

Wildlife Services Directive

2.401

May 2025

PESTICIDE USE

1. PURPOSE

This directive will provide for the safe and effective use of pesticides by Wildlife Services (WS), including purchase, manufacture, production, storage, application, disposal, and all associated recordkeeping. It is also intended to mitigate unintentional releases of pesticides. This directive does not apply to non-antimicrobial deodorizers and cleaning agents, or to antimicrobial products regulated as drugs.

2. REPLACEMENT HIGHLIGHTS

This directive revises WS Directive 2.401 dated 12/08/2009.

3. POLICY

WS activities will follow all applicable Federal, State, Tribal, and local laws and regulations pertaining to pesticides, including application, certification, storage, transportation, shipment, disposal, and supervision, or when recommending the use of pesticides to non-WS entities. Pesticides used or recommended by WS personnel must be registered by the U.S. Environmental Protection Agency (EPA) and the appropriate State regulatory agency.

WS personnel are responsible for all aspects of control operations involving Animal and Plant Health Inspection Service (APHIS)-specific labels (i.e., WS pesticides) having label language that specifies for use only by APHIS personnel or persons under their direct supervision. Furthermore, per label restrictions, pesticides displaying APHIS-specific labels, and all derived bait products, will not be transferred or otherwise released to personnel not-authorized by the label and approved by the State Director (SD) or National Wildlife Research Center (NWRC) Project Leader. This restriction does not preclude or limit reimbursement to WS for any cost of materials or services provided involving these pesticides.

Pesticide use, storage, and disposal will conform to label instructions and all other applicable regulations and laws. Before allowing the use of any pesticide, WS supervisors must ensure their personnel are trained in its proper and safe use which may include personnel obtaining Federal, State, and/or Tribal pesticide application licensure.

For field applications, WS personnel must have available the label-specified decontamination equipment whenever possible. In cases where specified equipment is not available in sufficient quantity or type, WS personnel must carry, at a minimum, a decontamination kit containing at least one quart of water, coveralls, disposable towels, and soap.

WS personnel will not conduct operational activities where other persons are known to be using the same or a similar pesticide(s) intended for control of the same target species without prior approval from the respective Regional or NWRC Director. WS equipment, materials, and warning signs will be promptly removed from the area if such use is discovered. WS will notify the property owner or manager of this action.

Prior to use, WS supervisors must provide Safety Data Sheets (SDS) and labels for a given pesticide to all WS personnel and other potential users. SDSs for products sold by WS Pocatello Supply Depot (WS PSD) can be obtained from the WS PSD. Otherwise, the SDS can be obtained from the seller or manufacturer of the pesticide.

When not in use, all pesticides, restricted-use or not, must be stored according to label directions and in a locked or secured box, building, or vehicle. Warning signs and/or symbols required by Federal, State and Tribal laws and regulations must be displayed in the appropriate locations. Pesticides must be stored in accordance with the WS' Standard for Storing Pesticides (Attachment 1).

All unused/unusable pesticides and by-products will be handled in accordance with EPA, state, and local pesticide and hazardous waste regulatory requirements, product labeling, and with WS Standard Operating Procedure HS/WS 003 - Collection, Storage, and Disposal of EPA Regulated Hazardous Waste within Wildlife Services. SDs are responsible for establishing proper accounting and monitoring procedures for all pesticides used in their program.

5. RECORDKEEPING REQUIREMENTS

WS, as a non-private certified applicator, must meet minimum recordkeeping requirements for use of restricted-use pesticides (RUP) and certain general-use pesticides under 40 CFR 171.303(b)(7)(vi) and state pesticide laws. Some states require recordkeeping for application of any pesticide (RUP or general use) to someone else's property. At a minimum, WS applicators must record the following information (usually within 30 days following the pesticide application) and keep these records for at least 2 years:

- a. The brand or product name, and EPA and Special Local Needs registration number(s) of the restricted-use pesticide that was applied;
- b. The total amount of restricted-use pesticide applied;
- c. The location of application, target pest, size of the area treated, and crop, commodity, stored product, or use site to which a restricted-use pesticide was applied;
- d. The month, day, and year when restricted-use pesticide application occurred;
- e. The name and certification number of the certified applicator who applied or who supervised the application of restricted-use pesticide; and,

- f. Documentation that each noncertified applicator applying a restricted-use pesticide under their direct supervision has the qualifications required in 40 CFR 171.201(c) as listed in 40 CFR 171.201(e).

