

Enforcement of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) at U.S. Borders

August 30th, 2025

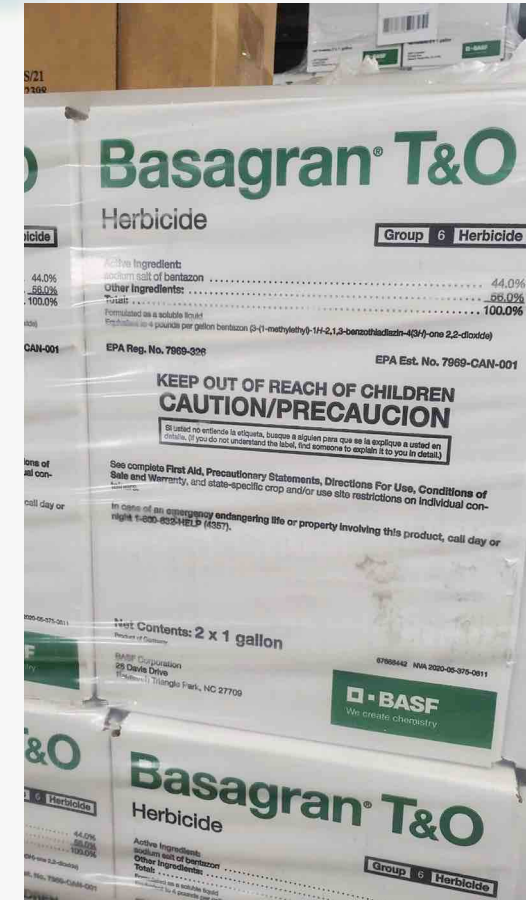
Christine Tokarz

Region 8, Helena Montana Office
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency



Topics

- EPA Enforcement Program Goal and Priorities
- FIFRA Overview
- Import Requirements for Pesticides & Devices
- Snapshot of Attempted Imports



Import inspections in Pembina, North Dakota and Sweetgrass, Montana.



EPA Enforcement Goal

Effectively implement the Federal Insecticide, Fungicide, and Rodenticide Act to ensure pesticides and pesticide devices are reviewed for their potential risks to human health and the environment and **enforcement actions are taken when necessary.**

FIFRA Import Enforcement

Section 17 of the Federal Insecticide Fungicide and Rodenticide Act (FIFRA), regulates the importation of pesticides and devices into the United States to ensure that only compliant products enter into the U.S. marketplace.

Illegal importation of noncompliant pesticide products or devices can result in pesticide misuse, illegal residues on food crops, human injury or exposure, and environmental damage.



Unregistered pesticides attempting import through the Southern Border of the U.S.



FIFRA Enforcement Authorities

FIFRA § 9

- Notices of Warning

FIFRA § 12

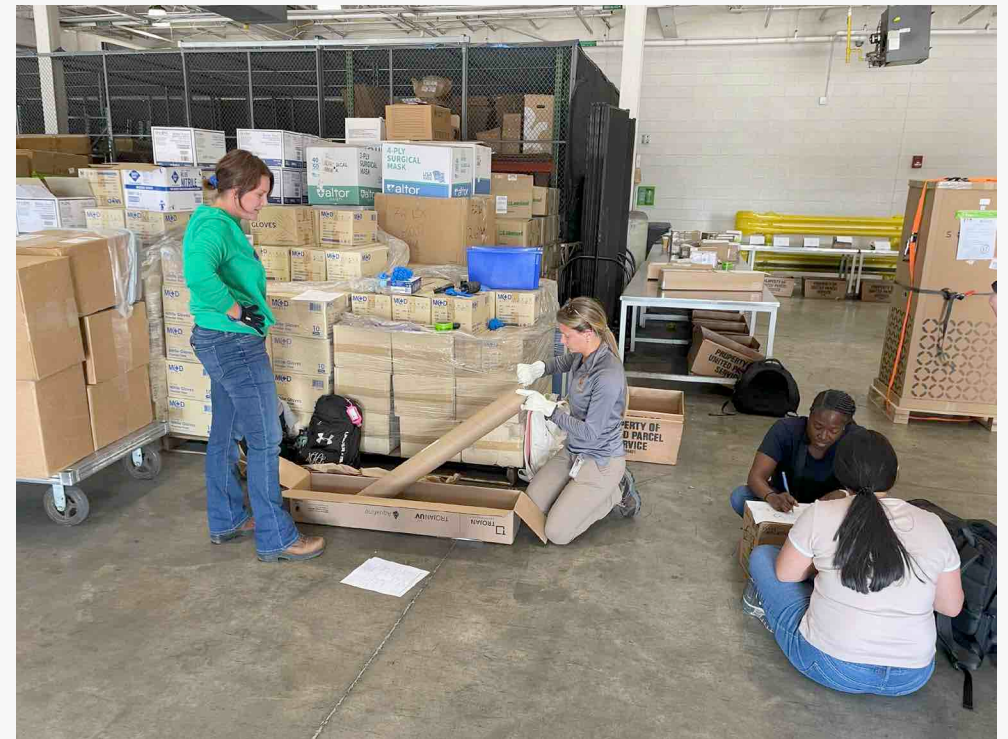
- Unlawful Acts

FIFRA § 13

- Stop Sale, Use, or Removal orders

FIFRA § 14

- Civil and Criminal penalties



FIFRA and CAA Inspectors during a Border Operation in Detroit, Michigan.



Unlawful Acts

Description	FIFRA Regulations
Registration Status	FIFRA § 12(a)(1)(A)
Claims Differ	FIFRA § 12(a)(1)(B)
Composition Differs	FIFRA § 12(a)(1)(C)
Coloration	FIFRA § 12(a)(1)(D)
Misbranded or Adulterated Pesticide	FIFRA § 12(a)(1)(E)
Misbranded Device	FIFRA § 12(a)(1)(F)
Advertising of Restricted Use Pesticides (RUPs)	FIFRA § 12(a)(2)(E)
Distribution or Sale of Restricted Use Pesticides (RUPs)	FIFRA § 12(a)(2)(F)
Violations of Orders, Suspensions, Cancellations	FIFRA § 12(a)(2)(I) FIFRA § 12(a)(2)(J) FIFRA § 12(a)(2)(K)
Violations of Section 7	FIFRA § 12(a)(2)(L)
Failure to File Reports	FIFRA § 12(a)(2)(N)
Falsify Information Relating to Testing	FIFRA § 12(a)(2)(Q)

<https://www.epa.gov/sites/production/files/documents/fifra-erp1209.pdf>



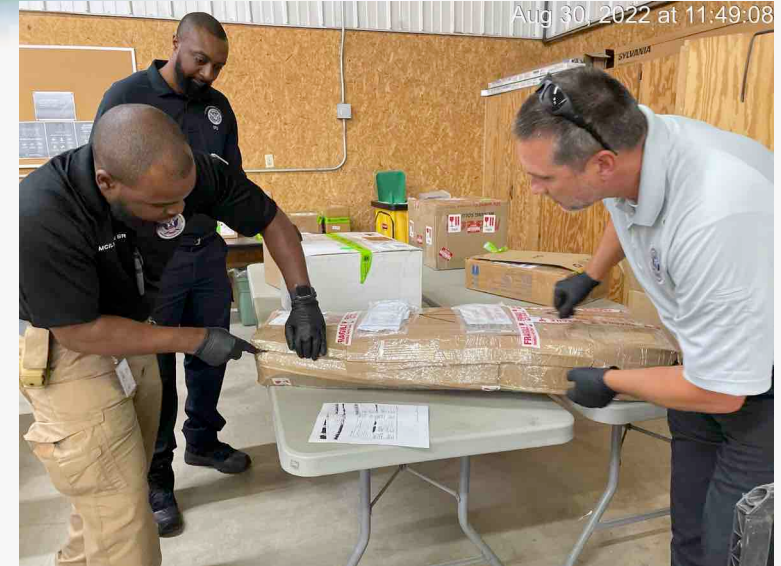
FIFRA Inspectors during a Border Operation in Detroit, Michigan.



Scope of FIFRA

To distribute or sell

“...to distribute, sell, offer for sale, hold for distribution, hold for sale, hold for shipment, ship, deliver for shipment, release for shipment, or receive and deliver or offer to deliver”



Pembina, North Dakota Operation.



International Mailing Center Miami Facility.



FIFRA Import Enforcement

The EPA enforces requirements under FIFRA that govern the distribution, sale and use of pesticides or devices.

In an imports context, the EPA takes enforcement actions to address the:

- distribution or sale of unregistered pesticides,
- registered pesticides whose composition differs from that submitted at registration, and
- registered pesticides that are misbranded or adulterated.



Import inspections in Portal, North Dakota.



Statutory Authority

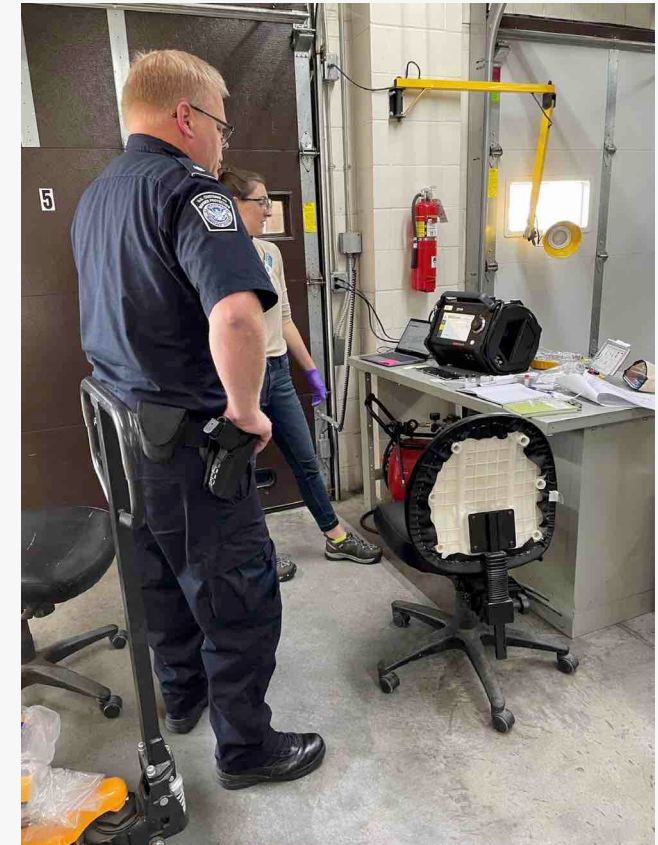
Section 17 of FIFRA directs the Secretary of the Treasury to:

- Notify the EPA Administrator of the arrival of pesticides and devices.
- Prescribe regulations for the enforcement of the Notice of Arrival (NOA) requirement.

Regulatory Authority

19 CFR §12.110 - §12.117 - U.S. Customs procedures for enforcement of FIFRA Section 17(c)

- The importer submits the NOA to EPA *prior to* the arrival of the pesticide or device in the U.S.
- EPA completes the NOA and returns to importer.
- Importer presents NOA to the CBP director at the port of entry.



Pembina CBP Officers working alongside EPA Technicians at Border.



Enforcement Toolkit

Enforcement actions include:

- Notice of Refusal of Admission (Deny Entry)
- Stop Sale, Use or Removal Order (SSURO)
- Notice of Warning (NOW)
- Consent Agreement (penalties for illegal distribution)



FILED

Jul 22, 2025

4:21 pm

U.S. EPA REGION 8
HEARING CLERK

SENT VIA EMAIL
DELIVERY RECEIPT REQUESTED

SUBJECT: Requested action to be taken regarding the Magnicide B Microbiocide products in shipment with entry number 231-53370504 FIFRA-08-2025-0058

FROM: David Cobb
Supervisor, Toxics Enforcement Section
Enforcement and Compliance Assurance Division

DAVID COBB

Digitally signed
by DAVID COBB
Date: 2025.07.07
16:32:36 -06'00'

TO: U.S. Department of Homeland Security
Bureau of Customs and Border Protection
Sweetgrass, Montana 3310

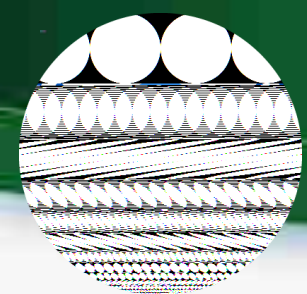
By this memorandum, the U.S. Environmental Protection Agency, Region 8, is informing the Bureau of Customs and Border Protection of the U.S. Department of Homeland Security (CBP) that the products in the import shipment described below should be Denied Entry-Refused Delivery into the United States pursuant to the authority of section 17(c) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), 7 U.S.C. § 136o(c), and the implementing regulations at 19 C.F.R. §12.114. The shipment was inspected by EPA on July 1, 2025.

The following information pertains to the shipment:

- The importer is Baker Petrolite LLC, 2001 Rankin Road, Houston, Texas 77073-5114. Points of contact, TIFFANY.SAINT@BAKERHUGHES.COM and WENDY.ELIZONDO@BAKERHUGHES.COM.
- The broker is Expeditors International, Jeff LaMonica, jeff.lamonica@expeditors.com.
- The arrival date was June 11, 2025.
- The bill number is LOSI0003382.
- The port of entry is Sweetgrass, Montana 3310.

Section 2(t) of FIFRA, 7 U.S.C. § 136(t) defines "pest" as "(1) any insect, rodent, nematode, fungus, weed, or (2) any other form of terrestrial or aquatic plant or animal life or virus, bacteria, or other micro-organism (except viruses, bacteria, or other micro-organisms on or in living man or other living animals) which the Administrator declares to be a pest under section 136w(c)(1) of this title."

Under FIFRA section 2(u) 7 U.S.C. § 136(u), a pesticide is any substance (or mixture of substances) intended for a pesticidal purpose, i.e., use for the purpose of preventing, destroying, repelling, or mitigating any pest or use as a plant regulator, defoliant, or desiccant. 40 C.F.R. § 152.15 states: "A substance is considered to be intended for a pesticidal purpose, and thus to be a pesticide requiring registration, if... [t]he person who distributes or sells the substance claims, states, or implies (by labeling or otherwise) ... [t]hat the substance... can or should be used as a pesticide."



FIFRA Imports

Import Requirements under FIFRA:

- Pesticides and devices must be produced in registered establishments
- Pesticides must be registered by the EPA unless exempted (*minimum risk, conditionally transferred, or imported for export*)
- Pesticides and devices must bear compliant label/labeling



Region 8 FIFRA Inspectors working alongside Region 2 FIFRA Inspectors at the Lake Champlain Port of Entry.



