

PALLET PHYTOSANITARY PROJECT BULLETIN



A Cooperative Effort of the Limestone Bluffs Resource Conservation and Development Area And The Wood Education and Resource Center USDA Forest Service

Number 3

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AN OVERVIEW OF THE INSPECTION PROGRAM FOR METHYL BROMIDE FUMIGATION OF WOOD PACKAGING MATERIAL (WPM)

The National Wooden Pallet and Container Association (NWPCA) has been authorized, through a Memorandum of Understanding with USDA Animal and Plant Health Inspection Service (APHIS), to administer the Export Wood Packaging Material (WPM) Fumigation Program. The program is designed to provide wood packaging material manufacturers a means for treating and marking their products using methyl bromide fumigation in accordance with the International Standards for Phytosanitary Measures (ISPM) Publication No. 15, "Guidelines for Regulating Wood Packaging Materials in International Trade".

The Fumigation Program is operated under the auspices of an Enforcement Committee comprised of nine (9) voting and one (1) non-voting member. The voting members include the Program Manager, two USDA-APHIS staff, four representatives of the WPM industry, a fumigant manufacturer representative, and one faculty member from an academic institution. The non-voting member is a

representative from an accredited inspection agency.

The Enforcement Committee accredits and monitors the inspection agencies with respect to their duties and responsibilities in the Fumigation Program. All inspectors must complete a fumigation inspector training program before they can inspect and audit certified WPM and fumigation facilities. Certified WPM manufacturers using only a program-enrolled fumigator may apply the stamp (or mark). WPM manufacturers may also use a certified fumigator. For those WPM manufacturers or shippers who export on a limited basis, they can, on an as-needed basis, use a fumigator enrolled in the program and have them or an inspector apply the mark. A more detailed explanation of the treatment options are included in a later section of this bulletin.

Inspection agencies will be conducting audits of fumigator records and comparing those to the records kept by WPM manufacturers. The Enforcement Committee will then be

auditing the records of the inspection agencies to ensure the overall integrity of the program.

ACCREDITED INSPECTION ORGANIZATIONS

There are currently three (3) organizations accredited to conduct facility inspections under the fumigation program. These organizations, with current contact information, are:

Lee Inspection and Consulting Services, Inc.

2207 California Plaza #3B
Bossier City, LA 71171

www.leeinspect.com

Contact Person: Don Stokes

Phone: (800) 508-6232

Fax: (800) 508-5531

Email: dkstokes@dixie-net.com

Package Research Laboratory (PRL)

41 Pine St.

Rockaway, NJ 07866

www.package-testing.com

Contact Person: Dave Dixon

Phone: (973) 627-4405

Fax: (973) 627-4407

Email: ddixon@package-testing.com

Timber Products Inspection (TPI)

(East Coast)

PO Box 919

1641 Sigman Road

Conyers, GA 30012

www.tpinspection.com

Contact Person: Bryan Smalley

Phone: (770) 922-8000

Fax: (770) 922-1290

Email: bsmalley@tpinspection.com

(West Coast)

105 SE 124th Avenue

Vancouver, WA 98684

Contact Person: Casey Dean

Phone: (360) 449-3840

Fax: (360) 449-3953

Email: tpwest1@mindspring.com

OVERVIEW OF INSPECTION AGENCY PRICING STRUCTURES

For those companies interested in becoming certified to stamp/mark methyl bromide treated WPM, the cost of maintaining the certification is an issue. At the time this bulletin was being prepared, the pricing structures of the accrediting agencies were still evolving so that publication of specific, finalized cost structures was not possible.

However, the following cost components may be included in an accrediting agency's pricing structure:

1. Monthly audit/inspection fee (a minimum of 12 audits/inspections are required annually).
2. Travel expenses associated with monthly audits/inspections.
3. Monthly fees assessed by NWPCA, which includes a \$15 per facility per month audit plus 2 cents per unit treated (e.g., per pallet or container). The inspection agency is responsible for paying this fee to NWPCA. In some cases, the inspection agency will assess client companies for this expense. Others incorporate the fee into the monthly audit costs.
4. Start-up/Initiation Fees
5. Cost of Hand Stamps.

