

White Paper

Commodity Fumigation at the Ports

Environmental Protection Agency - Region 4

In March of 2015, a family of four vacationing in the United States Virgin Islands fell ill after staying in a condominium where the unit below them was treated with methyl bromide. The product used was not labeled for use in residential settings, rather for commodity fumigation. This brought attention to the handling of fumigants and the need for measures to assure such an incident does not happen again.

The Environmental Protection Agency Region 4 states have several ports where commodity fumigation is common practice. Commodity Fumigation is monitored by the United States Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS). The USDA has a [manual](#) describing the procedures and treatment schedules that are authorized for the Plant Protection and Quarantine (PPQ) program, designed to prevent the movement of agricultural pests into the United States. There is question as to the relationship between fumigant applicators and APHIS when it comes to handling of commodity fumigants.

Region 4 has identified several areas that warrant further exploration. There is a need for clarification on who is responsible for unused fumigant that is obtained by certified applicators through a compliance agreement with USDA. Some states have regulations that specifically address storage and inventory recordkeeping. For example, the North Carolina Department of Agriculture and Consumer Services regulations require certified applicators to maintain a current inventory list for all restricted use pesticides and this list is required to be updated every 30 days. However, not all states require this, which calls into question the tracking of commodity fumigants. Is unused product used at the ports stored and secured by the certified applicator or the USDA until future use, or is the product returned to the distributor?

While pesticide labels and state specific fumigation regulations help guide applicators on the safe use of pesticides, there is always room for improvement. Having a better understanding of how commodity fumigants are handled at the ports, may provide insight into areas that can be improved. The ultimate goal is to ensure that adverse impacts are avoided.