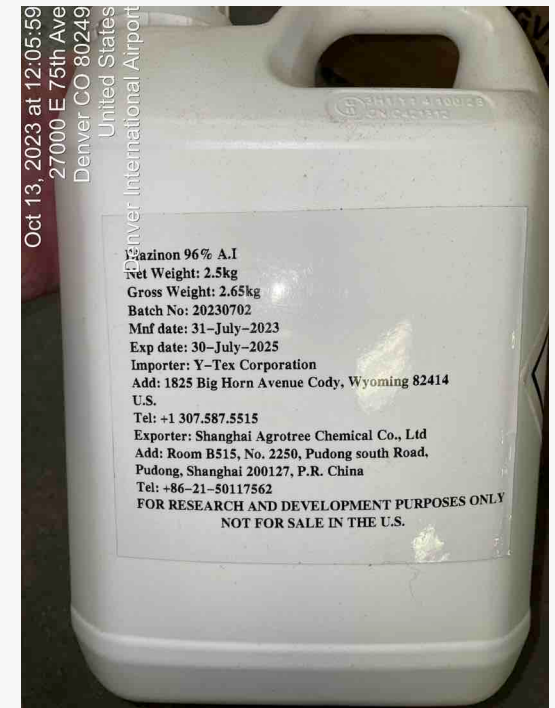
Failure to Submit an NOA & Present the Product for Examination

The shipment will be detained by CBP at the importer's risk and expense.

- Detention is not to exceed 30-calendar days, during which time the completed NOA should be presented to CBP or until other disposition is ordered by the EPA.
- CBP may authorize a 30-calendar day extension for good cause.

Pesticides or devices for which the NOA requirements have not been met will be treated as a **prohibited importation**.

CBP will cause the destruction of any such shipment not exported by the consignee within 90-calendar days after the detention period.



Unregistered pesticide attempted import in Denver, Colorado.



Notice of Arrival (NOA)

FIFRA directs the U.S. Secretary of the Treasury to:

- Notify the EPA Administrator of the arrival of pesticides and pesticide devices into the U.S.
- Prescribe regulations for the enforcement of “Notice of Arrival” requirements.

United States
ENVIRONMENTAL PROTECTION AGENCY
Washington, DC 20460

OMB Control No. 2070-0020
Expires on 1/31/2025

Notice of Arrival of Pesticides and Devices

Send Completed Form to Appropriate Regional Office Listed in the Instructions for this Form.
Note: Read instructions before completing form.

Part I: To Be Completed by Importer of Record or Licensed Customs Broker

1. Name, Complete Mailing Address, and Email Address of the Licensed Customs Broker	2. Name, Complete Mailing Address, and Email Address of the Importer of Record
☐ Return Form to This Address	☐ Return Form to This Address
3. Name, Complete Mailing Address, and Email Address of the Shipper	4. EPA Registration Number
	5. EPA Producer Establishment Number
	6. Brand Name of Pesticide Product or Pesticide Device
7. Active Ingredients and Percentage of Each	
8. Unit Size (e.g., 500 lbs.)	9. Quantity (e.g., 10 bags)
10. Total Net Weight (e.g., 5,000 lbs.)	
11. Country of Origin	12. Port of Entry (Enter port code, or the city and state)
13. Name, Complete Mailing Address and Email Address of the Carrier	14. Entry Number
	15. Anticipated Entry Date
16. I assert that information constituting Confidential Business Information (CBI) is shown in the above blocks numbered:	17. Location of Goods for Examination after Importation

Note: Blocks 4, 5, 6 and 7 are not entitled to CBI treatment—see instructions.

18. [Optional] For pesticides without an EPA Registration Number, select all that apply:
(The following information may expedite the processing of the Notice of Arrival.)

☐ 18a. A pesticide transferred between registered establishments operated by the same producer. Domestic Producer Establishment Number (40 CFR §152.30(a)):
☐ 18b. A pesticide transferred between registered establishments not operated by the same producer. Domestic Producer Establishment Number (40 CFR §152.30(b)): EPA Registration Number of Product being Formulated, if applicable:
☐ 18c. A pesticide distributed under an Experimental Use Permit. Experimental Use Permit Number (40 CFR §152.30(c)(1)):
☐ 18d. A Pesticide distributed for research and development purposes without an Experimental Use Permit. (40 CFR §152.30(c)(2))

EPA Form 3540-01 (Rev 3/22) Previous versions are obsolete. [Print Form](#) [Reset Form](#) Page 1 of 2

Part I (continued): To Be Completed by Importer of Record or Licensed Customs Broker

EPA Registration Number:	Product Name:
Total Net Weight:	Entry Number:
☐ 18e. A pesticide transferred solely for export. (40 CFR §152.30(d)/ PRN 99-1) Enter the foreign purchaser details in Box 19. Domestic Producer Establishment Number (40 CFR §152.30(b)):	
☐ 18f. A pesticide distributed under an emergency exemption. Emergency Exemption Number (40 CFR §152.30(e)):	
☐ 18g. A pesticide transferred for the purposes of disposal. (40 CFR §152.30(f))	
☐ 18h. Other. Provide an explanation including the intended use and a description of why the product is being imported into the United States in Block 19 – Remarks.	
19. Remarks. Provide additional information here. It is recommended that a copy of the label affixed to the product be submitted with the NOA.	

Certification

I certify that the statements I made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

20. Printed Name of Importer of Record or Licensed Customs Broker:	Telephone No.:
21. Signature of Importer of Record or Licensed Customs Broker:	Date:

Part II: To Be Completed by U.S. Environmental Protection Agency

Action to be taken by U.S. Customs and Border Protection:

☐ Release Shipment	☐ Detain for inspection
☐ Request CBP to collect samples (19 CFR §12.116)	☐ Release shipment to consignee under bond.
☐ Other. (Specify)	☐ Shipment must be held intact pending inspection.

EPA Remarks:

Signature and Title of EPA Official:	Date:
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Part III: To Be Completed by U.S. Customs and Border Protection

The information shown in Part I was compared with the entry papers for this shipment and no discrepancies were noted.
The shipment was handled as instructed by EPA in Part II. Any deviations should be brought to the attention of EPA before releasing the shipment and should be noted in "Remarks."

CBP Remarks:

Signature of District Director of Customs:	Date:
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Paperwork Reduction Act Notice: This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control No. 2070-0020). Responses to this collection of information are mandatory (19 CFR 12). An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The public reporting and recordkeeping burden for this collection of information is estimated to be 26 minutes per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden to the Regulatory Support Division Director, U.S. Environmental Protection Agency (2821T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

EPA Form 3540-01 (Rev 3/22) Previous versions are obsolete. [Print Form](#) [Reset Form](#) Page 2 of 2

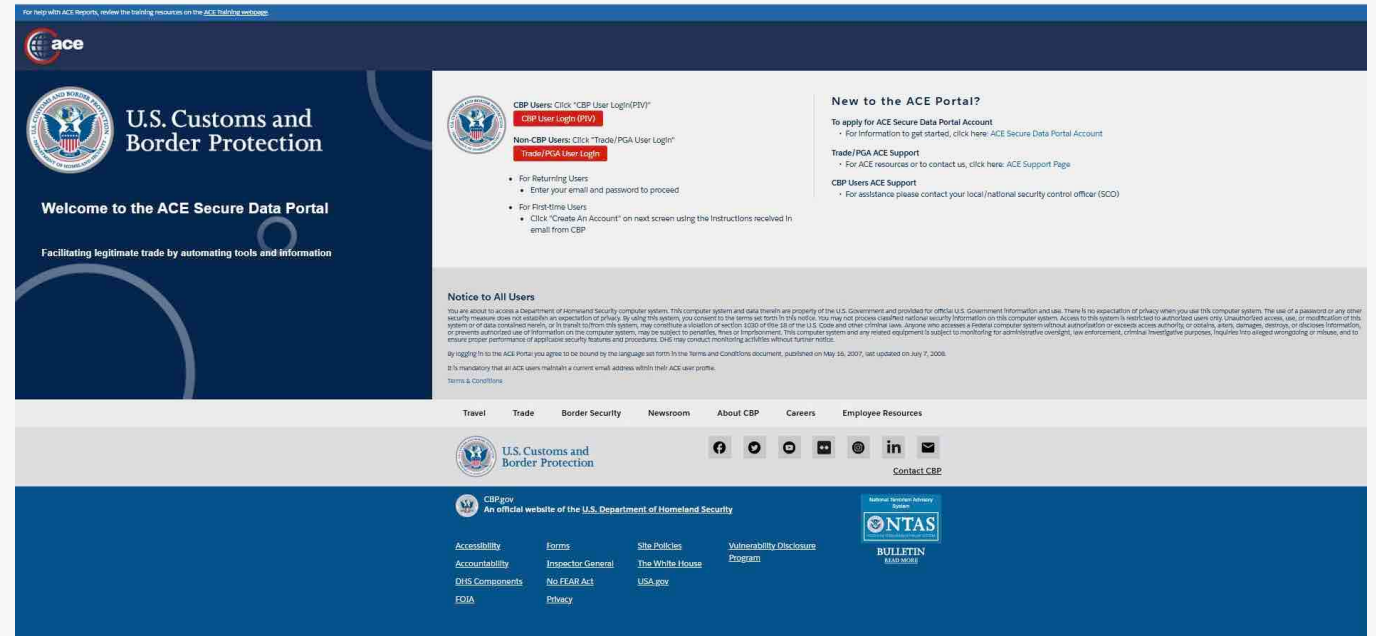


Notice of Arrival (NOA)

- Along with the Notice of Arrival the on-product label should also be submitted for review.

- Inspectors (CBP or EPA) can request other documents, such as shipping documents, manuals, etc.

- Mostly this process is done electronically



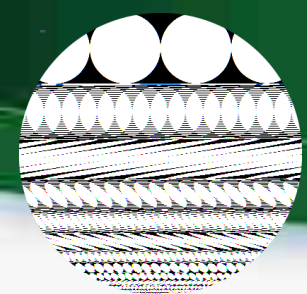
Screenshot of Automated Commercial Environment (ACE) database.



How Does EPA Monitor US Borders?



- Electronic “wall”
- Every import and export is entered into a Homeland Security Database called “ACE”
- This database is monitored by Customs and Border Protection
- Other “Partner Government Agencies” also monitor the database



Types of Pesticides and Devices

Pesticides

- **Commonly recognized forms:**
insecticides, herbicides, rodenticides, and fungicides
- **Less recognized forms:**
Disinfectants, attractants, plant defoliants, swimming pool treatments, and plant growth regulators

Devices

- Ultraviolet Light Units and Bulbs
- Air/Water Treatment Units and Filters
- Insect Traps
- Sound Generators
- Ground Vibrators



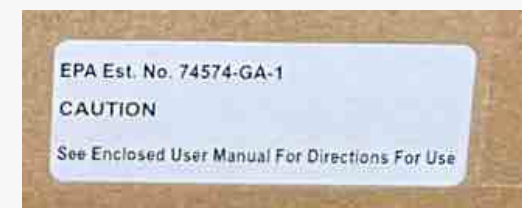
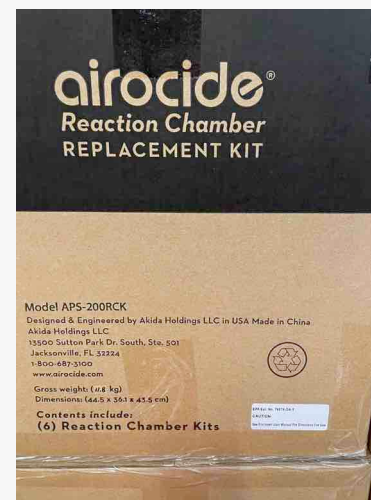
Pesticides vs Devices

FIFRA Authority

EPA under FIFRA has regulatory authority over both pesticides and devices



FIFRA defines a pesticide as “any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest...”



FIFRA defines a device as “any instrument or contrivance that is intended for trapping, destroying, repelling, or mitigating any pest or any other form of plant or animal life”



Pesticides vs Devices

FIFRA Authority

First step, “What is the intended use of this product?”

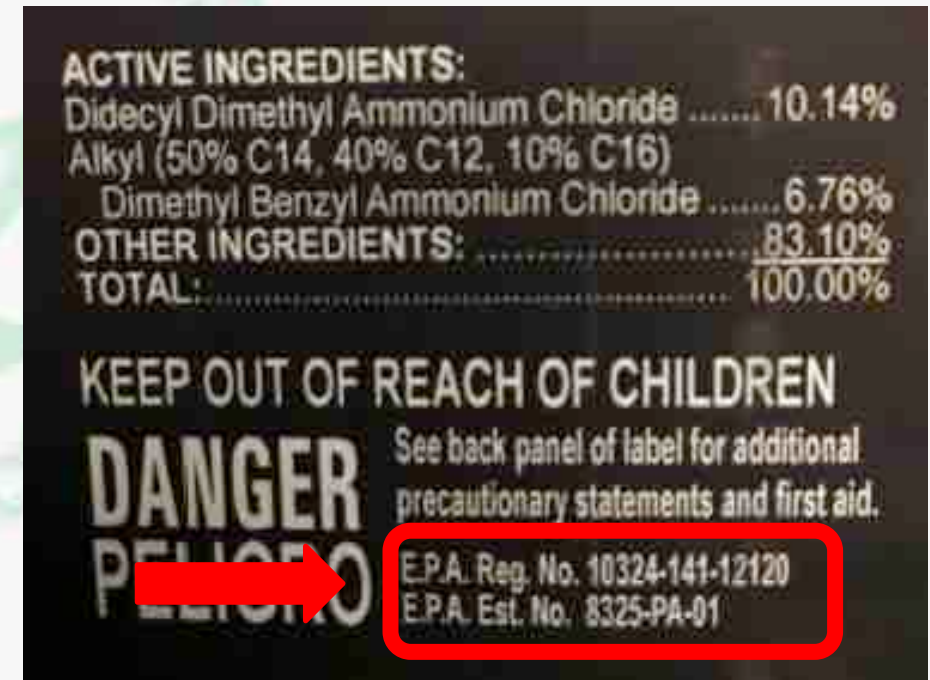


If the intended use is to “kill, repel, trap a pest” then **YES** they are most likely EPA/FIFRA regulated. 17

On Product Label Review



This label language is federal law.



