



APPLICATOR'S MANUAL

FOR

Fumitoxin® PELLETS AND TABLETS

FOR CONTROL OF PESTS IN STORED GRAIN,
PROCESSED FOODS, FEEDS AND NON-FOOD COMMODITIES, INCLUDING TOBACCO
READ THE ENTIRE LABEL, APPLICATOR'S MANUAL AND GUIDANCE FOR PREPARATION
OF A FUMIGATION MANAGEMENT PLAN BEFORE USING.

THIS PRODUCT CAN ONLY BE USED IN CONJUNCTION
WITH A DETAILED FUMIGATION MANAGEMENT PLAN

A FUMIGATION MANAGEMENT PLAN MUST BE WRITTEN
FOR ALL FUMIGATIONS PRIOR TO ACTUAL TREATMENT

RESTRICTED

DANGER



POISON

**KEEP OUT OF REACH OF CHILDREN
AND PREVENT ACCESS BY UNAUTHORIZED PERSONNEL**

GUARANTEE: Aluminum Phosphide 55%

REGISTRATION NO. 19226 PEST CONTROL PRODUCTS ACT (Pellets)

OR

REGISTRATION NO. 19227 PEST CONTROL PRODUCTS ACT (Round Tablets)

Manufactured for:

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THIS PRODUCT IS ACCOMPANIED BY AN APPROVED LABEL, APPLICATOR'S MANUAL AND GUIDANCE FOR PREPARATION OF A FUMIGATION MANAGEMENT PLAN. READ AND UNDERSTAND THE ENTIRE LABEL AND THE APPLICATOR'S MANUAL. ALL PARTS OF THE LABEL AND MANUAL ARE EQUALLY IMPORTANT FOR SAFE AND EFFECTIVE USE OF THIS PRODUCT. CALL THE MANUFACTURER IF YOU HAVE ANY QUESTIONS OR DO NOT UNDERSTAND ANY PART OF THIS LABEL AND THE APPLICATOR'S MANUAL.

REFER TO THIS APPLICATOR'S MANUAL FOR DETAILED PRECAUTIONS, SAFETY RECOMMENDATIONS AND DIRECTIONS FOR USE.

ALUMINUM PHOSPHIDE PELLETS AND TABLETS ARE NONCOMBUSTIBLE, BUT EXPOSURE TO MOISTURE IN THE AIR OR WATER RELEASES FLAMMABLE AND TOXIC HYDROGEN PHOSPHIDE (PHOSPHINE, PH₃) GAS. SPONTANEOUS IGNITION MAY RESULT IF CONTACTED BY WATER, ACIDS, OR OTHER LIQUIDS.

HYDROGEN PHOSPHIDE-AIR MIXTURES AT CONCENTRATIONS ABOVE THE LOWER FLAMMABLE LIMIT MAY IGNITE SPONTANEOUSLY. IGNITION OF HIGH CONCENTRATIONS OF HYDROGEN PHOSPHIDE CAN PRODUCE A VERY ENERGETIC REACTION. EXPLOSIONS CAN OCCUR UNDER THESE CONDITIONS AND MAY CAUSE SEVERE PERSONAL INJURY. **NEVER ALLOW THE BUILD-UP OF HYDROGEN PHOSPHIDE TO EXCEED EXPLOSIVE CONDITIONS.** DO NOT CONFINE SPENT OR PARTIALLY SPENT DUST FROM METAL PHOSPHIDE FUMIGANTS, AS THE SLOW RELEASE OF HYDROGEN PHOSPHIDE FROM THIS MATERIAL MAY RESULT IN THE FORMATION OF AN EXPLOSIVE ATMOSPHERE.

NOTICE TO USER: This pest control product is to be used only in accordance with the directions on the label. It is an offence under the Pest Control Products Act to use this product in any way that is inconsistent with the directions on the label. The user assumes the risk to persons or property that arises from any such use of this product.

NATURE OF RESTRICTIONS:

The use of this product is RESTRICTED due to the high acute inhalation toxicity of hydrogen phosphide (phosphine, PH₃) gas, which is formed when this product is exposed to moisture in the air.

This product is for retail sale to and use only by individuals holding an appropriate pesticide applicator certificate or license recognized by the provincial/territorial pesticide regulatory agency where the pesticide application occurs or by persons trained in accordance with the Applicator's Manual working under the direct supervision and in the physical presence of an applicator holding an appropriate pesticide applicator certificate or license. Consult local pesticide regulatory authorities about use permits which may be required.

This product is accompanied by an approved label, an Applicator's Manual and Guidance for Preparation of a Fumigation Management Plan. **READ AND UNDERSTAND THE ENTIRE LABEL AND APPLICATOR'S MANUAL.** All parts of the label and manual are equally important for the safe and effective use of this product. Call the manufacturer if you have any questions or do not understand any part of this label and the Applicator's Manual.

A minimum buffer zone of 30 metres must be established for all fumigated sites (with the exception of ships and railcars that are in motion), refer to the Applicator's Manual – BUFFER ZONE REQUIREMENTS. Note that the term "fumigated site/application site" refers to the site under fumigation treatment. Placarding is required for both the fumigated site and the buffer zone perimeter.

Appropriate respiratory protection, as outlined in the Applicator's Manual – RESPIRATORY PROTECTION, must be worn during delivery/dispensing of product, while attending to spills and leaks, during deactivation of unreacted granules and while monitoring hydrogen phosphide levels during the fumigation and aeration periods (i.e. worn at all times when levels of hydrogen phosphide gas are above 0.1 ppm or are unknown). Entry by unprotected workers is only permitted after the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone.

Note that transport of non-aerated commodities is permitted by rail or ship only. Other transport vehicles, such as trucks, vans, and trailers, are prohibited for travel over public roads or highways until completely aerated to a hydrogen phosphide level at or below 0.1 ppm.

This product must be stored away from lodging for humans, animal quarters and normal work areas to avoid inadvertent exposure. Refer to the Applicator's Manual for detailed storage instructions.

RESTRICTED USES: For the treatment of space, grain pests in stored barley, cocoa beans, coffee beans, corn, cotton seeds, dates, dried peas, lentils, millet, nuts in shells, oats, peanuts, popcorn, rice, rye, sorghum, soybeans, sunflower seeds, triticale, wheat, all processed foods and feeds. FUMITOXIN® may also be used to fumigate bagged, packaged or treated cereal, grass, sorghum or small legume seeds destined for planting use only.

Non-food items may also be fumigated with FUMITOXIN®: dried plants and flowers; feathers, human hair, rubberized hair, vulcanized hair, mohair leather products, animal hides and fur; paper and paper products, processed or unprocessed cotton wool and other natural fibers or cloth, clothing; seeds (grass seed, ornamental herbaceous plant seed and vegetable seed); straw and hay; tobacco; wood and wood products.

Even distribution throughout the commodity is essential for good results. Refer to the Applicator's Manual for detailed Precautions, Safety Recommendations and Directions for Use.

The time of required fumigant exposure is as follows:

Below 5°C	Do not fumigate*
at 5-12°C	10 days are required
at 13-15°C	5 days are required
at 16-20°C	4 days are required
above 20°C	not less than 3 days

*If the temperature drops below 5°C during a fumigation, deactivate the FUMITOXIN® at the end of the fumigation period, as detailed in the SPILL AND LEAK PROCEDURES (Section 15).

To guarantee compliance with maximum residue limits for hydrogen phosphide residues, fumigated commodities must be aerated for 48 hours prior to offering them to the end consumer. For tobacco, aeration in hogsheads should be not less than three days; on any other type of storage, two days. It is the user's responsibility to ensure that there is no residue on such commodities in excess of these amounts.

This product is highly toxic to birds and mammals. Carefully inspect the outside and inside of the structure prior to application of the fumigant to ensure the absence of nesting or roosting birds. Avoid application if birds are present.

This product is not to be used for vacuum fumigations.

Hydrogen phosphide will corrode certain metals, especially at high concentrations and humidities. Protection or removal of wiring, sensitive equipment or precious metals is recommended under these conditions.

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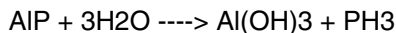
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1. INTRODUCTION

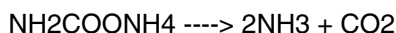
Aluminum phosphide fumigants are used to protect stored commodities from damage by pests. Fumigation of stored products with FUMITOXIN® in the manner prescribed in the labeling does not contaminate the marketed commodity.

Aluminum phosphide and other metal phosphide fumigants are acted upon by atmospheric moisture to produce hydrogen phosphide (phosphine, PH₃) gas. FUMITOXIN® tablets and pellets contain aluminum phosphide (AIP) as their active ingredient and will liberate hydrogen phosphide via the following chemical reaction:



Hydrogen phosphide gas is highly toxic to insects, humans and other forms of animal life. In addition to its toxic properties, the gas will corrode certain metals and may ignite spontaneously in air at concentrations above its lower flammable limit of 1.8% (v/v). These hazards will be described in greater detail later on in this Applicator's Manual.

FUMITOXIN® also contains ammonium carbamate which liberates ammonia and carbon dioxide as follows:



These gases are essentially nonflammable and act as inerting agents to reduce fire hazards. The ammonia gas also serves as a warning agent.

FUMITOXIN® is prepared in two spherical shapes. The rounded tablets weigh approximately 3 grams and release 1 gram of hydrogen phosphide gas. They are about 16mm in diameter and are bulk packaged in resealable aluminum flasks containing 100, 333, or 500 tablets each. The pellets weigh approximately 0.6 gram and release 0.2 gram of hydrogen phosphide gas. They are about 10mm in diameter and are also packaged in resealable flasks containing about 1666 or 2500 pellets.

Upon exposure to air, aluminum phosphide tablets and pellets begin to react with atmospheric moisture to produce small quantities of hydrogen phosphide gas. This reaction starts slowly, gradually accelerates and then tapers off again as the aluminum phosphide is spent. FUMITOXIN® pellets react somewhat faster than do the tablets. The rates of decomposition of the tablets and pellets will vary depending upon moisture and temperature conditions. For example, when moisture and temperature of the fumigated commodity are high, decomposition of FUMITOXIN® may be complete in less than 3 days. At lower ambient temperatures and relative humidity levels, however, decomposition of FUMITOXIN® may require 5 days or more. After decomposition, FUMITOXIN® leaves a grey-white powder composed almost entirely of aluminum hydroxide. This will cause no problems if the fumigant has been added directly to a commodity such as grain or bulk animal feed. However, the spent powder must usually be retrieved for disposal after space fumigations. If properly exposed, the spent FUMITOXIN® will normally contain only a small amount of unreacted aluminum phosphide and may be disposed of without hazard. While not considered a hazardous waste, partially spent residual from incompletely exposed FUMITOXIN® may require special care. Precautions and instructions for further deactivation and disposal will be given later in this Applicator's Manual.

FUMITOXIN® tablets and pellets are supplied in gas-tight containers and their shelf life is unlimited as long as the packaging remains intact. Once opened for fumigation, the aluminum flasks of tablets or pellets may be tightly resealed and stored for future use. Storage and handling instructions will be given in detail later in the Applicators Manual.

SAFETY RECOMMENDATIONS SUMMARY

1. Carefully read the label and Applicator's Manual and follow instructions explicitly.
2. Licensed/certified applicator must develop and follow a Fumigation Management Plan and notify appropriate company employees prior to fumigation.
3. Never fumigate alone from inside the storage structure. At least two persons, a licensed/certified applicator and trained person, or two persons trained in accordance with the Applicator's Manual working under the direct supervision of the licensed/certified applicator must be present during fumigation of structures when entry into the structure for application of the fumigant is required.
4. Appropriate respiratory protection, as outlined in Section 6, RESPIRATORY PROTECTION, must be worn during delivery/dispensing of product, while attending to spills and leaks, during deactivation of unreacted granules and while monitoring hydrogen phosphide levels during the fumigation and aeration periods (i.e. worn at all times when levels of hydrogen phosphide gas are above 0.1 ppm or are unknown). Observe all Provincial pesticide legislation requirements.
5. The licensed/certified applicator must maintain visual and/or voice contact with all fumigation workers during the application of the fumigants.
6. Wear a loose fitting long sleeve shirt, long pants, socks and shoes, and wear dry gloves of cotton or other breathable material when handling FUMITOXIN® tablets, pellets or dust. Aerate used gloves and other contaminated clothing in a well-ventilated area prior to laundering. Wash hands thoroughly after using FUMITOXIN®.
7. A minimum buffer zone of 30 metres must be established for all fumigated sites (with the exception of ships and rail-cars that are in motion) as per the instructions outlined under Section 8, BUFFER ZONE REQUIREMENTS. Note that transport of non-aerated commodities is permitted by rail or ship only. Other transport vehicles, such as trucks, vans, and trailers are prohibited from travel over public roads or highways until completely aerated to a hydrogen phosphide level at or below 0.1 ppm.
8. Post warning placards around both the fumigated site and the buffer zone perimeter as per instructions in Section 9, PLACARDING OF FUMIGATION AREAS.
9. Entry by unprotected workers is only permitted after the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone.
10. Exposure to hydrogen phosphide must never exceed 0.1 ppm. If workers must handle incompletely aerated commodity, or are indoors (e.g. an enclosed elevator head) they must wear appropriate respiratory protection (see Section 6, RESPIRATORY PROTECTION).
11. Keep containers of FUMITOXIN® tightly closed except while removing product for application. Never open fumigant containers in a flammable atmosphere. It is preferable to open them in open air, near a fan or other appropriate ventilation which will rapidly exhaust contaminated air.
12. Piling of tablets, pellets or bags or the addition of liquid to the product is prohibited.
13. Dispose of empty containers and spent residual dust in a manner consistent with the label instructions.
14. Hydrogen phosphide fumigants are not to be used for vacuum fumigations.
15. Finished foods and feeds which have been fumigated with aluminum phosphide must be aerated for 48 hours prior to offering to the end consumer.
16. Hydrogen phosphide will corrode copper and precious metals at high concentrations or humidities. Protection or removal of wiring, sensitive equipment or precious metals is recommended under these conditions.
17. Under no circumstances shall any processed food, feed or bagged commodity come into direct contact with FUMITOXIN® pellets, tablets or residual dust, or a raw agricultural commodity that will be used directly as a food without further processing
18. Do not use aluminum phosphide containers for any purpose other than recycling or reconditioning.
19. Preexposure screening of employees to detect impaired pulmonary function is recommended. Any employees developing this condition should be referred for medical examination.
20. Theft of products: Immediately report to the local police department thefts of metal phosphide fumigants.
21. Registrant must be informed of any incident involving the use of this product.

