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Fumigating Farm-stored Grain with Aluminum Phosphide

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Fumigants kill all insect life stages. They control pests by diffusing through the air spaces between grain kernels and into the kernel itself. Fumigants are able to penetrate into places that are inaccessible to insecticide sprays or dusts.

Regardless of formulation, all fumigants are poisonous to humans, other animals, insects and other pests. Because fumigant chemicals are highly toxic and hazardous to use, they are Restricted Use Pesticides (RUP) and can only be purchased and used by certified applicators.

Aluminum phosphide is formulated in tablets, pellets, paper sachets, plates and blister strips. The tablet or pellet formulations are most suitable for farm applications. Solid aluminum phosphide formulations release hydrogen phosphide (phosphine) gas when exposed to moisture and heat. Warm, humid air *accelerates* the reaction while cool, dry air slows it down. The reaction starts slowly, gradually accelerates and then tapers off.

Federal regulations require a Fumigation Management Plan (FMP) be developed prior to the application. The basics of a FMP will be discussed in this publication and a fill-in-the-blanks fumigation management plan is included as well. Details of the requirements in the plan can be found in the applicator's manual for the product label.

In most cases, the authors recommend farmers hire a trained, licensed professional to fumigate grain. However, a producer with a valid private pesticide applicator license and the necessary air monitoring equipment can legally fumigate his or her own grain provided a FMP is completed prior to the fumigation event. This

publication is designed to help provide direction to farmers who have a private pesticide applicator license and who decide to do the fumigation themselves.

Fumigation Management Plan

All phosphine-type fumigant labels require the development of a Fumigation Management Plan (FMP) for each fumigated storage site. A FMP is a written document, required by the U.S. Environmental Protection Agency (EPA), which describes the grain storage site and details each step of the proposed fumigation. The purpose of the FMP is to ensure the safety of all workers, the community and the environment. It also is designed to ensure an effective fumigation and to assist in meeting label requirements.

The FMP provides a uniformly organized process that will help grain managers at each grain storage site to document their fumigation procedures, and thus "characterize" their fumigation. The FMP should include a plot plan illustrating the primary structures and technical features (such as main electrical power, gas and water shut-off points) of the storage facility, showing grain storage structures in relation to other buildings, and equipment at the site.

The FMP has a standard data form that is to be completed by the person responsible for the fumigation each time a fumigation application is made. It covers important items like the volume of grain fumigated, the type and dosage level of the fumigant, starting and ending times of the fumigant application, and the overall fumigation time from dosage to structure ventilation.



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During the fumigation, gas levels are to be monitored and documented at specific locations around the storage structure where people work, as well as at specified locations on the property, such as property boundaries downwind from fumigated structures. A fill-in-the-blank example of a Fumigation Management Plan is provided at the end of this publication.

The Plan

The FMP must address characterization of the site and include appropriate monitoring and notification requirements consistent with but not limited to the following:

1. Inspect the site to determine its suitability for fumigation.
2. When sealing, consult previous records for any changes to the structure, seal leaks, and monitor any occupied adjacent buildings to ensure safety.
3. Prior to each fumigation, review any existing FMP, material safety data sheets (MSDS), fumigant label, applicators manual and other relevant safety procedures.
4. Develop procedures and appropriate safety measures for all workers in and around the area during the application and subsequent aeration.
5. Develop an appropriate monitoring plan to confirm that nearby workers and bystanders are not exposed to levels above the allowed limits during the application/aeration. This plan also must demonstrate that nearby residents will not be exposed to concentrations above the allowable limits.
6. Develop procedures for local authorities to notify nearby residents in the event of an emergency.
7. Confirm the placement of placards to restrict entrance into any area under fumigation.
8. Confirm the required safety equipment is in place and the necessary manpower is available to complete a safe effective fumigation.

These factors must be considered in developing a FMP. 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 circumstances at and around the site.

In addition to the plan, the applicator must read the entire label and applicator manual and follow the directions carefully. If the applicator has any questions about the development of a FMP, contact the product registrant for further assistance.

The FMP and related documentation, including monitoring records, must be maintained for a minimum of three years for fumigations made in Nebraska.

Application and Distribution of Aluminum Phosphide

Aluminum phosphide tablets and pellets may be applied to the grain mass by probing them below the grain surface, adding them as the grain is turned, or placing them in the aeration ducts below the grain mass. Treatment during turning of the grain generally is not feasible in on-farm storage and often alternative methods must be used to treat the grain in place. In shallow bins, tablets may be probed into the grain using a 5- to 7-foot long hollow tube designed for this purpose. These tubes can be made from 1 ½-inch PVC pipe or other similar material.