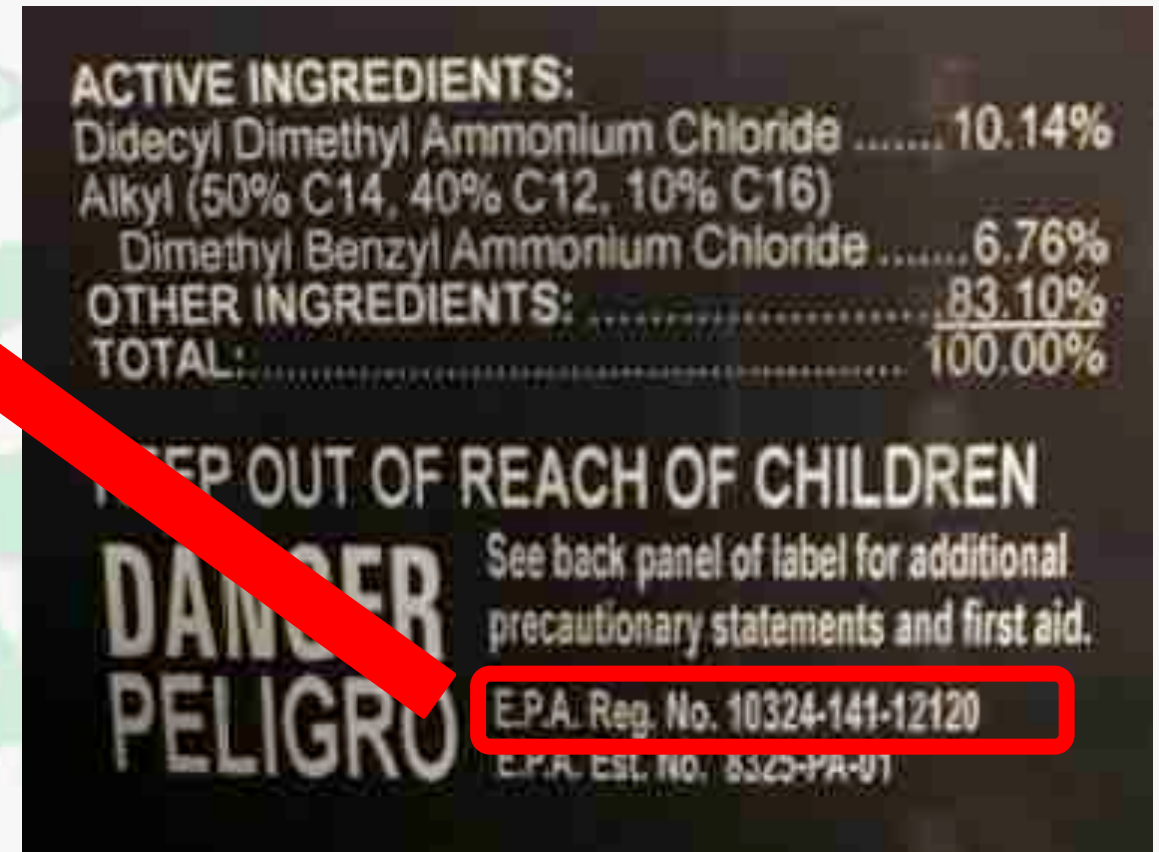
Photos of on product labels are part of the entry information-
Inspectors ensure the imported product labels are compliant.



On Product Label Review

EPA uses PPLS to ensure the language on the product being imported MATCHES the language on the federal registration.

The is a public database.



Pesticide Product Label Search

<https://www.epa.gov/pesticide-labels/pesticide-product-label-system-ppls-more-information>



On Product Label Review

Check that the EPA Establishment has submitted all required reports.

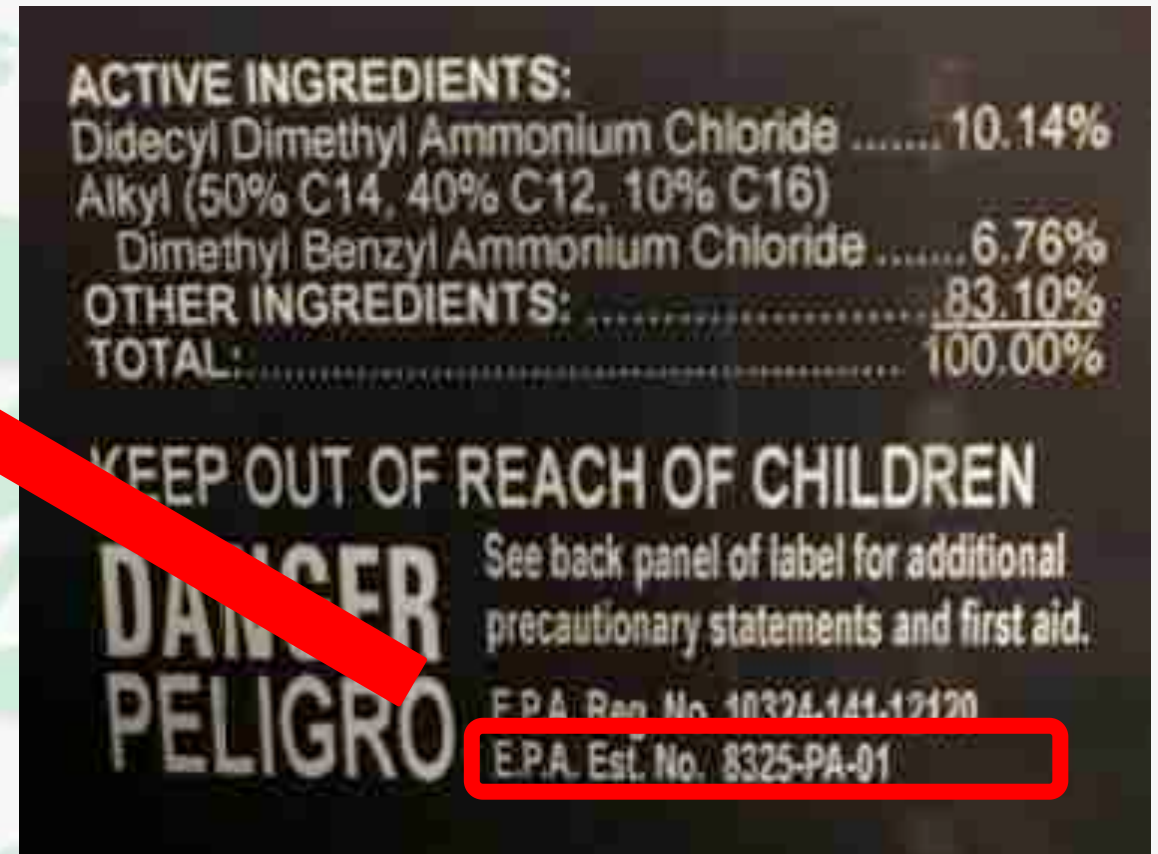
This is an EPA internal database.

Section Seven Tracking System

Production History

15 entries found.

Processed By	Reporting Year	Production Reported	Signed Date	Postmark Date
AMATUSIK	2018	Yes	01/10/2019	01/10/2019
AMATUSIK	2017	Yes	01/08/2018	01/08/2018
AMATUSIK	2016	Yes	01/06/2017	01/06/2017
MSTEVE03	2015	No	01/07/2016	01/07/2016
	2014	Yes	01/14/2015	01/14/2015
	2013	Yes	02/28/2014	02/28/2014
	2012	Yes	02/28/2013	02/28/2013
	2011	Yes	02/27/2012	02/28/2012
	2010	Yes	02/25/2011	02/28/2011
	2009	Yes	02/23/2010	02/25/2010
	2008	Yes	02/26/2009	03/02/2009
	2007	Yes	02/26/2008	02/27/2008





On Product Label Review



LABEL REQUIREMENTS:

- ☐ EPA Establishment Number
- ☐ Directions for Use
- ☐ Caution or Warning Statement
- ☐ No False Claims

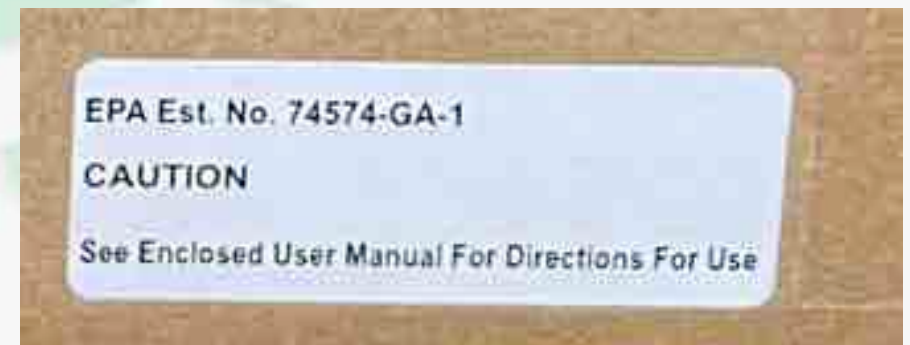
**EPA does not review efficacy
purchase at your own risk**



On Product Label Review

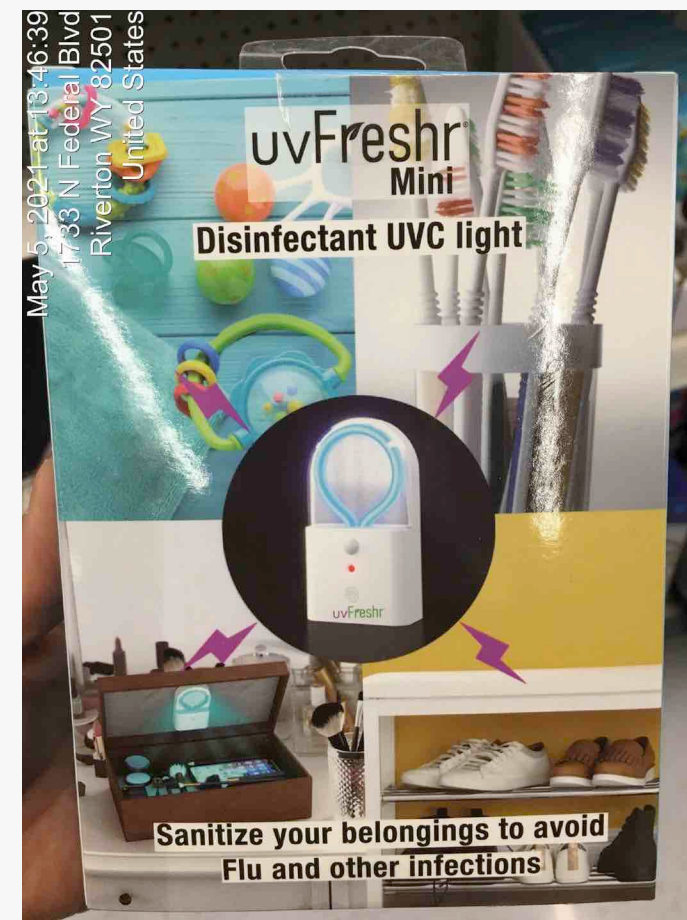
Label Requirements:

- ✗ EPA Establishment Number
- ✗ Directions for Use
- ✗ Caution or Warning Statement
- ☐ No False Claims





Are these claims “false or misleading”?

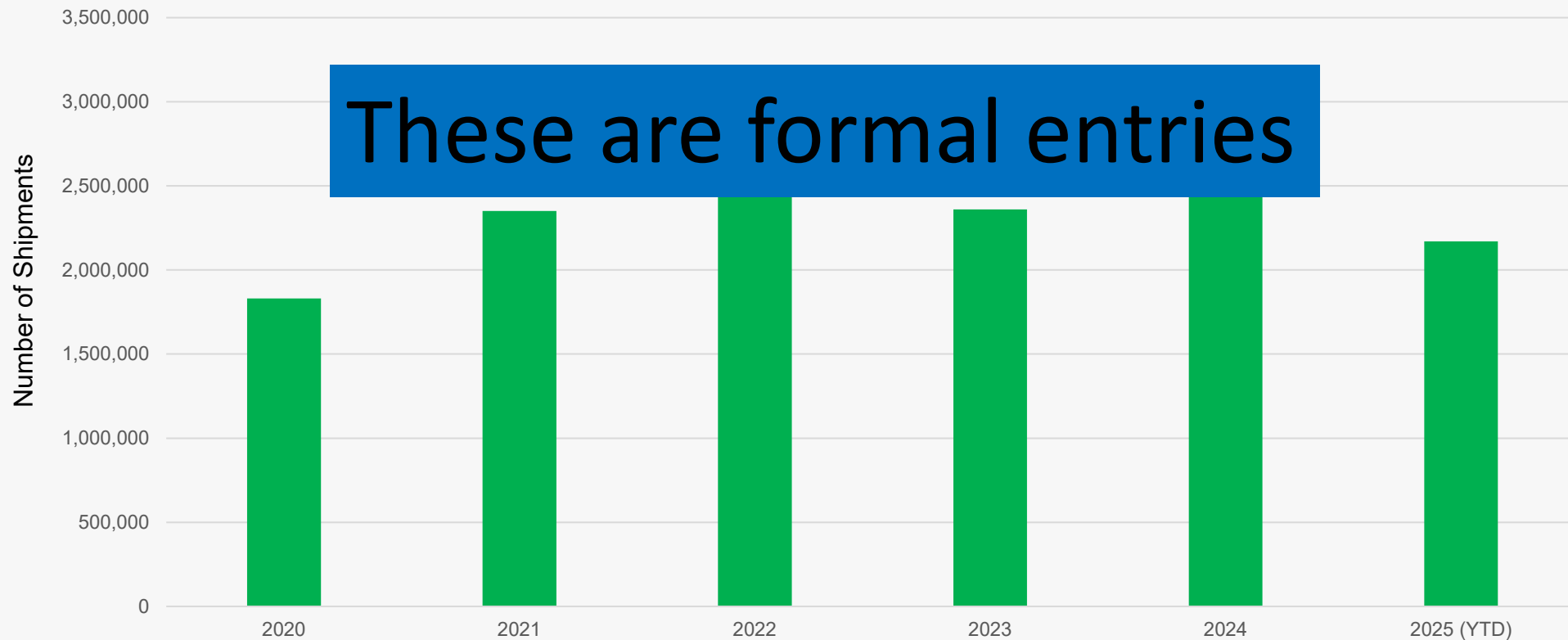


EPA is looking for claims that are unprovable by science.



Scope of the Import Universe

Potential FIFRA Regulated Shipments Attempting Import into the US





QLIK Dashboard of ACE Data

Snapshot of shipments that were declared as pesticides.



Number of unique products

Number of shipments

C – A paper NOA has been reviewed by EPA prior to entry

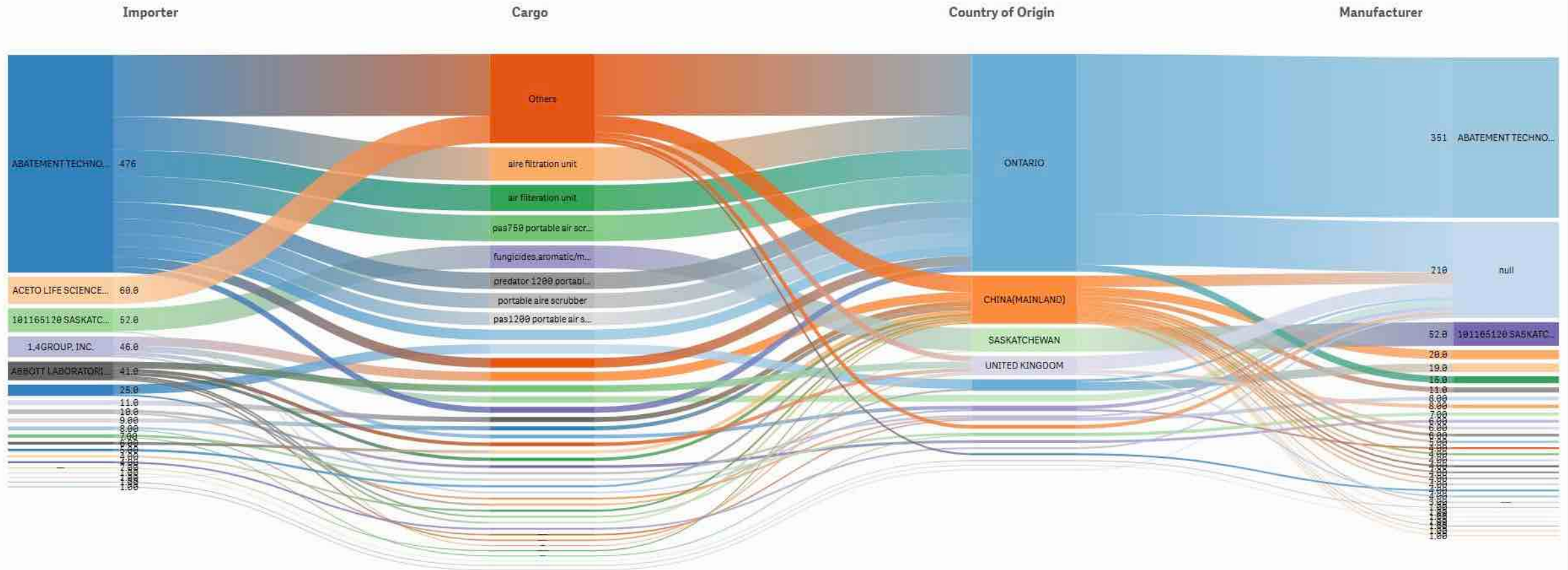
Null - entry data has been submitted for EPA review



QLIK Dashboard of ACE Data

Snapshot of shipments that were declared as pesticides.

