

Guide to performing QPS fumigations with methyl bromide

Version 1.2



Guide to performing QPS fumigations with methyl bromide - August 2018

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Purpose

This guide provides detailed information and further explanation of, the various methods and techniques that can be used by fumigators to meet the requirements of the *Methyl Bromide Fumigation Methodology*.

Scope

This document is not intended to specifically cover the performance of methyl bromide fumigation treatments under ISPM 15, however, the basic principles, requirements and recommendations described in this document and the associated guideline are still generally applicable.

Even though the basic principles and requirements would be relevant this document is not intended to specifically cover fumigations of vessels, whether it is the vessel itself or its cargo, silos or other storage facilities, buildings or other fumigations not done in the types of enclosure described herein and not related to import or export.

How to use this document

This document should be read in conjunction with the *Methyl Bromide Fumigation Methodology* which specifies the minimum requirements that must be met by fumigators when performing QPS methyl bromide fumigations.

This document covers the most commonly encountered fumigation situations and provides information on the methods that a fumigator may use to ensure a successful fumigation.

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1 Prior to fumigation

1.1 Target of the fumigation

The fumigator should know why the fumigation is being done and what the specific target of the fumigation is so they can determine if the fumigant will come into contact with, and be able to penetrate into, the goods.

Depending on the nature of the consignment, the commodity itself, the packaging, or a combination of both, could be the target of fumigation.

1.2 Consignment suitability

The suitability of a particular consignment will depend on the nature of the risk.

There are a number of factors that will affect the suitability of the consignment for fumigation. Some materials are adversely affected by methyl bromide which can cause damage to the commodity and thereby reduce its value. There are some commodities that are not suitable for fumigation with methyl bromide and others that may be affected in some circumstances.

The list in Appendix 1 provides a guide on some commodities where problems have been known to occur. Due to the variations in the composition of materials and other factors like temperature, humidity, length of exposure and concentration levels it is not necessarily straight forward to evaluate the suitability of a particular commodity. If there is some doubt as to the suitability of any particular material it may be necessary to conduct tests to determine if the outcome will be satisfactory.

The fumigator and the owner should also consider the potential for adverse effects on other materials in the consignment that are not necessarily the target of the fumigation, but will also be exposed to the fumigant.

1.3 Free airspace

Free airspace will allow the fumigant to readily circulate throughout the enclosure and greatly assist in achieving even gas distribution. The enclosure should be configured to ensure that there is adequate space above, below, at the sides and throughout the commodity. Putting the commodity on pallets, creating space between the sheets and the commodity and stacking the commodity so there is space between items, will improve fumigant circulation.

If there is inadequate free airspace then the consignment may need to be unpacked and fumigated as a stack. Fumigators should encourage the owner/exporter of the goods to present the consignment in a way that is suitable for fumigation. If the consignment is not packed with sufficient free air space, the fumigation should not proceed.

Load factors are important when treating some perishable items as the exposure periods can be very short and rapid distribution of gas throughout the enclosure and into the commodity is critical to achieve an effective treatment. Another reason to specify a load factor is to avoid an excessive concentration of methyl bromide which can damage the commodity in some instances. For example, if a load factor of 50% is specified then the quantity of the commodity and any associated packaging can occupy a maximum of half the volume of the available space inside the

enclosure. This can also result in an effective doubling of the initial concentration of methyl bromide as half the air in the enclosure is displaced by the commodity.

1.4 Timber thickness and spacing

Penetration into the commodity

In many cases the fumigant must be able to penetrate into the commodity to effectively treat pests (for example; wood borers) that can exist inside the commodity itself. The fumigator should inspect the consignment to verify that it can be treated effectively prior to fumigation. If the consignment cannot be adequately inspected, the fumigator may need to rely on information from the manufacturer/exporter of the goods to ascertain whether there is anything that may prevent the fumigant from adequately penetrating into the commodity.

The effective penetration of methyl bromide into wood is 100 mm under normal fumigation conditions and exposure periods, therefore individual wooden planks, rounds and articles, which haven't be coated in an impervious surface, must have at least one physical dimension which is less than 200 mm.

If, however, the commodity is partially coated with an impervious surface the maximum thickness from the uncoated surface will be 100mm.

1.5 Impervious wrappings, coatings and surfaces

If the target of the fumigation is wrapped in materials that are impervious to the fumigant, the wrapping should be cut, slashed or removed prior to fumigation.

If the target of the fumigation has impervious surfaces that will prevent effective penetration of the fumigant then an alternative method of treatment must be used. Where practical, the commodity should be fumigated prior to any impervious surfaces being applied.

The packaging material for perishable consignments must also be treated along with the product. The packaging may harbour insects that could re-infest the consignment when the product is re-packed after treatment.

1.6 Impervious wrapping perforation requirements

In addition to cutting, slashing or removing wrapping, wraps can also be perforated to allow fumigant to pass through and come into contact with the commodity. Perforated impervious wrapping must meet the requirements outlined in the Methodology and must not be layered or wrapped over itself. This is to ensure the fumigant is not impeded as it passes through the holes in the wrapping.

1.7 Site suitability

For fumigation performed in temporary enclosures, that is, anything other than a chamber, the fumigator must determine if the site is suitable to conduct a safe and effective fumigation. It is assumed that due safety considerations have been taken into account during the design of any permanent fumigation facility.

There must be sufficient space to create an exclusion zone around the enclosure to warn others that a fumigation is underway. If the enclosure is adjacent to a high traffic area, either pedestrian or vehicular, it may be appropriate to extend the risk area out further if space permits. Where there is a prevailing wind it is also prudent to extend the risk area out further on the downwind side. Methyl bromide dissipates rapidly and the concentration will decrease exponentially as the distance increases from the source.

Ventilating the enclosure poses the greatest risk for un-protected personnel to be exposed to unsafe levels of methyl bromide. As part of the site suitability assessment the fumigator must determine if the enclosure can be ventilated safely before starting to fumigate. It is too late once the enclosure is under gas. As a general guide 50 metres downwind from the enclosure is safe in most circumstances. The site should be well ventilated. This is particularly important when ventilating the enclosure to promote rapid dispersal of the fumigant.

<u>Section 9 - ventilation</u> provides more information on how the ventilation process can be safely managed in different situations.

The fumigation surface must be flat and even. For un–sheeted shipping container fumigations, uneven or sloping surfaces can cause the container to twist which may make it difficult to open and close the doors or result in greater leakage around the door seals.

Power must be available to run the fans and any other equipment that requires mains power. If mains power is not available then a generator will be needed. Some concentration measuring instruments may be affected by fluctuations in the current so the more consistent and reliable the power source, the better.

Secure the fumigation enclosure from un-authorised access as much as practicable.

2 Safety

Methyl bromide is a toxic gas which can be harmful to humans if not handled carefully. Appropriate precautions must be taken to avoid exposure to unsafe levels of fumigant by fumigation personnel, as well as any other persons in the vicinity.

The effect of methyl bromide on humans and other mammals varies according to the intensity of exposure. The concentration and length of time determine the intensity of exposure and the resulting signs and symptoms can vary greatly.

