



# MATERIALS MANAGEMENT - PESTICIDES & HERBICIDES

**ENVIRONMENTAL GUIDELINE**



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## PURPOSE

The purpose of this guideline is to provide guidance on what DEN's expectations are for the Management of Pesticides and Herbicides. The purpose of this guideline is to cover the proper storage, handling, and disposal of all pesticides, herbicides, rodenticides, insecticides, and larvicides (hereinafter referred to as pesticides). This document is one of several specifically identified procedures for activities/facilities that are required by the Pollution Prevention/Good Housekeeping section of CCD's MS4 permit.

## ACTIVITY DESCRIPTION

This activity covers the proper storage, handling, transportation, and disposal of all pesticides. For application instructions, read labeling instructions on the container and/or speak to a supervisor.

## EXPECTATIONS

### Best Practices:

- Contractors engaged in the application of restricted use pesticides must be qualified and licensed as Commercial Pesticide Applicators by the Colorado Department of Agriculture.
- Employees using pesticides shall be trained by their Supervisor on proper use, handling, and disposal.
- Training will be conducted as necessary to conduct the Activity as described herein and to inform employees of impacts associated with illegal discharges and improper disposal of waste from municipal operations.
- All employees using pesticides shall take the free, non-registered applicator training offered by Colorado State University. Access the training here: <https://cepep.agsci.colostate.edu/1-licensing/non-registered-applicator-training-modules/>
- All employees will also need to take the AIM Calibration training. Supervisors should ensure that employees have taken BOTH trainings prior to handling and applying any pesticides on DEN property.
- Records of on-the-job training are not required. Records of formal employee training, if provided, shall be retained.
- Store materials per the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)-approved methods.
- Maintain legible labels and markings on all containers and tanks.
- Ensure adequate secondary containment for all bulk storage containers, and that all containers and containment are in good operating condition.
- Each operator and tenant conducting activities utilizing a pesticide or herbicide is responsible for understanding the applicable regulations and managing their activities accordingly; this Environmental Guideline is meant as guidance only and does not supersede any regulations.
- Follow application instructions exactly as described on the container label.



- Take care not to breathe chemicals. Wear appropriate personal protection equipment (PPE) during application and handling of materials. Prior to usage, read the container labeling for PPE requirements.
- Pesticide MSDSs and product information must be made available at the facility to all employees that utilize the chemicals.
- Minimize use of pesticides. Seek less harmful/toxic pesticides to replace ones currently in use. Develop an integrated pest management plan to address areas of concern.
- Have adequate first aid materials near the application area in case of emergency. Read container label for first aid requirements.
- Maintain adequate supplies of spill response equipment and materials in locations where spills are likely to occur.
- If waste materials are handled as universal waste, the material can only be stored on site for one year. For more information see Management of Universal Wastes.
- Maintain inventories of pesticide materials stored on site. When possible, pesticide inventory should be minimized to amounts required for intended use.
- Usage Records
  - For DEN applications, pursuant to XO 127A, the CCoD Department/Agency applying mosquito control larvicides shall record the location and frequency of application as well as the amount applied. This information shall be submitted to the CCoD Animal Control Division monthly during the application season.
  - The department responsible for the deployment of mosquito control larvicides must complete the attached Larvicide Usage Report or similar document when larvicide is applied. Completed reports shall be submitted to DEN Environmental Services (ES). DEN ES will submit the report to the CCoD Animal Control Division monthly during the application season.
  - Contractors applying pesticides, including larvicides, on DEN are responsible for maintaining usage records.
- Waste management records (profiles, manifests, sample results, etc.).
  - Based on the disposal profile, manifests and related forms may be required. Manifests & profile forms can be obtained from the disposal facility for off-site disposal activities (manifests are required for hazardous, special, and universal waste).
  - Operators must maintain waste management records at the facility for a minimum of 3 years.
- Safety Data Sheets (SDSs) for pesticides and herbicides
  - Manufacturers of these products will supply SDS documents on demand. SDSs for all pesticides/herbicides/larvicides should be made available to all employees engaged in application activities. SDSs should be maintained on file at the maintenance center facility.
  - Contractors that apply herbicides and pesticides are responsible for making SDSs available to employees and for training on proper use.
- MS4 related maintenance activities conducted by DEN Field Maintenance shall be recorded in the DEN Maximo system. Recorded information should include costs incurred and total hours for the activity. This information will be incorporated into the CCD MS4 Annual Report.



## Shall Not:

- Disposing of any unused pesticides in the storm sewer system or anywhere on DEN property is prohibited.
  - Unused, recalled, or waste pesticides may require special handling as hazardous (universal) waste.
- Disposal of pesticide containers without triple rinsing to remove residues is prohibited.
  - Triple rinse all pesticide containers prior to sending them off for disposal. Rinse water shall be properly disposed of according to label instructions.
  - Application of pesticides classified as "restricted use" by an unlicensed applicator is prohibited.
  - These activities must employ an applicator licensed with the Colorado Department of Agriculture.
- Washing spills into the stormwater sewer system is prohibited.
- Discharges to surface waters of the State without a permit are prohibited.
- See CDPS General Permit "Discharges from Applications of Pesticides" for specific eligibility requirements.

## REFERENCES

### Contacts

- DEN Environmental Services (Main Line): 303-342-2730; [DENEnvironmental@flydenver.com](mailto:DENEnvironmental@flydenver.com)

### Additional Resources

- City and County of Denver Noxious and Invasive Weeds Management Guidelines
- SDSs
- Seven Ways to a Successful Dipping Career
- 40 CFR 117.3 Determination of Reportable Quantities for a Hazardous Substance
- 40 CFR 122-124 NPDES Regulations for Storm Water Discharges
- 40 CFR 260-262-273 Federal RCRA Regulations
- 6 CCR 1007-3, Part 261 State RCRA Regulations
- CCD MS4 Permit
- CCD Ordinances
- Denver Wastewater Management Division Rules and Regulations
- Metro Wastewater Reclamation District Rules and Regulations
- DEN Rules and Regulation 180
- CCD Mayor's Executive Orders