In metal farm bins, currents of air form within the grain mass even if the visible leaks have been sealed. When cold grain is fumigated during warm weather, the dominant currents will carry the fumigant downward, so most of the fumigant should be probed into the top 5 to 8 ft of the grain mass. When warm grain is fumigated during cool weather, chimney-effect air currents carry fumigant toward the surface. Therefore, much of the fumigant should be applied beneath the grain mass, in the aeration ducts. Consult the label for instructions about the maximum portion that can be applied in the aeration ducts or drying floor. The fumigant formulation must never be applied to a wet floor or duct.

The following is a step-by-step description of a typical probe application of aluminum phosphide to grain in a circular steel bin.

Equipment Needed

- Man-in-Bin sign placed near the control panel or auger power control.
- 2- or 3-inch tape, spray adhesive and adhesive for polyethylene sheets.
- Instruction manual and current label.
- Sufficient fumigant for the volume of the bin.
- Tape measure to calculate volume of grain to be treated.
- 2-6 mil polyethylene film large enough to cover the grain surface. A rope should be attached to the polyethylene film for easy removal after fumigation.
- Cotton gloves for handling phosphine-type fumigant — do not handle tablets with bare hands or wet gloves.

- All fumigations should be done by at least two people, each equipped with a full set of safety equipment, including chemical-resistant gloves, protective clothing, etc. If entrance into the structure is required for fumigating the grain, two licensed people **MUST** be present.
- Proper respiratory protection for all personnel involved in the fumigation. Check the fumigant label for specific requirements.
- Probes for applying aluminum phosphide tablets.
- Safety rope to attach to anyone climbing into a bin, and long enough to extend through the bin access point and strong enough so rescue personnel can drag a victim to the exit if necessary.
- Shovels to level grain mass prior to treatment.
- Grain thermometer to measure grain temperature prior to treatment at locations throughout the grain mass.
- Fumigation placards.
- A lock to keep unauthorized personnel out of the building. Be sure everyone is out before attaching the lock.
- Monitoring equipment to check gas concentration. (Available from the vendors listed at the end of this guide)

Level the grain

Level the grain surface and break up any crusted areas prior to fumigant application.

Seal the bin

Sealing the bin is the single most important step in achieving good fumigation results. The bin must be made as air tight as possible to achieve and maintain the proper gas concentration and exposure time necessary to kill grain pests.

Metal storage bins are not gas tight. Many were originally designed to hold and aerate grain, but can be used for fumigation with proper sealing. It is important to recognize that bins will vary in tightness depending upon how well they were built. If the corrugated sections were caulked when put together, and then bolted, they will be more gas-tight. Loosely constructed wooden bins may have to be totally covered with a gas-tight plastic sheet or coated tarpaulin to retain enough fumigant to be effective.

Grain in flat storage buildings must be covered with a tarpaulin for maximum effectiveness. Remember, the goal is to confine the gas in the grain mass long enough at the proper concentration to be lethal to the target

pests. *Sealing is extremely important* and demands study and work. There are several places in a bin where gas can escape. The roof-wall junction may look tight from the outside, but most grain bins have a gap between the roof and wall so water that may condense on the underside of the roof can run down and drip outside the bin. This gap is difficult to seal because it is usually dusty and may be damp. Cracks wider than 1 inch are even harder to seal.

To begin the sealing process, clean the dust from the surfaces before applying tape or other sealing material. Professionals often clean the surface first and then spray it with an adhesive dispensed from a pressurized can. The gap is then sealed with tape. Use at least 2-inch and preferably 3-inch wide tape when sealing these cracks.

A useful tool is the pressurized can of spray adhesive. It is available from the fumigant distributor or sometimes from hardware or hobby stores. This adhesive can help attach plastic sheets and make the tape's sticky surface stickier and improve the holding quality.

Polyurethane foams can be used to seal gaps, but they are expensive and difficult to remove. Roof vents must not be obstructed during grain aeration.

Another key area to seal is the gap between the bottom of the wall and the concrete floor. Some manufacturers design the wall base to accept a special sealant that can give a long-term seal. Various sealing materials have been used, including one made with polyurethane impregnated with asphalt. Roofing asphalt also has been used on the outside as a sealant but does not have as much elasticity.

Roof ventilators must be covered with plastic at least 3 mils thick. The plastic is less likely to tear against sharp edges if a burlap bag is placed over the ventilator first. The plastic must be taped in place and removed before aeration.