Harmful effects from exposure to a toxic gas such as methyl bromide may fall into two general categories - acute and chronic.

Acute effects can result from a single exposure to high levels of methyl bromide. At concentrations not immediately fatal, it produces neurological symptoms. High concentrations may bring about death through pulmonary injury and associated circulatory failure. The onset of toxic symptoms is delayed and may vary between 30 minutes to 48 hours, according to the intensity of the exposure and the reaction of the individual. The most common signs and symptoms of acute exposure include central nervous system depression, nausea, fever, dizziness, confusion, delirium, staggering, visual disturbances, abdominal pain, mania, tremors, pulmonary oedema, convulsions and coma.

Contact of the skin with the liquid or strong concentrations of the gas may cause severe local blistering.

Chronic effects may result from an overdose on a single exposure or from repeated long-term exposure to relatively low concentrations. In some cases the effects are cumulative and may not become apparent for some time, therefore they may not be easily associated with long term low level exposure to methyl bromide.

There is a body of evidence which seems to indicate that daily exposure to concentrations of 20 ppm to 100 ppm of methyl bromide can quickly result in serious neurological symptoms. Exposure for only a few hours to concentrations of 100 ppm to 200 ppm may cause severe illness or death.

Persons should not be exposed continuously to concentrations of methyl bromide in excess of 5 ppm. This concentration is the most broadly accepted threshold limit for an 8 hour daily exposure. Some countries already have or, are moving towards, a lower value. The fumigator must fully comply with the local requirements whenever they are more stringent.

2.1 Risk assessment

As part of the site suitability assessment the fumigator must evaluate the site from a safety perspective. Is the fumigation able to be carried out safely and, to the extent necessary, any potential risks be satisfactorily managed?

There are three phases during the fumigation which present different types and degrees of risk.

The first phase is the gas injection phase. If proper preparation is done and adequate care exercised then this process should be low risk. The main concern is accidental leakage from the supply system. The fumigator should pre-determine a safe and accessible route to follow away from the fumigation area, either as a result of the fumigation or some other occurrence that represents a danger. In the event of an accidental leak the supply cylinder should be shut off immediately and both fumigators should leave the area together walking in the direction of their pre-determined exit route. Once sufficient time has passed for the methyl bromide to dissipate the fumigators can return to the fumigation and rectify any problems before resuming the fumigation. If canisters are used to supply the methyl bromide a bucket of water should be close by. If there is a leak from the applicator the canister can be dropped into the water bucket. This will slow down the rate of release from the canister and allow the fumigators to exit the area until it is safe to return.

Using good quality supply hoses and secure connections will significantly reduce the potential for problems. Avoid any sharp angles or bends in the supply pipe as the gas will be very hot and under high pressure so there is the possibility of the hose bursting.

No-one other than the fumigators directly involved in the injection of the gas should be in the risk area. The methyl bromide supply and the vaporiser must be inside the risk area during injection and un-protected personnel kept well away even if they are outside the risk area.

When the required amount of methyl bromide has been measured, close the methyl bromide cylinder securely, this is not applicable for cans as the entire contents must be fully discharged into the enclosure. The supply system will now contain pure methyl bromide which should be

purged before dismantling the supply system. This can be easily completed by forcing air through the system from the methyl bromide supply to the enclosure. Some methyl bromide cylinders have an additional valve for this purpose, if it doesn't then a simple T piece with a valve connected in-line with the supply pipe close to the cylinder outlet is effective. Purging the methyl bromide from the supply system not only prevents the diffusion of methyl bromide out of the system which may accumulate in un-safe levels, particularly in enclosed spaces, but will ensure that the entire dose is in the enclosure. This can be a significant proportion of the dose depending on the volume of the system in relation to the enclosure (Figure 1).

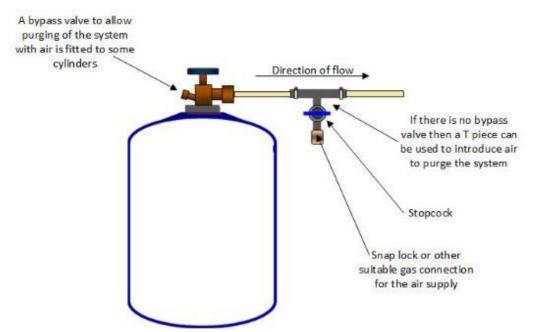


Figure 1 Illustration of a gas cylinder supply system for methyl bromide

An alternative is to disconnect the supply pipe from the cylinder and force air down the pipe until all the methyl bromide has been forced into the enclosure.

The second phase is the exposure period. There is minimal risk of exposure during this phase providing that the enclosure has been carefully checked to find and fix any significant leaks. Unsheeted containers should be locked to prevent unintentional opening of the container while it is under gas.

By their nature, fumigation under sheets cannot be secured to prevent someone from unintentionally, or otherwise, lifting the sheet and gaining access to the goods. Despite the establishment of a risk area with good warning signs, individuals may try to access the sheeted enclosure while it is under gas to steal the goods. Conducting the fumigation in a secure fumigation site can reduce the risk of this occurring.

The final phase is ventilation. The fumigator must plan for the safe ventilation of the enclosure before it is put under gas, it is too late afterwards. The fumigator must consider the proximity of occupied buildings, other site personnel in the vicinity and the likelihood of passing traffic, either pedestrian or vehicular. Further information on consideration during this phase can be found in <u>section 9 ventilation</u> of this document.

2.2 Risk area

Risk area

A risk area must be established around the entire enclosure. It must be demarcated by a physical barrier, such as rope or tape hung on stands or bollards, held off the ground so that someone has to deliberately step over the barrier to enter the risk area. Lines painted on the fumigation surface are ineffective and are not acceptable.

When fumigating outdoors a solid wall can be used for one or more of the sides if it is at least 2 metres high. When fumigating indoors, a wall can be used as part of the barrier if it extends from floor to ceiling.

Don't use other shipping containers as part of the barrier unless you are certain that they will not be moved before the fumigation is finished.

Large, easily seen warning signs should be placed on all sides of approach to the enclosure. For an enclosure that can be approached from all sides a minimum of four signs would be needed. They could either be placed on each of the corners of the risk area or on each side provided that they are visible from all angles of approach.

It is not advisable to use signs made from paper, cardboard or other material that could deteriorate through exposure to the elements.

The required risk area varies depending on where the fumigation is being conducted. A 6m risk area is required inside a building because there is less air movement. Therefore, there is an increased chance for unsafe levels of gas to accumulate if there is a significant leak from the enclosure.

In some circumstances it may be appropriate to increase the risk area of the fumigation from the minimum required in the methodology.

2.3 Personal Protective Equipment

Personal protective equipment (PPE)

Suitable respiratory protection must be worn inside the risk area at all times while it is under gas. That is, from the time you are ready to inject the gas into the enclosure until the enclosure has been ventilated to below 5ppm.

The respirator is the most important piece of equipment used for the protection of persons working with fumigants. When fumigation is carried out regularly, it is advisable for each of the operators to be supplied with their own respirator so that they are responsible for its care and upkeep, for their own personal protection.

