
The Law

- The repackaging facility must keep all records required by federal pesticide law, and must report the amount of repackaging to EPA each year.

Under the EPA bulk policy, if any of the above conditions is not met, the repackaged pesticide is considered to be unregistered. The dealer responsible could be subject to enforcement action under federal or state law, which could include the assessment of fines.

For information on registering your establishment with EPA, or record-keeping and reporting requirements, please call **(206) 553-1970**. For all other information concerning the bulk policy, please call **(206) 553-5032**.

-August 1994

U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue (AT-083)
Seattle, Washington 98101-9797



EPA 910/F-94-002

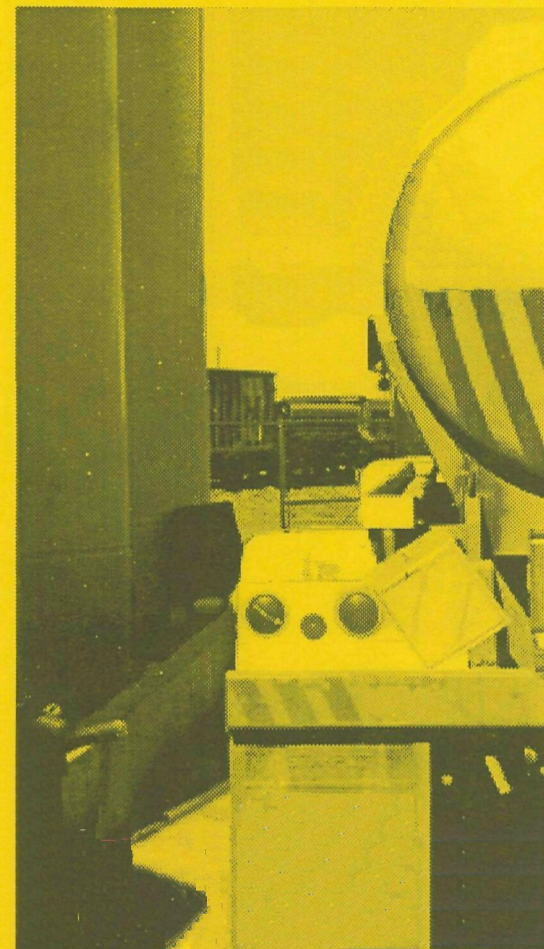


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Repackaging Bulk Pesticides Information Bulletin

Important Information for
Dealers/Repackagers of
Bulk Agricultural Pesticides



This bulletin provides information on the EPA bulk policy and is intended for dealers who repackage bulk pesticide products for sale to the agricultural community. **Please read this carefully.** There have been recent changes in the policy and, as a result, new requirements for dealers.

A "bulk dealer" is anyone who repackages bulk pesticides for sale to end-users (growers/applicators). EPA's bulk policy allows the repackaging of any quantity of a registered pesticide into a **refillable** container if the following conditions are met:

The Container

- The containers must hold more than 55 gallons of liquid pesticide or more than 100 pounds of dry pesticide.
- The containers must be dedicated to and refilled with one specific pesticide product, or they must be cleaned according to instructions from the pesticide registrant before being filled with another pesticide.
- The containers of all repackaged pesticides distributed by the repackaging facility must be labeled with the EPA-approved, end-use label. The label must include the establishment number of the repackaging facility, and the correct net contents of the container.

The Site

- **Each** site (physical location) where repackaging takes place must be registered as a producing establishment with EPA.
- **Each** site (physical location) where repackaging takes place must have a written agreement with the pesticide registrant which allows them to repackage the product and to use the registrant's label. A copy of the agreement, dated and signed by the dealer **and** the registrant must be kept at each site.

The Bulk Tank

- The bulk storage tanks must be correctly labeled with the registrant's EPA-approved label.
- The label must include the number of the establishment where the pesticide was last produced. (This requirement is a change from previous policy. In the past, many bulk dealers have been instructed to put their own establishment number on the bulk tank labels. This is no longer the correct procedure.)
- The net contents of the bulk tank must be marked on the label **when it is filled**. (It is not necessary for the dealer to change the net contents on the bulk tank each time he withdraws product.)

