COLORADO DEPARTMENT OF AGRICULTURE
Division of Plant Industry
305 Interlocken Parkway, Broomfield, Colorado, 80021
Tel: (303) 869-9050 Fax: (303) 466-2860 www.colorado.gov/ag/dpi

DPI-PA-FMPFAQ

Fumigation Management Plans
Frequently Asked Questions

Q: FMP's seem to be complicated any suggestions on how to get started?

Try this, review the Applicator's Manual, and then review the FMP templates to determine which type is best for your situation. Once you have chosen a FMP template, modify it to fit your circumstance / applications.

Q: Does CDA require that the CDA inspector obtain a representative copy of a Fumigation Management Plan from the company?

No, however the inspector needs to verify that the company has an FMP for EACH fumigation application and that the pertinent elements are in the FMP.

Q: Where can the applicator / inspector find the pertinent FMP elements?

The FMP requirements and elements of the FMP can be found in the label application booklet. In this case, you can find FMP requirements in the Fumitoxin Pellets Applicator's Manual, starting in Section 21, page18. This is where the general FMP information begins.

Q: The FMP's I've seen so far were for prairie dog mitigation – one applicator indicated that much of the FMP information that he found was focused more on structural fumigation. Are there different FMP requirements for burrowing animal applications vs. grain bins/buildings?

No the requirements are the same for structural vs. burrowing rodent FMP's, it is the amount of detail that is different.

The FMP language in the Fumitoxin Pellets Applicator's Manual does focus more on structural, grain bins, rail cars, etc. than burrowing rodents, the FMP information in the manual is flexible enough to be appropriate for any situation.
In fact, the Fumitoxin Pellets Applicator's Manual states on Page 19 "These factors (listed in previous pages) must be considered in putting a FMP together. It is important to note that some plans will be more comprehensive than others. All plans should reflect the experience and expertise of the applicator and the circumstances at and around the structure and / or the area."

The Fumitoxin Pellets Applicator's Manual also states on Page 19: in the Guidance For Preparation of a Fumigation Management Plan – "A Fumigation Management Plan (FMP) is an organized, written description of the required steps involved to help ensure a safe, legal and effective fumigation. It will also assist you and others in complying with pesticide product label requirements.

This guidance is intended to help you organize any fumigation that you might perform PRIOR TO THE ACTUAL TREATMENT. It is meant to be somewhat prescriptive, yet flexible enough to allow the experience and expertise of the fumigator to make changes based on circumstances which may exists in the field. By following a step by step procedure, which allow for flexibility, a safe and effective fumigation can be performed."

Q: Where can applicators / fumigators find acceptable FMP templates/formats?

Fumigation applicators can contact the fumigant product manufacturer for guidance when developing a FMP. In addition, the New Mexico Department's of Agriculture has provided examples of FMP's that can be used as templates and then adapted to each applicator's situation. Copies of various FMP's can be found on CDA's website.

Q: Does the customer need to be provided a copy of the FMP?

The FMP Guidance does not directly state that a copy of the FMP must be provided to the customer, Page 19 of the Fumitoxin Applicator's Manual states: "Before any fumigation begins, carefully read and review the label and the Applicator's Manual. This information must also be given to the appropriate company officials (supervisors, forman, safety officer, etc.) in charge of the site. CDA interprets this that the label implies that a copy of the FMP must be provided to the customer as well. This is a label issue, the Colorado Pesticide Applicators' Act does not directly address this situation.

Fumigation Management Plans
Frequently Asked Questions (continued)

Q: Should the applicator have a copy with them at the job site?

The fumigant label / Applicator's Manual does not directly address this issue of having a copy of the FMP at the application site. CDA recommends that a copy of the FMP be on site, simply because it will have local emergency contacts / telephone numbers, customer telephone numbers etc. to refer to if an emergency occurs.

Q: Is a separate FMP required for each application, or each site (e.g. prairie dog town that you return to multiple times) or the year, etc.?

Each fumigation application requires that a new FMP be developed. In many circumstances, this may be as easy as reviewing the previous FMP, confirming that nothing has changed and then changing the date effective date of the FMP. If changes to the site have occurred then simply make the corresponding changes to the FMP. Keep in mind that a new fumigation application also requires that the applicator provide the customer a copy of the label /Applicator's Manual / FMP.

Q: How long is the applicator required to keep / maintain the FMP?

The Fumitoxin Applicator's Manual states: "The FMP and related documentation, including monitoring records, must be kept for two years." In addition, CDA considers the FMP to be part of the application record and the Pesticide Applicators' Act requires that pesticide application records be kept or maintained for three years, therefore the applicator must keep the FMP for three years.