The two most common types of respirators used for QPS fumigations are those that use a filter canister designed to remove contaminant gases from the air being breathed or self-contained breathing apparatus (SCBA). Whichever type of respirator is used the mask must cover the entire face, including the eyes.

Filter-type respirators

When using filter canister respirators it is strongly recommended that the fumigator read the manufacturer's instruction on the safe use for the brand of filter that they use. The canister provides protection for a limited length of time which varies depending on the concentration of fumigant it is exposed to. The only practical way to determine if there has been exposure is to use a suitably sensitive electronic detector with an audible alarm set to signal if there are unsafe levels of fumigant present.

It is important to check that the canister on the respirator is the right one for use with the specific gas or mixture of gases that will be used for that particular job. Cartridge-type respirators are small devices with one or two small chemical cartridges attached to the nosepiece. These are usually designed to give protection against gases up to 0.1 percent by volume. They should not be used in any phase of fumigation work. Also, respirators designed as dust filters, or for use with insecticidal or fungicidal aerosols, provide no protection whatsoever against fumigants.

Detailed instructions for applying, adjusting and checking respirators are supplied with each unit purchased. They should be carefully read at the time of purchase and read over again before the respirator is used. Supervisors should give new operators detailed instructions on the proper use of the respirators.

When a canister is new its top and bottom are sealed. Manufacturers stamp an expiry date on the label in order to indicate when the canister must be discarded even if the seals have not been broken.

The supply of canisters should be stored in a cool, dry, well-ventilated place away from contamination by any gases.

For methyl bromide the correct filter canister designation is AX, which is designed for Volatile Organic Compounds (VOC) with a boiling point below 65 °C. Do not use A2 filters as they are specifically designed for VOCs with a boiling point above 65 °C and are much less effective.

Self-contained Breathing Apparatus (SCBA)

SCBA respirators provide breathable air from a portable cylinder carried by the user. These types of respirators are becoming more common as they have some significant advantages over the canister type respirators. SCBA provides protection in environments with high concentrations and are effective against all toxic gasses. While the initial purchase price can be quite high compared to a filter type respirator, the ongoing operating costs are much lower than the cost of replacing spent filter canisters. Operators need to be properly trained in their use and maintenance and they must only ever be re-filled by an authorised agent. The cylinder must never be refilled using normal air compressor as the air will be contaminated and cause severe injury or death.

Care and maintenance

Regular maintenance should be undertaken on the respirators to ensure that they continue to provide effective protection. After each use, particularly in hot conditions, the mask should be washed in mild soapy water otherwise the mask may become permanently tainted. The valves should be removed and checked regularly to ensure that they are clean and in good condition. Care should be taken to ensure that the valves are refitted properly so that the respirator

functions correctly. Valves can be easily replaced when signs of wear start to occur. The seal around the face-plate should also be checked in case it has been damaged.

Fumigation personnel

It is recommended that two people are always present during a fumigation, especially when undertaking work within the risk area. If a fumigator becomes sick or an accident occurs and they can no longer maintain control of the fumigation, serious consequences may occur if no one is there to provide assistance.

It is difficult to communicate verbally while wearing a respirator, so it is advisable for the fumigation team to establish visual signals to indicate if there is a problem and what action should be taken. For example, one of the fumigators may notice a leak from the supply system. The first action should be to shut off the gas supply at the cylinder, then they can assess the situation and, if the leak was significant enough to warrant them to temporarily leave the area, get their colleagues attention by tapping on their shoulder and indicate that they must leave the area until it is safe to return.

3 Fumigation enclosures

3.1 Gas-tightness

All enclosures will leak to some degree, particularly temporary ones such as sheeted enclosures and shipping containers. The fumigator must take all reasonable steps to minimise fumigant loss from the enclosure during the exposure period to:

- ensure the treatment is effective
- prevent unsafe levels of fumigant accumulating in the immediate vicinity
- reduce methyl bromide usage by minimising the need to use additional fumigant.

3.2 Sheeted enclosures

Temporary fumigation enclosures are often created using a sheet or sheets to surround the consignment and retain fumigant in contact with the contents of the enclosure. The space enclosed by the gas-proof sheets is, irrespective of the size of the enclosure, a single fumigation for concentration monitoring and documentation purposes. There are three main causes of gas loss from sheeted enclosures:

- the fumigation surface is not impervious
- the fumigation sheet is not made of a suitably impervious material or it is in poor condition
- leakage from between the sheet and the fumigation surface.

The first two of these are covered in the sections on site selection and fumigation sheets respectively.

The sheet must be held flat against the fumigation surface to prevent excessive leakage. This is easily achieved by the use of sand snakes. Sand snakes are flexible tubes filled with sand around 100 mm in diameter and from 0.5 metres to 1.5 metres long. Sand snakes should only be filled to 65% to 75% with clean dry sand so they remain flexible enough to bend around corners and lie

flat on the ground. A minimum of two rows of sand snakes should be used around the entire enclosure. They should be laid end to end with the second row offset to overlap the joins of the first row in a brick-work pattern.

Water snakes can also be used. A single continuous water snake should be laid flush against the stack and filled 75% to 85% full. Care should be taken to ensure a complete seal where the ends of the snake meet. The water snake should not start or end on a corner. If water is used to create snakes similar to sand snakes they should be laid in the same way as sand snakes.

Loose sand or soil can also be used to seal the sheet to the floor. Sufficient sand or soil must be used to create a continuous seal around the entire enclosure.

Fumigation sheets should extend at least 500 mm from the base of the stack to allow more sand snakes, water snakes to be added to improve the seal between the sheet and the fumigation surface if a leak is detected. The additional snakes should be placed alongside the existing rows rather than on top.

The sheet at the corners of the stack should be folded so the sheet will lay flat against the fumigation surface making it easier to get a good seal. Once folded the corners should be secured with clamps or tape to prevent the wind from pulling the sheet apart.

Strong winds can cause the fumigation sheet to billow resulting in excessive loss of methyl bromide with the potential to cause the fumigation to fail. In circumstances where high winds are unavoidable (for example, an open site at a port) ropes should be used around the enclosure to hold the sheet in place.

Fumigation sheets

Fumigation sheets must be impervious to methyl bromide. They must be able to easily retain sufficient fumigant concentrations for the entire exposure period without the need to add additional fumigant. The ability of the sheets to retain fumigant will deteriorate with use and they should be carefully monitored to ensure their condition is good enough to meet the gas retention requirements.

The sheets must be inspected for any damage before each use. Any tears or holes can be temporarily repaired using impervious tape capable of adhering to the sheet material. Permanent repairs should be made to sheets at the first opportunity by heat welding or gluing patches over the damaged area. Patches should not be sewn on as the needle holes will still allow gas to escape.