Bin doors are not gas tight. Seal them with plastic and tape.

Aeration ducts must be sealed to avoid gas loss. Remove the fan and heater, and seal the opening with plastic 3 mils thick and tape.

Determine dosage

Determine the number of tablets required to treat the volume of grain in the bin and the head space.

Since hydrogen phosphide is a gas and will penetrate to all parts of the storage structure, dosage must be based upon the total volume of the space being fumigated and not on just the amount of grain, unless the grain surface is covered with a plastic tarpaulin.

Follow label instructions for dosage determinations.

Calculate dosage

All fumigant labels provide information on the recommended dosages required to effectively treat stored grain. Using less fumigant than recommended can result in a concentration of gas too low to be effective. Using more fumigant than recommended is illegal, adds unnecessary cost, and may not increase efficacy.

Dosages recommended for the various phosphine-producing fumigant formulations are fairly similar. However, the actual amount of phosphine involved in specific fumigations will vary depending on the type of structure to be treated. Because phosphine distribution is not materially affected by being taken up by the grain, application rates are based primarily on the gas tightness of the structure, the size and shape of the structure, and the method of application.

Dosages for aluminum phosphide formulations are expressed in terms of tablets per 1,000 bushels storage capacity or 1,000 cubic feet of space.

Calculating Total Bin Volume — Cubic Feet

To calculate the total volume in a bin follow the steps outlined here. The total volume is determined by combining the volume of the bin from the floor to eave with the volume of the bin above the eave.

Step 1

Volume of space from concrete pad to the eave (ft³)
= 0.7854 x Diameter² x height to eave

Example: A bin has a diameter of 30 feet and is 18 feet from the concrete pad to the eave.

The volume (ft³) = 0.785 x 30 x 30 x 18
= 12,723 ft³

Step 2

Volume of the head space under the roof (ft³) =
0.2618 x Diameter² x height (from eave to peak.)

Example: The head space in the bin is 5 feet higher at the peak than at the eave.

The head space volume (ft³) = 0.2618 x 30 x 30 x 5
= 1178 ft³

Step 3

Total volume of the bin = volume to eave + volume above the eave = 12,723 ft³ + 1178 ft³ = 13,901 ft³

Post warning placards

The applicator must post warning signs at all entrances to the fumigated area. These signs must contain:

1. The words “DANGER/PELIGRO.”
2. The SKULL AND CROSSBONES symbol in red.
3. “Area and/or commodity under fumigation, DO NOT ENTER/NO ENTRE.”
4. “This sign may only be removed after the commodity is completely aerated (contains 0.3 ppm or less phosphine gas). If incompletely aerated commodity is transferred to a new site, the new site must also be placarded and workers must not be exposed to more than 0.3 ppm phosphine.”
5. The date and time fumigation begins and is completed, name of fumigant used, and the name, address and telephone number of the applicator.

Apply the aluminum phosphide tablets

Divide the total number of tablets needed by four so they may be placed in each pie-shaped quarter of the bin. Typically, the number would then be divided by five (the number of tablets per probe) to determine the number of probes needed per quarter. For example, if the total number of tablets required for the bin is 280, the number for each quarter is 280 divided by four which equals 70 per quarter section. Each section would be probed 14 times with five tablets in each probe.

When placing the tablets in the probe, place the first one when the probe is down 5 feet, then raise it 1 foot, and place the next tablet in the probe. Continue until five tablets are placed. The last tablet should be placed about 6 inches from the surface.

Applicators must work in *pairs*, be properly fitted with respiratory devices and other personal protective equipment required by the label, and must monitor the atmosphere.

Provide respiratory protection

If the fumigator enters the fumigated structure to apply the fumigant, re-open the structure, or for any reason, a National Institute for Occupational Safety and Health-approved gas mask must be used. A NIOSH-approved self-contained breathing apparatus (SCBA) also must be available if needed. The gas mask must be a full-face type with the appropriate filter canister. The SCBA gear may be present at a nearby emergency responder, but the applicator must have written proof of availability.

The gas level must be monitored, and workers must not be exposed to more than 0.3 ppm on a time-weighted average basis unless wearing gas masks. The SCBA would be used only if it were necessary to enter a

fumigated structure containing an unknown concentration or a concentration greater than 15 ppm phosphine.

