

# American Agronomic Stewardship Alliance(AASA)



PROGRAM  
OVERVIEW  
2004-2010



# What is the AASA?

- The AASA is a non profit association that develops stewardship practices for the safe handling and storage of bulk, refillable, and packaged crop protection products .
- The AASA developed and maintains an inspection checklist based on these practices and applicable federal requirements.
- AASA hires third party inspectors that use the checklist to conduct inspections of ag retail facilities.
- AASA is funded by manufacturers that purchase inspection reports to aid in their decision as to where products can be handled and stored safely and correctly (no cost to retailer).

# AASA Board of Directors

- 6 Manufacturers
- 5 Distributors
- 2 Retailers
- 1 Ag Retailer Industry Representative
- 1 State Pesticide Control Official

# Why The Need For An Industry Stewardship Program Like AASA?

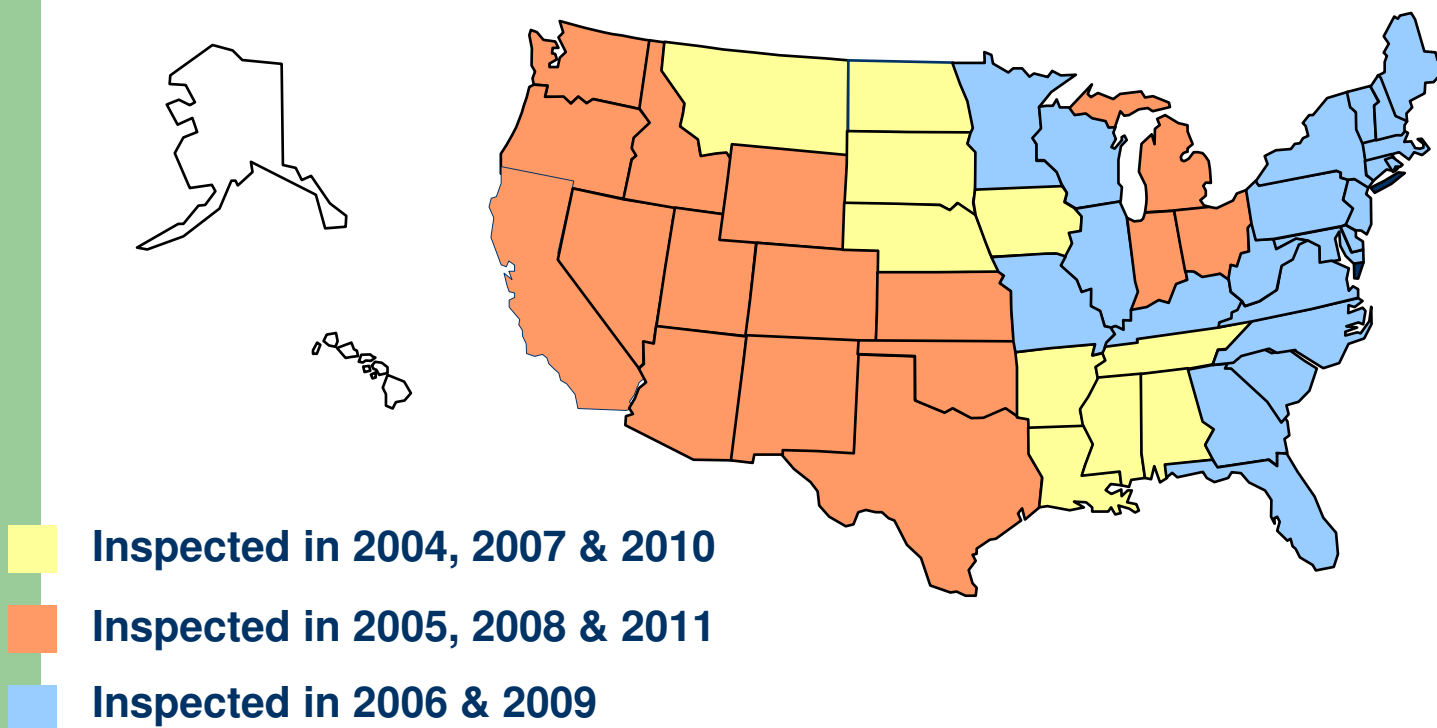
- Reduce liability from potential spills and leaks by ensuring crop protection products are stored safely.
- Provide a single source for industry stewardship practices and inspections
- Reduce the need for multiple inspections.
- Prepare our industry (manufacturers, distributors, dealers) for the USEPA Pesticide Container & Containment Regulations.

# AASA-History Timeline

- 1997 - Initiative started With Crop Life America
- 2001 - Ag Retailers Association Joined
  - Steering Committee develops stewardship practices and checklist
- 2003 - Pilot Program (200+ sites)
- 2004 - AASA Incorporation
- 2004 - Inspection program begins
- 2007 - IFCA takes over administration in January

Approximately 11,180 Retail Facility Inspections completed through September, 2010

# History of State Inspections



# AASA 2010 Demonstration Event

## Eastern Farmers Cooperative, Worthing, SD



# The AASA Inspection Process

- Third party inspector makes an appointment to visit a facility- inspections conducted from June through September.
- Inspector inspects facility in about 2 hours (we encourage facility personnel to participate).
- Copy of completed inspection checklist available upon request on day of inspection.
- AASA will mail a copy of the completed inspection report (as it appears in the database) to each facility.
- Facility reviews the report and sends any corrections to the AASA.