A variety of different materials are suitable for use as fumigations sheets. They range from thin plastic sheets that last for only a few uses, to heavier, more durable sheets that will last for many years if handled with care. Most of the materials used in the manufacture of fumigation sheets are not completely gas-tight because such materials are all permeable to fumigants to some degree. The rate at which diffusion through the sheet takes place depends upon the type of material, its thickness and the ambient temperature. Diffusion through the sheet will reduce the concentration of fumigant to which insects are exposed. If a sheet is highly permeable to methyl bromide there may be uneven distribution of fumigant within the enclosure to such an extent that in some locations the concentration is insufficient to kill all the insects present. As the ratio

of sheet area to enclosure volume is greater in small enclosures compared to larger enclosures, loss of gas by diffusion would be expected to be proportionally greater in smaller enclosures.

Woven tarpaulins that are not coated, or are only thinly coated, allow too much gas loss and are unsuitable for use as fumigation sheets.

When purchasing fumigation sheets consideration should be given to the following:

- permeability
- durability of the material
- flexibility
- weight
- size
- ease with which any holes, tears or abrasions can be permanently and effectively repaired
- if a sheet has joins that they are connected in a way that is gas-tight.

Many fumigators prefer to use lightweight sheets regardless of other properties, because such sheets require less labour and are easier to handle. However, caution should be taken when handling these types of sheets. Removal of debris such as stones from the fumigation floor, carrying rather than dragging the sheet and padding any sharp corners can protect the sheet and they can last for many years.

The sheets should be large enough to completely cover the enclosure being fumigated with a minimum 500mm of sheet extended out from the base of the enclosure on all sides. As a guide the following size sheets would be sufficient for shipping containers:

- 20 ft = 12.5 m wide x 16 m long
- 40 ft = 12.5 m wide x 22 m long.

Sheets can be joined to create a larger enclosure if necessary but care should be taken to ensure that the joins are gas-tight.

Sheets can be joined by tightly rolling a 400 mm to 500 mm overlapped join, which should be secured using tight welding style clips or other suitable means. Often a better join can be created by wrapping the sheets around something rigid like lengths of wood. Roll the sheets at least three to four full turns around the wooden battens and hold together with tight welding style clips or other suitable method.

Any clamps or clips with sharp edges should either not be used or the sharp edges should be covered in some way to prevent damage to the sheet.

Joins should be positioned so they are supported by a solid surface. For example; a container roof.

Sand snakes

Sheeted enclosures require some method of creating a gas tight seal between the sheet and the fumigation surface and sand snakes are the most common method used for achieving this. They are preferred because they are:

- heavy enough to hold down the sheet flat to the fumigation surface to create a good seal
- light enough to be easily handled
- flexible so they can be bent around corners
- soft, so they do not damage fumigation sheets
- easy to make
- reusable, if made from durable material
- versatile, they can also be used to pad sharp corners, hold down supply pipe and sampling tubes.

The snakes should be partially filled with clean dry sand to no more than 65% to 75%. To check how full a sand snake is, hold it up lengthwise and shake the sand down. For example a correctly filled snake 1 metre long should have sand up to between 65 cm to 75 cm.

If the filling does not move freely then it is likely that the filling is not clean sand. This can affect the ability of the snake to lay flat against the fumigation surface reducing its effectiveness to create a gas tight seal. A correctly filled sand snake can be turned around a right angle corner with an even distribution of sand along the full length of the sand-snake.

Water snakes

Water snakes are much less common than sand snakes. While they can be very effective in creating a gas tight seal they have a number of disadvantages over sand snakes such as:

- water for filling is required on-site
- they are very heavy and can be difficult to move or adjust once filled
- easily punctured
- can make the ventilation procedure more difficult.

Water snakes must be filled to the point where they are still flexible enough to bend at right angles around the corners of the enclosure, lay flat against the fumigation surface and be heavy enough to give a good seal. Particular care should be taken around the corners of the fumigation sheet to ensure they are flattened, otherwise the water will flow to the lowest points reducing the weight and hence their effectiveness. This can also be a problem on uneven surfaces.

Maintaining gas-tightness

The success of the fumigation depends on maintaining the required gas concentrations for the entire exposure period. Some simple and easily performed preparations can greatly assist in improving gas retention on sheeted enclosures. Folding and securing sheets at the corners so they lay flat against the floor improves the effectiveness of the seal. Putting a rope around the enclosure between a third from the bottom and half way will also help to reduce sheet

movement in windy conditions which may result in the sheet working loose and releasing fumigant.

3.3 Un-sheeted shipping containers

Shipping containers can be used as the fumigation enclosure without the need to cover them under a gas-proof sheet. Any container used as a fumigation enclosure without a sheet, is to be set up and managed as a separate fumigation, even if each container is part of the same consignment. For this reason, in some circumstances, it may be more efficient to fumigate multiple containers under a single fumigation sheet.

Container inspection

Before preparing the container for fumigation, the fumigator must:

- check that there is enough space to position and operate the fan inside with the doors closed
- inspect the container for any visible holes or damage that would make it unsuitable
- check the door seals are intact and in good condition
- seal the air vents from the outside using impervious tape that will remain in place throughout the exposure period.

Container preparation

Once the fumigator is satisfied the container is suitable they can now install sampling tubes and fan (and/or heaters) in accordance with the requirements.

Arrange the tubes and leads so they all exit the container where the doors meet at the base of the container. There is more space between the doors at this point making them easier to close and less likely to compress or kink the sampling tubes. Tape or other suitable method of sealing can then be used to reduce leakage further.

Injection of fumigant into the container should be done by inserting the supply hose through the door seals at the top of the container where the doors meet. Remove the supply hose after fumigant injection. A rigid tube may need to be fitted to the end of the supply hose to make it easier to insert through the door seals.

A potential risk that could cause a problem is excessive leakage through the container floor. These leaks may not be able to be detected and, even if they are, it is not practical to fix them if the container is on the ground. If there are significant leaks through the floor the rate of gas loss will be exacerbated by any wind passing under the container. This can be minimised by creating a barrier around the enclosure to reduce the airflow. One of the simplest methods to create this barrier is to use sand snakes to cover any fork-lift holes or gaps. This is not intended to stop any leaks only to slow down the effects of the wind.

The container should be set up on a flat even surface, this prevents the risk of the container twisting resulting in potential gaps at the doors that could increase the risk of gas-leakage.

Sometimes, despite careful preparation and set-up, a container may still leak too much gas to be able to maintain the required concentration throughout the exposure period. If the fumigator is concerned about this then careful monitoring at the start of the fumigation is advisable to give an indication of the rate of gas loss and if it is acceptable. If the monitoring shows a trend that

may lead to fumigation failure, a possible solution may be to enclose the fumigation, as is, under a gas-proof sheet provided the fumigation surface is acceptable.

Another option when fumigating inside an un-sheeted container is to fit a false door to create the gas tight seal. This is normally conducted if the extraction of the gas needs to be carefully controlled or for recapture. The supply pipe, sampling tubes and power leads must pass through the false door and there must be a re-sealable opening to allow fresh air into the container to replace the extracted gases. The door needs to be leak checked and any leaks detected sealed using tape.

The tape used for any sealing should be impervious to methyl bromide and able to withstand wet weather if there is a possibility of rain.