Supply Chain Data – includes Pesticide Devices

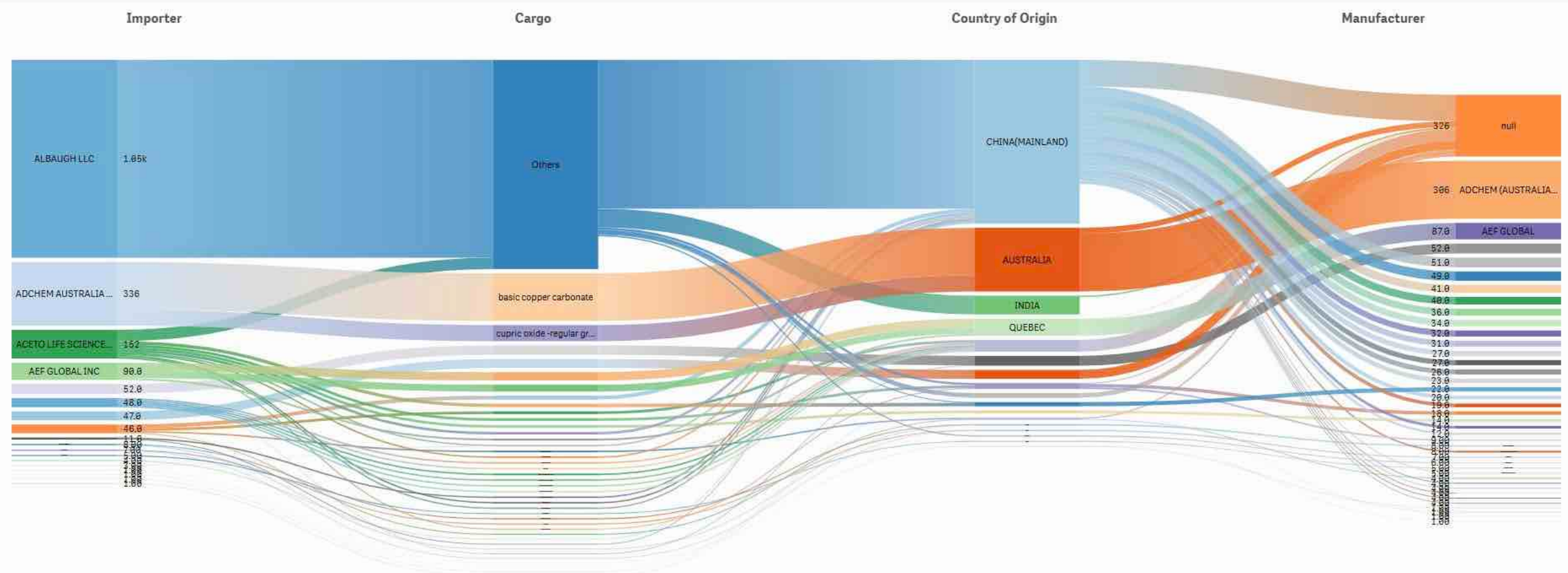




QLIK Dashboard of ACE Data

Snapshot of shipments that were declared as pesticides.

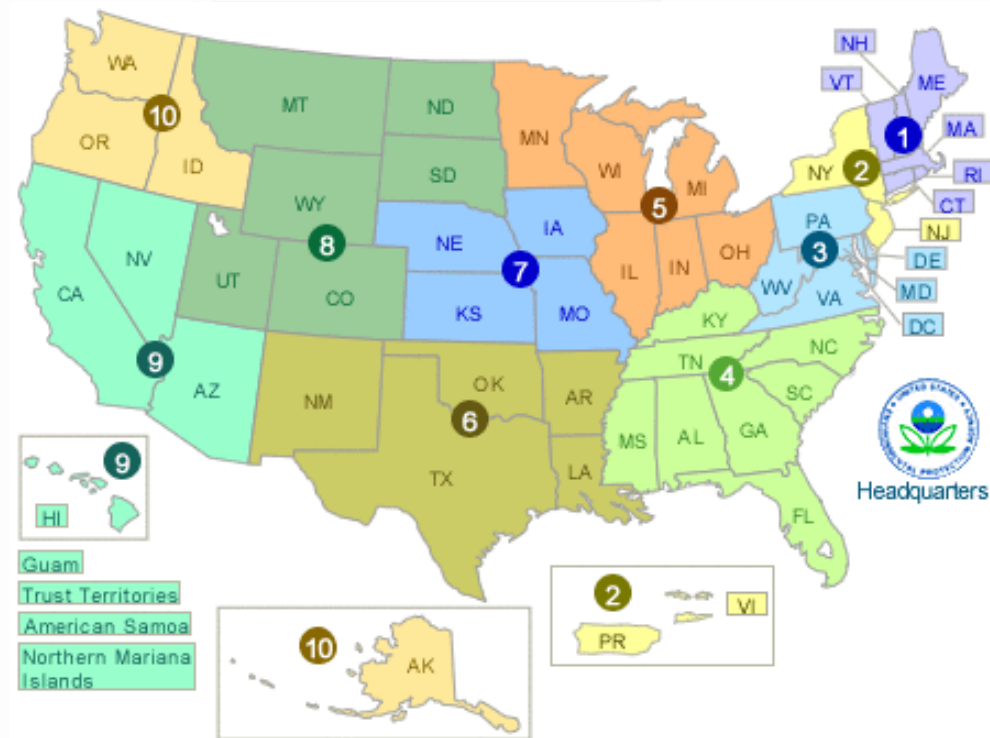
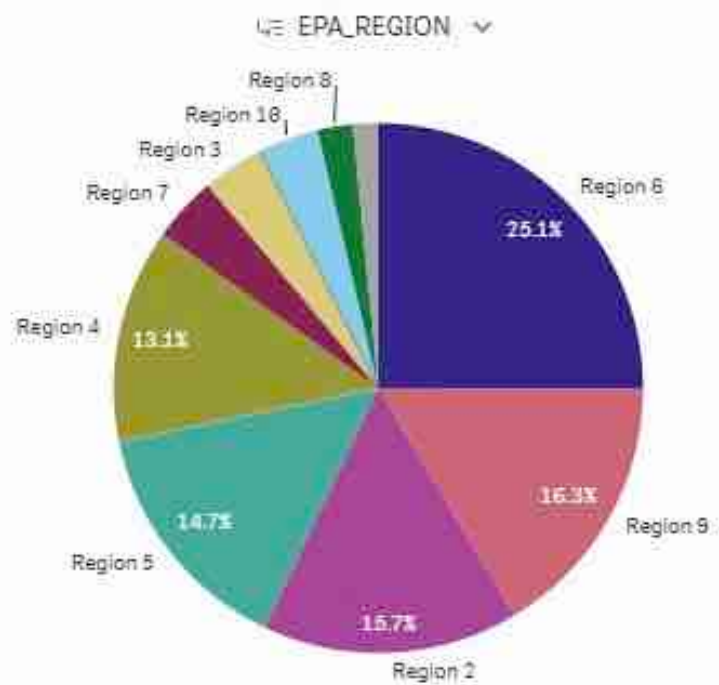
Supply Chain Data – excludes Pesticide Devices





QLIK Dashboard of ACE Data

Snapshot of shipments that were declared as pesticides.

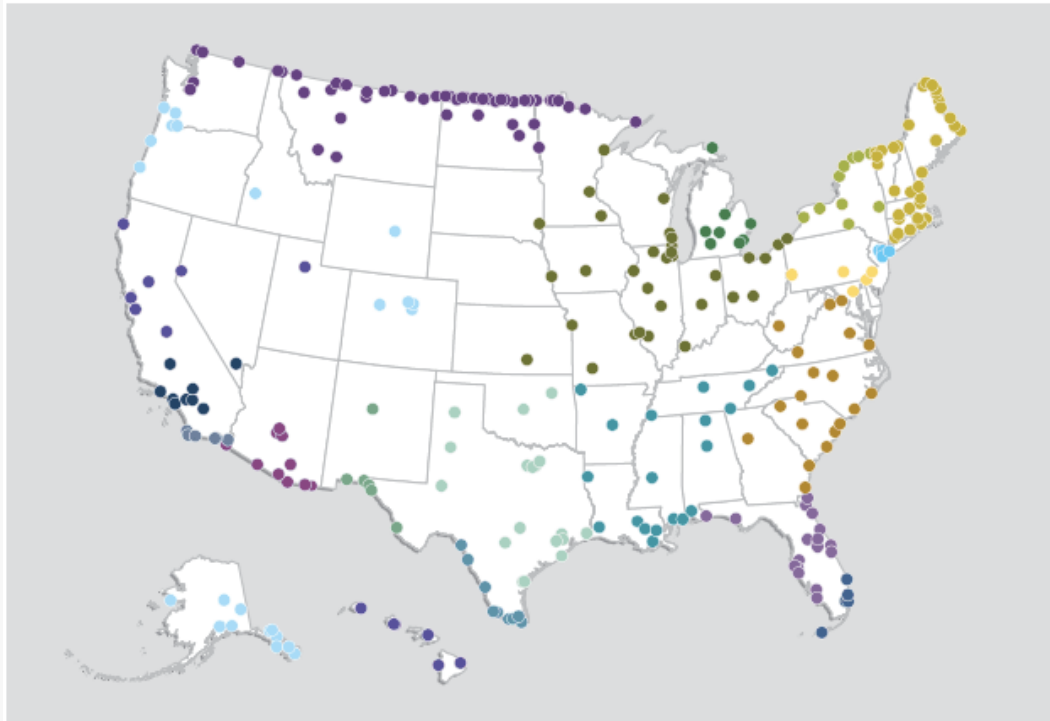




How Does EPA Monitor US Borders?

Every State Has at Least 1 Port of Entry

314 ports of entry categorized by the 19 Field Operations offices to which they report



Atlanta Buffalo El Paso Los Angeles New York San Francisco Tucson
Baltimore Chicago Houston Miami Portland Seattle
Boston Detroit Laredo New Orleans San Diego Tampa

Several Partner Government Agencies (PGAs) have a constant physical presence at major Ports of Entry.



EPA monitors the electronic “wall” remotely and occasionally conducts “Operations” at Ports of Entry.



USMCA-FIBE

FIFRA Import Border Enforcement

From FY22 to FY25 EPA was part of a USMCA Project that funded EPA Inspector Travel to Ports of Entry.

Coordinate a series of Operations, where EPA Inspectors are physically at the border inspecting every shipment that crosses.

Work alongside CBP Officers and train them in **exactly what information EPA needs** to make a compliance determination.

Create contacts at each port of entry so when enforcement is necessary, it can be **efficient and effective**.

Reduce port shopping.

Sample pesticides for product integrity.



Pembina, North Dakota Operation August 2022.



NEIC Staff training Customs and Border Control Officers at the Pembina, North Dakota Port of Entry in mobile sampling equipment for pesticide active ingredients. 30



How Does a FIFRA Operation Happen?

- Coordination with CBP Officers:
 - Dates of Operation
 - Projected HTS Codes, products, companies to target
 - Officers to assist with logistics: holding trucks, trains and inspections
- Coordination with Laboratory:
 - Dates of sampling
 - List of probable pesticides to be sampled
- Utilize the ACE Dashboard to assist in this planning process.

HTS 10 Digit	Description
3004909203	For veterinary use
6811891000	Tubes, pipes and tube or pipe fittings
73030000*	pipes and hollow profiles, of cast iron
73241000*	Sinks and wash basins, of stainless steel
7419995010	Brass plumbing goods not elsewhere specified or included
8413810030	Household water systems, self-contained, and windmill pumps
8418690120	Drinking water coolers, self-contained
8418.99.8050	Parts of combined refrigerator-freezers fitted with separate external doors and parts of household type refrigerators
8419190020	Instantaneous water heaters
8419190040	Solar water heaters
8419901000	Of instantaneous or storage water heaters
8421210000	For filtering or purifying water
8421220000	For filtering or purifying beverages other than water
8421990040	Parts of machinery and apparatus for filtering or purifying water
8422110000	dishwashing machine - Of the household type
8422900200	Water containment chambers for the dishwashing machines of subheading 8422.11 and other parts of dishwashing machines of the household type incorporating water containment chambers
8481801020	Bath and shower faucets
8481801030	Sink and lavatory faucets
8481805060	Bath, shower, sink and lavatory faucets
8516100080	Other water heaters and immersion heaters

Typical list of HTS Codes targeted in FIFRA Operation.