FUMIGATION CONSIDERATIONS

One difference between heat treatment and fumigation is that WPM manufacturers will not generally become fumigators due to the cost and environmental compliance procedures necessary to handle and apply methyl bromide. Because of the inherent limitations to WPM manufacturers becoming fumigators, the most likely alternative for them is to use one of the existing methyl bromide fumigators. These existing

fumigation businesses will most likely acquire certification to apply the methyl bromide stamp to WPM.

Because it is unlikely that WPM manufacturers will be fumigating their own products, the treatment will occur in one of two ways. One option is for WPM manufacturers to send loads of product to fumigator facilities for treatment. The other, and more likely, option will be for a fumigator to travel to the WPM manufacturer's plant and set up temporary facilities for treatment purposes. The primary issue in this case will be with winter treatment. Wood to be fumigated must be 52°F in order to be treated. Wintertime temperatures will oftentimes not allow this condition to be met. This may be alleviated with mobile units that allow for both heat and fumigation at the same time.

The methyl bromide treatment will require a slightly different series of marks than heat treated WPM. Like heat treated WPM, each unit (pallet, container, etc.) must have the IPPC mark. In addition, methyl bromide treated WPM will have a Lot Number and Date stamped on each unit.

FUMIGATION/INSPECTION OPTIONS

Because methyl bromide fumigation involves a combination of WPM manufacturers, fumigators (both fixed site and mobile), and inspection agencies, the options for fumigation and inspection are a little more complicated than for the heat treatment option. The following options are possible:

- A fumigator is certified by an inspection agency to apply the registered trademark. The fumigator will have mobile equipment, giving them the ability

to fumigate at WPM facility locations. The fumigator will hold what is referred to as a "mobile" stamp. The inspection agency will audit the records of the fumigator at the home office on a monthly basis. In addition, the fumigator will be subject to monthly, random field audits that will be conducted by their inspection agency.

- The certified fumigator may have a fixed location, such as a port facility, where the loaded WPM is transported to the facility, treated, and marked. The inspection agencies will inspect the records of the fumigator at the home office on a monthly basis.
- A WPM facility is certified to apply the IPPC mark. In this case, the WPM facility may use either a certified fumigator (one qualified to apply the registered trademark) or a registered fumigator (a fumigator not able to apply the registered trademark, but approved by one of the three certified inspection agencies, meeting certain basic criteria, such as holding a current pesticide applicators license and be approved to purchase methyl bromide). The WPM facility would choose to stamp their product, instead of using the certified fumigator with stamping capability in order to better control labor, materials handling, and inventory costs. In either case, both the WPM facility and the fumigator (certified or registered) will be subjected to a monthly audit of their records.
- In the case where neither the WPM facility nor the fumigator is certified to apply the IPPC mark, the WPM facility may request that an inspection agency supply an inspector to oversee the fumigation

activity and apply the IPPC mark. No monthly audits would be applicable here, but the cost of this alternative is expected to be high.

FUMIGATION COMPANIES

The following companies have been identified as methyl bromide fumigators that include WPM fumigation as part of their overall service offerings. It is important to note that this is not necessarily an exhaustive list of existing fumigators. Further, the list does not imply an endorsement of these fumigators, nor does the absence of any legitimate fumigators imply discrimination by the Pallet Phytosanitary Project. Other companies may be identified as the fumigation program evolves. The NWPCA will maintain an up-to-date listing of certified and registered fumigators. This listing may be accessed at the program website: <http://www.palletcentral.com/ExportTreatment/ProgramOverview.htm>.

At this time no companies have been certified or registered as fumigators by any of the accredited inspection agencies.