3.4 Fumigation chambers

Most chambers are either converted shipping containers or a structure designed and built specifically for fumigation. The door seals on converted shipping containers need to be inspected regularly for wear.

3.5 Pressure testing

Procedure for performing a pressure test

Check the monitoring tubes, supply pipes and exhaust system valves are closed.

The pressure inside the closed chamber must be raised to 250 Pa. This can be done using highpressure compressed air supplied from a portable compressor or gas cylinders attached to the supply pipe or, in some designs, by reversing the flow of the extraction fans.

Attach a suitable pressure measuring instrument to one of the sampling tubes.

- 1) when the pressure inside the chamber reaches 250 Pa, turn off the compressed air supply
- 2) allow the pressure to decay to 200 Pa
- 3) start measuring the time (in seconds) when it reaches 200 Pa
- 4) stop measuring the time (in seconds) when it reaches 100 Pa
- 5) record the pressure decay time.

Instruments for measuring the pressure decay time

The pressure inside the chamber can be measured using a variety of instruments. These include:

- A simple U tube manometer or an inclined manometer, using a manually operated stop watch
- any sensitive pressure gauge, using a manually operated stop watch
- a purpose made instrument, the CONTESTOR, which combines a pressure sensor with a timer that cuts in when the required pressures have been achieved.

4 Preparing the fumigation enclosure

A safe and effective fumigation requires good preparation.

4.1 Concentration sampling tubes

Concentration sampling tubes must be placed at different points within the enclosure to measure fumigation levels for even distribution and concentration levels at or above any specified minimum amount.

The tubes should be labelled according to their location within the enclosure. The labels should be placed at the end of the sampling tubes outside the risk area to allow easy identification when taking concentration readings.

The internal diameter of the sampling tubes should be suitable for the inlet of the concentration measuring instrument used. The connection must be gas-tight with no fresh air being drawn in contaminating the sample. The usual range of internal diameter is from 2 mm to 6 mm.

The sampling tubes should be long enough to extend outside the risk area to allow readings to be taken without the need to wear PPE.

The tubes should not be able to be compressed easily or susceptible to kinking which may restrict air flow and adversely affect the accuracy of the readings.

4.2 Concentration sampling tube placement – Non-perishable fumigations

Enclosures smaller than 30m³ only requires one sampling tube, therefore, equilibrium is not necessary. The sampling tube should be placed at the top-centre of the commodity.

Enclosures larger than 30m³ must have at least 3 sampling tubes. They should be placed towards the top-back of the enclosure, somewhere around the middle and at the front base. Fumigation of multiple shipping containers under a fumigation sheet requires at least three sampling tubes in the enclosure with at least one in each container. If two containers are being fumigated under a sheet a sampling tube must be placed at the top-centre of the commodity in each container with the third sampling tube placed at the front-base of either container. Three or more containers fumigated as stack sheet require at least one sampling tube in each container placed at the top-centre of the commodity. Therefore, five containers being fumigated under a single fumigation sheet would need five sampling tubes, one placed at the top centre of the commodity in each container.

The reason for positioning the sampling tubes as recommended is to check that the fumigant is evenly distributed throughout the enclosure.

Positioning the tubes in a loaded container can present a problem especially for the two tubes away from the door. Fixing the tubes to rigid poles long enough to extend into the container can solve this problem. Bamboo poles or plastic electrical conduit is commonly used for this purpose. If the configuration of the commodity in the enclosure makes placement of the sampling tubes at the recommended locations impractical, they can be re-positioned to more accessible locations provided the even distribution of fumigant throughout the enclosure can still be adequately determined.

4.3 Concentration sampling tube placement - Perishable fumigations

In addition to the non-perishable sampling tube quantity and positioning requirements, perishable fumigations must have sampling tubes placed in the commodity (within cartons, bags, protective sleeves) to demonstrate that the fumigant has penetrated in sufficient concentrations to achieve an effective treatment.

4.4 **Temperature probes for perishable commodities** Temperature probes for fruit and vegetables

Some perishables require treatment at a specific temperature or within a specific temperature range to ensure the treatment is effective while minimising any adverse effects on the quality of the commodity. If the treatment requires measurement of the internal or pulp temperature of the commodity then suitable temperature probes must be used. Fumigations that require a specific temperature or temperature range must be performed in a facility capable of heating the commodity to the desired temperature and maintaining it for the duration of the fumigation exposure period.

The temperature must be measured by placing the tip of the temperature probe into the centre of a piece of fruit or vegetable located in the middle of a carton. At least three temperature readings must be taken from the fruit/vegetable in three different cartons/pallets and from different varieties within the consignment:

- from one carton at the top of the pallet
- from one carton in the middle of the pallet
- from one carton at the bottom of the pallet.

Calibration of temperature probes used for fruit and vegetables

Temperature probes must be maintained to an accuracy of at least plus or minus (+/-) 1 °C. A suitably qualified technician, manufacturer or distributor will be able to calibrate the probes at least once a year. You can also calibrate the probes using the following method.

Ice Water Slurry

- crush several pieces of ice (about 50 g to 100 g) and place in a small container such as a drinking glass
- add enough cold water to produce a slurry but not so much that the ice floats
- stir the ice slurry vigorously and let stand for approximately 5 minutes
- insert the probe into the slurry and wait at least one to two minutes for the reading to stabilise
- record the temperature
- take three further readings at least one minute apart.

If consecutive readings are not within 0.5 $^{\circ}\mathrm{C}$ replace or service the probe.

If the temperature readings are higher than +1 °C or lower than -1 °C attach a label to the probe showing the date the calibration check was made and the variation from 0 °C. Alternatively purchase a new probe.

The complete measuring system (sensor probe, cable and data logger) has to be checked and calibrated, not only the sensor.

The date and result of the calibration of each thermometer must be recorded.

4.5 Fumigant supply pipes

Aluminium tubing should not be used for any part of the system used for the application of methyl bromide as it can react violently on contact with liquid methyl bromide.

The method used to inject methyl bromide into the enclosure will vary depending on the type of enclosure used.

If the fumigation is conducted in an un-sheeted container then the gas can be injected using a rigid tube fitted to the end of the supply pipe and pushed through the door seals, usually at the top where the doors meet. Once injection is complete the tube is withdrawn and the door seal can be checked for leaks. If additional fumigant needs to be added to the enclosure simply reinsert the supply tube through the seal.

Where a sheeted enclosure is used, the pipes should be disconnected from the vaporiser after injection is complete, sealed to prevent leakage and left in position for the duration of the exposure period in case additional fumigant is required. The supply pipes should be positioned so the fumigant is directed into the free airspace to aid circulation and secured in place to prevent it from moving around due to the force of the gas exiting the pipe. The outlet should be positioned away from the sampling tubes. If the supply pipes are not purged of methyl bromide after injection is complete they will contain pure methyl bromide which will slowly diffuse out of the pipe and may create a localised pocket of higher concentration near the outlet and any nearby sampling tube. Placement one to two metres away from the sampling tubes should be sufficient.