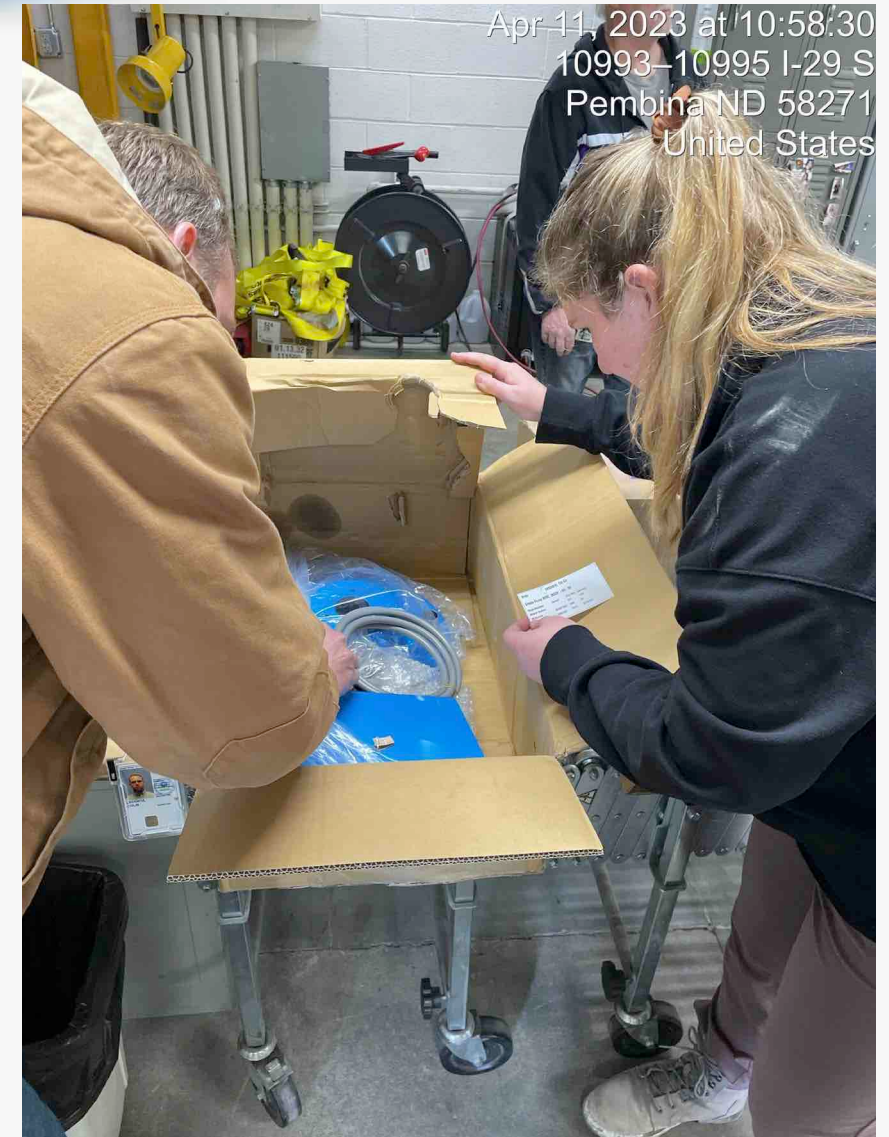


Pesticide samples sent to Fort Meade for product integrity analysis.



How Does a FIFRA Operation Happen?

- Conduct Operation
 - Training of CBP Officers
 - Utilize CBP targeting mechanisms to stop shipments:
 - Real time monitoring of shipments crossing
 - Shadow FDA, USDA, Fish & Wildlife Officers
 - Section 321 Shipments
(small value items that don't meet \$800 threshold)
- Ship samples to Fort Meade or National Enforcement Investigations Center (NEIC) for analysis



EPA Inspectors investigating a Section 321 shipment.



How Does a FIFRA Operation Happen?

- Post Operation
- Send CBP points of contacts and Cargo Chief(s) a report out:
 - Number of Shipments Inspected
 - Number of Enforcement Actions
 - Number of Officers Trained
 - Photos
- Follow up on enforcement actions.
- Discuss best practices and set dates for next Operation

USMCA-FIBE Operation Report Out

Operation Port of Entry: Sweetgrass, Montana 3310

Dates of Operation: March 27-31, 2023

EPA Inspectors: Christine Tokarz, tokarz_christine@epa.gov,
Devin Donaldson, donaldson.devin@epa.gov,
Brittani Clairmont Brittani.Clairmont@cst.org
(Confederated Salish & Kootenai Tribes)

CBP Officers: Gaul Aeleyni, AELEYNIR.GAUL@cbp.dhs.gov,
Nadja Seymour NADJAC.SEYMOUR@cbp.dhs.gov,
Caleb Fuchs E CALEBF.FUCHS@cbp.dhs.gov,
Sonia Lojewski- Woodbury, SONIA.LOJEWSKIWOODBURY@cbp.dhs.gov,
Diana Davis diana.c.davis@cbp.dhs.gov,
Rebecca Moore, rebecca.r.moore@cbp.dhs.gov,
Erika Karcher Erika.Karcher@fda.hhs.gov,
JD Stewart JD.Stewart@cbp.dhs.gov,
Collin Bate, collin.r.bate@cbp.dhs.gov,
Dana Dahle, dana.t.dahle@cbp.dhs.gov,
Jon James jonathan.r.james@cbp.dhs.gov

Statue(s): EPA- FIFRA

During the Operation:

Number of CBP Officers Trained: 11

Number of products inspected: 50

Number of samples sent to Fort Meade: 2

Enforcement Outcomes: 8 Notice of Refusals of Admissions issued

After the Operation:

Enforcement Outcomes: 15 products denied entry (4.16.23)

Narrative:

This Operation involved training 11 CBP Officers in FIFRA, inspecting 50 products, and sending two samples for product integrity analysis. Eight Notice of Refusals of Admission's were issued to Sweetgrass, Montana POE and 1 Notice of Refusal of Admission was issued to the Seattle Washington POE as part of a cross regional referral (an outcome of the Operation). Next Operation in Sweetgrass, Montana is planned for May 15-19, 2023.

Attachments:

8 Notices of Refusals of Admission, Photographs of Inspection Results, Inspection Photos

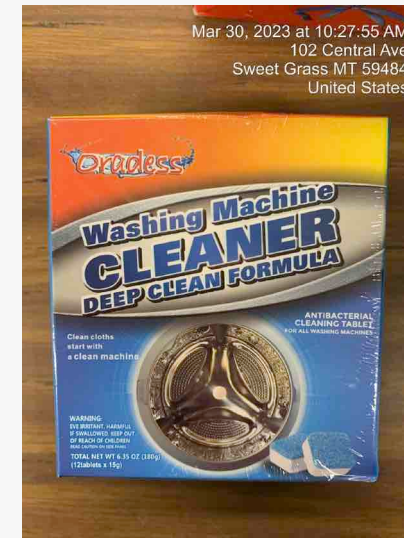
A photograph showing the interior of a metal storage container or trailer, filled with various items, possibly equipment or supplies, used during the operation.

Typical report out for CBP Officer Post Operation

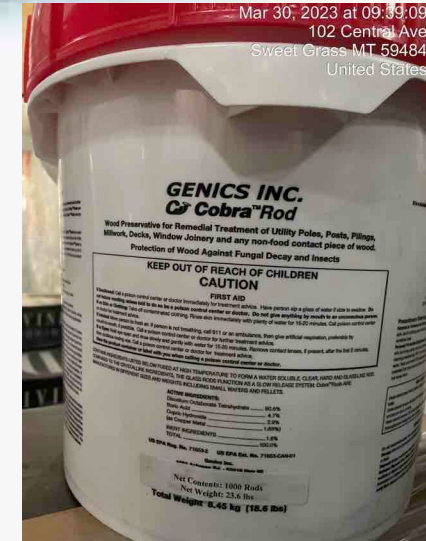


Sweetgrass, Montana Operation: FIFRA

- Worked directly with ATCET and FDA Teams, extremely productive.
- Refused entry to unregistered and misbranded pesticides.
- Pesticide Inspector from the Confederated Salish & Kootenai Tribes assisted with Operation.
- Officers requested EPA return to conduct Car/Vehicle Targeted Operation.



Unregistered pesticide denied entry.



Registered pesticide sent for analysis.



Unregistered pesticide denied entry.

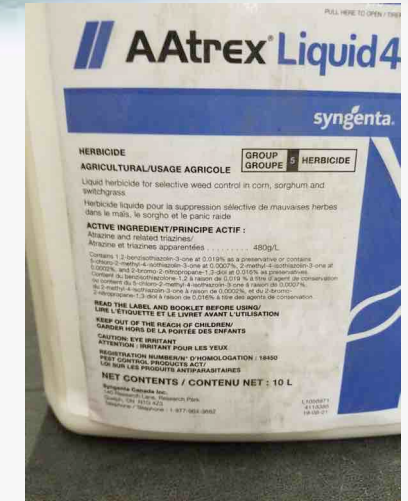


Pembina, North Dakota Operation: FIFRA & CAA

- Over 100 shipments inspected in a two-day period.
- Sent several registered pesticides to Fort Meade for analysis.
- Brought portable sampling unit to test pesticides on sight.
- Trained 10 CPB Officers in FIFRA, CAA, and HFCs.



Pesticide sent for analysis.



Officers in Pembina, North Dakota stopped **two** shipments of unregistered RUPs a month post Operation.



Unregistered pesticide.



EPA Border Operations

- Sampling on site and in the field.
- Regional Imports Task Force to include:
 - FIFRA (pesticides)
 - TSCA (toxic chemicals)
 - CAA (mobile sources, cheat devices, HFCs)
 - RCRA (hazardous waste)
- Increase regional participation including EPA Criminal and Attorneys.
- Open dialogue with Canadian and Mexican Counterparts.



EPA and CBP operation, Pembina, North Dakota.



EPA providing training to CBP Officers at the Port of Hidalgo, Texas



Griffin G510 Gas Chromatograph Mass Spectrometer

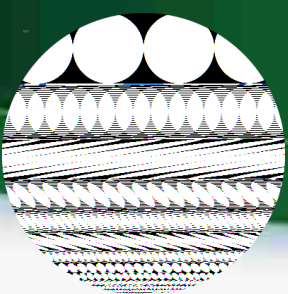
- Another EPA Project that was funded involved the purchase of a Portable GC/MS (aka chemical identifier).
- Capable of analyzing all phases (liquid, solid, vapor)
- Full NIST on-board library provides confirmatory identification and analysis of trace compounds, unknown chemicals, and mixtures
- Projected field work: unknown identification of materials within containers, pesticides, and/or HFCs



Portable GC/MS in the field.

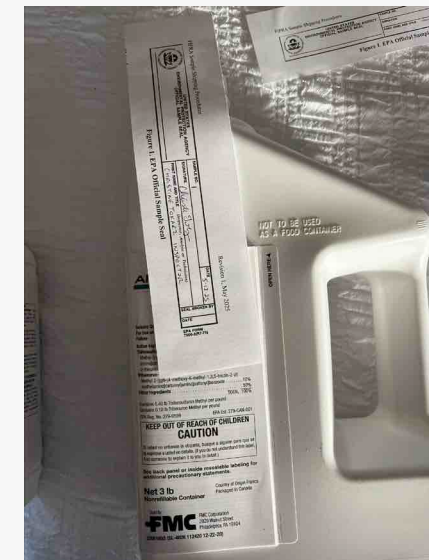
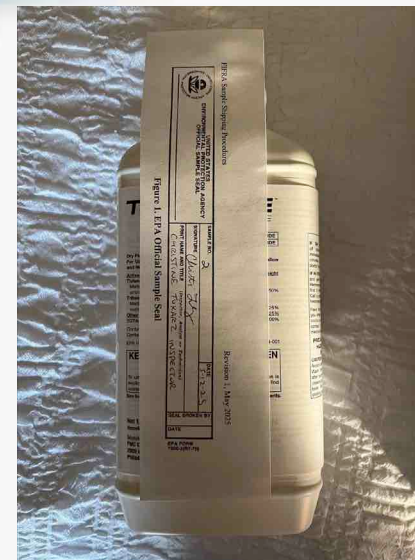


Portable GC/MS

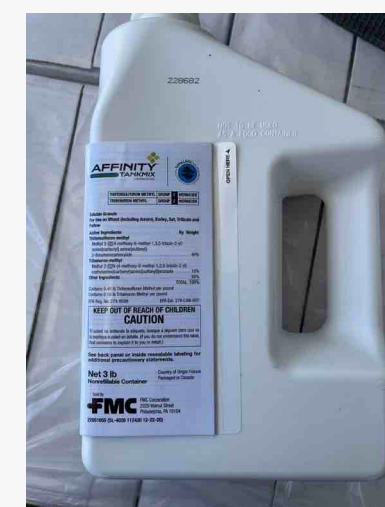


Product Integrity Analysis

- All shipment crossing the border are subject to inspection under Customs and Border Protection Authority.
- When EPA is at the Port, samples of registered pesticides are sent for analysis of active ingredients.
- The results are then compared to the Confidential Statement of Formula (CSF).
- If the % of actives does not fall within the range indicated in the CSF the violation is, “FIFRA 12(a)(1)(C) - Sold or distributed a pesticide whose COMPOSITION DIFFERED from the composition represented in the registration.”



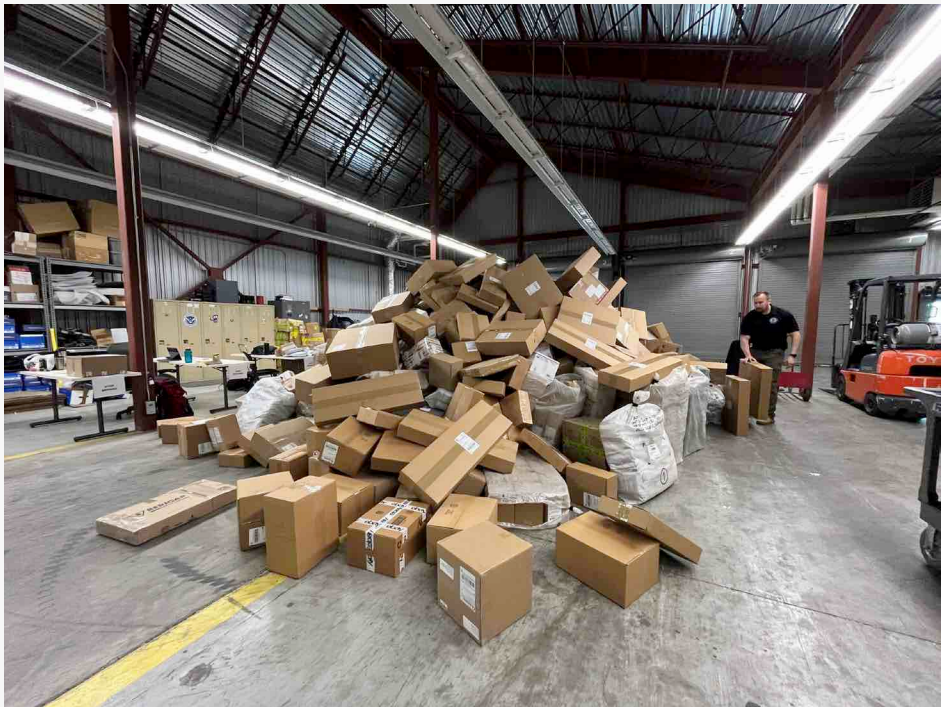
Pesticide Samples taken from shipment crossing in Portal North Dakota sent to laboratory for product integrity analysis.





What is Crossing the Border?

A FIFRA Snapshot



Section 321's being scanned in Sweetgrass, Montana.



Section 321's inspected in Pembina, North Dakota.



