

BURROWING PEST
FUMIGATION MANAGEMENT PLAN

THE USE OF THIS PRODUCT IS STRICTLY PROHIBITED ON SINGLE AND MULTIFAMILY RESIDENTIAL PROPERTIES AND NURSING HOMES, SCHOOLS (EXCEPT ATHLETIC FIELDS), DAYCARE FACILITIES AND HOSPITALS.

A Fumigation Management Plan (FMP) is an organized, written description of the required steps involved to help ensure a safe, legal and effective fumigation. It will also assist you and others in complying with pesticide product label requirements. The guidance that follows is designed to help assist you in addressing all the necessary factors involved in preparing for and fumigating a structure and/or area.

This guidance is intended to help you organize any fumigation that you might perform, PRIOR TO ACTUAL TREATMENT. It is meant to be somewhat prescriptive, yet flexible enough to allow the experience and expertise of the fumigator to make changes based on circumstances which may exist in the field. By following a step-by-step procedure, which allow for flexibility, an effective fumigation may be performed.

Before any fumigation begins, carefully read and review the label which includes the container label and Applicator's Manual. This information must also be given to the appropriate company officials (supervisors, foreman, safety officer, etc.) in charge of the site. Preparation is the key to any successful fumigation. If you do not find specific instructions for the type of fumigation that you are to perform listed in this Guidance Document, you will want to construct a similar set of procedures using this document as your guide or contact DEGESCH AMERICA, INC. for assistance. Finally, before any fumigation begins, you must be familiar with and comply with all applicable federal, state and local regulations. The success of the fumigation is not only dependent on your ability to do your job but also upon carefully following all rules, regulations, and procedures required by governmental agencies.

BURROWING PEST
FUMIGATION MANAGEMENT PLAN

Company: _____

Address: _____

Telephone: _____

PRELIMINARY PLANNING & PREPARATION

Purpose of Fumigation: Eliminate Vertebrate Pests
Vertebrate Type: _____

Type of Fumigation: Outdoor area

- Closed-burrow system (pocket gophers, etc.)
- Open-burrow system (ground squirrels, prairie dogs, etc.)

Read and review with the facility management and appropriate employees any existing FMP (Fumigation Management Plan), M.S.D.S. (Material Safety Data Sheet), product label, Applicator’s Manual and other relevant safety procedures.

Obtain or develop a site-drawing of the facility layout and attach to this document. This drawing is used to make “site-specific” notes, as needed. Attach this drawing to the FMP and update it yearly, or prior to each fumigation. Keep it on file with the FMP.

Inspect the site to determine its suitability for fumigation. Consult previous records (FMP) for treatment history information.

Date of site inspection: _____
Name of inspection personnel: _____

Facility / Owner / Manager:

Facility: _____
Facility Address: _____

Facility Manager: _____
Daytime telephone: _____
Night telephone: _____
Mobile telephone: _____
Other number: _____

Certified Applicator (Fumigator) in charge:

Name: _____
Company: _____
Certification No: _____
Daytime telephone: _____
Night telephone: _____
Mobile telephone: _____
Other number: _____

Emergency Information:

Hospital Emergency: _____

Fire Dept: _____

Police Dept: _____

Poison Control: _____

HOT LINE NUMBER

Have the product container, label or Applicator's Manual with you when calling a poison control center, doctor, or when going for treatment. **CONTACT 1-800-308-4856 FOR ASSISTANCE WITH HUMAN OR ANIMAL MEDICAL EMERGENCIES.** You may also contact DEGESCH AMERICA, INC. – 540-234-9281/1-800-330-2525 or CHEMTREC –1-800-424-9300 for all other chemical emergencies.

Exposure time considerations: (Consult label instructions)

Fumigant to be used: Aluminum phosphide (Phostoxin®)

- Tablets (3.0 grams / tablet)
- Pellets (0.6 grams / pellet)

Ambient temperature: _____

(burrow / tunnel system)

Temperature: _____

Fumigation date / time of application: _____

Recommended label dosage:

Tablets (3.0 grams / tablet) = 2-4 tablets per tunnel or burrow

Pellets (0.6 grams / pellet) = 10-20 pellets per tunnel or burrow

Dosage used: Tablets: _____ / tunnel or burrow

Pellets: _____ / tunnel or burrow

No inhabited structures are less than 100 feet from treated tunnel / burrow systems: _____

PERSONNEL

Product labeling requires that at least one (1) state certified / licensed pesticide applicator to be present and on site to oversee all phases of the fumigation procedure.

List of personnel scheduled for chemical treatment:

1. _____
2. _____
3. _____

Instruct all personnel on the following:

- Read the Container Label, Applicators Manual, MSDS & Fumigation Management Plan prior to any application.
- To report any accident and / or incidents related to exposure, provide a telephone number for emergency response reporting.
- To report to proper authorities any theft of fumigant and / or equipment related to the fumigation.
- The established meeting area for all personnel in case of an emergency.