Using more than one supply pipe in larger enclosures will help to achieve even fumigant distribution faster. Fumigations of multiple containers in a single sheeted enclosure must have at least one supply pipe placed in each container.

Where more than one supply pipe is used, the fumigant can be released into the enclosure through the pipes simultaneously if the pipes are balanced. A balanced system is where the supply pipes are of equal internal diameter and equal length so an equal amount of fumigant will flow through each pipe. Using multiple supply pipes that are balanced can significantly shorten the time taken to achieve equilibrium. If the multi-pipe supply system is not balanced then an equal proportion of fumigant should be released through each pipe in turn until the entire dose has been applied.

4.6 Fans

Since methyl bromide is more than three times heavier than air, it diffuses outward and downward readily, but requires fans to ensure upward movement and equal gas distribution. Fan circulation also enhances penetration of methyl bromide into the commodity. Once the gas

is evenly distributed, it will be maintained for the duration of the treatment unless an outside event such as excessive leakage occurs.

One or more fans must be used in each enclosure to force the fumigant to mix thoroughly with the air and circulate throughout the entire enclosure until even gas distribution is achieved.

Fumigations in shipping containers, whether it is a single container or multiple containers under one fumigation enclosure, must have at least one fan placed in each container. The fans should be positioned so that an air flow will be created to rapidly disperse the fumigant evenly throughout the enclosure. The capacity and/or number of fans used should be proportionate to the volume of the enclosure. The total combined air flow capacity of the fans in each enclosure should be sufficient to move the equivalent of the enclosure volume of air every one to two minutes.

It is very important to check that the fans are working when they are installed. After testing the fan make sure that the power switch on the fan itself is left on and turn it off by unplugging the lead from the power source on the outside of the enclosure. Once the enclosure is sealed and under gas the fans can't be operated if the power switch inside the enclosure is off.

Fans should be turned on 10 minutes to 15 minutes before releasing any fumigant into the enclosure and continue to run until equilibrium is reached. The time it takes to achieve equilibrium will vary depending on factors such as, how tightly packed the commodity is, the size of the enclosure, the capacity of the fans and the number of supply pipes used to introduce the fumigant. It is a matter of experience to judge how long to run the fans before taking the first readings.

Fans should be turned off prior to taking any concentration readings. Once even gas distribution has been achieved there is no practical benefit in continuing to run the fans so they can be switched off until ventilation unless there is a need to add additional fumigant during the exposure period.

5 Calculating the dose

To achieve an effective fumigation the target of the fumigation must be exposed to a sufficient concentration of fumigant for a sufficient length of time to achieve a lethal dose. The dosage rate and any minimum retention rate, is set to effectively treat all life stages of the target pest.

Fumigations must be conducted in enclosures that are sufficiently gas-tight to maintain concentration levels above the minimum requirement over the duration of the exposure period. Typically, there will be a reduction of fumigant concentration in the enclosure over time due to penetration into or sorption by the commodity and leakage from the enclosure. To ensure that the target pest is subjected to a lethal concentration of fumigant over the entire exposure period a minimum final retention rate may be required. The minimum retention rate is a percentage of the dosage rate concentration which must be met or exceeded at the end of the fumigation exposure period.

5.1 Dose rate

The dose rate specifies the concentration of fumigant that must be initially applied to the enclosure and the required exposure period.

Ct product

The amount of fumigant required to achieve the lethal dose is referred to as the dosage rate and is expressed as a function of concentration and time, commonly referred to as the Ct product. It is an expression of the minimum total cumulative exposure to the fumigant needed to effectively treat the biosecurity risk associated with the consignment.

The starting dose is set to achieve the required Ct product taking into account gas loss during the exposure period from leakage and sorption. For example, timber is typically fumigated with methyl bromide at a dosage rate of 48 g/m³ for 24 hours giving a Ct product of 48 x 24 which is 1152 g/h/m^3 , assuming no gas loss. In reality the actual Ct product, taking into account gas loss, is around 500 g/h/m³ based on a retention rate of 30% after 24 hours.

5.2 Dose rate compensation for temperatures below 21 °C

The most important environmental factor influencing the action of fumigants is temperature as the toxicity of a fumigant depends on the respiration rate of the target organism. Generally, the lower the temperature, the lower the respiration rate of the organism making it less susceptible to the mode of action of the fumigant. To compensate for this effect, fumigation at lower temperatures requires a higher concentration of fumigant than fumigation at higher temperatures.

For practical purposes, it is increasingly difficult to kill insects with fumigants when the temperature is 10 °C or less. In general, the effectiveness of fumigants becomes unreliable below 10 °C so fumigation is not permitted where the temperature is expected to fall below 10 °C at any stage during the exposure period.

The expected minimum ambient temperature must be used to determine any adjustments to the dosage rate for fumigations performed outside or in facilities without adequate temperature control. The temperature can be obtained by checking the official forecast minimum temperature of the nearest locality to the fumigation site.

The adjustment schedule for temperatures below 21 °C is:

- 21 °C and above no adjustment allowed
- 16 °C to 20 °C add 8 g/m³ to the prescribed dose rate
- 11 °C to 15 °C add 16 g/m 3 to the prescribed dose rate
- 10 °C add 24 g/m³ to the prescribed dose rate.

If the ambient temperature is expected to fall below 10 °C heaters can be used to increase the temperature and maintain it at a satisfactory level for the duration of the exposure period. There will be a gradient within the enclosure where the temperature will progressively decrease the

greater the distance from the heat source. Using fan heaters can improve the heat distribution in the enclosure but they may also contribute to an increased loss of methyl bromide from the enclosure, for this reason, the enclosure needs to be as gas-tight as practical.

The use of a min/max thermometer within the enclosure to measure the minimum temperature is recommended. Where possible it should be placed at the point farthest away from the heat source. By recording the actual minimum temperature in this way the fumigator can improve the accuracy of their estimates when using heaters in fumigation enclosures.

Sufficient time must be allowed for the enclosure and the commodity to reach the desired temperature prior to starting the fumigation.

Position the heaters within the enclosure so they will not present a fire risk or cause damage to the commodity.

If there is a need for heaters it is advisable to set up the fumigation at the warmest time of the day. It is more efficient and effective for the heaters to try and maintain a steady temperature rather than try to re-heat a cold enclosure.

5.3 Temperature

Unless specified otherwise, the minimum expected ambient air temperature within the enclosure during the exposure period should be used to determine any adjustments to the dosage rate.

Some commodities, particularly perishables, require treatment at a specific temperature or within a specific temperature range to ensure the treatment is effective while minimising any adverse effects on the quality of the commodity that may result from increased temperatures. If the treatment requires measurement of the internal or pulp temperature of the commodity then suitable temperature probes must be used. Fumigations that require a specific temperature or temperature range must be performed in a facility capable of heating the commodity to the desired temperature and maintaining it for the duration of the fumigation exposure period.

The expected minimum ambient temperature for fumigations performed outside or in facilities without adequate temperature control should be obtained by checking the official forecast minimum temperature of the nearest locality to the fumigation site.

Sufficient time must be allowed for the enclosure and the commodity to reach the desired temperature prior to starting the fumigation.