Note: Most state pesticide regulatory agencies also require additional recordkeeping, such as pesticide disposal records. Some states may require recordkeeping for all pesticide applications and may enforce record retention requirements longer than 2 years.

All users will maintain a pesticide inventory record using the Control Materials Inventory Tracking System (CMITS) application within the Operations and Reporting System (OARS). The NWRC will continue to verify and account for pesticide usage in accordance with their Chemical Management Plan. Records will be evaluated by Operational Support Staff (OSS), with periodic spot checks by designated officials.

6. REPORTING REQUIREMENTS

Additionally, WS personnel are required to report knowledge of any alleged or known adverse effects incidents involving a pesticide containing an active ingredient that APHIS has currently or previously registered with EPA to their SD or Program leader. FIFRA Section 6(a)(2) defines an adverse effects incident as any adverse effect to a human or nontarget organism or property damage resulting from the use of a pesticide. The SD or Program leader must report all events meeting the definition of adverse effect under FIFRA 6(a)(2) to OSS, even if the event did not involve an APHIS-owned end-use product or ingredient. Refer to WS guidance titled “Wildlife Services Guidance for Reporting Adverse Effects under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)” dated October 4, 2018, on the WS SharePoint Intranet and Program Resources page for more information. Incident details must be recorded on WS Form 160 and WS Form 160A, 160B, or 160C, depending on the type of incident. The OSS Director or designee will report the incident and submit specifics to the appropriate APHIS/Departmental official.

In addition to FIFRA Section 6(a)(2) reporting requirements, human incidents, injuries, illnesses, and accidents resulting from the use of pesticides must be immediately reported to the appropriate supervisor and to the APHIS First Report. The APHIS Safety and Health Branch (SHB) is responsible for investigating and/or coordinating the investigation of any incident or accident related to the use of pesticides. A complete documented investigation must be performed by a qualified person for any significant accident. A significant accident is defined as a death of any person, or a three-day (or more) lost time accident of an employee. The WS Safety and Health Committee will review and report any findings and recommendations to the WS Management Team to prevent a recurrence of such an incident.

7. REFERENCES

Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. 136 et seq.), as amended.
Food, Agriculture, Conservation, and Trade Act of 1990 (FACT Act).

40 CFR Part 153.75 - Toxic or Adverse Effect Incident Reports, (a)(1)(i) through(iii).
Resource Conservation and Recovery Act (RCRA), 40 CFR parts 239-282.
Federal Register Vol. 58, No. 67 p. 19014.

National Fire Protection Association (NFPA) 434, Code for the Storage of Pesticides.
NFPA 30, Flammable and Combustible Liquids Code.
NFPA 30B, *Code for Manufacture and Storage of Aerosol Products*.

Deputy Administrator

ATTACHMENT 1

STANDARD FOR STORING PESTICIDES WILDLIFE SERVICES

INTRODUCTION

The purpose of this Standard is to provide information for safe worksites for employees and safe storage of pesticides, identify appropriate waste disposal methods, and define an adequate pesticide inventory and its contents.

DEFINITIONS

This Standard defines typical nomenclature involved in safely storing pesticides. These terms are important in understanding the applicability and scope of this Standard.

Safety Data Sheet (SDS). A document that is produced by the manufacturer that describes the pesticide content and specifications, hazardous properties, disposal and safety information.

Pesticide Container. Any drum, bag, box, bottle, carton, jar, pressurized container, or other closed vessel containing a pesticide, or pesticide residue, having an attached product label and used as the pesticide's primary container.

