



**Florida Department of Agriculture & Consumer Services**

**BOB CRAWFORD, Commissioner**

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July 24, 2000

Memorandum # 708A

**TO:** All Pest Control Operators certified in  
 Fumigation and all Special Identification Cardholders

**FROM:** T. Wayne Gale, Chief  
 Bureau of Entomology and Pest Control

**SUBJECT:** Clarification of Fumigation Label Directives and Aeration/Clearance Procedures  
 (Revised 06/01/2000)

This memorandum has been issued to clarify Vikane™ (sulfuryl fluoride) label directives and policies enforced by the Bureau as requirements for conducting fumigations. Another memorandum will be issued regarding the use of Brom-O-Gas™ (methyl bromide) in the near future.

<b>Fumigation Requirement</b>	<b>Interpretation</b>
"Direct Supervision"	<p>In general, a Certified Operator (CO), in charge of fumigations and certified in the fumigation category, is responsible for the conduct of all fumigations performed by the company for which that CO is registered. Violations of fumigation requirements may result in the CO being named in any administrative complaint based on the Special Identification Cardholder's (SPID) violation(s) even if the CO was not present.</p> <p>In Florida, the Administrative Rules allow a SPID to continue to perform any of their duties (such as: final preparation walk through, introduction of fumigant, final clearance and posting) even when the CO in charge is unavailable (vacation, etc.) for periods up to thirty days. Emergency certificates are not available for the fumigation category.</p>
Accessibility to the Structure	<p>Fumigators should have in their possession any key(s) necessary to gain the immediate entrance to a structure during the entire time that the structure is under fumigation (fumigant release, exposure period and during aeration and clearance until properly cleared of all fumigant).</p> <p>If customers will not provide keys, or make other arrangements for the immediate access to keys, the fumigation should not be done. It is not possible for a fumigator to comply with emergency response requirements</p>

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	<p>and proper aeration procedures (opening of all entry doors and windows to facilitate ventilation of the structure) without having this capability.</p> <p><b>It is the fumigator's responsibility to have the necessary access to perform the fumigation properly, <u>including any keys necessary for secondary locks.</u></b></p>
Securing Structure Entrances	<p>The new Vikane™ label requires that all exterior entrances to the fumigated structure be locked (using the existing locking mechanisms), <b>and to have a secondary lock or be barricaded</b>, during the fumigation exposure period and Step 2 of the aeration period (passive aeration).</p> <p>A secondary lock is a device or barricade that is demonstratively effective in preventing an exterior door or entrance from being opened or entered by normal means.</p> <p>Exterior entrances or openings without doors must be barricaded to prevent entry. If sheds and storage areas are within the fumigated area, they must be locked, secondarily locked or barricaded to prevent entry.</p> <p>A door or entrance that, once locked from the interior, cannot be unlocked and opened from the exterior (such as a sliding glass door) would not require a secondary locking device or barricade.</p>
Warning Sign Posting	<p>Warning signs are to be posted on all sides of the tarps and on all entrances to the structure (including garage doors, sliding glass doors, etc.) prior to release of the fumigant and left in place up to and until the actual clearance is performed and the structure is determined to be safe (5 ppm or less of Vikane™) for re-entry or re-occupancy.</p> <p>In cases of attached structures such as lanai, florida rooms or screened rooms, warning signs are required to be placed on the entrances to these areas as well as the entrances to the structure adjacent to these areas (sliding glass doors, etc.).</p> <p><b>In general, if any entrance door is closed (as part of normal fumigation practice), it should be locked, secondarily locked and posted with a warning sign.</b></p>
Warning Sign Information	<p>The warning sign should have the name of the pest control operator certified in fumigation or the SPID who was directly involved in the shooting process at that site. Additional numbers and other contact information can be placed on the sign.</p> <p>Emergency Phone number information should be a phone number, cell phone number or beeper number in the possession of a person familiar with the job and trained and equipped to respond to fumigation emergencies. Answering machines, beepers or voice mail systems that do</p>

