When wineries add sulfur dioxide (SO₂) to wine as an antioxidant and preservative, the SO₂ is not considered a pesticide. However, when sulfur dioxide is used to sanitize corks, barrels and equipment, the compound is legally classified as a pesticide. That means that only an SO₂ product registered as a pesticide with the U.S. Environmental Protection Agency (EPA) or the California Department of Pesticide Regulation (DPR) can be used to sanitize corks, barrels and equipment. (A pesticide is a substance or mixture of substances used to kill or control a pest. A pesticide may be a chemical substance, biological agent, antimicrobial, disinfectant, or device used against any pest.)

Check the product label to make sure there is an “EPA Registration Number,” and that the intended use is on the label. Using unregistered SO₂ for winery sanitation (for example, using a product bought for fermentation use that lacks a pesticide registration) is against the law and subject to fines and penalties.

Sulfur dioxide is a corrosive, deadly gas. Winery workers must carefully follow safety rules whenever they use SO₂, whether as a pesticide or not. However, extra rules must be followed when the gas is used as a pesticide.

The only SO₂ product registered for winery sanitation is a federally restricted-use pesticide. That means certain requirements must be met to buy or use it:

- **Only certified applicators can use or buy restricted pesticides.** Federal and state laws require that any person who uses or supervises the use of a federally restricted-use pesticide must at a minimum hold a qualified applicator certificate (QAC) or a qualified applicator license (QAL). Getting a QAC or QAL requires passing two examinations given by the DPR. Proof of certification is required for each purchase of pesticidal sulfur dioxide.

- **Operator identification number is also needed for purchase.** Wineries must present an operator identification number to buy a federally restricted-use pesticide. You can get an operator ID from the county agricultural commissioner (CAC).

- **Recordkeeping and reporting of pesticide use is required.** Wineries must keep records of how much pesticidal SO₂ they use and send use information to the CAC on a monthly summary pesticide use report.

**What’s required to get certified or licensed to buy or use pesticidal SO₂?**

Federal and state laws require each winery that buys or uses a restricted pesticide to have at least one employee with a QAC or QAL. This requires passing two DPR examinations: “Laws, Regulations and Basic Principles”; and the “Category F - Microbial Pest Control” exam.

Detailed information on how to get a qualified applicator certificate or qualified applicator license is available at www.cdpr.ca.gov, click on **ANOTHER OPTION**

Smaller wineries that have few occasions to sanitize equipment, barrels and corks may choose to hire a licensed pest control business to do their sanitation work. These businesses must have the necessary licenses to buy and use SO₂.

RECORDKEEPING AND REPORTING OF SULFUR DIOXIDE USE

California law requires that all agricultural operations file reports of their pesticide use. Each month, wineries that use SO₂ as a sanitizer must send a Monthly Summary Pesticide Use Report to their CAC. (You don’t have to report nonpesticidal uses of SO₂.) The reporting form (#PR-ENF-060) and instructions can be downloaded from www.cdpr.ca.gov, click on the red “Forms” Quick Finder link in the center of the page, then “Pesticide Use Reporting.” Reports must be sent by the tenth of each month following the month in which the application was made.

To calculate use, weigh the SO₂ cylinder at the beginning and end of each month. The difference between the two readings is the pounds of sulfur dioxide used that month. Enter that number in column C of the form. Under column D, applications made to multiple barrels on a single day can be reported as one application. In column E, enter “91” (the code for other fumigation).

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<tr>
<th>C</th>
<th>D</th>
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<th>F</th>
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<tbody>
<tr>
<td>TOTAL PRODUCT USED (Check One Unit of Measure)</td>
<td>NUMBER OF APPLICATIONS</td>
<td>CODE</td>
<td>COMMODITY OR SITE TREATED</td>
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<tr>
<td>LB</td>
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