The Pesticide Registration Branch

Desk Manual
Chapter 5

2013

California Department of Pesticide Regulation
Special Requirements for Certain Types of Products

I. Products Containing Tributyltin (TBT)
II. Category I Liquid Pesticides
III. Rodenticides
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I. **Products Containing Tributyltin (TBT)**

Antifouling paints are products labeled for use on boat and ship bottoms, piers, and dock pilings, and similar submerged structures to prevent attachment or damage.

Release rate data are needed for each formulation. Antifouling paints or coatings containing tributyltin (TBT) or tributyltin compounds can have an average release rate of no more than four micrograms of organotin per square centimeter per day, as determined by the U.S. EPA-adopted testing procedure in ASTM Draft 6. This data is routed to the chemistry station for review.

Antifouling paints or coatings containing tributyltin (TBT) require a restricted materials permit prior to sale or use. Extensive restrictions are placed on the types of vessels that can be treated. Counties listed in 3 CCR section 6910 prohibit sale or use of TBT products for the control of microorganisms in cooling water systems.

II. **Category I Liquid Pesticides**

Any liquid formulation of an agricultural use pesticide carrying the signal word "Danger" must submit product viscosity data or any other applicable data to show that the product is compatible with a closed transfer system. Our chemistry staff will determine the need for this type of data and evaluate any submitted viscosity data for Category I liquid formulations for compatibility with a closed system.

A closed system means a procedure for removing a pesticide from its original container, rinsing the emptied container and transferring the pesticide and rinse solution through connecting hoses, pipes and couplings that are sufficiently tight to prevent exposure of any person to the pesticide or rinse solution. Rinsing is not required when the pesticide is used with dilution. The system's design and construction must meet the closed system criteria.

III. **Rodenticides**

Biochemical data describing the metabolic pathway and the mode of action in animal models, suitable for extrapolation to people, is required for new rodenticide products.
Anticoagulant rodenticide baits intended for home use must contain a color additive of readily evident intensity. Suggested dyes are listed in the CDFA Vertebrate Pest Control Handbook. Exempted are bird control products and animal repellents.

Strychnine rodenticides must be dyed with a green color additive specified in the CDFA Vertebrate Pest Control Handbook.

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**IV. Precursors**

A precursor is a chemical with or without pesticidal action that is converted on-site, through a chemical reaction, to a pesticide.

For example, sodium chlorite and sodium chlorate are used to generate chlorine dioxide, which controls microorganisms. Examples of registered end uses are oil field injection waters, industrial cooling water systems, pulp and paper mill systems, and refinery wastewater.

In addition to the general data requirements, a detailed description of the system or systems used in connection with the generation and distribution of the pesticidal product are required.

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**V. Copper Sulfate**

It is prohibited to sell or use copper sulfate products for control of tree (or other plant roots) or fungal slime in sewers and drains in counties specified in 3 CCR Section 6920. Product labels may still contain these uses.