MONITORING

Exposures to phosphine must not exceed the 8-hour Time Weighted Average (TWA) of 0.3 ppm or the 15-minute Short-Term Exposure Limit (STEL) of 1.0 ppm phosphine. All persons are covered by these exposure standards.

NOTIFICATION

Confirm that the appropriate local authorities (fire departments, police departments, etc.) have been notified as per label instructions, local ordinances, or instructions of the client.

Prepare written procedure (“Emergency Response Plan”), which contains explicit instructions, names, and telephone numbers so as to be able to notify local authorities if phosphine levels are exceeded in an area that could be dangerous to bystanders and / or domestic animals.

SEALING

Open-Burrow Systems:

Locate all entrances to each burrow system. Treatment of more than one entrance in a system is often desirable as systems often overlap and are not defined. Treat all entrances except for those entrances you are sure connect to already treated entrances. Insert 2 to 4 tablets or 10 to 20 pellets into each entrance to be treated. Use the lower rates for smaller burrows and/or when soil moisture is high. Use higher rates for larger burrow systems and when soil moisture is relatively low. Pack each treated entrance with crumpled paper and shovel soil to completely cover the paper. Using crumpled paper will prevent soil from covering the tablets or pellets and slowing down their action. Rocks, clods of soil, cardboard, etc. may also be used for this purpose. Be sure to seal all untreated entrances by shoveling and packing soil and/or sod to completely seal the opening.

Closed-Burrow Systems:

Locate the main underground runway by probing with a smooth-sided rod 12 to 18 inches from a fresh mound. For pocket gophers, begin probing on the flat side of the mound. A sudden reduction in soil resistance to the probe indicates that the main runway has been located. Once the main runway is located, remove the probe and apply 2 to 4 tablets or 10 to 20 pellets through the probe hole. Adjust treatment rate according to the level of soil moisture, using more pellets or tablets if the soil is relatively dry. Do not treat if soil is extremely dry or if there are no signs of recent gopher or mole activity. Make a tight seal to close probe hole by using a clod of soil or a sod plug to cover the hole or by using the heel of your shoe to push sod and/or soil over the surface opening. If the probe hole is more than one inch in diameter, place crumpled paper in the hole before closing it with soil and/or sod. Two days after treatment, you may check area for residual pest activity by opening holes in main runways of burrow systems, flagging holes and inspecting them two days later. You should retreat all reclosed systems, on both sides of the plug.

APPLICATION PROCEDURES & FUMIGATION PERIOD

- Plan carefully and apply the fumigant in accordance with the label requirements.
- Protective Clothing: Wear dry gloves of cotton or other material when applying aluminum phosphide tablets or pellets. Gloves should remain dry during use.
- Wash hands thoroughly after handling aluminum phosphide tablet or pellet products.
- Aerate used gloves and other clothing that may be contaminated in a well ventilated area prior to laundering.

Use Restrictions:

THIS PRODUCT MUST NOT BE APPLIED INTO A BURROW SYSTEM THAT IS WITHIN 100 FEET OF A BUILDING THAT IS, OR MAY BE, OCCUPIED BY HUMANS, AND/OR DOMESTIC ANIMALS.

Aluminum phosphide must be applied to underground burrow systems located in noncrop areas, crop areas, or orchards occupied by woodchucks, yellowbelly marmots (rockchucks), prairie dogs (except Utah prairie dogs, *Cynomys Parvidens*), Norway rats, roof rats, mice, ground squirrels, moles, voles, pocket gophers, and chipmunks.

All treatments for control of these species in burrows must be made outdoors.

Tablets or pellets must be applied directly to underground burrow systems.

Before using **PHOSTOXIN®** tablets or pellets for burrowing pest control, read the applicable restrictions under Environmental Hazards, Endangered Species and Special Local Restrictions below.

This product must be used out-of-doors only for control of burrowing pests and for use **ONLY** on agricultural areas, orchards, non-crop areas (such as pasture and rangeland), golf courses, athletic fields, airports, cemeteries, rights-of-way, earthen dams, parks and recreational areas and other non-residential institutional or industrial sites.

- When this product is used in athletic fields or parks, the applicator shall post a sign at entrances to the treated site containing the signal word DANGER/PELIGRO skull and crossbones, the words: DO NOT ENTER/NO ENTRE, FIELD NOT FOR USE, the name and EPA registration number of the fumigant, and a 24-hour emergency response number. Placards may be removed 2 days after the final treatment.
 - When this product is used out-of-doors to a site other than an athletic field or park, the applicator shall post a sign at the application site containing the signal word DANGER/PELIGRO skull and crossbones, the name and EPA registration number of the fumigant, and a 24-hour emergency response number. Signs may be removed 2 days after the final treatment.