2. FIRST AID

Symptoms of exposure to hydrogen phosphide gas-releasing products can include headache, dizziness, nausea, difficult breathing, vomiting, and diarrhea. In all cases of exposure, protect yourself, remove the person from the source of exposure and get them to an Emergency department. If possible, bring this Applicator's Manual, the container, label or product name and Pest Control Registration Number with you when seeking medical attention.

FIRST AID RESPONDER PROTECTION: Hydrogen phosphide gas is a highly toxic systemic poison and a severe respiratory tract irritant. Persons exposed to solid phosphides, which react with moisture to produce hydrogen phosphide gas, can pose risks to others if phosphides are on clothes, skin, or hair. First Aid responders should protect

themselves through the use of appropriate personal protective equipment before attempting to rescue or care for a person who has been exposed to a hydrogen phosphide gas-releasing product, and/or if entering a zone with potentially unsafe hydrogen phosphide levels. A NIOSH-approved self-contained breathing apparatus (SCBA) with a full face piece operated in a pressure-demand or other positive-pressure mode OR a NIOSH-approved air-line respirator with a full face piece operated in a pressure-demand or other positive-pressure mode combined with an auxiliary self-contained positive-pressure breathing apparatus is recommended in response situations that involve exposure to potentially unsafe or unknown levels of hydrogen phosphide (see Section 4, PRECAUTIONS, of product label or Applicator's Manual for further guidance regarding personal protective equipment.)

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, and then give artificial respiration using a bag-valve-mask device to prevent possible secondary exposure to hydrogen phosphide gas to the first aid responder. Do not perform mouth-to-mouth resuscitation. Do not give anything by mouth to an unconscious person. Call a poison control centre or doctor immediately for further treatment advice.

IF SWALLOWED: Call a poison control centre or doctor immediately for treatment advice. **DO NOT DRINK WATER.** Do not administer anything by mouth or make the person vomit. It is likely that this exposure will lead to spontaneous vomiting.

IF ON SKIN OR CLOTHING: Brush or shake material off clothes and shoes in a well-ventilated area. Allow clothes to aerate in a ventilated area prior to laundering. Do not leave contaminated clothing in occupied and/or confined areas such as automobiles, vans, motel rooms, etc. Wash contaminated skin thoroughly with soap and water for 15-20 minutes. Call a poison control centre or doctor for further treatment advice.

IF IN EYES: 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 centre or doctor for treatment advice.

HOT LINE NUMBER

Have the product container label or Applicator's Manual with you when calling a poison control centre, doctor, or when going for treatment. You may also contact SUNZON INTERNATIONAL, INC. 252-237-7923 or SELLEN GRAIN SERVICES, LTD. 519-692-4232. For all other chemical emergencies, please contact CHEMTREC – 1-800-424-9300 or Canadian Transport Emergency Centre (CANUTEC) 613-996-6666.

3. TOXICOLOGICAL INFORMATION

Aluminum phosphide tablets, pellets or dust will react with moisture from the air, acids and many other liquids to release hydrogen phosphide (phosphine, PH₃) gas. Mild exposure by inhalation causes malaise (indefinite feeling of sickness), ringing in the ears, fatigue, nausea and pressure in the chest which is relieved by removal to fresh air. Moderate poisoning causes weakness, vomiting, pain just above the stomach, chest pain, diarrhea and dyspnea (difficulty in breathing).

Symptoms of severe poisoning may appear within a few hours to several days. Severe poisoning may result in pulmonary edema (fluid in lungs) and may lead to dizziness, cyanosis (blue or purple skin colour), unconsciousness, and death.

In sufficient quantity, hydrogen phosphide affects the liver, kidneys, lungs, nervous system and circulatory system and may result in (1) pulmonary edema, (2) liver elevated serum AST, ALT and AIP, reduced prothrombin, hemorrhage and jaundice (yellow skin colour) and (3) kidney haematuria (blood in urine) and anuria (abnormal or lack of urination). Pathology is characteristic of hypoxia (oxygen deficiency in body tissue). Frequent exposure to concentrations above permissible levels over a period of days or weeks may cause poisoning. Inhalation can cause lung edema (fluid in lungs) and hyperaemia (excess of blood in a body part), small perivascular brain hemorrhages and brain edema (fluid in brain). Poisonous if swallowed. Ingestion can cause lung and brain symptoms, but damage to the viscera (body cavity organs) is more common. Treatment is symptomatic. The following measures are suggested for use by the physician in accordance with his/her own judgement:

In its milder to moderate forms, symptoms of poisoning may take up to 24 hours to appear. Monitoring should continue for at least this long. Manifestations of severe poisoning appear early. Hypoxia and hypotension should be treated with usual supportive measures of oxygenation, intubation, ventilation and positive pressure as needed, and intravenous fluids, pressors and inotropes as required, respectively. In the event of the ingestion of a large quantity of aluminum phosphide, once the patient is stabilized, aspiration of gastric contents by inserting a 16 french naso-gastric tube to suction the stomach contents might be considered. There is no specific antidote. Hemodialysis may be indicated if renal failure develops but does not remove the toxin.

4. PRECAUTIONS

4.1 **DANGER: Hazardous to Humans, Birds and Mammals – KEEP OUT OF REACH OF CHILDREN AND PREVENT ACCESS BY UNAUTHORIZED PERSONNEL**

Aluminum phosphide from FUMITOXIN® tablets, pellets or dust is fatal if swallowed. DO NOT ingest tablets, pellets or dust. Aluminum phosphide forms extremely hazardous gas that is fatal if inhaled. DO NOT inhale/breathe gas. Fatal if absorbed through eyes or skin. DO NOT get in eyes, on skin or on clothing. DO NOT eat, drink or smoke while handling aluminum phosphide fumigants. If a sealed container is opened, or if the material comes into contact with water, acids or other liquids these products will release hydrogen phosphide (phosphine, PH₃) which is an extremely toxic gas. If a garlic odour is detected, refer to the information on Industrial Hygiene Monitoring (Section 8.6) of this Applicator's Manual for appropriate monitoring procedures. Pure hydrogen phosphide gas is odourless; the garlic odour is due to a contaminant.

Since the odour of hydrogen phosphide may not be detected under some circumstances, the absence of a garlic odour does not mean that dangerous levels of hydrogen phosphide gas are absent. Observe proper entry procedures specified elsewhere in the labelling to prevent overexposure. In situations where ventilation of buildings is required following fumigation (e.g. warehouses), hydrogen phosphide gas may pose a potential hazard to small birds (e.g. swallows) nesting or roosting on or near those structures. Therefore, carefully inspect the outside of the structure prior to application of the fumigant to ensure the absence of nesting or roosting birds.

4.2 **Physical and Chemical Hazards**

Aluminum phosphide in tablets, pellets and partially spent dust will release hydrogen phosphide gas if exposed to moisture from the air or if it comes into contact with water, acids and many other liquids. Since hydrogen phosphide may ignite spontaneously at levels above its lower flammable limit of 1.8% v/v, it is important not to exceed this concentration. Ignition of high concentrations of hydrogen phosphide can produce a very energetic reaction. Explosions can occur under these conditions and may cause severe personal injury. **Never allow the build-up of hydrogen phosphide to exceed explosive concentrations.** Do not confine spent or partially spent metal phosphide fumigants as the slow release of hydrogen phosphide from these materials may result in formation of an explosive atmosphere. Piling of tablets, pellets or bags or the addition of liquid to the product is prohibited. This may cause a temperature increase, increase the rate of gas production and confine the gas so that ignition could occur.

It is preferable to open containers of aluminum phosphide products in open air, as under certain conditions, they may flash upon opening. Containers may also be opened near a fan or other appropriate ventilation which will rapidly exhaust contaminated air. When opening, point the container away from the face and body and slowly loosen the cap. Although the chances for a flash are very remote, never open these containers in a flammable atmosphere. These precautions will also reduce the fumigator's exposure to hydrogen phosphide.

Pure hydrogen phosphide (phosphine) gas is practically insoluble in water, fats and oils, and is stable at normal fumigation temperatures. However, hydrogen phosphide will corrode copper and precious metals at high concentrations or humidities. Protection or removal of wiring, sensitive equipment or precious metals is recommended under these conditions. Thus, small electric motors, smoke detectors, brass sprinkler heads, batteries and battery chargers, fork lifts, temperature monitoring systems, switching gears, communication devices, computers, calculators and other electrical equipment should be protected or removed before fumigation. Hydrogen phosphide will also react with certain metallic salts and, therefore, sensitive items such as photographic film, some inorganic pigments, etc., should not be exposed.

4.3 **Environmental Hazards**

Toxic to birds and mammals. Carefully inspect the outside and inside of a structure prior to application of the fumigant to ensure the absence of nesting or roosting birds. Avoid application if birds are present. DO NOT contaminate irrigation or drinking water supplies or aquatic habitats such as lakes, rivers, sloughs, ponds, prairie potholes, creeks, marshes, streams, reservoirs and wetlands by cleaning of equipment or disposal of wastes.

5. PROTECTIVE CLOTHING

Wear a loose fitting long sleeve shirt, long pants, socks and shoes, and wear dry gloves of cotton or other breathable material when handling FUMITOXIN® products. After fumigation activities, remove all protective clothing, check and

ensure that there are no FUMITOXIN® tablets or pellets trapped inside clothing, aerate in a well-ventilated area then wash thoroughly, separately, before re-use.

If FUMITOXIN® tablets or pellets become trapped inside clothing, remove affected clothing, place the collected trapped FUMITOXIN® in a sealable clean and dry plastic bag, store in a place that is inaccessible to any unauthorized personnel; and then wash hands and exposed skin thoroughly, shower and change into clean clothing. As much as possible, continue wearing the appropriate respiratory protection while handling the tablets or pellets.

6. RESPIRATORY PROTECTION

Entry by unprotected workers is only permitted after the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone. NIOSH-approved respiratory protection must be worn if worker exposure limits cannot be met through engineering controls (such as forced air ventilation) and/or appropriate worker practices.

Appropriate respiratory protection must be worn during delivery/dispensing of product, while attending to spills and leaks, during deactivation of unreacted granules and while monitoring hydrogen phosphide levels during the fumigation and aeration periods (i.e. worn at all times when levels of hydrogen phosphide gas are above 0.1 ppm or are unknown). Observe all Provincial pesticide legislation requirements. The respiratory protection must fit properly, any obstruction to a proper fit should be removed (e.g. beard, long sideburns).

For hydrogen phosphide levels between 0.1 – 5 ppm, the minimum protection required is a NIOSH-approved air-purifying, full face respirator (gas mask) with a chin-style, front- or back-mounted canister approved for hydrogen phosphide OR a NIOSH-approved supplied-air respirator (i.e., air-line respirator or self-contained breathing apparatus) with a full face piece.

For hydrogen phosphide levels above 5 ppm or at unknown concentrations, a NIOSH-approved self-contained breathing apparatus with a full face piece operated in a pressure-demand or other positive-pressure mode OR a NIOSH-approved air-line respirator with a full face piece operated in a pressure-demand or other positive-pressure mode combined with an auxiliary self-contained positive-pressure breathing apparatus must be worn.

For emergency use and/or to escape from conditions which are Immediately Dangerous to Life or Health (IDLH), keep available for use an adequate number of NIOSH-approved self-contained breathing apparatus with a full face piece operated in a pressure-demand or other positive-pressure mode.

When required, gas concentration measurements for safety purposes may be made using low level detector tubes or electronic metering devices*. See Section 8, APPLICATOR AND WORKER EXPOSURE, for monitoring requirements.

*Information on hydrogen phosphide (phosphine, PH₃) detector tubes or electronic metering devices may be obtained from your distributor.

7. BUFFER ZONE REQUIREMENTS

7.1 Buffer Zones

A buffer zone is an area established around the perimeter of the application site (fumigated site) where a hydrogen phosphide gas-releasing fumigant is applied.

The following describes the general buffer zone requirements:

- A minimum buffer zone of 30 metres must be established for all fumigated sites (with the exception of ships and railcars that are in motion). Note that transport of non-aerated commodities is permitted by rail or ship only. Other transport vehicles such as trucks, vans, and trailers, are prohibited from travel over public roads or highways until completely aerated to a hydrogen phosphide level at or below 0.1 ppm.
- The buffer zone must extend from the perimeter of the application site equally in all directions.
- All non-handlers including workers, nearby residents, pedestrians, and other bystanders, must be excluded from the buffer zone (i.e. not present) during the application and until the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone.

- A buffer zone must be established prior to application when the fumigant is delivered/dispensed to the application site. The buffer zone must be maintained until the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone.
- Appropriate respiratory protection (as outlined in Section 6, RESPIRATORY PROTECTION) must be worn if entry into the fumigated site and the buffer zone is required at any point from the beginning of application until the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone.
- If an extension of the buffer zone is required due to levels of hydrogen phosphide greater than 0.1 ppm, the provisions in the **Areas Not Under the Control of Owner/Operator of the Application Site** section must be followed.

7.2 Extension of Buffer Zone as a Result of Monitoring

From the beginning of the fumigant application until the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone, a supervising fumigant application/handler or someone under his/her supervision must continually monitor hydrogen phosphide levels at several locations along the buffer zone perimeter.

If at any time the person monitoring hydrogen phosphide levels detects concentrations greater than 0.1 ppm, the buffer zone must be extended until the hydrogen phosphide is at or below 0.1 ppm along the perimeter. If an extension of the buffer zone is not feasible, appropriate measures must be implemented (e.g. cease the delivery/dispensing of product, sealing of leaks, limiting aeration) until the hydrogen phosphide level is at or below 0.1 ppm at the buffer zone perimeter at which time fumigation activities may continue.

7.3 Authorized Entry to Buffer Zones

Only authorized pesticide applicators/handlers wearing appropriate personal protective equipment may be in the buffer zone during the fumigation and aeration periods. All non-handlers including workers, nearby residents, pedestrians, and other bystanders, must be excluded from the buffer zone (i.e. not present) during the application and until the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone.

7.4 Structures Under the Control of Owner/Operator of the Application Site

The buffer zone must not include within it any structures UNLESS they are unoccupied during the application. Entry into these structures is not permitted until the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone.

See Section 9, PLACARDING OF FUMIGATION AREAS for additional requirements that may apply.