Pesticide Inventory. A written record containing the following information for each pesticide being stored, regardless of quantity:

- name of pesticide;
- EPA and Special Local Needs Registration numbers, as applicable;
- quantity transferred, used, sold, disposed of;
- beginning and ending balance.

Pesticide Storage Cabinet/Box. A WS-approved storage cabinet or box used for the sole purpose of storing pesticide containers.

Pesticide Storage Site. A storage site for general and restricted-use pesticides approved by WS for long-term storage such as a central storage/distribution facility or residential site, or temporary storage of pesticides such as at a residence or in a vehicle overnight. Designated WS manufacturing sites have additional guidelines that they must adhere to. Storage areas can be categorized as incidental, small quantity, or large quantity storage sites (defined below).

- **Incidental storage sites.** Incidental storage sites are areas which contain less than 500 total pounds (lbs.) of solid or liquid pesticide with each pesticide not exceeding the incidental total for any one pesticide (Table 1). Even though incidental storage provides for exceptionally small quantities of pesticides, general storage requirements regarding security must still be implemented.

- **Small quantity storage sites.** These sites are defined as areas that exceed the requirements of an incidental storage site, but not exceeding 1000 total pounds of solid or liquid pesticide and not exceeding the small storage total for any one pesticide (Table 1). Even though small storage sites hold small quantities of pesticides, general storage requirements regarding security must still be implemented.
- **Large quantity storage sites.** These sites are defined as bulk storage areas that contain over 1000 total pounds of solid or liquid material.

Pesticide Weight. The weight of pesticide is determined as the weight of active pesticide ingredients and does not include the weight of capsules, containers, inactive ingredients, etc.

Ready Supply. A quantity of pesticide kept on-hand sufficient to complete an identified project, concurrent projects, or to conduct up to one week of work. When an employee is required to travel an extensive distance to pickup the pesticide from a central storage/distribution facility, or when there are other extenuating circumstances, the supervisor may extend the ready supply rule to a longer period.

Restricted-Use Pesticide. Pesticides classified as restricted use under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) in 40 CFR, Part 152.175 and may only be used by applicators certified to use them.

Secondary Containment. Any container or device that prevents a release of pesticide material into the environment if the primary pesticide container leaks or fails.

Worksite. For this Standard, a worksite is defined as an office, warehouse, residence, or other ground location from which employees base their work. Restrictions on pesticide storage at residential sites apply (see **Residential Storage Sites** below).

GENERAL STORAGE REQUIREMENTS

The following are general requirements that apply to all pesticide storage sites. All pesticides must be stored:

- in full compliance with EPA and State pesticide label requirements;
- in closed containers, at WS-approved worksites;
- so only employees approved by the State Director (SD), Field Station Leader, Project Leader, or their designee, will have access to the pesticides;
- separate from food and personal contact items such as clothing, linens, furniture, animal feeds and animal health products;
- in a way that minimizes contact with moisture, excessive heat or freeze/thaw cycles, or other environmental conditions that affect the container integrity or product stability;
- away from open-flame devices such as cutting and welding torches and furnaces without an evaluation to ensure these sources will not ignite any pesticides;

- to prevent theft or unauthorized use; unattended pesticides must be locked at all times (*Pesticides must not be left in motel rooms or other unsecured locations. **Immediately notify the supervisor if a theft or loss occurs***),
- with a current pesticide inventory that is available to emergency responders, auditors, and other authorized persons,
- in a manner that segregates any incompatible pesticides,
- in a manner that prevents run-off or leaching into the environment, paying particular attention to waterways such as streams, drinking water protection zones, well heads, lakes, rivers, open drains and other waters.

A current Occupant Emergency Plan that includes emergency phone numbers must be in place in each office of warehouse where pesticides are stored.

Banned or unapproved pesticides will not be used or stored at any WS facility. Refer to the section Waste Disposal for appropriate disposal procedures.