# Key Advantages

- A single checklist so facility managers have a clearer idea of industry expectations.
- Reduce duplicative inspections.
- The inspection is at no cost to the retailer
  - manufacturers pay for each report.
- A copy of its inspection report is mailed to each retailer.
- Individual facility Inspection data is confidential.

# Questions On The AASA Checklist

- General Information about a facility.
- General Tank Information to ensure tanks can accommodate product--tank capacity, hoses, vents, pump size, etc.
- Containment information
- Required Items--those items that are required by law or by one or more of the basic manufacturers.  
(AASA has no enforcement capability)
- General Items—best practices or items that may be required in the future.

# 2011 Program

- Inspections
  - Regulatory Consultants Inc
  - FarmChem
  - Piedmont Environmental Consultants
  - JTAG Inc.
- Data Management
  - Regulatory Consultants Inc
- Inspection Report Review
  - Crop Protection Manufacturers
- Quality Assurance Program
  - Klean Wash, Inc.

# 2010 Postcard Survey

- Brief postcard survey to gather basic information and feedback on inspectors and inspections.
- Postcards were provided to inspectors to be left with each facility upon completion of inspection
- 65% of the postcards were returned.
- 120 retailers asked for a follow-up call

# 2010 - Post Card Survey

- Did the AASA inspector make an appointment? 98% Yes
- Was the inspector courteous & professional? 100% Yes
- Did the inspector inform the retailer they would receive a copy of the inspection form? 82% Yes
- Did the inspector provide feedback or explanation of any problems? 84% Yes
- Did the inspector measure the sizes of all tanks & all containments? 83% Yes
- Approximately how long did the inspection take?
  - 39-59 minutes – 43%
  - > 60 minutes – 36%
  - < 30 minutes – 19%

# Inspection Summaries: 3 Year Comparison ( 2004, 2007, 2010)

| • Year                     | <u>2004</u> | <u>2007</u> | <u>2010</u> |
|----------------------------|-------------|-------------|-------------|
| • # Sites                  | 1668        | 1581        | 1534        |
| • # Tanks                  | 8675        | 8757        | 9346        |
| • # Containments           | 2241        | 2178        | 2117        |
| • # Packaged Storage Areas | 1635        | 1539        | 1488        |

# Inspection Summaries: Containment

|  | 2007 | 2010 |
|--|------|------|
| Q# 42- Tank secondary containment with 100%(indoor) or 110% (outdoor-uncovered) capacity                   | 80%  | 91%  |
| Q#43- Tanks containment area is indoors or outdoors and covered  | 83%  | 83%  |
| Q#47- Bulk containment is rigid material (I.e. concrete, steel, reinforced sealed block) & is liquid-tight | 78%  | 98%  |
| Q#44- Containment drains, valves, & cracks are permanently sealed.   | 80%  | 85%  |
| Q#50- Dispensing & transfers occur are on rigid, liquid-tight containment.                                 | 84%  | 91%  |
| Q#68- Filled PRCs are stored in or within containment  | 70%  | 80%  |

# Inspection Summaries: Bulk Labeling

|  | 2007 | 2010 |
|--|------|------|
| Q#31a- The tank is labeled with the net contents           | 80%  | 78%  |
| Q#31b- The correct EPA Est. No. is affixed to the tank     | 85%  | 83%  |
| Q#31- The tank is labeled which includes a product booklet | 87%  | 91%  |
|  |      |      |

# Inspection Summary- Sampling of Encouraging Elements

|  | 2007 | 2010 |
|--|------|------|
| Q#62- Repackaging Agreements for bulk products are current & on file | 99%  | 99%  |
| Q#74- Material Safety Data Sheets (MSDS) are available to employees  | 99%  | 99%  |
| Q#76- Personal protective equipment is available to employees        | 99%  | 99%  |
| Q#75- Written emergency response plan is available & current         | 98%  | 99%  |
| Q#30- Written security plan is on file.                              | 92%  | 98%  |
|  |      |      |

# Inspection Summary- Miscellaneous Facts

|   | 2007 | 2010 |
|---|------|------|
| Q#36- Tank inlet/outlet valve is lockable stainless steel                               | 97%  | 98%  |
| Q#37- Tank inlet/outlet valves are closed & locked whenever the facility is unattended. | 98%  | 94%  |
| Q#49- Tanks are inside a lockable fence or in a secured building                        | 79%  | 88%  |
| Q#58- Shower and eyewash are in place and operational.                                  | 41%  | 45%  |

# Inspection Summary- Portable Refillable Containers (PRCs)

|   | 2007 | 2010 |
|---|------|------|
| Q#59- All PRCs have a unique identifier   | 90%  | 81%  |
| Q#65b- PRCs have an intact one-way valve and/or tamper-evident device on all non-vent openings.                                       | 48%  | 66%  |
| Q#71- All PRCs are regularly inspected and meet <i>applicable</i> EPA/DOT packaging and/or leak proofness requirements                | 91%  | 94%  |
| Q#64*- Written procedure in place to ensure PRCs are cleaned per manufacturer's instructions prior to changing product or formulation | 96%* | 99%* |
| * Yes/No responses counted. NA not included.  |      |      |

# To get copies of AASA Summaries

- Contact AASA in writing ([www.aginspect.org](http://www.aginspect.org))
- National summary and your state only.
- Summaries only—no identifiable sites.

## For Additional Information

- Visit the AASA Website at [www.aginspect.org](http://www.aginspect.org) for:
  - Contact Information
  - AASA Fact Sheet
  - Inspection Checklist
  - Inspector Credentials and Photographs