The permissible gas concentration ranges (based on eight hours, time weighted average) for various types of respiratory protection devices are:

<i>Gas Concentration</i>	<i>Respiratory Protection</i>
Less than 0.3 ppm	None required
0.3 - 15 ppm	NIOSH/MSHA-approved full face gas mask-hydrogen phosphide canister combination
More than 15 ppm	NIOSH/MSHA-approved self-contained breathing apparatus (SCBA)

If monitoring equipment is not available and the gas concentration is unknown, a NIOSH/MSHA-approved self-contained breathing apparatus is required.

If monitoring equipment is not available and the application cannot be done from outside the structure, an approved canister respirator must be worn during application from within the enclosed indoor area.

Seal the doors

After all sections of the bin have been probed, close the bin and seal the access point with tape or plastic glued into place. This seal prevents fumigant vapors from venting to the outside and prevents the wind from drawing the fumigant out of the grain.

Determine length of fumigation

The exposure time of the phosphine gas in the grain must be long enough to provide for adequate control. Lengthen the time at lower temperatures because insects are more difficult to kill under these conditions (Table 1).

Table 1. Guide to determine the minimum length of exposure¹ for aluminum phosphide.

<i>Temperature to which fumigant and/or insects are exposed</i>	<i>Pellets</i>	<i>Tablets</i>
Below 40°F	Do not fumigate	Do not fumigate
40°F - 53°F	8 days	10 days
54°F - 59°F	4 days	5 days
60°F - 68°F	3 days	4 days
Above 68°F	2 days	3 days

¹As a rule-of-thumb a minimum of one day should be added to the exposure time listed above for each 10 feet the gas must penetrate downward. It is preferable to add 2 days to each 10 feet.

Aeration and re-entry

If the area is to be entered after fumigation, it must be aerated until the level of hydrogen phosphide gas is 0.3 ppm or below. Remove the plastic covering the grain surface immediately after fumigation even if the bin is not to be aerated. The area or site must be monitored to ensure that liberation of gas from the treated grain does not result in the development of unacceptable levels of hydrogen phosphide. Do not allow anyone to enter treated areas before this time unless protected by an approved respirator.

After the bin is aired out, treat the grain surface with an approved grain protectant to reduce insect reinfestation and to kill any flying insects in the space above the grain.

At the end of a phosphine fumigation, the powdery residue of tablets or pellets will still contain a small amount of undecomposed aluminum phosphide for several additional days. Under normal circumstances of grain handling, these residues do not present a hazard, but inhalation of the powder should be avoided.

Determining concentrations. After the fumigation is over, it is important to determine that the gas has been reduced to a level below the eight-hour Time Weighted Average (0.3 ppm) to ensure worker safety upon re-entry.

There is no single device that can economically and efficiently measure all fumigants at all normal levels. Various devices can be used depending on the gas being measured and whether a high reading during the fumigation or a low-range reading for compliance with the Time Weighted Average after the fumigation is needed. Follow instructions for the particular device you use.

Detection tubes (Figure 1) are probably the most versatile tools available for measuring gas concentrations. They are available for many industrial gases as well as for phosphine. The matching pumps (*Figure 2*) used with the tubes are well built, durable and manufactured by a number of suppliers. The initial equipment cost for the pumps is moderate and can be amortized over hundreds of uses and many years. For most gases, they are sufficiently accurate.

The disadvantage to using the detection tubes is that they are designed for a single use on a single type of fumigant. Their cost can be burdensome when many readings are needed. And, they are not available for both high and low readings so separate tubes of different capacities must be used. The tubes have a limited shelf life and are not reliable after the expiration date. In addition, they have limited accuracy on some gases.



Figure 1. Gas detection tubes.

Cautions

- All fumigants are dangerous if improperly used. Follow the cautions listed on the container label and use only in strict accordance with label directions.
- **Never place aluminum phosphide on a wet surface or in standing water since it would evolve the gas too fast and could possibly ignite or explode.**
- Wear respiratory protection approved by NIOSH/MSHA (Mine Safety and Health Administration) for the level of hydrogen phosphide gas to which you will be exposed.
- The effective life of a gas mask canister is limited. Keep an accurate account of the time that a canister is used and replace it after each use, if you smell fumigant, or the canister is outdated.
- A self-contained breathing apparatus requires a refill source. Your local fire station or rescue squad may be a refill source.



Figure 2. Gas detection pump with a detector tube attached.