Pesticide Containers. All pesticide containers having pesticides or residue will be:

- properly labeled (legible FIFRA label on the outside of the container); labels must not be removed from original container;
- free from rust and leaks;
- stored appropriately in an approved pesticide cabinet/box or at an officially designated central storage/distribution facility.

Pesticide Cabinets and Boxes. WS approved pesticide cabinets and boxes must be:

- made of metal, hard high-density plastic or another non-combustible material of substantial construction to minimize the risk of vandalism;
- fire and weather resistant with sturdy hinges, locks and hasps;
- clearly labeled to depict the pesticide's associated hazards, and/or other signage as appropriate;
- stored where adequate fire extinguisher or spill containment and collection materials (items used to clean-up a spill, i.e. sealable plastic containers, rags, paper towels, broom, dustpan, etc.) are readily available;
- dedicated to pesticide storage only.

Central Storage/Distribution Facilities. These facilities are generally located at State, District, or Field Offices, and/or their affiliated warehouse buildings. These sites can be designated as incidental, small, or large-quantity storage sites. The primary function of a Central Storage or Distribution Facility is for the distribution or transfer of smaller amounts or "ready supply" of pesticides to WS employees for their use. Access to pesticides should be limited to one or two designated persons who are responsible for distribution, inventory, recordkeeping under FIFRA, and disposal under the Resource Conservation and Recovery Act (RCRA). In addition to the general storage requirements, the following requirements apply:

Incidental Storage Sites. Storage sites meeting the definition of incidental storage will meet all general storage requirements.

Small-Quantity Storage Sites. Small-quantity storage sites will meet all general storage requirements and will provide a locked pesticide storage cabinet, or, if appropriate, a flammable liquid storage cabinet constructed of noncombustible materials, if the pesticide is flammable or combustible, in a dedicated room that is appropriately ventilated. Additionally:

- Smoking is prohibited in all storage areas containing pesticides and “No Smoking” signs will be conspicuously posted at all entrances to storage areas.
- A fire extinguisher and spill kit (if applicable) must be located within 50 feet of the storage area.
- If pesticide transfer operations will be performed, e.g., from one container to another container, personal protective equipment and the availability of an emergency eyewash system (permanent or portable) or an emergency shower should be available, dependent upon the nature of the potential exposure.
- The most recent pesticide inventory, SDS, and emergency response information with contact phone numbers will be maintained and readily available on-site.
- All storage lockers will include the appropriate “State-approved” signage.
- All pesticide-containing compressed gas cylinders must be stored in a secured covered area outdoors.
- Accumulation of combustible materials or trash in pesticide storage area is prohibited.
- All containers must be in secondary containment to prevent pesticide spills into the environment. Examples of secondary containment for liquids include polyethylene-lined tubs, dikes, curbing, and double-walled tanks, and for non-liquids, a pesticide storage cabinet or box, as defined above.

Large-Quantity Storage Sites. Large-quantity storage sites shall meet all general and small-quantity requirements and shall not be located in basements or buildings made of combustible materials. In addition, the following characteristics will apply to all large-quantity storage sites:

- Pesticide spills must be able to be contained within the inside of the facility or directed to an exterior holding tank. The spill capacity shall be equal to the largest pesticide container capacity plus 10%.
- Building floors must be constructed and maintained to contain spills and prevent emergency conditions in adjoining occupied areas or buildings. Floor drains must be plugged.
- The building must have sufficient lighting to allow easy identification of pesticide container labeling.
- All exterior, large-quantity storage areas will have appropriate hazard identification. Generally, NFPA 704, *Standard Systems for the Identification of the Hazardous of Materials for Emergency Responders* (the diamond system) will be used. In addition, a State-approved sign or a placard that reads PESTICIDES in black 2-inch letters on a white background shall be posted.
- Storage of incompatible materials shall not be within 25 feet of each other unless protected by 1-hour fire-rated material.