7.5 Areas Not under the Control of Owner/Operator of the Application Site

a. Agricultural areas

The buffer zone must not include within it any agricultural areas owned/operated by persons other than the owner/operator of the application site to be fumigated UNLESS, persons who own/operate an adjacent area (such as areas that are not under the control of the owner/operator of the application site) provide explicit written confirmation to the supervising fumigant applicator/handler that they, their employees, and any other persons will not be present during the entire fumigation and aeration periods. Entry into these areas is not permitted until the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone.

b. Roads and rights-of-way

The buffer zone must not include within it any roads and rights-of-way UNLESS the area is not occupied during the application. Entry into these areas is not permitted until the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone.

c. **All other publicly owned and/or operated areas**

For all other publicly owned and/or operated areas such as parks, sidewalks, walking paths, playgrounds and athletic fields, the buffer zone must not include these areas within it UNLESS,

- The public area is not occupied during the fumigation and aeration periods and entry into the area is not permitted until the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone, and
- Explicit written permission to include the public area within the buffer zone is provided to the supervising fumigant applicator/handler and/or the owner/operator by the appropriate provincial/territorial and/or local authorities responsible for the management and operation of the area.
 - See Section 9, PLACARDING OF FUMIGATION AREAS, for additional requirements that may apply.
 - It is the responsibility of the supervising fumigant handler to record this information in the Fumigation Management Plan.

d. **Difficult-to-Evacuate Sites**

Difficult-to-evacuate sites include schools (preschool to grade 12), provincially licensed day care centres, nursing homes, assisted-living facilities, hospitals, in-patient clinics, and prisons.

No fumigant application is permitted within 200 metres of the sites listed above UNLESS the site is not occupied during the fumigation and aeration periods. Entry into these sites is not permitted until the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone.

e. **All other residential areas**

The buffer zone must not include within it any residential areas (such as employee housing, private property, commercial buildings, and other areas that people may occupy or outdoor residential areas, such as lawns, gardens, or play areas, etc.) UNLESS the occupants in the area provide explicit written confirmation to the supervising fumigant applicator/handler and/or the owner/operator that all premises will be vacated during the fumigation and aeration periods.

Entry by occupants and other non-handlers is not permitted until the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and buffer zone.

8. **APPLICATOR AND WORKER EXPOSURE**

8.1 **Hydrogen Phosphide Exposure Limits**

Exposure to hydrogen phosphide must never exceed 0.1 ppm. Entry by unprotected workers is only permitted after the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone. All persons in the fumigated site and the buffer zone are covered by this 0.1 ppm exposure safety limit. Periodic gas measurements should be made in the worker's breathing zone using hydrogen phosphide low level detector tubes or electronic metering devices, unless they are protected by a NIOSH-approved self-contained breathing apparatus with full face piece operated in a pressure-demand or other positive-pressure mode OR a NIOSH-approved air-line respirator with a full face piece operated in a pressure-demand or other positive-pressure mode combined with an auxiliary self-contained positive-pressure breathing apparatus.

The level of hydrogen phosphide gas may be higher at the core of the commodity than the surrounding air. Monitoring is required when unloading or otherwise disturbing a commodity that has been fumigated to ensure that liberation of gas from the treated commodity does not result in unacceptable levels of hydrogen phosphide.

8.2 Application of Fumigant

Depending upon temperature and humidity, FUMITOXIN® releases hydrogen phosphide gas slowly upon exposure to moisture from the air. Appropriate respiratory protection, as outlined under Section 6, RESPIRATORY PROTECTION, must be worn during delivery/dispensing of the product. For safety purposes, monitoring of hydrogen phosphide levels during fumigation is required and may be conducted using low level detector tubes or electronic metering devices according to the information on Industrial Hygiene Monitoring in Section 8.6 of this Applicator's Manual.

8.3 Leakage from Fumigated Sites

Hydrogen phosphide gas is highly mobile and given enough time may penetrate seemingly gas-tight materials such as concrete and cinder block. Therefore, adjacent, enclosed areas likely to be occupied must be monitored to ensure that significant leakage has not occurred. Sealing of the fumigated site, establishment of a buffer zone, and/or air flow in the occupied areas must be sufficient to meet the 0.1 ppm exposure safety limit.

8.4 Aeration and Reentry

If the fumigated site is to be entered after fumigation, it must be aerated until the level of hydrogen phosphide gas is at or below 0.1 ppm in the fumigated site and the buffer zone. Otherwise appropriate respiratory protection (as outlined in Section 6, RESPIRATORY PROTECTION) must be worn.

The fumigated site must be continually monitored for hydrogen phosphide levels as well as at several locations along the buffer zone perimeter to ensure that liberation of gas from the treated commodity does not result in the development of unacceptable levels of hydrogen phosphide. If at any time the person monitoring hydrogen phosphide levels detects concentrations greater than 0.1 ppm, the buffer zone must be extended until levels are at or below 0.1 ppm along the perimeter. If an extension of the buffer zone is not feasible, appropriate measures must be implemented (e.g. sealing of leaks, limiting aeration) until the hydrogen phosphide level is at or below 0.1 ppm at the buffer zone perimeter at which time fumigation activities may continue.

Adhere to provincial ambient air quality criteria standards and monitor downwind gas levels. Ensure that the fumigated site and the buffer zone are secure and placarded to prevent public and unauthorized worker access.

8.5 Handling Un-Aerated Commodities

Exposure to hydrogen phosphide must never exceed 0.1 ppm during moving, storage or processing of incompletely aerated commodities by unprotected workers. If levels exceed 0.1 ppm or are unknown, appropriate respiratory protection as outlined in Section 6, RESPIRATORY PROTECTION must be worn.

The level of hydrogen phosphide gas may be higher at the core of the commodity than the surrounding air. Monitoring is required when unloading or other wise disturbing a commodity that has been fumigated to ensure that liberation of gas from the treated commodity does not result in unacceptable levels of hydrogen phosphide.

8.6 Industrial Hygiene Monitoring

At each site and operation under fumigation, monitor airborne hydrogen phosphide concentrations in all areas to which fumigators and other workers have had access during fumigation and aeration. Perform such monitoring in workers' breathing zones. This monitoring is performed to determine when and where respiratory protection is required. Periodic gas measurements in those areas must be taken to determine whether conditions have significantly changed or if an unexpected garlic-like odour is present. Record all monitoring data in an operation log or manual.

There are a number of devices on the market for the measurement of hydrogen phosphide gas levels for industrial hygiene purposes. One of these is the hydrogen phosphide detector tube used in conjunction with the appropriate hand-operated air sampling pump. These devices are reliable, portable, simple to use, do not require extensive training and are relatively rapid, inexpensive and accurate. Low level detector tubes or electronic metering devices are available which can detect 0.1 ppm and are suitable for industrial hygiene monitoring.

Information on hydrogen phosphide (phosphine, PH₃) detector tubes or electronic metering devices may be obtained from your distributor.

9. PLACARDING OF FUMIGATION AREAS

IMPORTANT: Post warning placards around both the application site (fumigated site) and the buffer zone perimeter before the actual fumigation treatment. Relocating the placards may be required if the buffer zone needs to be extended at any point during the fumigation or aeration period.

The licensed/certified applicator must placard or post warning signs at all usual points of entry and along other likely routes of approach where people not under the land operator's control may be in close proximity to the fumigated site and the buffer zone. Placards should be placed in advance of the fumigation to keep unauthorized persons away. Some examples of points of entry include, but are not limited to, roadways, sidewalks, paths, and bike trails. Some examples of likely routes of approach are the area between a buffer zone and a roadway, or the area between a buffer zone and a housing development.

Posting of warning signs for the buffer zone perimeter is required, UNLESS there is a physical barrier (e.g. fence) that prevents access into the buffer zone. Signage must not be removed until the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone. Only a licensed/certified applicator can authorize removal of warning signs.

Placards must be at least 35 cm long and 25 cm wide and made of substantial material that can be expected to withstand adverse weather conditions. They must bear the following information:

1. The signal word DANGER in letters at least 7cm high and the SKULL AND CROSSBONES symbol in red.
2. The "DO NOT WALK" symbol.
3. The statement "Area and/or commodity under fumigation, DO NOT ENTER".
4. The statement, "This sign may only be removed after the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone.
5. The date and time when fumigation begins and the date and time when aeration can begin.
6. Name and registration number of fumigant used: FUMITOXIN® Pellets or Tablets; Registration #19226 or #19227
7. Contact information (name, address and telephone number) for the supervising fumigant handler in charge of the fumigation.
8. Placards must bear a 24-hour emergency response telephone number.

For railroad hopper cars, placards must be placed on both sides of the car near the ladders and next to the top hatches into which the fumigant is introduced.

Transport of incompletely aerated commodities to a new site is permissible by rail or ship only, and the new storage site must be placarded if the hydrogen phosphide gas concentration is above 0.1 ppm. Trucks, vans, trailers and similar transport vehicles cannot be moved over public roads or highways until they are aerated and the warning placards removed. If workers must handle incompletely aerated commodity, or are indoors (e.g. an enclosed elevator head) they are to wear appropriate respiratory protection (refer to Section 6, RESPIRATORY PROTECTION).

Do not remove placards until the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone. To determine whether aeration is complete, each fumigated site or vehicle and the buffer zone perimeter must be monitored and shown to contain 0.1 ppm or less hydrogen phosphide gas in the air space around and, if feasible, in the mass of the commodity.

It is recommended that the trained persons, under the supervision of a licensed/certified applicator, responsible for removing placards be familiar with the physical, chemical and toxicological properties of hydrogen phosphide. They should also be knowledgeable in making gas concentration measurements, exposure limits and symptoms and first aid treatment for hydrogen phosphide poisoning.

10. FUMIGATION MANAGEMENT PLAN

A FUMIGATION MANAGEMENT PLAN MUST BE WRITTEN FOR ALL FUMIGATIONS PRIOR TO ACTUAL TREATMENT

A Fumigation Management plan must be devised to cover application and exposure period, aeration and disposal of the fumigant so as to keep to a minimum any human exposures to hydrogen phosphide and to help ensure adequate control of pests.

The licensed/certified applicator is responsible for working with the owners and/or responsible employees of the site to be fumigated to develop and follow a Fumigation Management Plan. The Fumigation Management Plan is intended to ensure a safe and effective fumigation. The Fumigation Management Plan must address characterization of the site, and include appropriate monitoring and notification requirements, and include a record that the following have been completed:

1. Inspect the site to determine its suitability for fumigation.
2. When sealing is required, consult previous records for any changes to the site/structure, seal leaks, and monitor any occupied adjacent buildings to ensure safety.
3. Prior to each fumigation, review any existing Fumigation Management Plan, MSDS, Applicator's Manual and other relevant safety procedures with company officials and appropriate employees.
4. Consult company officials in the development of procedures and appropriate safety measures for nearby workers that will be in and around the area during application and aeration.
5. Consult with company officials to ensure that an appropriate monitoring plan will be in place to confirm that nearby workers and bystanders will not be exposed to levels above the allowed hydrogen phosphide safety limit (i.e. 0.1 ppm) during application, fumigation and aeration. This plan must take into consideration all of the buffer zone requirements and demonstrate that nearby residents will not be exposed to concentrations above the allowable limits.
6. Consult with company officials to develop procedures for local authorities to notify nearby residents in the event of an emergency.
7. Confirm the placement of placards to secure entrance and along other routes of approach into any site under fumigation and along the buffer zone perimeter.
8. Confirm the required safety equipment is in place and the necessary manpower is available to complete a safe and effective fumigation.
9. Written notification must be provided to the receiver of a vehicle that is fumigated in transit (i.e., fumigation in transit is permitted by rail or ship only).

It is important to note that some Fumigation Management Plans will be more comprehensive than others. All Fumigation Management Plans should reflect the experience and expertise of the licensed/certified applicator and circumstances at and around the site/structure and the buffer zone.

In addition to the development of the Fumigation Management Plan, the licensed/certified applicator must read the entire label and the Applicator's Manual and follow its directions carefully. If the licensed/certified applicator has any questions about the development of a Fumigation Management Plan, contact the product manufacturer for further assistance.

The Fumigation Management Plan and related documentation, including monitoring records, must be maintained for a minimum of 2 years.

GUIDANCE FOR PREPARATION OF A FUMIGATION MANAGEMENT PLAN

Purpose

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, yet allowing for flexibility, a safe and effective fumigation can be performed.

Before any fumigation begins, carefully read and review the product label and the 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 SUNZON INTERNATIONAL, INC. for assistance. Finally, before any fumigation begins, you must be familiar with and comply with all applicable federal, provincial and municipal laws and 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.

A CHECKLIST GUIDE FOR A FUMIGATION MANAGEMENT PLAN

This checklist is provided to help you take into account factors that must be addressed prior to performing all fumigations. It emphasizes safety steps to protect people and property. The checklist is general in nature and cannot be expected to apply to all types of fumigation situations. It is to be used as a guide to prepare the required Fumigation Management Plan. Each item must be included if it is applicable to the fumigation. However, it is understood that each fumigation is different and not all items will be necessary for each fumigation site.

A. PRELIMINARY PLANNING AND PREPARATION

1. Determine the purpose of the fumigation.
 - a. Control of insect infestation
 - b. Control of vertebrate pests
 - c. Plant pest quarantine
2. Determine the type of fumigation. For example:
 - a. Space: tarp, mill, warehouse, food processing plant,
 - b. Vehicle: railcar, truck, van, container
 - c. Commodity: raw agricultural or processed foods or non-food
 - d. Type of storage: vertical silo, farm storage, flat storage, etc.
 - e. Vessels: ship or barge. In addition to the Applicator's Manual, read the Cargo, Fumigation and Tackle Regulations under the *Canada Shipping Act, current to August 5, 2014*.
3. Fully acquaint yourself with the site and commodity to be fumigated, including:
 - a. The general structure layout, construction (materials, design, age, maintenance), of the structure, fire or combustibility hazards, connecting structures and escape routes, above and below ground, and other unique hazards or structural characteristics. Prepare, with the owner/operator/person in charge, a drawing or sketch of structure to be fumigated, delineating features, hazards, and other structural characteristics.
 - b. The number and identification of persons who routinely enter the area to be fumigated (i.e. employees, visitors, customers, etc.)
 - c. The specific commodity to be fumigated, its mode of storage, and its condition.
 - d. The previous treatment history of the commodity, if available.
 - e. Accessibility of utility service connections
 - f. Nearest telephone or other means of communication. Mark the location of these items on the drawing/sketch.
 - g. Emergency shut-off stations for electricity, water and gas. Mark the location of these items on the drawing/sketch.
 - h. Current emergency telephone numbers of local health, fire, police, hospital and physician responders.
 - i. Name and phone number (both day and night) of appropriate company officials.
 - j. Check, mark and prepare the points of fumigant application locations if the job involves entry into the structure for fumigation.
 - k. Review labeling and Applicator's Manual
 - l. Location of command centre
 - m. Exposure time considerations:
 1. Product (tablet and pellets) to be used
 2. Minimum fumigation period, as defined and described by the label use directions.
 3. Down time required to be available
 4. Aeration requirements
 5. Cleanup requirements, including dry or wet deactivation methods, equipment, and personnel needs, if necessary.