- **Never fumigate a bin by yourself.** Have one or more people on site to help if you get into trouble. The helper(s) must also be properly fitted with approved respiratory protective devices. Devise a code so that you can communicate with one another. Make sure gas and electrical connections are turned off. Have the telephone numbers of the police and fire departments, hospital, physician and rescue squad available.
- Do not drink alcoholic beverages for a day before, during or after exposure to grain fumigants. Do not think that because you might have gotten away with fumigations without these precautions before that you can always get away with disregard to safety. Fumigants demand respect if you want to avoid injury or death.
- **If there are differences between information provided here and on the aluminum phosphide label, follow the label instructions.**

Fumigation Supply, Safety and Gas Detection Vendors

AFC International, Inc.

715 SW Almond St. Ste C,
DeMotte, IN 46310
(800) 952-3293
<http://www.afcintl.com/index.html>

Draeger Safety Inc.

101 Technology Drive
Pittsburgh, PA 15275-1057
(800) 858-1737
<http://www.draeger.com/ST/internet/US/en/index.jsp>

DEGESCH America, Inc.

P.O. Box 116
Weyers Cave, VA 24486
(800) 330-2525
<http://degeschamerica.com/store/index.html>

Fumigation Service and Supply, Inc.

16950 Westfield Park Road
Westfield, IN 46074
(317) 896-9300
<http://www.fumigationzone.com/>

Lab Safety Supply, Inc.

PO Box 1368
Janesville WI 53547-1368
(800) 543-9910
<http://www.labsafety.com/>

Matheson Tri-Gas, Inc.

166 Keystone Drive
Montgomeryville, PA 18936
(800) 416-2505
<http://www.matheson-trigas.com/>

Mine Safety Appliances Company

PO Box 426
Pittsburgh, PA 15230
(866) MSA-1001
<http://www.msapoliceline.com/>

Pest Fog Sales

1424 Bonita
P.O. Box 3703
Corpus Christi, TX 78463
(800) 395-2345
<http://www.pestfogsales.com/>

Sensidyne, Inc.

16333 Bay Vista Drive
Clearwater, FL 33760
(800) 451-9444
<http://www.sensidyne.com/>

SKC, Inc.

Eighty Four, PA 15330
(800) 752-8472
<http://www.skshopping.com/>

Fumigation Management Plan

The purpose of this Fumigation Management Plan is to assist (Your name or Enterprise name) in (City), Nebraska to ensure the safety of their workers, the community and the environment. It is also designed to ensure an effective fumigation and to assist you in meeting phosphine label requirements.

Owner/Manager

Name:

Address:

Day Telephone Number:

Night Telephone Number

E-mail

Certified Applicator(s) in Charge

Name:

Address:

Day Telephone Number(s):

Night Telephone Number(s):

E-mail(s):

Certification Number(s):

Year of Expiration(s):

Emergency Telephone Numbers

Local Police:

Local Fire Department:

Local Hospital:

Sheriff's Office:

Chemtrec: 1-800-424-9300

Poison Control: 1-800-222-1222

Fumigant Company:

Date of Site Inspection: _____

or previous FMP date: _____

Date of developing FMP & worker safety plan: _____

Date of developing a monitoring plan: _____

Date of developing procedures for notifying local authorities and to notify nearby residents in the event of an emergency: _____

Date of confirming the placement of placards: _____

Date of confirming the presence of the required safety equipment: _____

Target Pest(s): _____

Commodity Fumigated: _____

Date of Application: _____ Start Time: _____

Fumigant Trade Name: _____ EPA Registration Number: _____

Location of nearest telephone: _____
(May refer to facility diagram with telephone marked)

Emergency electrical, gas and water shut-off stations:
(May refer to facility diagram with telephone marked)

Reason for Fumigation — pest(s), buyer requirements, etc.

Type of Fumigation: steel bin, corrugated steel, etc.

Previous fumigation history:

Site(s) to be Fumigated: (Indicate below or refer to attached diagram of facility)	Treated Area Volume	Commodity Temperature	Commodity Moisture	Dosage	Fumigation Time

Sites to Placard:

(List below or indicate on attached diagram)

Sites to be monitored:

(List below or indicate on attached diagram)

Site	Date	Phosphine Reading

Site, Wind Speed and Direction, Date and Reading for samples taken at property line.

Site	Wind Speed	Wind Direction	Date	Phosphine Reading

Site(s) and date cleared of phosphine:
 (List below or indicate on attached diagram)

Site	Date Cleared	Phosphine Reading

Method of disposal of unused pesticide: _____

Name of Persons Fumigating:
 Example:

Person Fumigating	License Number
Abraham Lincoln	NEB 000000
Jefferson Davy	NEB 000000