- The building will be equipped with automatic fire detection systems.
 - **Caution:** The selection of an extinguishing agent(s) must be carefully considered such that the chemical properties of the pesticide and extinguishing agent are examined to ensure compatibility. Some pesticides have chemical properties that pose escalated fire risk. For example, if an aluminum phosphide fumigant contacts water, it produces phosphine gas, a highly flammable gas that self-ignites at 100° C. In this case, water-based sprinkler systems should not be used. The appropriate extinguishing agent would include an ABC Multi-purpose or non-ozone depleting fire extinguishing agent.
 - **Note:** Halon-based extinguishing agents should not be used.
- A written risk assessment should be conducted to determine an appropriate storage facility location. Some factors to consider include:
 - the capacity for effective and safe evacuation,
 - nearby human populations,
 - unique or high-value environmental resources nearby,
 - in the case of fire, could human exposures be prevented, or adjacent property and environmental assets be protected,
 - chemical properties,
 - mixed product storage,
 - smoke and liquid runoff, and
 - emergency response capabilities.

Residential Storage Sites. When it is necessary for authorized employees to store small quantities of pesticides at their residences (i.e. single-family dwelling), the storage area at a residential location is classified as a worksite, and all of the aforementioned general storage, pesticide container, pesticide cabinet, and inventory requirements apply. If an employee's residence is located at a community dwelling such as an apartment complex or condominium, an approved alternative site must be obtained. In addition, the following will apply:

- Storage and storage area must be authorized by the SD in writing.
- Storage will be inside an approved, locked pesticide storage cabinet or box.
- Pesticides must be inaccessible to family members and visitors at all times.
- Pesticides will not be stored inside of residences. An attached garage is not considered inside the residence.
- A fire extinguisher of the appropriate type will be maintained in close proximity to the storage site/area.

TRANSPORTATION OF PESTICIDES AND OVERNIGHT STORAGE IN A VEHICLE

A "ready supply" of pesticides may be transported or stored overnight in Government-owned vehicles and enclosed trailers, or personal vehicles authorized for "Official Use" by the SD. The following will apply:

1. All pesticides, except for large quantities of bagged grain baits, must be transported in an approved locked storage box kept inside the vehicle, or in a locked storage box kept in a substantial locked toolbox (or equivalent) that is permanently attached to the vehicle.
2. Large quantities of bagged grain baits may be transported outside a pesticide storage box but may not be left unattended unless the truck bed or trailer is enclosed and locked, and the baits are covered to protect them from public view.
3. Overnight storage of all pesticides, including bagged grain bait, must be in an approved pesticide storage cabinet/box.
4. The vehicle must be locked when unattended.
5. Highly toxic or hazardous inhalation pesticides, such as aluminum phosphide, must not be carried or stored in the passenger compartment of a vehicle.
6. Pesticide labels and SDS will be transported with pesticides at all times.

TRAINING

A training program is required for all employees who handle pesticides at any storage facility. The training will include the review of current SDS, labels, and other pertinent information, storage requirements, product hazards, personal protective equipment, emergency procedures including appropriate notification, and proper waste disposal.

A Hazard Communication Program will be implemented and maintained for each pesticide storage worksite. (Refer to APHIS Safety and Health Manual, Chapter 10, Section 8, Hazard Communication and OSHA regulation 29 CFR 1910.1200, Hazard Communication.)

INSPECTIONS

Inspections of small- and large-quantity storage sites are required twice annually at a minimum. Inspections will be documented at all central storage/distribution facilities with the APHIS Safety Inspection Checklist (APHIS Form 256-5). Overnight residential or vehicle storage sites will be inspected using the self-inspection checklist (Enclosure 1). Employees who conduct self-inspections at vehicle storage and residential sites (two per year minimum) will forward the inspection reports to the SD/Field Station leader and retain copies for their files.

The SD/Field Station Leader will verify the accuracy of the self-inspection checklist and APHIS Safety Inspection Checklist (APHIS Form 256-5) and take appropriate actions to correct any deficiencies.