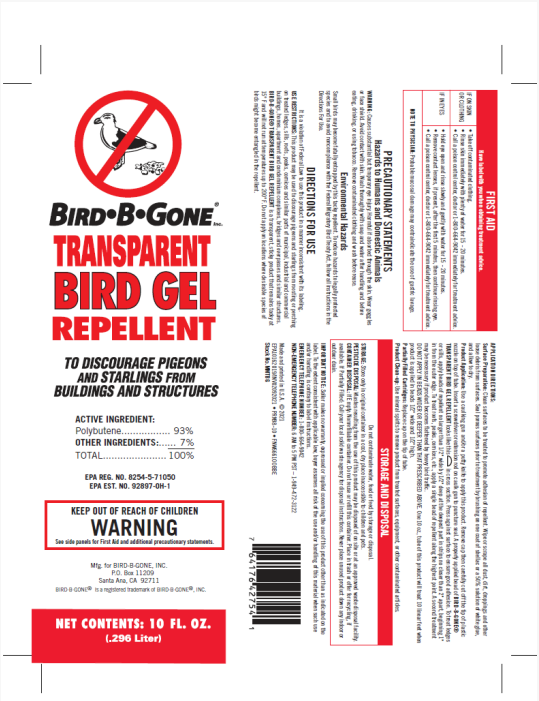
Solaris Disinfection Machine



Port of Entry: Detroit, Michigan



Bird – B – Gone



TRANSPARENT BIRD GEL

OVERVIEW

STICKY BIRD REPELLENT GEL

Transparent Bird Gel is a sticky repellent used to prevent birds from landing on horizontal surfaces. This bird repellent gel stops birds from perching on ledges, I-beams, parapet walls, signs, conduits, pipes, and more. This product **should not be used around protected bird species.**

- Designed for Pigeons & Starlings
- Applies easily with a caulking gun
- One tube covers approximately 10-ft
- Lasts up to 6 months outdoors!

Size:

Choose Options

* Required Fields

SKU: TBG

UPC: 764176427541

Port of Entry: Port Huron, Michigan



Good & Clean Disinfecting Wipes

Unregistered pesticide intended for the Canadian market

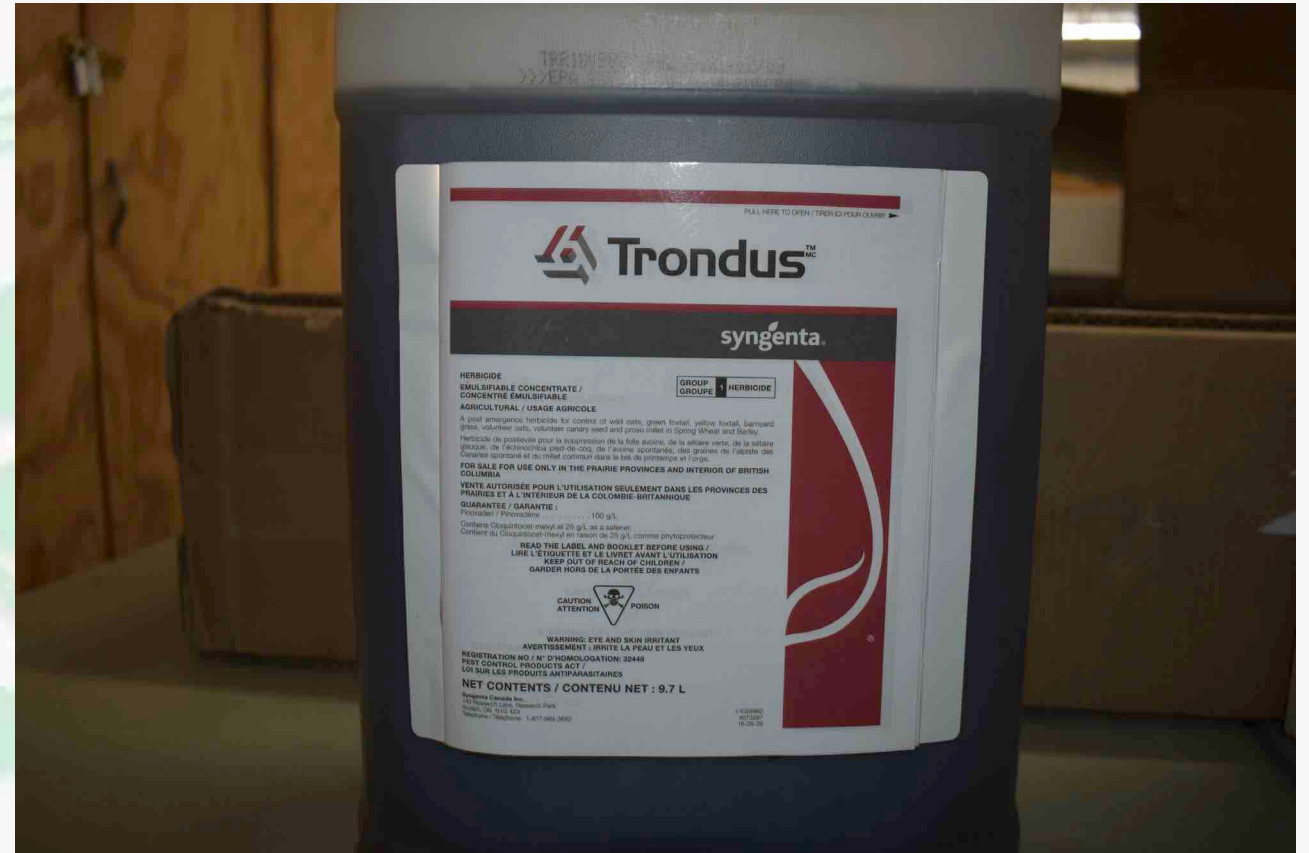


Port of Entry: Port Huron, Michigan



Trondus

- Not Registered with EPA
- This is the Canadian version of a Restricted Use Pesticide.
- Only products with the Section 3 label are considered “registered”.





Clorox Bathroom Disinfectant

- Not Registered with EPA
- This is the Canadian version of a General Use Pesticide.
- Only products with the Section 3 label are considered “registered”.





Delaro Fungicide

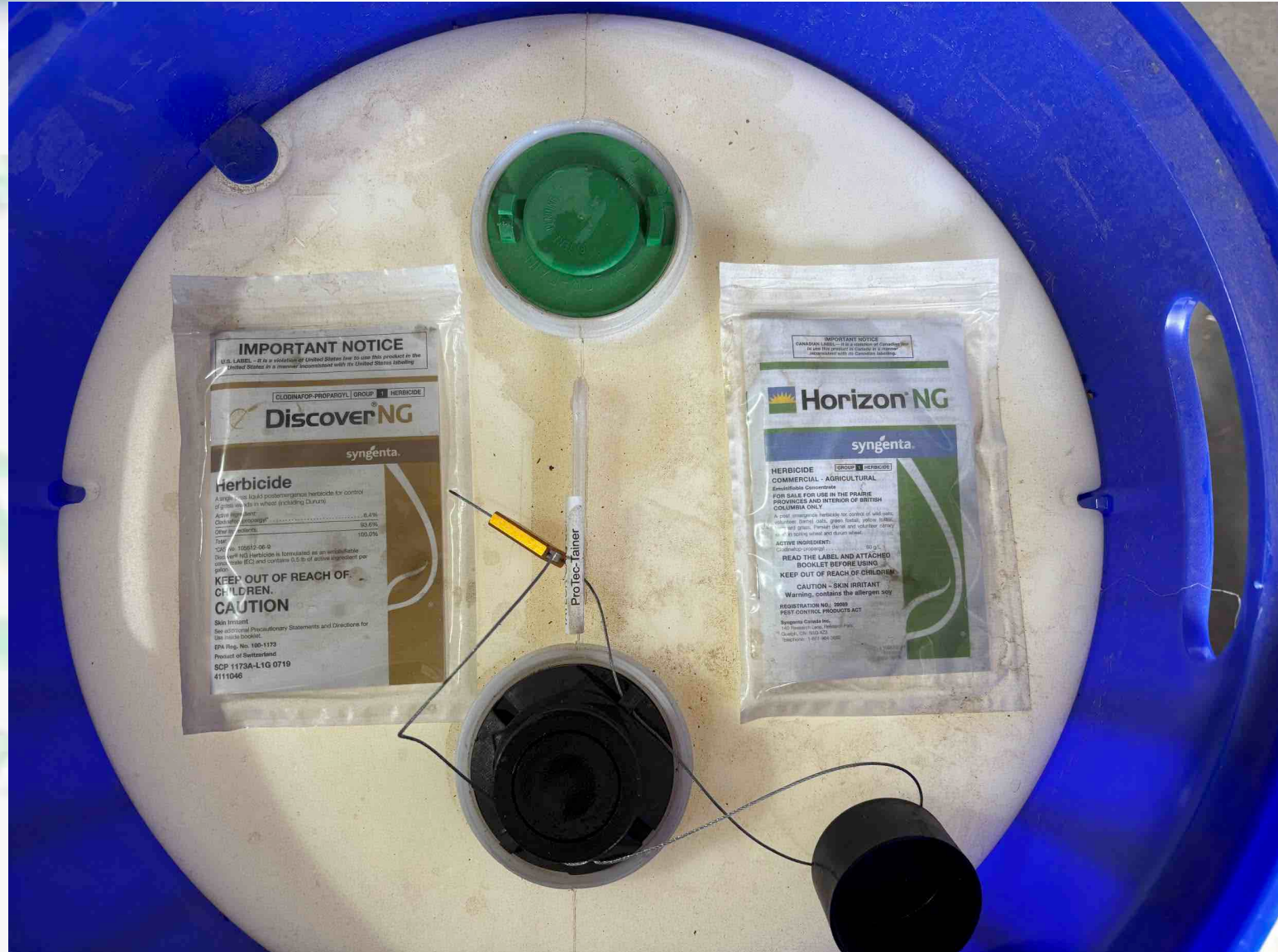
- There is a Registered version with EPA.
- This is the Canadian version of a General Use Pesticide.
- Only products with the Section 3 label are considered “registered”.
- Produced at 264-MO-3.





Discover NG Fungicide

- Only products with **ONLY** the Section 3 label are considered “registered”.





Fabuloso

- Similar issues on the Southern Border with products labeled for the Mexican market.

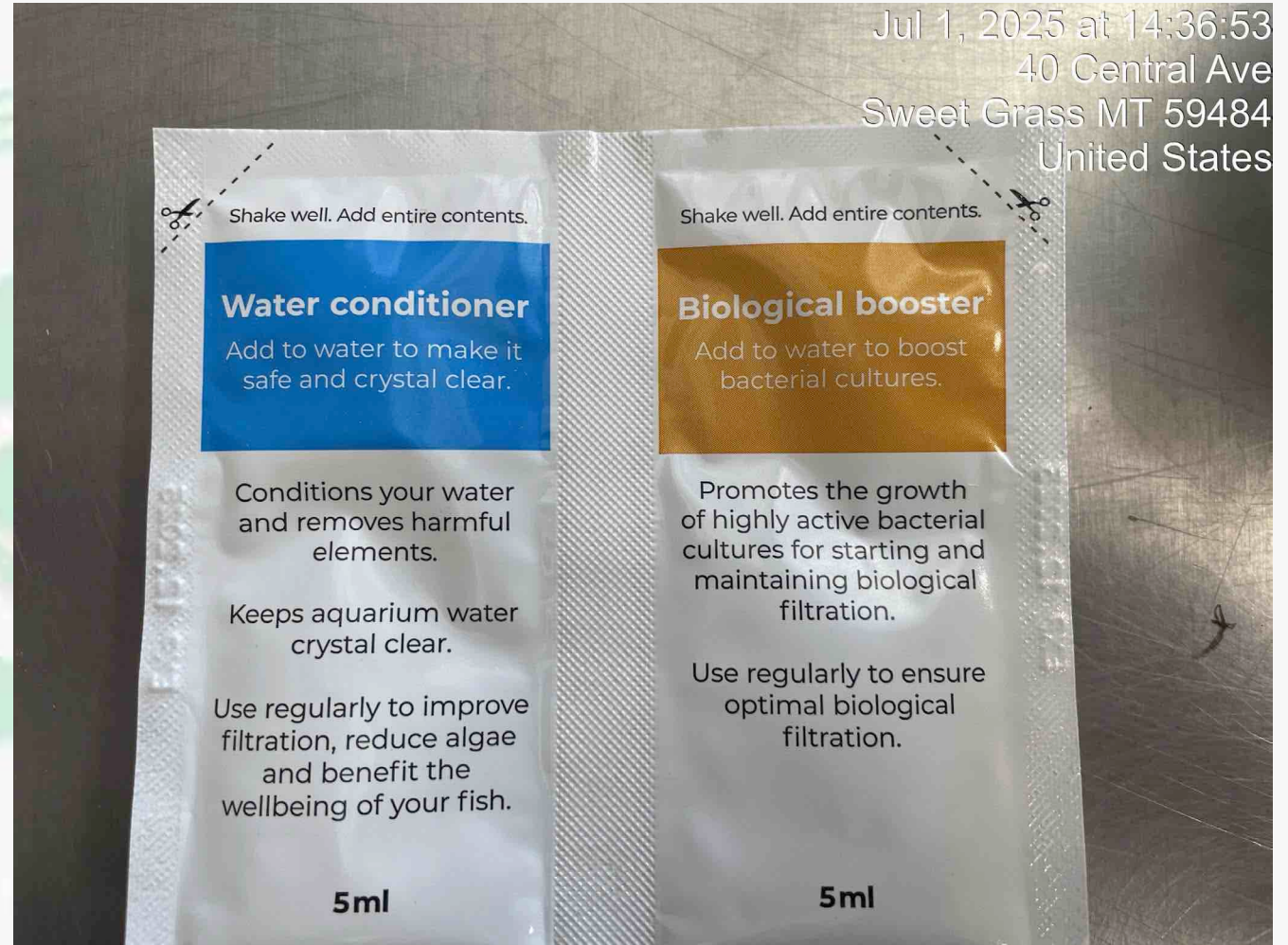




Aquarium Products



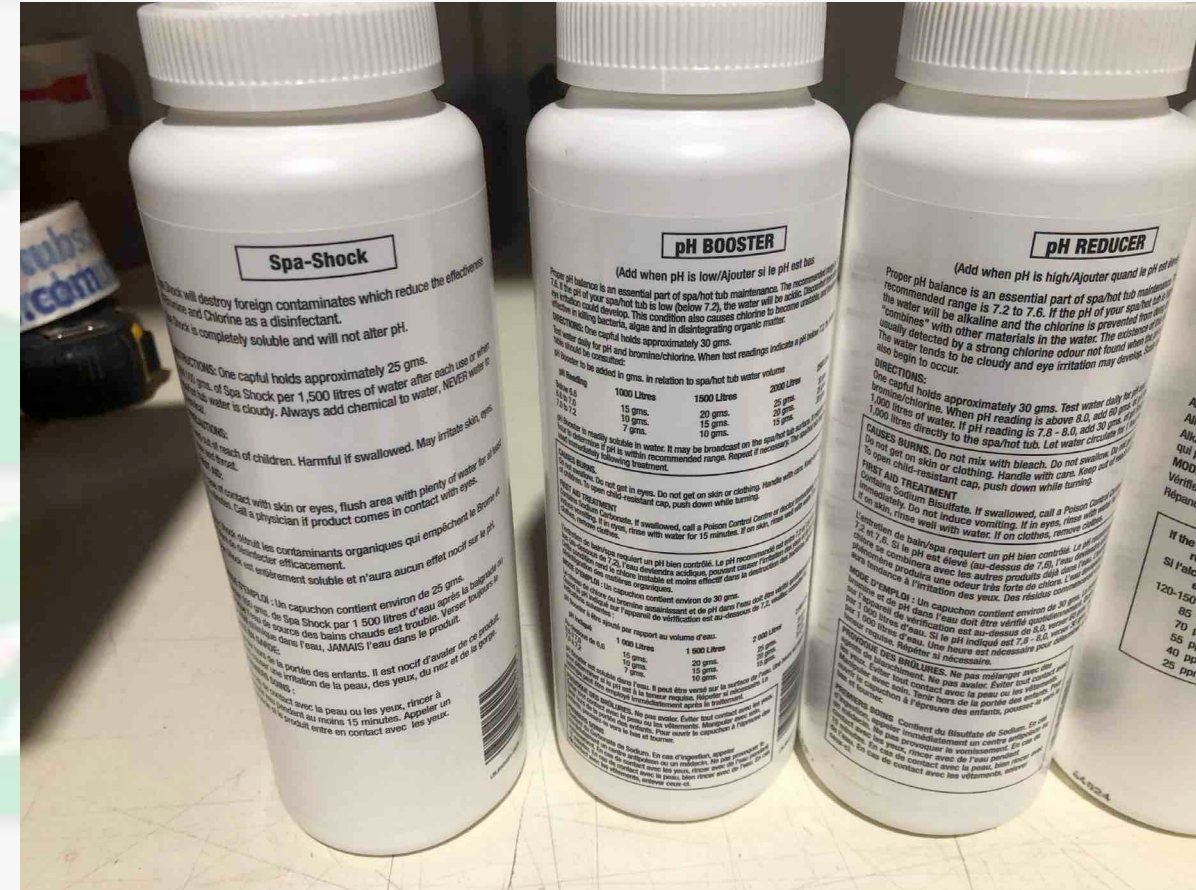
Mar 30, 2023 at 13:24:10
102 Central Ave
Sweet Grass MT 59484
United States