6. Measured and recorded commodity temperature and moisture
- n. Determination of dosage:
 1. Cubic footage or other appropriate space/location calculations
 2. Structure sealing capability and methods
 3. Label recommendations
 4. Temperature, humidity, wind
 5. Commodity/space volume
 6. Past history of fumigation of the site/structure
 7. Exposure time
 8. Amount of fumigant used
 9. Actual concentration achieved
- o. Distance to other on-site and neighbouring off-site structures, recreational areas or areas where bystanders may be exposed.
- p. Site of aeration vent(s) to be opened to aerate site/structure.
- q. Buffer zone requirements, including provisions for areas not under the control of the owner/operator of the application site (e.g. agricultural areas, roads and rights-of-way, publically owned and/or operated areas, difficult to evacuate sites and other residential areas.

B. PERSONNEL

1. Confirm in writing that all personnel in and around the site to be fumigated have been notified prior to application of the fumigant. Consider using a checklist that each employee initials indicating they have been notified.
2. Instruct all fumigation personnel to read the Applicator's Manual concerning the hazards that may be encountered, and about the selection of personal protection devices, including sufficiently sensitive detection equipment.
3. Confirm that all personnel are aware of and know how to proceed in case of an emergency situation.
4. Instruct all personnel on how to report any accident and/or incidents related to fumigant exposure. Provide a telephone number for emergency response reporting.
5. Instruct all personnel to report to proper authorities any theft of fumigant and/or equipment related to fumigation.
6. Establish a meeting area for all personnel in case of an emergency.

C. MONITORING

1. Safety
 - a. Scheduled ambient air monitoring of hydrogen phosphide concentrations must be conducted, downwind, along the buffer zone perimeter to prevent exposure of unprotected workers and bystanders to concentrations of hydrogen phosphide greater than 0.1 ppm*** and to determine where exposures may occur. It may be necessary to monitor gas levels in other areas as well. Document where monitoring will occur.
 - b. Monitor (and record) the wind direction and adjust the hydrogen phosphide monitoring if wind direction changes over the fumigation/aeration period.
 - c. Keep a log or manual of monitoring records for each fumigated site and the buffer zone. This log must, at a minimum, contain the timing, number of readings taken and level of concentrations found in each location.
 - d. When monitoring, document any hydrogen phosphide level even if it is present below the limit of detection.
 - e. From the beginning of the fumigant application until the fumigated site has been aerated, and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone, a super-

vising fumigant applicator/handler or someone under his/her supervision must continually monitor hydrogen phosphide levels at several locations along the buffer zone perimeter.

If at any time the person monitoring hydrogen phosphide levels detects hydrogen phosphide concentrations greater than 0.1 ppm, the buffer zone must be extended until the hydrogen phosphide level is at or below 0.1 ppm along the perimeter. If an extension of the buffer zone is not feasible, appropriate measures must be implemented (e.g. cease the delivery/dispensing of product, sealing of leaks, limiting aeration, etc.) until such time that the hydrogen phosphide level is at or below 0.1 ppm at the buffer zone perimeter at which time fumigation activities may continue.

*****NOTE: An evacuation action is necessary when hydrogen phosphide levels exceed 0.1 ppm.** To determine hydrogen phosphide levels, readings may be taken using low level detector tubes or electronic metering devices.

2. Efficacy

- a. Hydrogen phosphide readings should be taken from within the fumigated site and/or structure to ensure proper gas concentrations, along with temperature and relative humidity readings. Readings must be taken immediately after introduction of the product, six hours after the introduction of the product followed by a reading every twelve hours during the fumigation period. Finally, hydrogen phosphide readings should be taken every thirty minutes until aeration is complete. Refer to Section 11, DIRECTIONS FOR USE for detailed information.
- b. All hydrogen phosphide, temperature and relative humidity readings should be documented.

D. **NOTIFICATION**

1. Confirm all the appropriate local authorities (fire departments, police departments, etc.) have been notified as per label instructions, local ordinances, or instructions of the client.
2. Prepare written procedure ("Emergency Response Plan"), which contains explicit instructions, names, and telephone numbers so as to be able to notify local authorities if hydrogen phosphide levels are exceeded in an area that could be dangerous to bystanders and/or domestic animals. Elaborate in this section the key elements of an Emergency Response Plan including reference to evacuation procedures, etc.
3. Confirm that the receiver of in-transit vehicles under fumigation have been notified and are trained according to Section 11.6.7, Fumigation of Railcars, Containers, Trucks, Vans and Other Transport Vehicles Shipped Piggyback by Rail, of this Applicator's Manual.

E. **SEALING PROCEDURES**

1. Sealing must be adequate to control the pests. Care should be taken to ensure that sealing materials will remain intact until the fumigation is complete.
2. If the site has been fumigated before, review the previous Fumigation Management Plan for previous sealing information.
3. Make sure that construction/remodeling has not changed the site/structure in a manner that will affect the fumigation.
4. Warning placards must be placed to secure any entrance into the fumigated site and along other likely routes of approach.

F. **APPLICATION PROCEDURES AND FUMIGATION PERIOD**

1. Plan carefully and apply the product in accordance with the label requirements.
2. At least two persons, a licensed/certified applicator and trained person, or two persons trained in accordance with the Applicator's Manual working under the direct supervision of the licensed/certified

applicator must be present during fumigation of structures when entry into the structure for application of the fumigant is required. Appropriate respiratory protection, as outlined in Section 6, RESPIRATORY PROTECTION, must be worn during delivery/dispensing of product, while attending to spills and leaks and while monitoring hydrogen phosphide levels during the fumigation period (i.e. worn at all times when levels of hydrogen phosphide gas are above 0.1 ppm or are unknown).

3. Apply fumigant from the outside when and where appropriate.
4. Provide watchmen when you cannot secure the fumigated site and the buffer zone from entry by unauthorized persons (e.g., by secondary locks, barricades, etc.) during the fumigation process.
5. When entering sites/structures, always follow applicable provincial legislation for confined spaces.
6. Document that the receiver of transport vehicles shipped piggyback by rail and/or shipping containers fumigated in-transit has been notified.
7. Turn off any electric lights in the fumigated site and/or structure, as well as all non-essential electrical motors.

G. POST-APPLICATION OPERATIONS

1. Provide watchmen when you cannot secure the fumigated site and the buffer zone from entry (e.g., by secondary locks, barricades, etc.) by unauthorized persons during the aeration process.
2. Ventilate and aerate the fumigated site in accordance with site and/or structural limitations and nearby occupied areas so as to minimize bystander exposure.
3. Turn on ventilating or aeration fans where appropriate.
4. Determine hydrogen phosphide gas concentration in the fumigated environment from outside if possible. As much as possible, limit exposure. For example, by using monitoring equipment that measures indoor concentrations and displays results outside of the fumigated site. Use a sufficiently sensitive gas detector before entry into a fumigated site and/or structure to determine fumigant concentration.
5. During aeration, monitor gas levels continually until the fumigated site and/or structure is ready for entry.
6. Keep written records of monitoring to document completion of aeration.
7. Consider temperature when aerating.
8. Ensure that aeration is complete before moving treated transport vehicles onto public roads.
9. Remove fumigation warning placards, when authorized by a licensed/certified applicator, after aeration of the fumigated site is complete and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone as determined by using a detection device of sufficient sensitivity.
10. Inform business/client that employees/other persons may return to work or otherwise be allowed to enter the aerated site and/or structure.

11. DIRECTIONS FOR USE

11.1 General

- 11.1.1 The use of FUMITOXIN® is RESTRICTED due to the acute inhalation toxicity of hydrogen phosphide (phosphine, PH₃) gas, which is formed when this product is exposed to moisture in the air. These products are for retail sale to and use only by individuals holding an appropriate pesticide applicator certificate or license recognized by the provincial/territorial pesticide regulatory agency where the pesticide application occurs or by persons trained in accordance with the Applicator's Manual working under the direct supervision and in the physical presence of an applicator holding

an appropriate pesticide applicator certificate or license. Physical presence means on site or on the premises. Read and follow the label and this Applicator's Manual which contains complete instructions for the safe use of this pesticide.

- 11.1.2 A minimum buffer zone of 30 metres must be established for all fumigated sites (with the exception of ships and railcars that are in motion) as per the instructions outlined under Section 7, BUFFER ZONE REQUIREMENTS. Prior to entry by unprotected workers, the fumigated site must be aerated and the hydrogen phosphide level must be at or below 0.1 ppm in the fumigated site and the buffer zone.

- 11.1.3 Aluminum phosphide is a highly hazardous material and should be used only by individuals trained in its proper use. Before using, read and understand the entire label and this Applicator's Manual and follow all precautions, safety recommendations and directions.

Persons working with aluminum phosphide must be knowledgeable of the hazards of this chemical and trained in the use of required respiratory equipment and detector devices, emergency procedures, and use of the fumigant.

Additional copies of this Applicator's Manual are available from:

Sunzon International, Inc.
1808 Firestone Parkway
Wilson, NC 27893 USA
Telephone: 252-237-7923

- 11.1.4 At least two persons, a licensed/certified applicator and trained person, or two persons trained in accordance with the Applicator's Manual working under the direct supervision of the licensed/certified applicator must be present during fumigation of structures when entry into the structure for application of the fumigant is required.

Appropriate respiratory protection, as outlined in Section 6, RESPIRATORY PROTECTION, must be worn during delivery/dispensing of product, while attending to spills and leaks, during deactivation of unreacted granules and while monitoring hydrogen phosphide levels during fumigation and aeration periods (i.e. worn at all times when the levels of hydrogen phosphide gas are above 0.1 ppm or are unknown).

The licensed/certified applicator must maintain visual and/or voice contact with all fumigation workers during the application of the fumigants.

Large scale fumigations may require the posting of watchmen to prevent entry into the site under fumigation and the buffer zone. Refer to Provincial pesticide regulations.

- 11.1.5 Shipholds, containers on ships, railroad cars and containers, trucks, vans and other transport vehicles shipped piggyback by rail may be fumigated in transit. Aeration of railcars, railroad boxcars or shipping containers is prohibited en route.

Trucks, vans, trailers and similar transport vehicles are prohibited from travel over public roads or highways until completely aerated to a hydrogen phosphide level at or below 0.1 ppm and the warning placards removed.

- 11.1.6 Do not fumigate commodities with aluminum phosphide when commodity temperature is below 5oC (40°F).

- 11.1.7 The site to be fumigated must first be inspected to determine if it can be made sufficiently gas tight. Then a Fumigation Management Plan must be developed prior to actual treatment to provide for safe and efficient application of the fumigant to include emergency procedures, etc., and to decide how monitoring should be conducted to prevent excessive exposures (refer to Section 10, FUMIGATION MANAGEMENT PLAN).

- 11.1.8 Wear a loose fitting long sleeve shirt, long pants, socks and shoes, and wear dry gloves of cotton or other breathable material while handling FUMITOXIN®. Wash hands thoroughly after use. After fumigation activities, remove all protective clothing, check and ensure that there are no FUMITOXIN® tablets or pellets trapped inside clothing, aerate in a well-ventilated area then wash thoroughly, separately, before reuse.
- 11.1.9 Hydrogen phosphide gas may flash at concentrations above its flammable limit. **Do not open FUMITOXIN® containers in an explosive environment (e.g. flour mill).** It is preferable to open them in open air, near a fan or other appropriate ventilation which will rapidly exhaust contaminated air. These precautions will also reduce the applicator's exposure to hydrogen phosphide gas.
- 11.1.10 Contact with water, acids or other liquids is prohibited. Liquids in contact with unreacted aluminum phosphide will greatly accelerate the production of hydrogen phosphide gas which would result in a toxic and/or fire hazard.
- 11.1.11 Piling of tablets, pellets or bags or the addition of liquid to the product is prohibited.
- 11.1.12 As much as is possible, protect unused FUMITOXIN® from excessive exposure to atmospheric moisture during application and tightly reseal the aluminum flask prior to returning pellets or tablets to storage.
- 11.1.13 Hydrogen phosphide gas may react with certain metals and their salts to produce corrosion. This gas is corrosive to copper, copper alloys and precious metals such as silver and gold. Sensitive equipment and items containing these elements should be removed or protected prior to fumigation with aluminum phosphide.
- 11.1.14 Under no circumstances shall any processed food, feed or bagged commodity come into direct contact with FUMITOXIN® pellets, tablets or residual dust, or a raw agricultural commodity that will be used directly as a food without further processing.
- 11.1.15 If FUMITOXIN® is to be applied from within the structure to be fumigated, approved respiratory protection must be worn by all personnel in the structure (refer to Section 6, RESPIRATORY PROTECTION).

Respiratory protection approved for the concentration to which the fumigator will be exposed to must be worn. For hydrogen phosphide levels between 0.1 - 5 ppm, the minimum protection required is a NIOSH-approved air-purifying full face respirator (gas mask) with a chin-style front- or back-mounted canister approved for hydrogen phosphide OR a NIOSH-approved supplied-air respirator (i.e., air-line respirator or self-contained breathing apparatus) with a full face piece.

For hydrogen phosphide levels above 5 ppm or at unknown concentrations, a NIOSH-approved self-contained breathing apparatus with a full face piece operated in a pressure-demand or other positive-pressure mode OR a NIOSH-approved air-line respirator with a full face piece operated in a pressure-demand or other positive-pressure mode combined with an auxiliary self-contained positive-pressure breathing apparatus must be worn.

For emergency use and/or to escape from conditions which are Immediately Dangerous to Life or Health (IDLH), keep available for use an adequate number of NIOSH-approved self-contained breathing apparatus with a full face piece operated in a pressure-demand or other positive-pressure mode.

- 11.1.16 Notify appropriate company employees prior to fumigation and provide relevant safety information to local officials (fire department, police, etc.) for use in the event of an emergency. Observe all Provincial pesticide regulations.