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	<p>not provide a mechanism for providing immediate notification to an individual as described above are inadequate, and can be determined to be a violation.</p>
Trained Crew persons	<p>Vikane™ Gas Fumigant <u>has always required two trained crew persons during the release of the fumigant, any re-entry while under fumigation, and the initiation of the initial aeration procedure</u> (interpreted as the opening of the first seal and including the start to finish of the 1 hour active aeration) of the structure.</p> <p>The new label directions for Vikane™ state that <b>one of the trained crew persons must be licensed/certified by the state. (In other words, at least one SPID or CO must be present during these three segments of the fumigation.)</b></p> <p>The following types of documentation will satisfy the training requirement for the second trained crew person: identification cards issued by the Bureau following 5 days of documented field training in proper fumigation procedures, fumigant handling, SCBA use and familiarization with fumigant safety equipment; or documented attendance at Broward Community College's Fumigation School.</p>
Step 1- First opening of the seal- beginning of aeration period and including the 1 hour active aeration process	<p>Opening of the seal can occur before active aeration begins and must be performed with two trained crew persons, one of which must be licensed/certified by the state. The opening of the seal would include unclamping tent seams, removing sand or water snakes, or activating the fan attached to the ducting for the TRAP method (ventilating the fumigant between the tent and the structure).</p> <p>For enforcement purposes, the initial hour of active aeration is considered to begin when <b>trained crew persons</b> have completed opening all operable doors and windows and have deployed the required ventilation fans. Opening of all operable door(s) and window(s) will usually require Self Contained Breathing Apparatus (SCBA). SCBA must be worn by crew persons when entering the fumigated structure prior to the completion of the initial one hour active aeration period or when gas concentrations are unknown.</p> <p><b>Failure to open operable doors and windows and perform the initial one hour of active aeration of the structure is a violation of product label directions.</b></p> <p>During the initial opening of seams and the initial one hour active aeration period, the structure must remain posted with warning signs and no one is allowed to enter the structure without SCBA.</p>
Step 2- Requirements	Following the initial one hour active aeration period, the structure must

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<p>following the initial one hour of active aeration including the passive aeration period</p>	<p>remain posted with warning signs and all exterior doors must be secured or locked, and secondarily locked, against reentry for the remainder of the passive aeration period.</p> <p><b>These doors cannot be unlocked until the passive aeration period is completed and the structure has been properly cleared by a CO or SPID.</b></p> <p>Following the completion of the one hour active aeration period, (and using SCBA or an Interscan or Miran gas detection equipment to enter the structure) windows can be left opened or closed, air handling systems can be turned on or off and fumigation fans can remain or be removed, at the option of the company, for the remainder of the passive aeration period.</p>
<p>Fumigation Equipment Retrieval</p>	<p><b>General tent crew persons cannot enter the structure to retrieve fumigation equipment until the structure has been cleared.</b></p> <p>Trained crew persons can retrieve fumigation equipment at anytime during aeration while wearing SCBA during the initial one hour active aeration or with an Interscan or Miran gas detector upon completion of the initial one hour active aeration period.</p>
<p>SCBA requirements</p>	<p>SCBA must be worn if the SPID or CO enters the fumigated structure to open all operable doors and windows for the start of the initial one hour active aeration period.</p> <p>Following the completion of a properly conducted one hour active aeration period, the SPID or CO can enter the structure without wearing SCBA only if a properly working Interscan or Miran is used. The SPID or CO is required to leave the affected area immediately if the detector indicates that Vikane™ levels are in excess of 5 ppm.</p> <p>SCBA equipment should be available, <b>on site</b>, anytime the structure is under fumigation (fumigant release, exposure period and during aeration and clearance until properly cleared of all fumigant) and crew persons are present.</p>
<p>Calibration of Clearance Devices (frequency)</p>	<p>The Bureau recommends following the manufacturer’s calibration recommendations for gas detection devices used for clearance. It is the responsibility of the CO or SPID, familiar with the equipment, to calibrate it as needed to maintain the accuracy of the device. It will be a violation of this requirement if the device is determined to be inaccurate as a result of an investigation.</p>
<p>Step 3- Measurement of gas residues in a “breathing zone”</p>	<p>After the completion of the passive aeration period, the concentration of Vikane™ is to be measured by the CO or SPID in the breathing zone of <u>all</u></p>

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after completion of passive aeration period	<p><u>rooms of the fumigated structure</u> (including walk-in closets, laundry rooms, garage areas, etc.). In multi-unit structures, all units must be checked and determined safe with a gas detection device. Properly bagged food or medicine, prepared before the fumigation, does not have to be opened or checked.</p> <p>If fumigant levels are determined to be 5 ppm or less by properly operating gas detection equipment, the clearance notice can be posted and the structure may be reoccupied.</p>

If we can answer any further questions, please contact the Bureau at (850) 921-4177.