EMERGENCY PROCEDURES

Facilities storing pesticides will have adequate written emergency response procedures to include emergency evacuation plans, contact phone numbers, and adequate emergency equipment such as fire extinguishers, spill kits, and personal protective equipment. Actions and appropriate notifications must be consistent with the pesticide stored and the hazard potential. Additional information can be obtained from the APHIS Safety and Health Branch (SHB), Environmental Protection Program by calling 301-436-3114 or 301-436-3115.

The local fire department should be notified of pesticide materials stored at WS worksites, especially if they are flammable. All appropriate NFPA 704 red/blue/yellow (fire/health/reactivity) signage should be placed on storage cabinets or on the outside doors of storage buildings to identify potential hazards to the emergency response personnel. Additionally, State, county, and city regulations and ordinances must be checked for more restrictive “Notification Requirements.”

WASTE DISPOSAL

All unused/unusable pesticides and by-products, including pesticide-contaminated materials, must be disposed of or decontaminated in accordance with appropriate Federal, State, Tribal and local regulations, product labeling or SDS, and with WS Standard Operating Procedures HS/WS 003 – Collection, Storage, and Disposal of EPA Regulated Hazardous Waste within Wildlife Services. SHB has established GSA Blanket Purchases Agreements with hazardous waste disposal firms for use by APHIS Field Offices. Contact SHB at 301-436-3114 to arrange a pickup and to request funding. Funding assistance may be available from the Environmental Protection Program Delivery account. Additionally, State pesticide regulatory agencies may have a Pesticide Disposal Program or annual pickup or disposal event. Participating in State Pesticide Disposal Programs or using annual pickup or disposal events may result in reduced or no costs to APHIS.

Table 1. Pesticide limits for incidental, small and large quantity storage facilities.

Pesticide	Storage Weight Criteria (Net Weight of Active Ingredients)		
	Incidental	Small Quantity	Large Quantity
Cyanide (concentrate)	≤0.2 lb.	>0.2 lbs. and ≤20 lbs.	>20 lbs.
M-44 (total weight)	≤0.5 lb.	>0.5 lbs. and ≤20 lbs	>20 lbs
DRC-1339 (Concentrate – weight of active ingredient only)	≤1 lb.	>1 lbs. and ≤100 lbs.	>100 lbs
DRC-1339 (mixed – weight of total product)	≤100 lbs.	>100 lbs. and ≤1000 lbs.	>1000 lbs
Gas Cartridges (total weight)	≤100 lbs.	>100 lbs. and ≤1000 lbs	>1000 lbs
Strychnine (Concentrate – weight of active ingredient only)	≤1 lb.	>1 lbs. and ≤20 lbs	>20 lbs.
Strychnine (mixed – weight of total product)	≤100 lb.	>100 lbs. and ≤1000 lbs.	>1000 lbs.
Zinc phosphide (total weight)	≤10 lbs.	>10 lbs. and ≤500 lbs.	>500 lbs.
Aluminum phosphide (total weight)	≤10 lbs	>10 lbs. and ≤500 lbs.	>500 lbs.
All other Liquid Concentrates (active ingredient)	≤1lb.	>1 lbs. and ≤100 lbs	>100 lbs
All other liquid and solid pesticide that are non concentrates and non-acutely hazardous to life (total amount)	≤100 lb.	>100 lbs. and ≤1000 lbs.	>1000 lbs.

ATTACHMENT 2

GUIDELINES FOR APPLICATION

Compound DRC-1339 Concentrate Bird Control (EPA Reg. No. 56228-63) - for European Starling Management

Application of Compound DRC-1339 will be conducted in a safe and scientifically responsible manner consistent with the principles of transparency, accountability, and cost effectiveness. Towards this goal, State Directors will implement the following guidelines in developing and initiating control actions using DRC-1339 on European starlings under this label.