Where the temperature within a fumigation enclosure has been controlled, either through mechanical heating or placement within a larger climate controlled environment, the ambient air temperature should be monitored continuously throughout the duration of the fumigation and recorded at least at intervals of 60 seconds. This is to ensure the temperature does not fall below the allowable minimum temperature at any point during the fumigation.

5.4 Dose Calculation

The three methods for measuring the dose are by:

• volume

- weight
- can of fumigate equals 1 pound (454 g) and 1 ½ pound (680 g)

If cans are used the fumigator must round the dose up to the next full can, calculate using a combination of 1 and 1 ½ pound cans (454 g and 680 g respectively) to get the optimal combination. Partial use of a can is not permitted so the dose in this case must comprise one or more full cans.

Due to the inaccuracy inherent with measuring the dose by weight or volume the actual amount of methyl bromide injected into the enclosure will vary slightly to what was intended. The actual amount used, as far as can be practically determined, must be recorded on the Record of Fumigation.

5.5 Enclosure volume

The volume of the enclosure must be calculated from the measured dimensions. When fumigating sheeted enclosures the measured external dimensions should be used. The dimensions of sheeted enclosure should be measured each time because significant variations in volume can occur depending on the set-up of the enclosure.

If the enclosure is an un-sheeted container or a chamber the known internal volume of the enclosure can be used. The volume of any gas circulation equipment external to the chamber must be included in the calculation of the enclosure volume.

No reduction in the volume and therefore, the dosage, is allowed to account for any displacement of air in the enclosure by the commodity.

5.6 Chloropicrin

Some fumigants can be supplied mixed with other gases so the fumigant is diluted to less than 100%. For example, methyl bromide is commonly supplied with a mixture of 2% chloropicrin. Methyl bromide is colourless and odourless at concentrations normally encountered during fumigation so the chloropicrin is added as a warning agent.

If the fumigant is mixed with another gas the dosage must be adjusted to compensate for the dilution. The dosage is divided by the percentage of the active fumigant in the mixture to give the total amount of fumigant mix that needs to be released into the enclosure to achieve the specified dosage rate concentration.

5.7 Rounding

Whichever method is used to measure the amount of methyl bromide to be used it is not always possible to do it precisely so there will always be some degree of error. For this reason the calculated dose should be rounded up to the nearest reliably measurable increment for the equipment being used. Rounding is always completed once all other calculations have been completed.

6 Applying the dose

6.1 Vaporising the methyl bromide The purpose of vaporisation

The main reason the methyl bromide must be completely vaporised is to prevent liquid methyl bromide from being released into the enclosure. If liquid methyl bromide comes into contact with the commodity it can cause cold 'burns' as it continues to try and draw the heat from the environment it needs to evaporate. Not only can this cause damage to the commodity, it is potentially dangerous as liquid methyl bromide reacts explosively on contact with aluminium, magnesium and zinc (gaseous methyl bromide does not do this).

It is poor fumigation practice to not fully vaporise the methyl bromide and the fumigator may be held responsible if the product is adversely affected as a result.

In addition, vaporising the methyl bromide has the added benefit of energising the methyl bromide molecules improving the speed of dispersion throughout the enclosure and encouraging more rapid penetration into the product if it is porous.

Vaporiser design

There are two related factors that affect the vaporisation of methyl bromide, the first is temperature and the second is pressure. The higher the temperature i.e. the more heat available, the greater the tendency there is for the liquid to become a gas. Conversely, the higher the pressure the greater the tendency there is to stay as, or turn back into, a liquid. Both these factors need to be taken into account to ensure that the methyl bromide is fully vaporised before it reaches the enclosure.

Methyl bromide is supplied as a liquid under pressure in cylinders or cans. As the methyl bromide is released it changes from a liquid to gas, this process requires energy in the form of heat which it draws from the immediate surroundings. When it vaporises the methyl bromide increases 275 times in volume and this expansion increases the pressure in the supply hose. If this pressure gets too great and there is not enough heat available the methyl bromide will turn back into a liquid. As more methyl bromide passes through the supply system there is progressively less and less heat available so the liquid methyl bromide will travel further towards the outlet without vaporising until it exits into the enclosure.

The vaporiser is a heat exchanger that uses a metal coil immersed in a container of hot water to provide the energy needed to ensure that the methyl bromide is fully vaporised and remains in a gaseous state. There is a direct relationship between the amount of methyl bromide passing through the system and the energy available to turn it into a gas. If there is insufficient heat available the pressure build-up in the supply system can turn the methyl bromide back into a liquid.

Following is a simple design for a versatile and portable vaporiser suitable for most fumigation situations that would be covered by the Methyl Bromide Fumigation Methodology.

The heat transfer coil

The coil should be made from copper tubing because it is a good conductor of heat. The coil can be made from one continuous length that should be at least 12 metres long and with an internal diameter (ID) no greater than 12 mm. Internal diameters larger than 12 mm proportionally decreases the ratio of surface area to volume (assuming equivalent flow rates) making the vaporisation process less efficient as the internal diameter increases. This, in combination with allowing the methyl bromide to pass more quickly through the system, increases the chances of liquid methyl bromide exiting the supply pipe unless the flow rate is carefully monitored and controlled.

Another design option for the coil is to construct it from three five metre lengths of copper tubing of progressively increasing from 6 mm ID to 9 mm ID and finally 12 mm ID (Figure 2). This smaller ID at the start of the coil restricts the flow rate of methyl bromide from the supply cylinder and the subsequent increasing size improves the flow of the gas in the direction of the by avoiding excessive back-pressure which can re-liquefy the Methyl bromide.

Figure 2 Copper tubing with progressively increasing diameter to avoid back pressure



Direction of flow of fumigant

The lengths of tubing must be carefully joined in a manner that is completely gas-tight. The joins should be checked regularly as they can be susceptible to leaks, particularly if the vaporiser is moved around frequently.

Whichever coil design is used, suitable connectors should be used to join the coil to inlet and outlet of the vaporiser.

The water container

The water capacity of the vaporiser should be proportional to the length of the heat transfer coil. A water volume between 20 litres to 25 litres would be adequate for the coil specifications described above.

The container should be constructed of a material suitable for the heating method used. Stainless steel is a good option.

It is advisable for the vaporiser to have handles so that it can be moved if needed while it is full of water.

A lid that can be easily removed once the water is hot to make it easier to monitor the water temperature during injection. Alternatively a thermometer or steam whistle could be used.

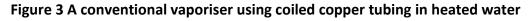
Heating the water

The heating method used should be able to heat the water to boiling in around 20 minutes to 30 minutes, this is about the time it would normally take an experienced fumigation team to prepare the enclosure for fumigation.

The method of heating must also be able to maintain the water temperature above 65 °C while the fumigant is being injected. The vaporisation process will draw heat from the water as the Methyl bromide passes through the coil so the heat source must continue operating during injection to replace the lost heat.

It is strongly recommended that good capacity gas burners are used. A cowling should be included to support the container above the gas burner and to protect the burner from the wind. Electrical heating elements are acceptable but they are generally less effective than gas slowing down the rate at which the gas can be injected (Figure 3).

