaging Establishments

Module Two – Labeling
Requirements that are
Applicable to Repackaging
Pesticides

Module Three – Achieving
Proper Containment for Bulk
Pesticide Tanks at
Repackaging Locations

Training Module Four –
Design, Managing and
Cleaning Bulk Tanks

Training Module Five –
Pesticide Transfer
Requirements and Managing
Portable Refillable
Containers (PRCs)

Design, Managing and Cleaning Bulk Tanks
Training Module #4

Pesticide Transfer Requirements and Managing
Portable Refillable Containers (PRCs)
Training Module #5

Training Modules 1 - 5
Are Now Available

AASA
leaves
yellow
stickers on
tanks with
date of
inspection



For Help – Contact AASA Staff and/or your Product Sales Representative

www.aginspect.com – Board & Staff page

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