Jul 1, 2025 at 14:36:53
40 Central Ave
Sweet Grass MT 59484
United States



Hot Tub Products

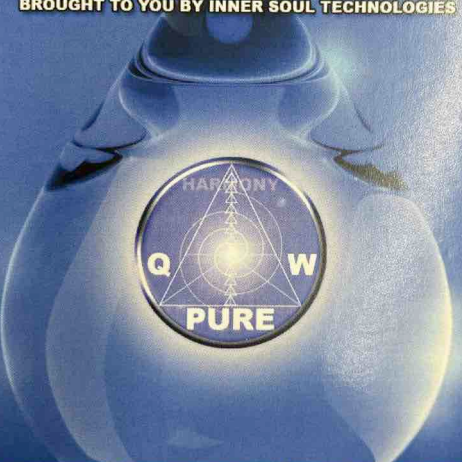




Quantum Pure Life Water Patches

Mar 11, 2025 at 15:08:10

QUANTUM PURE LIFE WATER PATCHES
CLEAN YOUR WATER, PURIFY YOUR LIFE!
EXCLUSIVE LEADING EDGE "QUANTUM NANO TECHNOLOGY"
BROUGHT TO YOU BY INNER SOUL TECHNOLOGIES



TRANSFORMS ORDINARY WATER FROM ANY SOURCE IN YOUR HOME, OFFICE OR WATER BOTTLE ON THE GO, INTO HIGHLY ENERGIZED, PURE POSITIVE LIFE FORCE WATER THAT REJUVENATES, REVITALIZES AND HARMONIZES YOUR BODY FROM THE INSIDE OUT! PURE WATER FOR YOUR FAMILY AND YOUR CHILDREN!
100% - 30 DAYS MONEY BACK GUARANTEE!
WE KNOW YOU WILL FEEL THE DIFFERENCE!

Mar 11, 2025 at 15:08:05

QUANTUM PURE LIFE WATER PATCHES

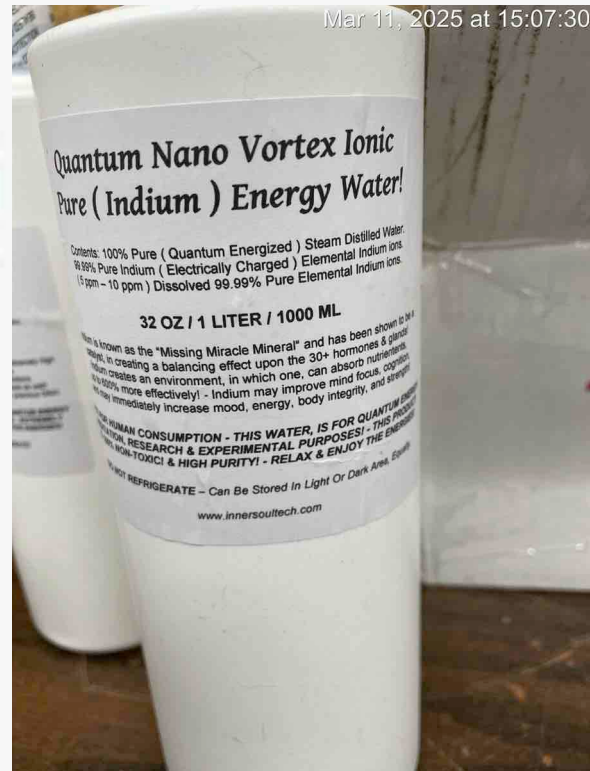
ALL WATER ON EARTH CONTAINS THE MEMORY, ENERGY AND INFORMATION OF EVERY SINGLE THING IT HAS EVER COME INTO CONTACT WITH. SEWAGE, CHEMICALS, TOXINS, PHARMACUTICALS, VIRUSES, RUSTY PIPES FROM OLD FAUCETS...ETC. ALL OF THESE THINGS ARE STORED AS CELLULAR INFORMATION WITHIN THE WATER. WHEN YOU DRINK, SHOWER OR BATH IN THE WATER THE INFORMATION THEN TRANSFERS TO YOU AND YOUR CELLS. THIS WATER THEN PASSES THIS LOW ENERGY, AND CORRUPTED INFORMATION TO YOUR VERY INNER BEING AS YOU ABSORB IT, AND IT BECOMES A PART OF YOU, HAVING AN IMMEDIATE AND LASTING EFFECTS ON YOUR MOOD, ENERGY LEVELS AND ALSO YOUR OVER ALL WELL BEING. THE QUANTUM PURE LIFE WATER PATCHES ARE A SOLUTION TO THE POLLUTED, TOXIC, NEGATIVE CELLULAR ENERGY THAT HAS TAKEN HOLD OF OUR VERY OWN PRECIOUS WATER SUPPLY THAT WE SO ESSENTIALLY RELY UPON.

WE GUARANTEE YOU WILL BE ABLE TO TASTE AND FEEL A DIFFERENCE!
CONTENTS: 10 QUANTUM PURE LIFE WATER PATCHES.



PLACE ONE QUANTUM PURE LIFE WATER PATCH ON THE FOLLOWING AREA'S FOR EFFECTIVE PROTECTION!
KITCHEN FAUCET, SHOWER HEAD, BATHROOM TUB FAUCET, BATHROOM SINK FAUCET, WATER COOLER BOTTLES OR WATER COOLER MACHINE, WASHING MACHINE, DISHWASHER, JUICE JUG, FAVORITE MUG, SPORTS WATER BOTTLE.

WWW.INNERSOULTECH.COM
(780) 914-3551





Bacoban

Not Registered with EPA

Appears to be "FAA Approved"

The following are pesticide claims:

- Disinfection
- Residual Antimicrobial Properties for 10 days



Ingredients:
100 g of solution containing:
Benzalkonium chloride 0,20 g, sodium
pylithione 0,025 g, polycondensates,
perfume substances, purified water.
Ingredients according to regulation
(EC) No 648/2004: less than 5 % cationic
surfactants, disinfectants, perfumes.

Intended use:
Ready-to-use disinfectant product
with residual effect. Does not contain
Aldehyde or Phenol.

Efficacy and application:
Tested in accordance with EN guidelines:
EN 1040: 5 min
EN 1275: 5 min
EN 1276: 5 min
EN 1650: 5 min
EN 12697: 15 min
EN 12727: 5 min
EN 12624: 5 min (C. albicans)

EN 12624: 5 min (T. interdigitale)
EN 14561: 60 min
EN 14562: 60 min
EN 1661: 5: 5 min (4-fold test)
Virucidal activity against enveloped
viruses according to EN 14476 under
dry conditions: 5 min (incl. HIV, HBV,
HCV, Influenza, Herpes, Ebolavirus, ...)
EN 14476: Rotavirus 5 min
Norovirus 20 min
Human papillomavirus 60 min

**Residual antimicrobial effect for
up to 10 days** (tested according to
ASTM G 2160)

Dermatologically tested (epicutaneous
test with 20 test persons): excellent skin
tolerance

See
label

LOT

Bacoban^{DL}

For Aerospace

**Alcohol-free disinfectant and cleaning
product for Aerospace surfaces**

**Fraser's
AEROSPACE**

www.fraser-aerospace.com

**Residual effect
on Bacteria, Fungi
and Viruses**

Safety instructions:
Wear gloves when using disinfectant
products. Keep out of reach of
children.
Can be used on all surfaces. For
positively sensitive surfaces, we recom-
mend testing for compatibility first on
a less visible place. To be kept in a dry
and place. Close properly after use.
Recycle and dispose of the container
in accordance with current legislation,
preferably via an approved collector or
company. Do not use after the sell-by
date. A safety sheet can be obtained
on request.

Important!
The residual effect of Bacoban^{DL} is
no excuse for not carrying out
necessary disinfection measures in
cases of visible and/or questionable
contamination!

Use disinfectants safely.
**Always read the label and pro-
duct information before use.**

Directions for use: Spread Bacoban^{DL}
evenly over the surface with a
cloth and leave to dry. Do not rinse.

Biocide Reg. No: N-24071 (C),
262/117A (Lu)

World Wide Exclusive Distributor
Fraser Aerospace
1 St. James Road, Brentwood,
Essex, CM14 4JH, UK
Tel: +44 (0)20 8597 9791
www.fraser-aerospace.com
contact@fraser-aerospace.co.uk

4 260143 810720



CLM Water Purification System

- Misbranded pesticide device
- No EPA Est. Number



Port of Entry: Chicago, Illinois



CLM Water Purification System

- Misbranded pesticide device
- No EPA Est. Number

[All Products](#)

Brinkley RV, CLM4 RV Filtration Kit

\$399.95

Quantity

[Buy Now](#)[Add to Cart](#)

For Brinkley RV
Reduces lead, cysts, absorbs chlorine, odor in water, and improves taste.
Reduces limescale build-up* in water**
P/N: CLM4-BL-B-BBC-PCL-KIT
Chlorine overall percent reduction: >97.5 %*
Lead overall percent reduction: >99.7 %*
Cyst overall percent reduction: >99.99 %*
NSF/ANSI 42, 53 and NSF/ANSI/CAN 61 certified
†Not performance tested or certified by NSF
*Data from NSF International test reports
** Internal tes

[Home](#) [Online Store](#) [Specifications](#) [Documents](#) [Contact](#) [About](#) [Brinkley RV OWNERS HUB](#) [Search](#)

[All Products](#)
Brinkley RV replacement filters
Brinkley RV Filtration Systems
CLM replacement filters
CLM filtration systems

All Products

Brinkley RV, CLM4 3-stage Replacement Filter Set
From \$99.95
[View options](#)

Brinkley RV, CLM4 Filtration System
\$329.95

Brinkley RV, CLM4 RV Filtration Kit
\$399.95

CLM, CLM2 Filtration System
\$89.95

CLM, CLM2.5 Filtration System
\$99.95

CLM, CLM2.5 #1 PPC Replacement Filter
From \$29.95

Lots of pesticide claims.

Sometimes these can become enforcement cases.



Luminor UV Sanitizing Bulbs

BLACKCOMB 5.1 B



- > Normal Flow - up to 83 lpm (22 gpm)
- > Monitoring of lamp life, system diagnostics and potential fault codes all on a colour interface with a "future-proof" expandability port for product upgrades and options

[LEARN MORE >](#)

BLACKCOMB 6.1 B



- > Normal Flow - up to 83 lpm (22 gpm)
- > Continuous UV monitoring in addition to lamp status monitoring, system diagnostics and potential fault codes all on a colour interface with a "future-proof" expandability port

[LEARN MORE >](#)

BLACKCOMB HO 5.1 B



- > High Flow - Up to 110 lpm (28 gpm)
- > Monitoring of lamp life, system diagnostics and potential fault codes all on a colour interface with a "future-proof" expandability port for product upgrades and options

[LEARN MORE >](#)

BLACKCOMB HO 6.1 B



- > High Flow - Up to 110 lpm (28 gpm)
- > Continuous UV monitoring in addition to lamp status monitoring, system diagnostics and potential fault codes all on a colour interface with a "future-proof" expandability port

[LEARN MORE >](#)

Part #: 140145

Lamp, S200RL-HO, replacement lamp, pkg. of 1

Serial #: 21200674



EPA Establishment
#088776-CAN-001



LUMINOR
ENVIRONMENTAL

LUMINOR ENVIRONMENTAL INC.
80 Southgate Dr., Unit 4
Guelph, ON N1G 4P5
Canada
P: 519.837.3800
F: 519.837.3808
www.luminoruv.com



8 00027 03045 3

Port of Entry: Port Huron, Michigan



Corteva R&D Pesticides



CORTEVA™
agriscience

Derivative of Pyridine (X11369703)

Active Ingredient(s)	
Derivative of Pyridine (X11369703)	93.80%
Other Ingredients	6.2%
Total	100%

Keep out of reach of children. WARNING Precautionary Statements Hazards to humans and domestic animals

Causes skin irritation. Causes serious eye irritation. May cause respiratory irritation. Avoid breathing dust/ fume/ gas/ mist/ vapors/ spray. Wash skin thoroughly after handling. Use only outdoors or in a well-ventilated area. Wear protective gloves/ eye protection/ face protection. IF ON SKIN: Wash with plenty of soap and water. IF INHALED: Remove person to fresh air and keep comfortable for breathing. Call a POISON CENTER/ doctor if you feel unwell. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If skin irritation occurs: Get medical advice/ attention. If eye irritation persists: Get medical advice/ attention. Take off contaminated clothing and wash before reuse. Store in a well-ventilated place. Keep container tightly closed. Store locked up. Dispose of contents/ container to an approved waste disposal plant.

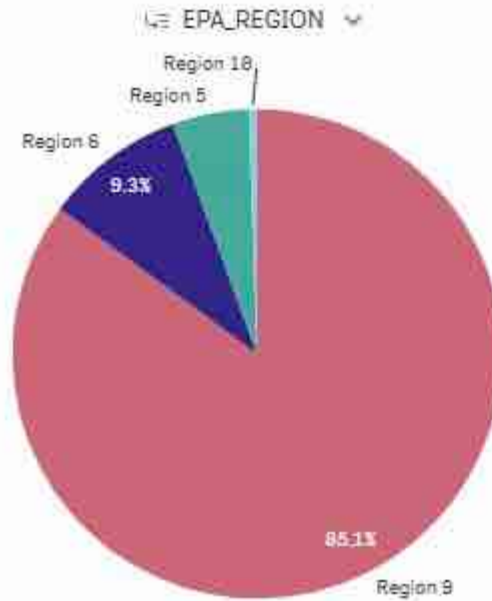
Specification #: 400000100107. Aragen Life Sciences LTD, Survey No's. 125(part)&126, IDA Mallapur, Hyderabad, Telangana, 500076, India. EPA Est No. N/A. In case of emergency endangering health or the environment involving this product, call 1-800-992-5994. Not Registered for Use in the United States of America. For Research and Development Purposes Only. Not for Sale. NOTICE: Research sample for use by qualified personnel only. Upon completion of tests, dispose of material and container safely and in accord with federal, state/provincial and local laws and regulations. If further information is needed on disposal or use, consult your supplier.