11.2. Pests Controlled

FUMITOXIN® has been found effective against the following pests, including pre-adult stages – (eggs, larvae and pupae) of insect pests:

Almond moth	Flat grain beetle	
Angoumois grain moth		
Bean weevil	Fruit flies	
	Grain moth	Raisin moth
Cadelle	Granary weevil	Red flour beetle
Cereal leaf beetle		Rice weevil
Cigarette beetle	Hairy fungus beetle	
Cockroaches	Hessian fly	Rusty grain beetle
Confused flour beetle	Indian meal moth	Saw-toothed grain beetle
Flour beetle	Khapra beetle	Spider beetles
Dermeid beetles	Lesser grain borer	Tobacco moth
Dried fruit beetle	Maize weevil	
Dried fruit moth	Mediterranean flour moth	Yellow mealworm
European grain moth	Pink bollworm	

Although it is possible to achieve total control of the listed pests, this is frequently not realized in actual practice. Factors contributing to less than 100% control are leaks, poor gas distribution, unfavourable exposure conditions, etc. In addition, some pests are less susceptible to hydrogen phosphide than others. If maximum control is to be attained, extreme care must be taken in sealing, the higher dosages must be used, exposure periods lengthened, proper application procedures followed and temperature and humidity conditions must be favourable.

11.3 Fumigant Exposure Conditions

The following table may be used as a guide in determining the minimum length of the exposure period at the indicated temperatures:

Minimum Exposure Periods for FUMITOXIN®	
TEMPERATURE	EXPOSURE PERIOD
below 5°C (40°F)	Do not fumigate*
5° - 12°C (40° - 53°F)	10 days (240 hours)
13° - 15°C (54° - 59°F)	5 days (120 hours)
16° - 20°C (60° - 68°F)	4 days (96 hours)
above 20°C (68°F)	3 days (72 hours)

*If the temperature drops below 5°C during a fumigation, deactivate the FUMITOXIN® at the end of the fumigation period, as detailed in the SPILL AND LEAK PROCEDURES (Section 15).

The length of the fumigation must be great enough so as to provide for adequate control of the pests which infest the commodity being treated. Additionally, the fumigation period should be long enough to allow for complete reaction of FUMITOXIN® with moisture so that little or no unreacted aluminum phosphide remains. This will minimize worker exposures during further storage and/or processing of the treated bulk commodity as well as reduce hazards in the disposal of partially spent aluminum phosphide products remaining after space fumigations. The proper length of the fumigation period will vary with exposure conditions since, in general, pests are more difficult to control at lower temperatures and the rate of hydrogen phosphide gas production is less at lower temperatures and humidities.

It should be noted that there is little to be gained by extending the exposure period if the site/structure to be fumigated has not been carefully sealed or if the distribution of gas is poor and pests are not subjected to lethal concentrations of hydrogen phosphide. Careful sealing is required to ensure that adequate gas levels are retained and proper application procedures must be followed to provide satisfactory distribution of hydrogen phosphide gas. Some sites/structures can only be treated when completely tarped while others cannot be properly sealed by any means and should not be fumigated. Exposure times must be lengthened to allow for penetration of gas throughout the commodity when fumigant is not uniformly added to the commodity mass, for example, by surface application or shallow probing. This is particularly important in the fumigation of bulk commodity contained in large storages.

Remember, exposure periods recommended in the table are minimum periods and may not be adequate to control all stored products pests under all conditions nor will they always provide for total reaction of FUMITOXIN®, particularly if temperatures and commodity moisture levels or humidity are low during the fumigation.

11.4 **Commodities Which May be Fumigated with FUMITOXIN® Pellets or Tablets**

FUMITOXIN® may be used for the fumigation of raw agricultural commodities, animal feed, processed foods, tobacco and certain other non-food items.

11.4.1 **Raw Agricultural Commodities, Animal Feeds and Processed Foods.**

FUMITOXIN® may be used for the treatment of grain pests in stored barley, cocoa beans, coffee beans, corn, cotton seeds, dates, dried peas, lentils, millet, nuts in shells, oats, peanuts, popcorn, rice, rye, sorghum, soybeans, sunflower seeds, triticale, wheat, all processed foods and feeds. FUMITOXIN® may also be used to fumigate bagged, packaged or treated cereal, grass, sorghum or small legume seeds destined for planting use only.

Pellets or tablets may be added directly to animal feed, and raw agricultural commodities stored in bulk. Under no circumstances shall any processed food, feed or bagged commodity come into direct contact with FUMITOXIN® pellets, tablets or residual dust, or a raw agricultural commodity that will be used directly as a food without further processing.

11.4.2 **Non-Food Commodities, Including Tobacco**

The following non-food items may be fumigated with FUMITOXIN®:

Dried Plants and Flowers

Feathers

Human Hair, Rubberized Hair, Vulcanized Hair, Mohair Leather Products, Animal Hides and Furs

Paper and Paper Products

Processed or Unprocessed Cotton, Wool and Other Natural Fibers or Cloth, Clothing

Seeds (grass seed, ornamental herbaceous plant seed and vegetable seed)

Straw and Hay

Tobacco

Wood and Wood Products

Tobacco and other non-food commodities should not be contacted by pellets, tablets or residual dust.

11.5 **Recommended Dosages**

Hydrogen phosphide is a mobile gas and will penetrate to all parts of the storage site/structure. Therefore, dosage must be based upon the total volume of the space being treated and not on the amount of commodity it contains. The same amount of FUMITOXIN® is required to treat a 1092 kL (30,000 bushel) silo whether it is empty or full of grain unless, of course, the surface of the commodity is sealed off by a tarpaulin. The following dosage ranges are recommended for bulk and space fumigations:

Dosage Guidelines for Fumigations with FUMITOXIN® Pellets or Tablets

PRODUCT	per 100m ³ *	per 100 tonnes*
Pellets	350 – 2560	480 – 3600
Tablets	70 – 500	100 – 720

*Dosage rates for dates, nuts & dried fruits is 350-700 pellets or 70-140 tablets/100m³; 500-1000 pellets or 100-200 tablets/100 tonnes.

These dosages are not to be exceeded. It is important to be aware that a shortened exposure period cannot be fully compensated by an increased dosage of FUMITOXIN®.

The wide range of dosages listed above is required to handle the variety of fumigation situations encountered in practice. Somewhat higher dosages are usually recommended under cooler, drier conditions or where exposure periods are relatively short. However, the major factor in selection of dosage is the ability of the site/structure to hold hydrogen phosphide gas during the fumigation. Modern, well-sealed warehouses may be treated with a low dosage, while more poorly constructed buildings may require the upper end of the dosage range. In certain other fumigations, proper distribution of lethal concentrations of gas to reach all parts of the site/structure becomes a very important factor in dose selection. An example where this may occur is in the treatment of grain stored in tall silos. Poor gas distribution frequently results when the fumigant cannot be uniformly added to the grain and it must be treated by surface application. In order to reduce the odds of overdosing, it is recommended that a careful inspection of the site to be fumigated is performed prior to application of the fumigant, including an assessment of the ability of the site/structure to hold the fumigant and a measure of the temperature and humidity inside the site/structure. The dosage should be based on the results of that inspection.

Although it is permissible to choose from the full range of dosages listed above, the following dosages are recommended for the various types of fumigations:

Recommended FUMITOXIN® Dosages for Various Types of Fumigations

DOSAGE RANGE

Type of Fumigation	# of Pellets/ 100m ³	# of Pellets/ 100 tonnes	# of Tablets/ 100m ³	# of Tablets/ 100 tonnes
1. Space (mills, warehouses, etc.)	350-1060		70-200	
Bagged commodities	530-1060		100-200	
Processed dried fruits & nuts	350-700		70-140	
Stored tobacco	350-700		70-140	
2. Bulk Stored Commodities:				
Vertical storages	530-1060	800-1500	100-200	160-300
Tanks	530-1060	800-1800	100-250	160-360
Flat storages (loose construction)	880-2560	1800-3600	250-500	360-720
Grain bins	880-2560	1800-3600	250-500	360-720
Bunkers & tarped ground storages	530-1400	800-2000	100-280	160-400
Railcars	530-1150	800-1500	100-230	160-300
Shipholds	530-1170	800-1600	100-230	160-320

The higher end of the dosage ranges may be required for structures that are of loose construction and in the fumigation of bulk stored commodities in which diffusion will be slowed and result in poor distribution of hydrogen phosphide gas.

11.6 Application Procedures

11.6.1 General Statement

Regardless of the type of storage or site/structure to be treated, there are several important factors common to all application procedures. A number of these points have been covered in other sections of this Applicator's Manual but are listed again in the following for completeness.

1. A Fumigation Management Plan must be written for all fumigations prior to actual treatment and must be devised for application, aeration and disposal of the fumigant so as to keep to a minimum any exposures to hydrogen phosphide (refer to Section 10, FUMIGATION MANAGEMENT PLAN).
2. A minimum buffer zone of 30 metres must be established for all fumigated sites (with the exception of ships and railcars that are in motion) as per the instructions outlined under Section 7, BUFFER ZONE REQUIREMENTS.
3. Entry by unprotected workers is only permitted after the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone. For all fumigations, appropriate respiratory protection must be worn if entry into the fumigated site and the buffer zone is required at any point from the beginning of application until the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone. Refer to the RESPIRATORY PROTECTION and the APPLICATOR AND WORKER EXPOSURE sections.
4. Observe all precautionary and safety statements mentioned elsewhere in this Applicator's Manual.
5. FUMITOXIN® pellets or tablets should be applied so as to provide effective gas concentrations throughout the storage. When pellets or tablets are not applied uniformly to a bulk commodity (surface application in a tall silo or ship's hold, for example), exposure times should be lengthened to allow for penetration of gas throughout the storage.
6. The site or storage structure to be fumigated must be sealed so as to maintain a suitable gas concentration over the time period required for control of pests.
7. Exposure periods should be long enough to provide for adequate control of pests and also complete reaction of the fumigant.
8. Piling of tablets, pellets or bags or the addition of liquid to the product is prohibited.
9. Contact with water, acid or other liquids is prohibited. Liquids in contact with unreacted aluminum phosphide will greatly accelerate the production of hydrogen phosphide gas which would result in a toxic and/or fire hazard.
10. Aluminum phosphide fumigants should not be applied to confined spaces where the concentration of hydrogen phosphide may build up to exceed its lower flammable limit.
11. FUMITOXIN® will corrode certain metals, especially at high concentrations and humidities. Protection or removal of wiring, sensitive equipment or precious metals is recommended under these conditions.

The following instructions are intended to provide general guidelines for typical fumigations:

11.6.2 Fumigation of Mills, Food Processing Plants and Warehouses

1. A Fumigation Management Plan must be written for all fumigations prior to actual treatment (see Section 10).

2. Using the label, calculate the duration of the fumigation and the dosage of pellets or tablets to be applied based upon volume of the building, air and/or commodity temperature and the general tightness of the structure.
3. A minimum buffer zone of 30 metres must be established as per Section 7, BUFFER ZONE REQUIREMENTS.
4. Carefully seal and placard the space to be fumigated and along the buffer zone perimeter as per Section 9, PLACARDING OF FUMIGATION AREAS.
5. Place trays or sheets of Kraft paper or foil, up to 1 m² (12 square feet) in area, on the floor throughout the structure to hold FUMITOXIN® pellets or tablets.
6. Wear appropriate respiratory protection while handling FUMITOXIN® as per the instructions outlined in Section 6, RESPIRATORY PROTECTION. Spread FUMITOXIN® tablets or pellets on the sheets at a density no greater than 75 pellets or 30 tablets per 0.1 m² (square foot). This corresponds to slightly more than one-half flask of pellets or tablets per 1 m² sheet. Check to see that the FUMITOXIN® has not piled up and that it is spread out evenly to minimize contact between the individual pellets or tablets.
7. Doors leading to the fumigated space should be closed, sealed, locked and placarded with warning signs.
8. The fumigation period usually lasts from 3 to 5 days depending upon the temperature. Continually monitor hydrogen phosphide gas levels at several locations along the buffer zone perimeter. If at any time the person monitoring hydrogen phosphide levels detects hydrogen phosphide concentrations greater than 0.1 ppm, the buffer zone must be extended until the hydrogen phosphide levels are at or below 0.1 ppm along the perimeter and warning signs relocated to reflect the new buffer zone perimeter. Refer to the sections on BUFFER ZONE REQUIREMENTS and PLACARDING OF FUMIGATION AREAS for detailed instructions.
9. Upon completion of the exposure period, windows, doors, vents, etc., should be opened and the fumigated structure allowed to aerate. Do not enter the structure and the buffer zone without appropriate respiratory protection until the hydrogen phosphide concentration is at or below 0.1 ppm in the structure and the buffer zone. When required, gas concentration readings may be taken using low level detector tubes or electronic metering devices to ensure safety of personnel who enter the fumigated site and the buffer zone. Refer to the section on RESPIRATORY PROTECTION and APPLICATOR AND WORKER EXPOSURE.
10. Collect the spent FUMITOXIN® dust and dispose of it, with or without further deactivation, following directions given under Section 14, DISPOSAL.
11. Remove fumigation warning placards when the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone (see Section 9, PLACARDING OF FUMIGATION AREAS).

11.6.3 Fumigation of Vertical Storages (concrete upright bins and other silos in which grain can be rapidly transferred)

1. A Fumigation Management Plan must be written for all fumigations prior to actual treatment (see Section 10).
2. Close all openings and seal all cracks to make the storage structure as airtight as possible. Prior to the fumigation, seal the vents near the bin top which connect to adjacent bins.
3. A minimum buffer zone of 30 metres must be established as per Section 7, BUFFER ZONE REQUIREMENTS.