Document any burrows that open under or into occupied buildings, and do not apply to these burrows. In addition, check for any other source through which the gas may enter into occupied buildings as a result of application to burrows. If there is any way gas can move through pipes, conduits, etc. from burrows, do not treat these burrows.

Prior to treating a rodent burrow, the applicator must provide the customer with a copy of the Fumigation Management Plan.

Environmental Hazards:

This product is very highly toxic to wildlife. Non-target organisms exposed to phosphine gas will be killed. Do not apply directly to water or wetlands (swamps, bogs, marshes and potholes). Do not contaminate water by cleaning of equipment or disposal of wastes.

Endangered Species Restrictions:

The use of **PHOSTOXIN®** in a manner that may kill or otherwise harm an endangered or threatened species or adversely modify their habitat is a violation of Federal laws. Before using this pesticide on range and/or pastureland, you must obtain the PESTICIDE USE BULLETIN FOR PROTECTION OF ENDANGERED SPECIES for the county in which the product is to be used. The bulletin is available from your County Extension Agent, State Fish and Game Office, or your pesticide dealer. Use of this product in a manner inconsistent with the PESTICIDE USE BULLETIN FOR PROTECTION OF

ENDANGERED SPECIES is a violation of Federal laws. Even if applicable county bulletins do not prohibit the use of this product at the intended site of application, you may not use this product for control of prairie dogs in the states of Arizona, Colorado, Kansas, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, South Dakota, Texas, Utah or Wyoming unless a pre-control survey has been conducted. Contact the nearest U. S. Fish and Wildlife Service Endangered Species Specialist to determine survey requirements in your area. This survey must be in compliance with the Black-Footed Ferret Survey Guidelines, developed by the U.S. Fish and Wildlife Service, and a determination must be made in accordance with the Guidelines that black-footed ferrets are not present in the treatment area.

POST APPLICATION PROCEDURES

1. Return all unused fumigant product to an approved, locked chemical storage area.
2. Re-inspection / Re-treatment

Open-burrow systems:

Inspect treated areas 1 or 2 days following treatment for signs of residual activity of target species. Treat all reopened burrows in the same manner prescribed above.

Closed-burrow systems:

Two days after treatment, you may check area for residual pest activity by opening holes in main runways of burrow systems, flagging holes and inspecting them two days later. You should retreat all reclosed systems, on both sides of the plug.

COMPLIANCE CHECK LIST

| | <u>YES</u> | <u>NO</u> |
|---|--------------------------|--------------------------|
| <u>PRELIMINARY PLANNING & PREPARATION:</u> | | |
| 1. Read & reviewed existing FMP, MSDS, product label, Applicator's Manual, and other relevant safety procedure with appropriate personnel. | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Develop a site drawing of the facility layout. | <input type="checkbox"/> | <input type="checkbox"/> |
| <u>RECORD KEEPING:</u> | | |
| 1. Name & address of Certified Applicator is recorded. | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Specific site of application recorded. | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Is the fumigation treatment conducted when the ambient temperature is 40 degrees F or more. | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Local officials provided with safety information. | <input type="checkbox"/> | <input type="checkbox"/> |
| <u>CERTIFIED APPLICATOR:</u> | | |
| 1. Certified applicator physically present during application: | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Certified applicator is certified in required category: | <input type="checkbox"/> | <input type="checkbox"/> |
| <u>NOTIFICATION:</u> | | |
| 1. Confirmation that the appropriate local authorities have been notified as per label instructions, local ordinances, or instructions of the client. | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Confirmation that a written procedure ("Emergency Response Plan") has been properly prepared and communicated to appropriate personnel. | <input type="checkbox"/> | <input type="checkbox"/> |
| <u>APPLICATION & FUMIGATION PERIOD:</u> | | |
| 1. Confirmation that the fumigant was applied in accordance with label requirements. (dosage, exposure period, temperature, etc.) | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Confirmation that protective clothing was properly used. | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Confirmation that personnel handling fumigant thoroughly washed their hands following treatment. | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Confirmation that proper distance was maintained between treated burrow / tunnel systems and any inhabited structures on site. | <input type="checkbox"/> | <input type="checkbox"/> |

SEALING PROCEDURES:

1. Properly performed sealing of burrow / tunnel systems following application of fumigant.

POST APPLICATION PROCEDURES:

1. Confirmation that Post Application Procedures were completed correctly

CHEMICAL – PRODUCT STORAGE:

1. Storage: Under lock & Key
 Posted as Pesticide Storage
 Dry storage
 Well-ventilated area
 Away from heat
2. Not Stored:

 Humans & Animals Reside
 Food / Feed Stored

Comments:

SITE DRAWING