Net Content 18.038 g/ 0.636 oz **LOT :** S-002592-005-P **Date of Manufacture** 5/8/2025 **Expiry Date** NA

Port of Entry: Indianapolis, Indiana



Unregistered Pesticides entering through EPA Region 10.



Using the QLIK Dashboard EPA can look back to see how many times an Importer distributed noncompliant products across the border.

Misbranded Pesticide Devices entering through EPA Region 10.



FILED
May 22, 2025
11:23 A.M. PST
U.S. EPA REGION 10
HEARING CLERK

BEFORE THE
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:)
WINIX AMERICA, INC.,)
)
Vernon Hills, Illinois,)
Respondent.)

DOCKET NO. FIFRA-10-2024-0007
CONSENT AGREEMENT

I. STATUTORY AUTHORITY

1.1. This Consent Agreement is issued under the authority vested in the Administrator of the U.S. Environmental Protection Agency ("EPA") by Section 14(a) of the Federal Insecticide, Fungicide, and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136(f)(a).

1.2. Pursuant to Section 14(a) of FIFRA, 7 U.S.C. § 136(f)(a), and in accordance with the "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties," 40 C.F.R. Part 22, EPA issues, and Winix America, Inc. ("Respondent") agrees to issuance of, the Final Order attached to this Consent Agreement ("Final Order").

II. PRELIMINARY STATEMENT

2.1. In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b), issuance of this Consent Agreement commences this proceeding, which will conclude when the Final Order becomes effective.

2.2. The Director of the Enforcement and Compliance Assurance Division, EPA Region 10 ("Complainant") has been delegated the authority pursuant to Section 14(a) of FIFRA, 7 U.S.C. § 136(f)(a), to sign consent agreements between EPA and the party against whom an administrative penalty for violations of FIFRA is proposed to be assessed.

In the Matter of: WINIX AMERICA, INC.
Docket Number: FIFRA-10-2024-0007
Consent Agreement
Page 1 of 16

U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 155, 11-C07
Seattle, Washington 98101

Between January 1, 2021, and April 30, 2022, Respondent “distributed or sold,” as defined by Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg), the products in Table 1 (“Table 1 Products”), by importing and distributing them to its distribution centers at least 15 times. These products contained “zinc oxide”.

Between January 1, 2021, and April 30, 2022, Respondent distributed or sold misbranded pesticides at least 15 times in violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

Between November 11, 2021, and April 30, 2022, Respondent distributed or sold misbranded devices at least 126 times in violation of Section 12(a)(1)(F) of FIFRA, 7 U.S.C. § 136j(a)(1)(F).

Respondent failed to file reports as required by FIFRA on 137 occasions, in violation of Section 12(a)(2)(N) of FIFRA, 7 U.S.C. § 136j(a)(2)(N)

\$1,145,795



FILED
April 8, 2024
4:21 P.M. PST
U.S. EPA REGION 10
HEARING CLERK

BEFORE THE
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:) DOCKET NO. FIFRA-10-2023-0057
GRAYL INC.,) **CONSENT AGREEMENT**
)
Seattle, Washington,)
Respondent.)

I. STATUTORY AUTHORITY

1.1. This Consent Agreement is issued under the authority vested in the Administrator of the U.S. Environmental Protection Agency ("EPA") by Section 14(a) of the Federal Insecticide, Fungicide, and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136(a).

1.2. Pursuant to Section 14(a) of FIFRA, 7 U.S.C. § 136(a), and in accordance with the "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties," 40 C.F.R. Part 22, EPA issues, and Grayl Inc. ("Respondent") agrees to issuance of, the Final Order attached to this Consent Agreement ("Final Order").

II. PRELIMINARY STATEMENT

2.1. In accordance with 40 C.F.R. §§ 22.13(b) and 22.18(b), issuance of this Consent Agreement commences this proceeding, which will conclude when the Final Order becomes effective.

2.2. The Director of the Enforcement and Compliance Assurance Division, EPA Region 10 ("Complainant") has been delegated the authority pursuant to Section 14(a) of FIFRA,

In the Matter of: GRAYL INC.
Docket Number: FIFRA-10-2023-0057
Consent Agreement
Page 1 of 13

U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 155, 11-C07
Seattle, Washington 98101

\$85,000

Misbranded Pesticide Devices entering through EPA Region 10.

[https://yosemite.epa.gov/oa/rhc/epaadmin.nsf/Filings/03BBC729D593B3F685258AFA00790FCC/\\$File/Grayl%20Inc%20CAFO.pdf](https://yosemite.epa.gov/oa/rhc/epaadmin.nsf/Filings/03BBC729D593B3F685258AFA00790FCC/$File/Grayl%20Inc%20CAFO.pdf)



Automated laser bird deterrent



AVIX Autonomic Mark II Laser
Bird Deterrent



\$13,104.00

Available on backorder

- 1 +

ADD TO CART

Categories: Nuisance Animal Control, Wildlife Habitat Management

Misbranded Pesticide Devices entering through EPA Region 10.



Product Details

The Shark® Steam & Scrub with Steam Blaster® Technology scrubbing and sanitizing* steam mop gently scrubs and sanitizes* all at once. The combination of steam and rotating pads delivers up to 3x better stuck-on stain removal vs. traditional steam mops** while providing chemical-free sanitization*.

- **POWERFUL PERFORMANCE:** Steam and rotating pads for up to 2x better stain removal
- **STEAM BLASTER®:** Steam blast that is controlled for stubborn stains and spots.
- **EASE OF USE:** Rotating microfiber pads deliver powerful and effortless cleaning.
- **3 STEAM MODES:** Light, Normal, and Deep, for stuck-on messes and stains.
- **CHEMICAL-FREE SANITIZATION:** Removes 99.9% of bacteria without chemicals
- **LED HEADLIGHTS:** Powerful LED headlights reveal hidden debris around your home

Misbranded Pesticide Devices entering through EPA Region 10.



<https://www.thesharkoff.com/?srsltid=AfmBOop5sLdYbM3G7GY1JOJ3FFMhjIccOFUptyUFav0VrPSO0E7v-Roj>

Misbranded Pesticide Devices entering through EPA Region 10.



Many times, these pesticides are smuggled with passengers (rather than cargo).



EPA Criminal Officers have been conducting Operations along the Southern Border.



EPA Criminal Officers have been conducting Operations along the Southern Border.



EPA Criminal Officers have been conducting Operations along the Southern Border.



EPA Criminal Officers have been conducting Operations along the Southern Border.



EPA Criminal Officers have been conducting Operations along the Southern Border.

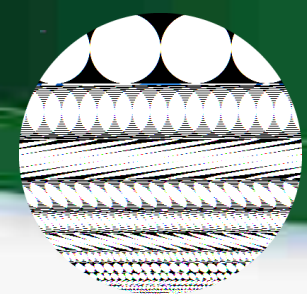


Abamectin - insecticides and miticide, sometimes registered as an RUP



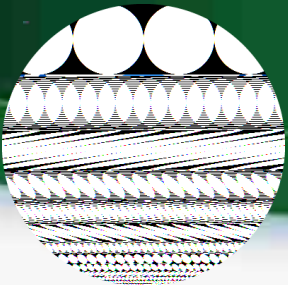
Resifum® U Pyrethroid and organophosphate insecticide based on a mixture of cypermethrin + DDVP in emulsifiable concentrate for indoor and outdoor pest control. Controls scorpions, spiders, mealybugs, cockroaches, ants and mealybugs.

EPA Criminal Officers have been conducting Operations along the Southern Border.



This is actually a fertilizer, consider how difficult it is to train CBP Officers in the nuances of FIFRA.

EPA Criminal Officers have been conducting Operations along the Southern Border.



Systemic fungicide that is quickly absorbed by plant foliage.

Controls such diseases as downy mildew, powdery mildew, greasy spot, Phytophthora, greasy spot, late blight and more.

There is an EPA registered version.



Systemic fungicide belonging to the Phenylamide family.

Designed for soil application via drip irrigation, drenching, or micro-sprinkling systems.

Primarily used to combat oomycetes (a plant pathogen).



Control of mites on a wide variety of agricultural crops, including cotton, citrus, tree nuts, beans, apples, and peppers.



EPA Criminal Officers have been conducting Operations along the Southern Border.



EPA Criminal Officers have been conducting Operations along the Southern Border.



Aluminum Phosphide

Federal and State (CA) Restricted Material

Common Forms:

- Dark grey or dark yellow crystalline (sand-like) solids
- Colorless, odorless, but when combined in some pesticide forms can create a garlic or fishy smell

Health Hazards:

- Lethal if ingested or inhaled
- Creates toxic phosphine gas when exposed to water (moisture) or acids

Reactivity/Incompatibilities:

- Flammable and reactive
 - Phosphine gas when exposed to water or acids
 - Phosphorus oxides and aluminum fumes when exposed to flames



Agro-Fum
Fumiteco



Zinc Phosphide

Federal and State (CA) Restricted Material

Common Forms:

- Granules, pellets, dust, flakes

Health Hazards:

- High acute toxicity

Reactivity/Incompatibles:

- Incompatible with acids, water, and oxidizers

Don Fosfone, Ratone, Fosforo de Zinc



Carbofuran

Federally banned pesticide

Common Forms:

- Granules, powders, liquids

Health Hazards:

- High acute toxicity

Reactivity/Incompatibles:

- Thermal breakdown may release toxic fumes
 - Incompatible with oxidizers, bases



Qufuran, Furadan



Methomyl

Federal and State (CA) Restricted Material

Common Forms:

- White crystalline (sugar-like) solid
- Slight sulfur smell

Health Hazards:

- Inhalation and absorption
- High acute toxicity
- Interrupts nervous system

Reactivity/Incompatibilities:

- Not compatible with strong bases (sodium/potassium hydroxide)
- poisonous gasses produced in fire
 - Sulfur Oxides and Nitrogen Oxides



Methomex
Lannate
Memilene y Acinate
Methavin



Chlorpyrifos

Federally Restricted Use, Banned in CA

Common Forms:

- White crystalline (sand-like) solid or liquid solution
- Smells like natural gas

Health Hazards:

- Organophosphate – Nerve agent
- Can be lethal if ingested, absorbed through the skin or inhaled

Reactivity/Incompatibilities:

- Not compatible with strong acids (hydrochloric/nitric/sulfuric acid) or strong bases (sodium/potassium hydroxide), ammonia, brass or copper (corrosive)
- poisonous gasses produced in fire including Sulfur Oxides, Phosphorus Oxides, Nitrogen Oxides, Chlorine



Agroclor, Lorsban



Methamidophos

Federally banned pesticide

Common Forms:

Granules, powders, and crystalline solid

Health Hazards:

- Organophosphate nerve-agent
- High acute toxicity

Reactivity/Incompatibles:

- Containers can explode in heat or fire, which produces toxic fumes
- Incompatible with reducing agents (hydrides), oxidizers, acids and bases



Tamaron
Metafos
Metaldane



Dichlorvos

Federally and CA Restricted Material

Common Forms:

- Liquid
- Yellow

Health Hazards:

- Fatal if swallowed, skin contact, or inhaled
- High acute toxicity
- Organophosphate nerve agent

Reactivity/Incompatibilities:

- Not compatible with strong bases (sodium/potassium hydroxide)
- Poisonous gasses produced in fire
 - Carbon oxides, oxides of phosphorus, hydrogen chloride gas



DDVP





Topics Covered

- EPA Enforcement Program Goal and Priorities
- FIFRA Overview
- Import Requirements for Pesticides and Devices
- Snapshot of Attempted Imports



Questions?



Christine Tokarz
EPA, Region 8, FIFRA Inspector
Tokarz.Christine@epa.gov
518.416.8965



Resources

Pesticide Registration

<https://www.epa.gov/pesticide-registration>

Pesticide Product and Label System

<https://iaspub.epa.gov/apex/pesticides/f?p=PPLS:1>

Pesticide Registration Manual

<https://www.epa.gov/pesticide-registration/pesticide-registration-manual>

Pesticide Label Review Training

<https://www.epa.gov/pesticide-labels/pesticide-label-review-training>

Label Review Manual

<https://www.epa.gov/pesticide-registration/label-review-manual>

Pesticide Labeling Questions and Answers

<https://www.epa.gov/pesticide-labels/pesticide-labeling-questions-answers>

Pesticide Registration Notices by Year

<https://www.epa.gov/pesticide-registration/pesticide-registration-notices-year>

PRIA External Reviews and Miscellaneous Actions

<https://www.epa.gov/pria-fees/pria-external-reviews-and-miscellaneous-actions>

M009 PRIA Fee Category and Submission Instructions

<https://www.epa.gov/pria-fees/m009-pria-fee-category>



Resources (continued)

Importing and Exporting Pesticides and Devices

<https://www.epa.gov/compliance/importing-and-exporting-pesticides-and-devices>

Pesticide Devices: A Guide for Consumers

<https://www.epa.gov/safepestcontrol/pesticide-devices-guide-consumers>

Compliance and Enforcement Alerts

Index: <https://www.epa.gov/enforcement/compliance-advisories-and-enforcement-alerts>

SARS-CoV-2: <https://www.epa.gov/sites/production/files/2020-05/documents/coronavirus-compliance-advisory.pdf>

UV Lights: <https://www.epa.gov/sites/production/files/2020-10/documents/uvlight-complianceadvisory.pdf>

FIFRA Enforcement Response Policy

<https://www.epa.gov/enforcement/guidance-fifra-enforcement-response-policy>

EPA's Audit Policy website

<https://www.epa.gov/compliance/epas-audit-policy>

Determining If a Cleaning Product Is a Pesticide Under FIFRA

<https://www.epa.gov/pesticide-registration/determining-if-cleaning-product-pesticide-under-fifra#:~:text=If%20the%20context%20of%20the,to%20be%20subject%20to%20FIFRA.>



Resources (continued)

Disinfectants and Coronavirus FAQ

<https://www.epa.gov/coronavirus/frequent-questions-about-disinfectants-and-coronavirus-covid-19>

List N: Disinfectants for Use Against SARS-CoV-2 (COVID-19)

<https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2-covid-19>

List of Pesticide Regulatory Consultants

<https://www.epa.gov/pesticide-registration/list-pesticide-regulatory-consultants>

Regulatory Information by Topic: Pesticides

<https://www.epa.gov/regulatory-information-topic/regulatory-information-topic-pesticides>