4. Place warning placards on the discharge gate and on all entrances leading to the storage structure and along the buffer zone perimeter as per Section 9, PLACARDING OF FUMIGATION AREAS.
5. Wear appropriate respiratory protection while handling FUMITOXIN® as per the instructions outlined in Section 6, RESPIRATORY PROTECTION. Pellets or tablets may be applied continuously by hand. Pellets may also be applied by an automatic dispenser on the headhouse/gallery belt or into the fill opening as the commodity is loaded into the bin. An automatic dispenser may also be used to add pellets into the commodity stream in the up leg of the elevator. **CAUTION: Know how to calibrate the dispenser to deliver the appropriate dosage. To prevent accidental poisoning, ensure that no FUMITOXIN® remains in the hopper of the automatic dispenser once the commodity has been transferred.**
6. Seal the bin deck openings after the pellets or tablets have been dispensed.
7. Bins requiring more than 24 hours to fill should not be fumigated by continuous addition into the commodity stream. These bins must be fumigated by probing, surface application, or other appropriate means. Exposure periods should be lengthened to allow for diffusion of gas to all parts of the bin if FUMITOXIN® has not been applied uniformly throughout the commodity mass.
8. Continually monitor hydrogen phosphide gas levels at several locations along the buffer zone perimeter. If at any time the person monitoring hydrogen phosphide levels detects hydrogen phosphide concentrations greater than 0.1 ppm, the buffer zone must be extended until the hydrogen phosphide levels are at or below 0.1 ppm along the perimeter and warning signs relocated to reflect the new buffer zone perimeter. Refer to the sections on BUFFER ZONE REQUIREMENTS and PLACARDING OF FUMIGATION AREAS for detailed instructions.
9. Appropriate respiratory protection must be worn if entry into the fumigated site and the buffer zone is required at any point from the beginning of application until the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone. When required, gas concentration readings may be taken using low level detector tubes or electronic metering devices to ensure safety of personnel who enter the fumigated site and the buffer zone. Refer to the section on RESPIRATORY PROTECTION and APPLICATOR AND WORKER EXPOSURE.
10. Remove fumigation warning placards when the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone (see Section 9, PLACARDING OF FUMIGATION AREAS).

11.6.4 Fumigation of Flat Storages (Flat Houses)

1. A Fumigation Management Plan must be written for all fumigations prior to actual treatment (see Section 10). Treatment of these types of storages may require considerable effort, therefore, sufficient manpower should be available to complete the work rapidly enough to prevent excessive exposure to hydrogen phosphide gas. Vent flasks outside the storage, conduct fumigations during cooler periods and employ other work practices to minimize exposures.
2. Wear appropriate respiratory protection during application, as per the instructions outlined in Section 6, RESPIRATORY PROTECTION and Section 8, APPLICATOR AND WORKER EXPOSURE.
3. A minimum buffer zone of 30 metres must be established as per Section 7, BUFFER ZONE REQUIREMENTS.
4. Seal any vents, cracks and other sources of leaks.
5. Post fumigation warning placards around the fumigated site and along the buffer zone perimeter as per Section 9, PLACARDING OF FUMIGATION AREAS.

6. Apply pellets or tablets by surface application, shallow probing, deep probing or uniform addition as the bin is filled.

Storages requiring more than 24 hours to fill should not be treated by addition of fumigant to the commodity stream as large quantities of hydrogen phosphide may escape before the bin is completely sealed.

Probes should be inserted vertically at intervals along the length and width of the flat storage. Pellets or tablets may be dropped into the probe at intervals as it is withdrawn.

Surface application may be used if the bin can be made sufficiently gas tight to contain the fumigant gas long enough for it to penetrate the commodity. In this instance, it is advisable to place about 25 percent of the dosage in the floor level aeration ducts. Check the ducts prior to addition of FUMITOXIN® to make sure that they contain no liquid water.

7. Tarping the surface of the commodity is often advisable, particularly if the overhead of the storage cannot be well sealed.
8. Lock all entrances to the storage.
9. Continually monitor hydrogen phosphide gas levels at several locations along the buffer zone perimeter. If at any time the person monitoring hydrogen phosphide levels detects hydrogen phosphide concentrations greater than 0.1 ppm, the buffer zone must be extended until the hydrogen phosphide levels are at or below 0.1 ppm along the perimeter and warning signs relocated to reflect the new buffer zone perimeter. Refer to the sections on BUFFER ZONE REQUIREMENTS and PLACARDING OF FUMIGATION AREAS for detailed instructions.
10. Appropriate respiratory protection must be worn if entry into the fumigated site and the buffer zone is required at any point from the beginning of application until the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone. When required, gas concentration readings may be taken using low level detector tubes or electronic metering devices to ensure safety of personnel who enter the fumigated site and the buffer zone. Refer to the sections on RESPIRATORY PROTECTION and APPLICATOR AND WORKER EXPOSURE.
11. Remove fumigation warning placards when fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone (see Section 9, PLACARDING OF FUMIGATION AREAS).

11.6.5 Fumigation of Grain Bins

1. A Fumigation Management Plan must be written for all fumigations prior to actual treatment (see Section 10).
2. A minimum buffer zone of 30 metres must be established as per Section 7, BUFFER ZONE REQUIREMENTS.
3. Leakage is the single most important cause of failures in the treatment of grain bins. Since these storages are often small, they usually have a higher leakage area in proportion to their capacity. Most wooden storage structures are so porous that they cannot be successfully fumigated unless they are completely tarped using plastic sheeting or tarpaulins of at least 4 mil thickness. Thicker poly sheeting is recommended to reduce the potential for loss of fumigant. Do not fumigate storages which will be entered by humans or animals prior to aeration.

Seal the bin as tightly as possible. It is recommended that the surface of the grain be covered with plastic sheeting after FUMITOXIN® has been applied. Tarping the grain surface will greatly reduce the leak rate of the gas as well as reduce the amount of FUMITOXIN® required. Only the volume below the tarp must be dosed. If not tarped, the entire volume of the storage must be treated, whether full or empty.

A recirculation system which draws gas from above the grain and introduces it to the grain mass will help to establish a uniform hydrogen phosphide concentration throughout the storage.

4. Place fumigation warning signs on entrances to the bin and near the ladder and along the buffer zone perimeter as per Section 9, PLACARDING OF FUMIGATION AREAS.
5. Wear appropriate respiratory protection while handling FUMITOXIN® as per the instructions outlined in Section 6, RESPIRATORY PROTECTION. FUMITOXIN® tablets may be scattered over the surface or probed into the grain using a rigid PVC pipe about 2 metres in length and having a diameter of 32 mm. Use 100 - 250 pellets or 20 - 50 tablets per probe. Spread the dose uniformly over the surface. Immediately cover the surface of the grain with a plastic tarpaulin. Place no more than 25 percent of the total dose at the bottom if the bin is equipped with aeration fans. **Caution:** Make sure that the aeration duct is dry before adding FUMITOXIN®. Addition of FUMITOXIN® to liquid in an aeration duct may result in a fire.

Seal the aeration fan with plastic sheeting of 4 mil thickness or greater. Thick poly sheeting not less than 4 mil, is recommended to reduce the potential for loss of fumigant.

6. Continually monitor hydrogen phosphide gas levels at several locations along the buffer zone perimeter. If at any time the person monitoring hydrogen phosphide levels detects hydrogen phosphide concentrations greater than 0.1 ppm, the buffer zone must be extended until the hydrogen phosphide levels are at or below 0.1 ppm along the perimeter and warning signs relocated to reflect the new buffer zone perimeter. Refer to the sections on BUFFER ZONE REQUIREMENTS and PLACARDING OF FUMIGATION AREAS for detailed instruction.
7. Appropriate respiratory protection must be worn if entry into the fumigated site and the buffer zone is required at any point from the beginning of application until the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone. When required, gas concentration readings may be taken using low level detector tubes or electronic metering devices to ensure safety of personnel who enter the fumigated site and the buffer zone. Refer to the sections on RESPIRATORY PROTECTION and APPLICATOR AND WORKER EXPOSURE.
8. Remove fumigation warning placards when the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone (see Section 9, PLACARDING OF FUMIGATION AREAS).
9. Following aeration of the bin, the surface of the grain may be sprayed with an approved protectant to discourage reinfestation.

11.6.6 Bunker and Tarpaulin Fumigations

1. A Fumigation Management Plan must be written for all fumigations prior to actual treatment (see Section 10).
2. A minimum buffer zone of 30 metres must be established as per Section 7, BUFFER ZONE REQUIREMENTS.
3. When possible, conduct tarpaulin fumigations outside. Do not conduct outdoor fumigation of commodities in the proximity of wildlife areas.

Use of plastic sheeting or tarpaulins to cover commodities is one of the easiest and least expensive means for providing relatively gas tight enclosures which are very well suited for fumigation. The volume of these enclosures may vary widely from a few cubic feet, for example, a fumigation tarpaulin placed over a small stack of bagged commodity, to a plastic bunker storage capable of holding 22000 kL (600,000 bushels) of grain or more.

An enclosure suitable for fumigation may be formed by covering bulk or packaged commodity with poly sheeting. The sheets may be taped together to provide a sufficient width of material to ensure that adequate sealing is obtained. If the material rests on soil or flooring of wood or other porous material, it should be repositioned onto poly prior to covering for fumigation. The plastic covering of the pile may be sealed to the floor using sand or water snakes, by shoveling soil or sand onto the ends of the plastic covering or by other suitable procedures. The poly covering should be reinforced by tape or other means around any sharp corners or edges in the stack so as to reduce the risk of tearing. Use plastic sheeting or tarpaulins of at least 4 mil thickness. Thicker poly sheeting is recommended to reduce the potential for loss of fumigant.

4. Place fumigation warning placards at conspicuous points on the enclosure and along the buffer zone perimeter as per Section 9, PLACARDING OF FUMIGATION AREAS.
5. Wear appropriate respiratory protection while handling FUMITOXIN® as per the instructions outlined in Section 6, RESPIRATORY PROTECTION.
6. Pellets or tablets may be applied to the tarped stack or bunker storage of bulk commodity through slits in the poly covering. Probing or other means of dosing may be used. Avoid application of large amounts of FUMITOXIN® at any one point. It should be added below the surface of the commodity if condensation or other source of moisture is likely to form beneath the sheeting. The slits in the covering should be carefully taped to prevent loss of gas once the dose has been applied. FUMITOXIN® pellets or tablets on trays or sheets of Kraft paper may be used for the treatment of bagged commodities and processed foods. Pellets or tablets and their reacted residues must not come into contact with any processed food except that they may be added directly to processed brewer's rice, malt and corn grits used in the manufacture of beer. Care should be taken to see that the plastic sheeting is not allowed to cover the FUMITOXIN® and prevent contact with moist air or confine the gas. Distribution of hydrogen phosphide gas is generally not a problem in the treatment of bagged commodities and processed foods. However, fumigation of larger bunker storages containing bulk commodities will require proper application procedures to obtain adequate results.
7. Continually monitor hydrogen phosphide gas levels at several locations along the buffer zone perimeter. If at any time the person monitoring hydrogen phosphide levels detects hydrogen phosphide concentrations greater than 0.1 ppm, the buffer zone must be extended until the hydrogen phosphide levels are at or below 0.1 ppm along the perimeter and warning signs relocated to reflect the new buffer zone perimeter. Refer to the sections on BUFFER ZONE REQUIREMENTS and PLACARDING OF FUMIGATION AREAS for detailed instruction.
8. Appropriate respiratory protection must be worn if entry into the fumigated site and the buffer zone is required at any point from the beginning of application until the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone. When required, gas concentration readings may be taken using low level detector tubes or electronic metering devices to ensure safety of personnel who enter the fumigated site and the buffer zone. Refer to the sections on RESPIRATORY PROTECTION and APPLICATOR AND WORKER EXPOSURE.
9. Remove fumigation warning placards when the fumigated site has been aerated and the hydrogen phosphide level is at or below 0.1 ppm in the fumigated site and the buffer zone (see Section 9, PLACARDING OF FUMIGATION AREAS).

11.6.7 **Fumigation of Railcars, Containers, Trucks, Vans and Other Transport Vehicles Shipped Piggy-back by Rail**

1. A Fumigation Management Plan must be written for all fumigations prior to actual treatment (see Section 10).
2. Railcars and shipping containers, trucks, vans and other transport vehicles shipped piggy-back by rail may be fumigated in-transit. Aeration of railcars, railroad boxcars or shipping containers is prohibited en route.

Transport vehicles, such as trucks, vans and trailers, are prohibited from travel over public roads or highways until completely aerated to a hydrogen phosphide level at or below 0.1 ppm and the warning placards removed.

3. Transport vehicles loaded with bulk commodities to which FUMITOXIN® products may be added directly are treated in essentially the same way as any other flat storage facility.
4. Wear appropriate respiratory protection during application, as per the instructions outlined in Section 6, RESPIRATORY PROTECTION and Section 8, APPLICATOR AND WORKER EXPOSURE. A minimum buffer zone of 30 metres must be established as per Section 7, BUFFER ZONE REQUIREMENTS. During application, post fumigation warning placards around the fumigated site and along the buffer zone perimeter as per Section 9, PLACARDING OF FUMIGATION AREAS.
5. FUMITOXIN® may be added as the vehicle is being filled, the dose may be scattered over the surface after loading has been completed or the tablets may be probed below the surface. Carefully seal any vents, cracks or other leaks, particularly if the fumigation is to be carried out in-transit. See Section 9, PLACARDING OF FUMIGATION AREAS for recommendations on placarding. Both doors of box cars should be placarded. Place fumigation warning placards on both sides of hopper cars near the ladders and atop the hatches to which FUMITOXIN® has been applied.
6. Written notification must be provided to the receiver of railcars, railroad boxcars, shipping containers and other transport vehicles shipped piggyback by rail that are being fumigated in transit. Notification must be made prior to the actual receipt of a fumigated vehicle or container by a consignee. A copy of the applicator's manual must precede or accompany all transportation containers or vehicles.
7. During transport, railcars containing non-aerated bulk commodities must not be located directly adjacent to another railcar containing workers or other individuals, unless it is likely to have a serious impact on train dynamics. Railcars containing fumigated cargo should be placed as far as possible from occupied cars.
8. If prolonged/extended stops are required while en route (e.g. to accommodate use of rest facilities or bunkhouses) buffer zone requirements around the fumigated cargo must be followed (as outlined under Section 7, BUFFER ZONE REQUIREMENTS).
9. Proper handling of treated railcars, containers and other transport vehicles shipped piggyback by rail, at their destination is the responsibility of the consignee. Upon receipt of the railcar, railroad boxcars, shipping containers and other transport vehicles, a licensed/certified applicator, or a person trained in accordance with the Applicator's Manual working under the direct supervision of a licensed/certified applicator, must perform the aeration process. The applicator must hold an appropriate pesticide applicator certificate or license recognized by the provincial/territorial pesticide regulatory agency where the aeration occurs. Both individuals must be familiar with the properties of hydrogen phosphide fumigants, worker exposure limits, required personal protective equipment and buffer zone requirements, symptoms and first aid treatment for hydrogen phosphide poisoning, and must know how to take hydrogen phosphide gas concentration measurements. A training completion date must be logged and maintained in the employee's safety training record. Upon receipt of a fumigated commodity, it must be documented in writing that the monitoring has been conducted and that aeration has been completed.

