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New PPR Form Expected

Making this the third consecutive year, EPA has informed us the annual Pesticide-Production Report form will most likely be revised again in December. The form is currently out for review by the different Regions of EPA. The new official version of the updated form will appear in the annual mailing which usually arrives in January of each year. We are working with EPA on the changes.

New Ammonia Additive Announced

This week Iowa Governor Tom Vilsack, along with other Iowa dignitaries, held a news conference to unveil the release of a new additive for anhydrous ammonia. The new product is calcium nitrate and has been found to be very effective in rendering anhydrous ammonia practically useless in the production of methamphetamine. Calcium nitrate has undergone years of testing prior to the news release which surprised the Ag industry this week, including the Meth Industry Task Force. Little information has been made available to industry yet on the practical use of the product. At this time, we do know it takes 110 gallons to treat one ton of anhydrous ammonia. The cost appears to be about \$9.00 per ton. YARA is the manufacturer of the product and Merschmann Fertilizer will act as the distributor. Calcium Nitrate will only be available for shipment in bulk by rail car. The Drug Enforcement Agency (DEA) has released information on calcium nitrate to be used on a voluntary basis as additive to anhydrous ammonia. The DEA report can be accessed on the Agribusiness Association of Iowa website at www.agribiz.org

NTIP Update

As of November 1st, 763 locations have requested to be covered by SP-13554. Just under 10,000 kits have been shipped with 7,169 inspections recorded on the website. A total of 184 nurse tanks have failed to pass the testing for the reasons of visual (94), thickness (72) or pressure (18). Illinois is the state that has recorded the most nurse tank inspections.

Please Define "immediate notification"

EPA rules require the owner or operator of a facility to immediately notify the appropriate agencies when a hazardous substance is released. The rules also require that a follow-up written notice be sent as soon as practicable. If you haven't looked into the meaning of "immediate" and "as soon as practicable," you may not realize how quickly a violation can occur. Immediate notification of a release is required under two regulations:

- The rules in 40 CFR 302.6 require the person in charge of a facility or vessel from which a hazardous substance has been released in an amount that meets or exceeds its reportable quantity to immediately notify the National Response Center as soon as he/she has knowledge of the release.
- Under 40 CFR 355.40, the owner or operator of a facility must immediately notify the appropriate

governmental entities for any hazardous substance release that requires notification under 302.6, and releases of extremely hazardous substances.

The notification must be given to state emergency response commissions (SERCs) and community emergency coordinators for the local emergency planning committees (LEPCs) to be affected by the release.

The regulations do not define "immediate notification." However, the Legislative History of the Superfund Amendments and Reauthorization Act of 1986 says that "delays in making the required notifications should not exceed 15 minutes after the person in charge has knowledge of the release. Immediate notification requires shorter delays whenever practicable." Enforcement documents instruct EPA staff to begin assessing penalties when notification exceeds 15 minutes.

CDMS and Tiger Jill Announce Software Integration

The integration of these two systems allows users of Tiger Jill Pocket Jill software to access to CDMS label "checking" database. Users can print recommendations in the field and then send, email, fax or import to the office computer, grower or applicator. ChemCheck reduces product liability and provides the most up-to-date label and compliance services to the industry. ChemCheck also enables food companies to receive crop input information for use in their traceability and supply chain operations.

Tiger Jill provides growers, applicators, packers, shipper, consultants and others in agri-business, software tools for reporting, budgeting, scheduling, billing and other management services. Multiple modules allow users to select the services most important to their operation. Users will have the portability, connectivity and power of a PDA to scout and write recommendations in the field.

New Hazardous Waste Manifest Form Required

EPA recently revised the Uniform Hazardous Waste Manifest used to track hazardous waste from a generator's site to the site of its disposition. Starting September 5, 2006, the new Uniform Hazardous Waste Manifest must be used for all hazardous waste shipments. The new standardized form reduces or eliminates many of the variables in state requirements, provides check boxes and adds fields that allow for better tracking of complicated shipments, and provides easier data collection and hazardous waste reporting. For more information, please [click here](#).

Suspicious Activity

Agricultural groups are skeptical of a Maine company attempting to apply risk mitigation techniques to improve anhydrous ammonia security in Lawrence County, IL. Strategy X Inc., a company involved in missile silo security and other defense work, held a meeting last month to discuss developing methods for protecting communities from the threat of thefts by methamphetamine producers. Jean Payne, President of the Illinois Fertilizer and Chemical Association (IFCA), said, "Strategy X is a security consultant company trying to drum up business by scaring people about anhydrous ammonia." A Strategy X news release said key agencies, including the attorney general's office, the Illinois Emergency Management Agency and the state agricultural department, were represented at the meeting. IFCA attended the meeting and reported that only two townspeople turned out. "The Emergency Management representative said he was opposed to the idea and the attorney general's spokesman went on record saying there is no affiliation with their office," Payne said.

New Hazard Communication Classification System Proposed

OSHA is considering adoption of the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). The GHS has been adopted by the United Nations and there is an international goal for as many countries as possible to implement the GHS by 2008. The GHS includes harmonized provisions for classification of chemicals for their health, physical, and environmental effects, as well as for labels on containers and safety data sheets. Adoption of the GHS by OSHA would require changes to the Hazard Communication System. This notice provides information on the GHS, benefits of its adoption, and the potential impact on the Hazard Communication System. OSHA is seeking comments at this time.

Legislation to Suspend Fines for First-Time Paperwork Violations

The Small Business Paperwork Amnesty Act of 2006 would Amend the Paperwork Reduction Act to direct

agency heads not to impose civil fines for first-time paperwork violations by small business concerns under certain conditions. The bill permits an agency to determine that a fine should not be imposed for a violation that presents a danger to public health or safety if the violation is corrected within 24 hours after receipt by the small business owner of notification of the violation in writing. HR 5242 was introduced by Representative Randy Neugebauer (TX). For more information go to: thomas.loc.gov and search for "hr 5242".

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