Al-Flex Exterminator

4035 SW 98th Ave.
Miami, FL 33165
<http://yp.bellsouth.com/sites/alflex/index.html>
Contact: Alex Napoles, Jr.
Phone: (305) 593-2385
Toll Free: (800) 782-9284
Fax: (305) 477-9062

All-Pro Pest Control Service

PO Box 851202
Mesquite, TX 75185-1202
www.allpropestsvcs.com
Phone: (972) 849-2501
Fax: (972) 288-5201
Email: bugman@allpropestsvcs.com

Copesan

3490 N 127th St.
Brookfield, WI 53005
www.copesan.com
Contact: Jim Sargent
John Fortuna
Phone: (262) 783-6224 x-280
Fax: (262) 790-8037
Email: jfortuna@opesan.com

Degesch America, Inc.

PO Box 116
Weyers Cave, VA 24486
www.degeschamerica.com/index.shtml
Contact: Jim Smiley
Phone: (503) 261-9798
Toll Free: (800) 330-2525
Fax: (503) 261-9752
Email: jsmiley@deggeschamerica.com

Fumigation Service and Supply, Inc.

16950 Westfield Park Rd.
Westfield, IN 46074
www.insectslimited.com
Contact: Dave Mueller
Phone: (317) 896-9300
Toll Free: (800) 992-1991
Fax: (317) 867-5757
Email: insectsltd@aol.com

The Industrial Fumigant Co.

PO Box 1200
19745 W. 159th St.
Olathe, KS 66051-1200
www.indfumco.com
Phone: (913) 782-7600
Toll Free: (800) 477-4432
Fax: (913) 782-6299

Rose Exterminator Co. Fisher

Multiple Office Contacts in IN, MI, OH
Following is a regional address:
2145 Heide Dr.
Troy, MI 48083
www.roseexterminator.com
Contact: John Lemons
Phone (Rose): (800) 966-7673
Phone (Fisher): (800) 521-3368

Royal Fumigation Inc.

53 McCullough Drive
Southgate Center
New Castle, DE 19720
www.royalfume.com
Phone: [302] 655-8179
Toll Free: (800) ROYALPEST
Fax: (302) 322-6887
Contact Person: George Milyo
E-Mail: gmilyo@royalfume.com

Temp-Air

3700 W. Preserve Boulevard
Burnsville, MN 55337
www.temp-air.com
Contact: Mimoun Abaraw
Toll Free: (800) 836-7432
Fax: (952) 707-5104
Email: info@temp-air.com

Vanguard Pest Control Co.

PO Box 1286
Newark, NJ 07105
Contact: Jerry Sweeney
Phone: (973) 344-9103
Fax: (973) 344-9103
Email: vanfumco@aol.com

The Terminix International Company

860 Ridge Lake Blvd.
Memphis, TN 38120
www.terminix.com
Phone: (901) 766-1111
Toll Free: (800) TERMINIX
Contact: Bill Mashraky
 Phone: (954) 486-7655
 Fax: (954) 486-9795
 Email: bmashraky@terminix.com
Contact: David Joles
 VP for Service, Eastern
 Commercial Region
 Phone: (866) 243-8756
 Email: djoles@terminix.com
Contact: Mark Harne
 Branch Manager
 Phone: (800) 620-2218
 Fax: (443) 436-9774
 Email: mharne@terminix.com

Western Fumigation

Servicing Office
Tinicum Industrial Park
10 Industrial Highway
Mail Stop #52
Lester, PA 19029
www.westernfumigation.com
Phone: (610) 595-2100
Toll Free: (800) 544-2847

**METHYL BROMIDE PROGRAM
CONTACT INFORMATION**

As previously indicated, the National Wooden Pallet and Container Association is the Administrator of the Methyl Bromide Program. This program is open to members and non-members of the organization. NWPCA contact information is as follows:

NWPCA

329 South Patrick St.
Alexandria, VA 22314-3501
www.palletcentral.com
Program Director: Edgar Deomano
Phone: (703) 519-6104
Fax: (703) 519-4720
Email: edeomano@palletcentral.com

BULLETIN AVAILABILITY

Please feel free to distribute this bulletin via email or hard copy to all interested parties.

All Pallet Phytosanitary Project Bulletins will be posted on the following USDA Forest Service website:

www.na.fs.fed.us/econaction/palletnews