Transfer without aeration:

Railcars, shipping containers and other transport vehicles shipped piggyback by rail, containing commodities under fumigation may be transferred to a storage area without prior aeration. The consignee must:

1. Ensure that worker exposure levels are not exceeded by measuring hydrogen phosphide levels in the vicinity of the commodity under fumigation. If hydrogen phosphide levels are above

0.1 ppm, appropriate respiratory protection must be worn (see Section 6, RESPIRATORY PROTECTION).

2. Ensure that the storage area into which the unaerated railcar, shipping container or transport vehicle shipped piggyback is transferred, is placarded if it contains a hydrogen phosphide level that is above 0.1 ppm or is unknown and conforms to the buffer zone requirements (refer to Section 7, BUFFER ZONE REQUIREMENTS).

Transfer with aeration:

The consignee must:

1. Completely aerate the railcar, shipping containers or other transport vehicles shipped piggyback by rail, containing fumigated commodities while conforming to the requirements outlined under Section 7, BUFFER ZONE REQUIREMENTS, and Section 9, PLACARDING OF FUMIGATION AREAS.
2. With the authorization of the licensed/certified applicator, remove the fumigation warning placard after aeration is completed.
3. Ensure that worker safety limits have not been exceeded by verifying that hydrogen phosphide levels are at or below 0.1 ppm.
4. Transfer the fumigated commodity from the railcar, or shipping containers and other transport vehicles shipped piggyback by rail.
5. Dispose of spent fumigant as per Section 14, DISPOSAL.

11.6.8 Fumigation of Ships

11.6.8.1 General Information

1. **IMPORTANT:** Shipboard, in-transit ship or shiphold fumigation is also governed by Transport Canada Ship Safety Regulations (see Cargo, Fumigation and Tackle Regulations under the *Canada Shipping Act, current to August 5, 2014*). Refer to and comply with those Regulations and Ship Safety Bulletins prior to fumigation. In Canada, fumigations must be carried out under the direction of a "Fumigator-in-Charge" as indicated in these regulations.

No person shall fumigate in-transit or permit in-transit fumigation in a Canadian flag ship. The decision to fumigate-in-transit on Non-Canadian flag vessels is at the discretion of the master (see Ship Safety Bulletin 13/93).

2. FUMITOXIN® pellets and tablets are classified as restricted use pesticides due to the acute inhalation toxicity of hydrogen phosphide (phosphine, PH₃) gas. These products are for retail sale to and use only by individuals holding an appropriate pesticide applicator certificate or license recognized by the provincial/territorial pesticide regulatory agency where the pesticide application occurs or by workers trained in accordance with the Applicator's Manual and working under the direct supervision and in the physical presence of an applicator holding an appropriate pesticide applicator certificate or license. (Physical presence means on site or on the premises). Read and follow the label, Applicator's Manual and Guidance for Preparation of a Fumigation Management Plan which contains complete instructions for the safe use of this pesticide.

11.6.8.2 Pre-Voyage Fumigation Procedures

1. Before fumigation is commenced, a notification of intention to fumigate must be given to the nearest Transport Canada Ship safety office (generally, no less than 24 hours in advance). Similarly, a notice must be given for vessels in-transit of Ca-

nadian waters and stopping at a Canadian Port. Prior to fumigating a vessel for in-transit cargo fumigation, the master of the vessel, or his/her representative, and the Fumigator-in-Charge must determine whether the vessel is suitably designed and configured so as to allow for safe occupancy by the ship's crew throughout the duration of the fumigation. If it is determined that the design and configuration of the vessel does not allow for safe occupancy by the ship's crew throughout the duration of the fumigation, then the vessel must not be fumigated unless all crew members are removed from the vessel. The crew members must not be allowed to reoccupy the vessel until the vessel has been properly aerated to a hydrogen phosphide level at or below 0.1 ppm and a determination has been made by the master of the vessel and the Fumigator-in-Charge that the vessel is safe for occupancy.

2. The Fumigator-in-Charge responsible for the fumigation must notify the master of the vessel, or his/her representative, of the requirements: 1) relating to the use of personal respiratory protection equipment*; 2) relating to the use of detection equipment; and 3) that a trained person under the direct supervision of the Fumigator-in-Charge, qualified in the use of this equipment must accompany the vessel with cargo under fumigation. Emergency procedures, cargo ventilation, periodic monitoring and inspections, and first aid measures must be discussed with and understood by the master of the vessel or his/her representative.

*Personal respiratory protection means a NIOSH-approved air-purifying full face respirator (gas mask) with a chin-style, front- or back-mounted canister approved for hydrogen phosphide OR a NIOSH-approved supplied-air respirator (i.e., air-line respirator or self-contained breathing apparatus) with a full face piece for hydrogen phosphide levels up to 5 ppm. A NIOSH-approved self-contained breathing apparatus with a full face piece operated in a pressure-demand or other positive-pressure mode OR a NIOSH-approved air-line respirator with a full face piece operated in a pressure-demand or other positive-pressure mode combined with an auxiliary self-contained positive-pressure breathing apparatus must be worn when hydrogen phosphide levels are above 5 ppm or at unknown concentrations. Refer to Section 6, RESPIRATORY PROTECTION for detailed information.

3. Seal all openings to the cargo hold or tank and lock or otherwise secure all openings, manways, etc., which might be used to enter the hold. The overspace pressure relief system of each tank aboard tankers must be sealed by closing the appropriate valves and sealing the openings into the overspace with gas-tight materials.
4. Placard all entrances to the treated spaces with fumigation warning signs as described in Section 9, PLACARDING OF FUMIGATION AREAS, of this Applicator's Manual. A watchman must be posted at the gangway to keep unnecessary persons from boarding.
5. If the fumigation is not completed and the vessel aerated before the manned vessel leaves port, the Fumigator-in-Charge shall ensure that there be on board the vessel during the voyage: 1) at least four NIOSH-approved self-contained breathing apparatus (SCBA)* with a full face piece operated in a pressure-demand or other positive-pressure mode and four additional filled air bottles; 2) two gas detection devices (when these devices require re-arming after use, the ship shall be equipped with 10% more spare tubes than are required to conduct the required testing for the duration of the voyage); and 3) a trained person, under the direct supervision of the Fumigator-in-Charge qualified in their operation. If the fumigated site of the vessel has to be entered before complete aeration, approved respiratory protection must be worn as outlined in Section 6, RESPIRATORY PROTECTION.

*The total number of SCBA on board a vessel need not exceed 6, including those already on board for fire fighting, etc. and required by other regulations.

6. During fumigation, the Fumigator-in-Charge shall ensure that a qualified trained person, under their direct supervision, using gas or vapour detection equipment routinely tests spaces adjacent to spaces containing fumigated cargo and all regularly occupied spaces for fumigant leakage. For fumigation-in-transit, the vessel must remain alongside for a minimum of 24 hours, or the Fumigator-in-Charge must sail with the ship and remain on board for a minimum of 24 hours once fumigation has commenced. If leakage of the fumigant is detected, the Fumigator-in-Charge of the fumigation shall take action to correct the leakage, or shall inform the master of the vessel, or his/her representative, of the leakage so that corrective action can be taken. At the end of the 24 hour period, final gas readings should be made and a clearance certificate issued.
7. Review with the master of the ship, or his/her representative, the precautions and procedures for during the voyage. Clear written instructions must be given to the master of the ship, to the receiver of the cargo and to the authorities at the discharging port as to how any powdery residues are to be disposed of.

11.6.8.3 **Application Procedures for Bulk Dry Cargo Vessel and Tankers**

Apply pellets or tablets by scattering uniformly over the commodity surface, or they may be shallow or deep probed into the commodity mass.

Immediately after application of the fumigant, close and secure all hatch covers, tank tops, butterworth valves, manways, etc.

11.6.8.4 **In Transit Fumigation of Containers Aboard Ships**

In transit fumigation of containers on ships is also governed by Transport Canada Ship Safety Regulations (see Cargo, Fumigation and Tackle Regulations under the *Canada Shipping Act, current to August 5, 2014*). Refer to and comply with these regulations prior to fumigation.

No fumigation of containers is to be commenced while the unit is on board a ship. The vessel Master must be notified and correct procedures regarding shipping documents, placarding and transport and stowage of containers under fumigation must be observed.

Application procedures for fumigation of raw commodities or processed foods in containers and other transport vehicles are described in Section 11.6.7.

11.6.8.5 **Precautions and Procedures During Voyage**

Using appropriate gas detection equipment, routinely monitor spaces adjacent to areas containing fumigated cargo and all regularly occupied areas for fumigant leakage. If leakage is detected, the area should be evacuated of all personnel, ventilated, and action taken to correct the leakage before allowing the area to be re-occupied.

Do not enter fumigated sites except under emergency conditions. If necessary to enter a fumigated site, appropriate personal respiratory protection equipment must be used as described in Section 6, RESPIRATORY PROTECTION. Never enter fumigated sites alone. At least two persons, a licensed/certified applicator and trained person, or two persons trained in accordance with the Applicator's Manual working under the direct supervision of the licensed/certified applicator, wearing the required breathing apparatus should enter, and at least one other person, wearing the required personal respiratory protection equipment, should be available to assist in case of an emergency.

11.6.8.6 **Precautions and Procedures During Discharge**

If necessary to enter a fumigated site prior to discharge, test spaces directly above grain surface for hydrogen phosphide concentration, using appropriate gas detection and per-

sonal respiratory protection as described in Section 6, RESPIRATORY PROTECTION. Do not allow entry to fumigated sites without personal respiratory protection, unless hydrogen phosphide concentrations are at or below 0.1 ppm, as indicated by a suitable detector.

11.6.9 Fumigations in Small Sealable Enclosures

1. A Fumigation Management Plan must be written for all fumigations prior to actual treatment (see Section 10).
2. A minimum buffer zone of 30 metres must be established as per Section 7, BUFFER ZONE REQUIREMENTS.
3. Carefully seal and place fumigation warning placards at conspicuous points on the enclosure and along the buffer zone perimeter as per Section 9, PLACARDING OF FUMIGATION AREAS.
4. Wear appropriate respiratory protection while handling FUMITOXIN® tablets or pellets as per the instructions outlined in Section 6, RESPIRATORY PROTECTION.
5. Excellent results may be attained in the treatment of small enclosures since it is often possible to control the temperature during fumigation and also to make the enclosure virtually gas tight. Take care not to overdose during these fumigations. A single FUMITOXIN® pellet will treat a space of from 0.04 - 0.28 m³ (1.4 to 10 cubic feet). [From 0.19 - 1.42 m³ (6.9 to 50 cubic feet) may be fumigated with a single FUMITOXIN® tablet].

12. MAXIMUM RESIDUE LIMITS FOR FUMIGATED COMMODITIES

12.1 Foods and Feeds

Many pesticidal chemicals are poisonous and may leave a toxic residue in the area to which they are applied. Health Canada has established maximum residue limits of such pesticidal chemicals that may remain on raw agricultural products, animal feeds and processed foods. **To guarantee compliance with these maximum residue limits for hydrogen phosphide, fumigated commodities must be aerated for 48 hours prior to offering them to the end consumer.** It is the user's responsibility to see that there is no residue on such crops in excess of these amounts. The instructions in this Applicator's Manual are based on the best available information, and if followed carefully, should not leave excessive residues.

12.2 Tobacco

To guarantee compliance with the default maximum residue limit of 0.1 ppm set for hydrogen phosphide in tobacco, fumigated tobacco must be aerated for at least three days (72 hours) when fumigated in hogsheads and for at least two days (48 hours) when fumigated in other containers. Tobacco fumigated in containers with plastic liners will probably require longer aeration periods to reach the residue limit of 0.1 ppm.

13. STORAGE INSTRUCTIONS

1. Do not store in buildings where humans or domestic animals reside. This product must be stored away from lodging for humans, animal quarters and normal work areas to avoid inadvertent exposure.
2. Store FUMITOXIN® in a dry, well-ventilated area away from heat, under lock and key. Post appropriate signage indicating it as a pesticide storage area. Do not contaminate water, food or feed by storing pesticides in the same areas used to store these commodities.
3. Keep out of reach of children and prevent access by unauthorized personnel.
4. FUMITOXIN® pellets and tablets are supplied in gas-tight, resealable aluminum flasks. Do not expose the product to atmospheric moisture any longer than is necessary and seal tightly before returning opened flasks to storage.
5. The shelf life of FUMITOXIN® is virtually unlimited as long as the containers are tightly sealed.

14. DISPOSAL

14.1 General

Pesticide wastes are toxic. Open dumping is prohibited. Do not discharge this product, or material containing this product, into natural waterways, wetlands (swamps, bogs, marshes, potholes, etc.) or municipal wastewater collection systems. Proper disposal of aluminum phosphide is required to ensure minimal impact on the environment.

Unreacted or partially reacted aluminum phosphide is acutely hazardous and must be deactivated before disposal. If these wastes cannot be disposed of according to label instructions, contact the Provincial Regulatory Agency or the Manufacturer. See also Section 15, SPILL AND LEAK PROCEDURES.

14.2 Product Container Disposal

The container must be cleaned prior to disposal. Appropriate respiratory protection (see Section 6, RESPIRATORY PROTECTION) must be worn during this process and while monitoring hydrogen phosphide levels (i.e. worn at all times when levels of hydrogen phosphide are above 0.1 ppm or are unknown). This should be done in a secured and well-ventilated area or outdoors, away from inhabited buildings to prevent access by unauthorized personnel.

There are two options: 1) Triple rinse empty flasks and stoppers with water. Dispose of rinsate in a sanitary landfill, by pouring it out onto the ground or by other approved procedures. 2) Remove lids and expose empty flasks to atmospheric conditions until residue in the flasks is reacted.

Once the container is clean, it may be offered for recycling or reconditioning. Alternatively, it may be made unsuitable for further use by puncturing the container and disposed of in a sanitary landfill, or by other procedures approved by provincial and local authorities.

14.3 Placarding During Deactivation of Unreacted Granules

IMPORTANT: Post warning placards on a suitable container used for deactivation (e.g. bucket, drum, etc.) and around the buffer zone perimeter before commencing deactivation. Relocating the placards may be required if the buffer zone needs to be extended at any point during the deactivation period.

Posting of warning signs for the buffer zone perimeter is required, UNLESS there is a physical barrier (e.g. fence) that prevents access into the buffer zone. Signage must not be removed until after deactivation is completed. Only a licensed/certified applicator may authorize removal of warning signs.