State Directors will prepare two implementation plans (1 urban/suburban, 1 rural) as appropriate for their respective State(s) that will provide guidance to field employees applying DRC-1339. The plans will be provided to the Regional Office for approval on a frequency determined by the Regional Director and will include, but are not limited to, the following:

- Application of DRC-1339 in/near urban/suburban areas will occur during Monday – Wednesday. Deviation from these days may occur after prior Regional Office approval on a case-by-case basis.
- Approved urban/suburban treatments on days other than Monday – Wednesday will require the availability of WS personnel over the weekend and/or holiday to answer calls from the affected public, and availability of WS or cooperators for carcass collection/disposal.
- Each WS State Office utilizing DRC-1339 for starling control under this label will utilize written informational materials that include WS contact information and issues related to starling damage management with DRC-1339 in that state.
- State Directors or their designee must develop and include in the implementation plan (s) a list of entities to receive prior notification of WS planned use of DRC-1339. The list shall contain at least the affected Township/City and appropriate state agencies (e.g. state wildlife management agency, cooperative extension, health department). Also, SDs should notify neighboring WS state programs when working within 20 miles of their state border.
- Prior to the application, WS will notify entities listed above of treatment date, generalized location of treatment, and general purpose for the application. Notification may be via telephone conversation, face-to-face meeting, or written material. Such notification shall be documented by WS (date, time, mode, what was communicated, and name/affiliation of individual).
- For urban/suburban areas, WS personnel shall coordinate collection of bird carcasses by WS personnel, cooperators, or other officials. The area searched for carcasses will vary, depending on habitat and treatment conditions. Priority shall be given to public properties, especially those containing suitable bird habitat within 2 miles of the treatment site, and private properties where homeowners have requested assistance with collecting carcasses.

- Carcass disposal must comply with applicable State and local laws and regulations.
- Both implementation plans must receive approval from the Regional Office before any new work can be initiated.
- Wildlife Services (WS) employees using the Compound DRC-1339 Concentrate - Bird Control (EPA Reg. No. 56228-63) or Livestock, Nest & Fodder Depredations (EPA Reg. No. 56228-29) labels for the lethal removal of European starlings must calculate their take estimates using the 2019 Take Estimation Program (Version 10) that incorporates bird bioenergetics and environmental conditions.

Enclosure 1

**Wildlife Services
Self-Inspection Checklist
Residential Storage Sites
For
Pesticides, Pyrotechnics, Rocket Net Charges
And/Or
Incidental Explosive Materials**

Inspector _____ Telephone Number _____ Date _____

Residential Site Location _____, or

License Plate No. for Storage Vehicle _____; Gov't. Vehicle _____ Private Vehicle _____

Storage	Yes	No	N/A
1. Are pesticides/explosive materials stored in separate approved storage containers/magazines?			
2. Are storage containers/magazines kept locked?			
3. Are storage areas appropriately ventilated?			
4. Are provisions made for minimizing exposure to moisture, overheating, and freezing?			
5. Are up-to-date inventories maintained at the site?			
6. Are pesticide containers and explosives magazines properly labeled?			
7. Do written emergency procedures exist for leakage and exposure to chemicals?			
8. Is personal protective equipment available?			
9. Is a fire extinguisher accessible (a rating of at least 3-A:40- B:C is recommended for explosive storage areas)?			
10. Has the local fire department been provided with the necessary information in writing?			
11. Are MSDSs available on location, and are pesticide containers properly labeled?			
12. Is your training and pesticide applicator's certification up-to-date?			
13. Is a first aid kit available?			
14. Does pesticide/explosives storage comply with State requirements?			
15. Are pesticides separate from food, personal contact items, and animal feed?			
16. Are storage containers/magazines in good condition?			
17. Has smoking, matches, open flame, and spark producing devices been prohibited in storage areas?			
18. Are flammable liquids and combustible materials kept away from the storage site?			
19. Is the storage area away from the residential building?			
20. Are pesticides and explosive materials always inaccessible to family members and visitors?			
21. Are you familiar with the provisions and attachments associated with WS Directive 2.401 and WS Directive 2.625?			

I certify that the above information is correct and valid.

Inspector's Signature

Date

State Director/Field Station Leader/Project Leader or Designee

Date