Placards must be at least 35 cm long and 25 cm wide and made of substantial material that can be expected to withstand adverse weather conditions. They must bear the following information:

1. The signal word DANGER in letters at least 7 cm high and the SKULL AND CROSSBONES symbol in red.
2. The "DO NOT WALK" symbol.
3. The statement "Access to area restricted due to deactivation of fumigant chemicals. DO NOT ENTER".
4. The statement, "This sign may only be removed after deactivation of fumigant chemicals is complete."
5. The date and start time of the deactivation.
6. Name of fumigant used: FUMITOXIN® Pellets or Tablets – Reg. #'s 19226 or 19227
7. Contact information (name, address and telephone number) for the supervising fumigant handler in charge of the deactivation.
8. Placards must bear a 24-hour emergency response telephone number.

14.4 Disposal of Spent Residual Dust from FUMITOXIN®

14.4.1 **Do not use these directions for incompletely exposed residual dust. See Section on Deactivation of Partially-Spent Residual Dust from FUMITOXIN®.** If properly exposed, the residual dust remaining after a fumigation with FUMITOXIN® will be a greyish-white powder. This will be a nonhazardous waste and contain only a small amount of unreacted aluminum phosphide.

14.4.2 Spent residual dust from FUMITOXIN® should be collected and disposed of at a sanitary landfill, incinerator or other approved sites.

14.4.3 From 2 to 3 kg (4 to 7 lbs.) of spent dust of FUMITOXIN® may be collected for disposal in a 4 litre bucket. Larger amounts may be collected in burlap, cotton or other types of porous cloth bags for transportation in an open vehicle to the disposal site. Do not collect dust from more than about 11 kg (25 lbs.) of product in a single bag. Do not pile cloth bags together.

Caution: Do not collect dust in large drums, dumpsters, plastic bags or other containers where confinement may occur.

14.5 Deactivation of Partially-Spent Residual Dust from FUMITOXIN®

14.5.1 There are two forms of partially-spent residual dust:

1. The most volatile of these is called "green dust", due to its grey-green colour. "Green dust" can result when FUMITOXIN® has not been exposed to the atmosphere for the recommended period of time (e.g. when a fumigation is aborted after only 8 hours because the temperature has dropped below 5°C).
2. A second form of partially-spent residual dust can occur when FUMITOXIN® is exposed under low temperature or humidity conditions. There may be some unreacted aluminum phosphide remaining in the dust, even if the product was exposed for the recommended period of time. Under these circumstances, the residual dust will have a grey-almost white appearance.

Partially spent dust must be further deactivated prior to transport for ultimate disposal. This is especially true in the cases where "green dust" is present, or following a fumigation which has produced large quantities of partially spent material.

Caution: Confinement of partially spent residual dust, as in a closed container, or collection and storage of large quantities of dust may result in a fire hazard. Small amounts of hydrogen phosphide may be given off from unreacted aluminum phosphide, and confinement of the gas may result in a flash.

14.5.2 Extension of the fumigation period is the simplest method for further deactivation of "green" or partially spent residual dust prior to ultimate disposal.

14.5.3 "Green" or partially spent residual dust from FUMITOXIN® may be deactivated as follows using the "Dry Method."

Appropriate respiratory protection (see Section 6, RESPIRATORY PROTECTION) must be worn while handling partially spent residual dust and while monitoring hydrogen phosphide levels during deactivation (i.e. worn at all times when levels of hydrogen phosphide are above 0.1 ppm or are unknown).

A minimum buffer zone of 30 metres must be established around the deactivation site (see Section 7, BUFFER ZONE REQUIREMENTS) and warning placards must be posted to secure the site and prevent unauthorized persons from tampering with the deactivating dust (see Section 14.3, Placarding During Deactivation of Unreacted Granules).

Small amounts of partially spent dust, from 2 to 3 kg (4 to 7 lbs.) may be deactivated by storage in a 4 litre bucket. Dust should be deactivated outdoors, in a dry location away from inhabited buildings. Larger amounts of partially spent residual dust (about 11 kg or 25 lbs.) may be held for deactivation in porous cloth bags (burlap, cotton, etc.). **Caution: Do not use cloth bags for the deactivation of "green dust".**

Once completely deactivated, the dust may be disposed of at an approved sanitary landfill. Caution: Transport the dust in open vehicles without stacking the buckets or piling the bags.

- 14.5.4 "Green" or partially spent residual dust from FUMITOXIN® may also be deactivated as follows using the "Wet Method":

Caution: Wear appropriate respiratory protection during wet deactivation of partially spent material. Do not cover the container being used for wet deactivation. This procedure should be performed in the open air and not in the fumigated site/structure.

Appropriate respiratory protection (see Section 6, RESPIRATORY PROTECTION) must be worn while handling partially spent residual dust and while monitoring hydrogen phosphide levels during deactivation (i.e. worn at all times when levels of hydrogen phosphide are above 0.1 ppm or are unknown).

A minimum buffer zone of 30 metres must be established around the deactivation site (see Section 7, BUFFER ZONE REQUIREMENTS) and warning placards must be posted to secure the site and prevent unauthorized persons from tampering with the deactivating dust (see Section 14.3, Placarding During Deactivation of Unreacted Granules).

Deactivating solution is prepared by adding the appropriate amount of low-sudsing detergent or surface active agent to water in a drum or other suitable container. A 2% solution (2000 ml in 100 litres) is suggested. The container should be filled with deactivating solution to within 5-7 cm of the top.

Residual dust is poured slowly into the deactivating solution and stirred so as to thoroughly wet all of the particles. Dust from FUMITOXIN® pellets or tablets should be mixed into no less than about 40 litres of water/detergent solution for each case (21 kg) of material used. Fill the drum with additional water to eliminate headspace.

Allow the suspension to stand for 36 hours or more.

Dispose of the completely deactivated dust/water suspension, with or without preliminary decanting, at an approved sanitary landfill. The deactivating solution may be poured onto the ground. Do NOT directly pour into a storm sewer.

15. SPILL AND LEAK PROCEDURES

15.1 General Precautions

A spill, other than incidental to application or normal handling, may produce high levels of hydrogen phosphide gas, and therefore, attending personnel must wear appropriate respiratory protection and personal protective equipment as specified below. Contact the manufacturer and the provincial regulatory agency in case of a spill and for clean-up of spills.

Directions for handling spills and leaks are provided below. Spills and leaks can be of two types:

- 1) spills and leaks in dry, non-wet areas;
- 2) spills into water.

15.2 Spills and Leaks in Dry, Non-Wet Areas

Personal Protective Equipment

Appropriate respiratory protection must be worn while attending to spills and leaks, during deactivation of unreacted granules and while monitoring hydrogen phosphide levels (i.e. worn at all times when levels of hydrogen phosphide gas are above 0.1 ppm or are unknown). Refer to Section 6, RESPIRATORY PROTECTION and Section 8, APPLICATION AND WORKER EXPOSURE for additional details.

Wear a loose fitting long sleeve shirt, long pants, socks and shoes, and wear dry gloves of cotton or other breathable material when handling FUMITOXIN®.

Directions for Handling Spills and Leaks in Dry, Non-Wet Areas

Unless directions specified below under “Deactivation by the Wet Method” are being followed, do **not** use water at any time to clean up a spill of FUMITOXIN®. Water, acids and other liquids in contact with unreacted pellets or tablets will greatly accelerate the production of hydrogen phosphide gas which could result in a toxic and/or fire hazard.

A minimum buffer zone of 30 metres must be established around the location of the spill site. Entry by unprotected workers is only permitted after the hydrogen phosphide gas level is at or below 0.1 ppm in the site and the buffer zone (Refer to Section 7, BUFFER ZONE REQUIREMENTS).

Return all intact aluminum flasks to fibreboard cases or other packaging which has been suitably constructed and marked according to T.D.G.A. regulations. Notify consignee and shipper of damaged cases.

1. If aluminum flasks have been punctured or damaged so as to leak, the container may be temporarily repaired with aluminum tape or the FUMITOXIN® may be transferred from the damaged flask to a sound metal container which must be sealed and properly labelled as aluminum phosphide. Transport the damaged containers to an area suitable for pesticide storage and for inspection. Further instructions and recommendations may be obtained from the manufacturer.
2. If a spill has occurred which is only a few minutes old, collect the pellets or tablets and place them back into the original flasks, if they are intact, and stopper tightly. Place the collected pellets or tablets in a sound metal container if the original flasks are damaged. **Caution, these flasks may flash upon opening at some later time. When possible, open flasks outdoors. Do not open flasks in an explosive environment (e.g. flour mill).**
3. If the age of the spill is unknown, or if the pellets or tablets have been contaminated with soil, debris, water, etc., gather up the spillage and place it into small open buckets having a capacity no larger than about 4 litres. Do not add more than about 1 to 1.5 kg (2 to 3 lbs.) to the bucket. Warning placards must be posted along the buffer zone perimeter to secure the site and prevent access by unauthorized personnel (see Section 14.3 Placarding During Deactivation of Unreacted Granules). If on-site deactivation is not feasible, these open containers should be transported in open vehicles to a suitable area. Wet deactivation may then be carried out as described below.

Deactivation of FUMITOXIN® by the Wet Method

This is similar to the Sec. 14.4.4 (Wet deactivation of partially-spent residual dust). The differences are that more water is required, and that any water which bubbles out of the drum is replaced.

Caution: Wear appropriate respiratory protection during wet deactivation of unexposed or incompletely exposed FUMITOXIN®. Never place pellets or tablets or dust in a closed container such as a dumpster, sealed drum, plastic bag, etc., as flammable concentrations and a flash of hydrogen phosphide gas are likely to develop.

Appropriate respiratory protection (see Section 6, RESPIRATORY PROTECTION) must be worn while handling pellets or tablets or dust, during deactivation of unreacted granules and while monitoring hydrogen phosphide levels (i.e. worn at all times when levels of hydrogen phosphide are above 0.1 ppm or are unknown).

A minimum buffer zone of 30 metres must be established around the deactivation site (see Section 7, BUFFER ZONE REQUIREMENTS). Warning placards must be posted on a suitable container used for deactivation (e.g. bucket, drum, etc.) and around the buffer zone perimeter before commencing deactivation in order to secure the site and prevent access by unauthorized personnel (see Section 14.3, Placarding During Deactivation of Unreacted Granules). Relocating the placards may be required if the buffer zone needs to be extended to any point during the deactivation period.

Deactivating solution is prepared by adding the approximate amount of low-sudsing detergent or surface active agent to water in a drum or other suitable container. A 2% solution (2000 ml in 100 litres) is suggested. The container should be filled with deactivating solution to within 5-7 cm of the top.

Add pellets or tablets to the deactivating solution slowly. Stir to thoroughly wet all of the product. This procedure should be done in the open air. Pellets or tablets should be mixed into no less than 57 litres of water/detergent solution for each case (21 kg) of material to be deactivated. Fill the drum with additional water to eliminate headspace.

Keep a water supply on hand to top-up the drum as necessary. Allow the mixture to stand, with occasional stirring, for 36 hours. The resultant slurry will then be safe for disposal.

Dispose of the slurry of completely deactivated material, with or without preliminary decanting, at an approved sanitary landfill. The deactivating solution may be poured onto the ground. Do not dispose of dust, slurry or deactivated solution by direct addition to sanitary or storm sewers.

15.3 Spills into Water

As releases into water can produce high levels of hydrogen phosphide gas, attending personnel must wear appropriate respiratory protection and personal protective equipment as specified below under EMERGENCY RESPONDER PROTECTION.

IMPORTANT: Emergency responders must be familiar with the “Emergency Response Guidebook”, which is maintained by Transport Canada.

WHAT TO DO

In the event of an accidental release, evacuate the area immediately and call for assistance. A response into the spill area should only be attempted by trained emergency responders. As a reference, small and large spills may require isolation distances between 60-500 metres and may also require protective distances between 200 metres and 7.5 kilometres (refer to the “Emergency Response Guidebook”).

HOT LINE NUMBER

Have the product container label or Applicator’s Manual with you when calling a poison control centre, doctor, or when going for treatment. You may also contact SUNZON INTERNATIONAL, INC. 252-237-7923 or SELL-EN GRAIN SERVICES, LTD. 519-692-4232. For all other chemical emergencies, please contact CHEMTREC – 1-800-424-9300 or Canadian Transport Emergency Centre (CANUTEC) 613-996-6666.

Emergency responders must follow the detailed specifications for aluminum phosphide (ID Number 1397, Guide Number 139) in the “Emergency Response Guidebook”, which is maintained by Transport Canada (www.tc.gc.ca/eng/canutec/guide-menu-227.htm).

EMERGENCY RESPONDER PROTECTION

Wear a NIOSH-approved self-contained breathing apparatus (SCBA) with full face piece and operated in a pressure-demand or other positive-pressure mode OR a NIOSH-approved air-line respirator with a full face piece operated in a pressure-demand or other positive-pressure mode combined with an auxiliary self-contained positive-pressure breathing apparatus when the concentration of phosphine gas is unknown. If the concentration is known, other appropriate respiratory protection must be worn as specified in Section 6, RESPIRATORY PROTECTION.

All emergency responses should be made wearing personal protective equipment as specified in Section 5, PROTECTIVE CLOTHING, including chemical-resistant gloves (neoprene, butyl rubber or PVA), a Seranex coated Tyvek suit and rubber boots. Note that the chemical protective clothing listed may provide little or no thermal protection. Structural firefighters’ protective clothing provides limited protection in fire situations only; it is not effective in spill situations where direct contact with the chemical is possible.

FOR ASSISTANCE, CONTACT:

SUNZON INTERNATIONAL, INC.
1808 Firestone Parkway
Wilson, NC 27893 USA
Telephone: 252-237-7923
Fax: 252-237-3259

OR

SELLEN GRAIN SERVICES, LTD.
17 Lemuel Street
Thamesville, Ontario
Canada N0P 2K0
Telephone: 519-692-4232
Fax: 519-692-5454

OR

HOT LINE NUMBER

Have the product container label or Applicator's Manual with you when calling a poison control centre, doctor, or when going for treatment. You may also contact SUNZON INTERNATIONAL, INC. 252-237-7923 or SELLEN GRAIN SERVICES, LTD. 519-692-4232. For all other chemical emergencies, please contact CHEMTREC – 1-800-424-9300 or Canadian Transport Emergency Centre (CANUTEC) 613-996-6666.