Fumigant outlet Fumigant inlet Copper coil Support cowling Gas burner



Fittings and connections

The choice of fittings for both inlet and outlet will depend on the individual and the equipment used. However it is strongly recommended that good quality gas rated fittings are used. Threaded fittings on all gas piping is recommended, rather than relying on hose clamps to hold piping in place on bare copper tubing. It is never a good idea to use tape to join any part of the supply system.

Using the vaporiser

Prior to use, the vaporiser should be inspected for damage and that the connections and fittings are in good order.

Set up the vaporiser inside the risk area and start heating the water so that it will be ready to use as soon as the enclosure has been prepared. Do not connect the vaporiser to the cylinder until just before you are ready to inject the gas.

Check the vaporiser for leaks by releasing a small amount of methyl bromide from the cylinder and test all the connections along the supply system with a suitable leak detector. Fix any leaks before starting to inject the dose into the enclosure. Be careful to open the supply valve slowly to

avoid rapid pressurisation of the system which could result in weak or poor connections coming apart releasing methyl bromide into the area. Suitable respiratory protection must be worn while releasing the methyl bromide.

While the required minimum water temperature is 65 °C it is recommend that the water be kept on the boil prior to and during the injection process as this allows the operator to easily check that the temperature is above the mandatory requirement. If the water is not boiling or the operator cannot see if it is, then a simple method to test that the temperature is acceptable is to hold the outlet hose about a metre from the vaporiser with bare hands. If it is almost too hot to hold firmly then the water temperature should be sufficient.

The operator must regulate the flow of the methyl bromide so that the temperature of the water is maintained and there is not excessive build-up of pressure in the system. Some vaporisers are fitted with thermometers or pressure gauges to assist with managing the rate of release. If the water temperature drops too low, slow or stop the methyl bromide until the temperature has time to recover and recommence releasing the methyl bromide at a slower rate.

6.2 Checking for leaks

Excessive leakage from the enclosure may cause the fumigant concentrations to fall below acceptable levels resulting in an ineffective fumigation.

Carefully check the enclosure for leaks. For sheeted enclosures check where the sheet meets the fumigation surface around the entire enclosure. Particular attention should be paid to the corners, where the monitoring tubes and leads exit the enclosure, any cracks or expansion joints in the floor and any temporary repairs made to the sheet.

Check around the door seals of un-sheeted containers used as enclosures.

The leak detection equipment must be sufficiently sensitive to detect fumigant concentrations low enough to find a leak that warrants attention. As a general guide the leak detector should be capable of detecting concentrations down to 30 ppm.

The leak detection equipment must be fit for purpose and properly maintained in accordance with the manufacturer's instructions.

Halide leak detection lamp

A halide lamp works on the principle that a flame in contact with a clean piece of copper will burn with a green to blue flame if vapour of an organic halide is present in the surrounding air. The copper ring must be kept clean and replaced regularly to ensure proper functioning. These instruments can be used to detect methyl bromide in the air for the purpose of detecting serious leaks which can then be rectified to prevent excessive loss of fumigant and thereby reduce the likelihood of fumigation failure (Table 1). At increasing concentrations of the halide gas, the colour changes from green to greenish-blue or blue.

Table 1 Determining methyl bromide concentrations with the halide detector

0 No reaction	Concentrations in air - parts per million	Reaction of flame
	0	No reaction

Concentrations in air - parts per million	Reaction of flame
10	Very faint green tinge at edge of flame
20	Light green edge to flame
30	Light green flame
100	Moderate green
200	Intense green, blue et edge
500	Blue green
1 000	Intense blue

Note: Owing to variations in response of individual lamps, readings below 30 ppm are unreliable.

Halide detection lamps cannot be relied upon for accurate quantitative measurements. They are useful for indicating the presence of immediately dangerous concentrations, for preliminary checking the effectiveness of aeration and for finding leaks during treatment. They are not suitable for checking threshold limits for continuous daily exposure to methyl bromide; a more accurate method must be used for final determination of gas clearance after ventilation.

Changes in the colour of the flame can be difficult to identify, particularly in direct sunlight or brightly lit areas. Halide lamps cannot be used by colour blind people.

Electronic gas detection

There is a range of electronic methyl bromide gas detection equipment available that are more sensitive and easier to use then a halide lamp. There are two types of electronic leak detectors, ones that only detect the presence of methyl bromide and those that give an actual value for the concentration detected. Leak detectors that provide quantitative reading of the concentration are also suitable for checking TLV if they can detect concentrations below 5 ppm.

Leak detectors used for refrigerant gases are not suitable for use with methyl bromide and are not acceptable.

6.3 Circulating the fumigant

The methyl bromide must be evenly distributed throughout the enclosure to ensure that fumigant concentrations are sufficient to administer a lethal dose to the target pests.

Methyl bromide is considerably heavier than air (3.27 times) and could be described as a 'lazy' gas. If it is allowed to disperse naturally, there will likely be areas of high concentration near the outlet and lower concentrations further away. Smaller spaces between and air pockets within the goods are particularly susceptible to lower concentrations as the natural movement of air is less effective in dispersing methyl bromide into these areas.

Mechanical agitation of the air is required to force rapid dispersal of the fumigant throughout the enclosure and into the spaces between and within the commodity. It is most common to use an electric fan for this purpose.

There is no specified minimum capacity as the suitability of a particular fan will depend on the size of the enclosure, how the consignment is configured and the amount of free airspace. However, the fan will have a direct effect on how quickly equilibrium is reached and therefore when start-time is achieved.

A fan with a capacity of at least 30 cubic metres per minute would be reasonable for an enclosure around 30 m³ in volume (equivalent to a 20 ft shipping container)—a 40 cm domestic fan will normally be capable of meeting this requirement.

For larger enclosures it is advisable to use a higher capacity fan and, for large stacks over 100 m³, multiple fans would further assist in achieving equilibrium.

Turn the fan/s on 5 minutes to 10 minutes prior to injecting the gas to get the air moving. As the methyl bromide is injected this will encourage the methyl bromide to mix with the air and be distributed throughout the enclosure. Even though methyl bromide is heavier than air the tendency for it to accumulate in higher concentrations lower down in the enclosure is minimal during normal fumigation exposure periods if it has been thoroughly mixed with the air from the beginning.

The fans must be running during the injection phase and for as long as necessary to achieve equilibrium. The fans should be turned off prior to taking the concentration readings to allow the air in the enclosure to settle. This helps to get more accurate and stable readings.

It is not necessary to run the fans again once equilibrium is achieved unless additional methyl bromide is added to the enclosure.

7 Monitoring fumigant concentration levels

The principal objective of fumigation is to maintain an adequate concentration of fumigant within the enclosure for a sufficient length of time for all pests, including different stages of their life cycle, to receive a lethal dose. The only way to determine if the minimum concentration levels have been met is to take concentration readings at the start of the fumigation and again at the end. If both these readings are at or above the minimum level specified for the time they were taken, then the concentrations have met the minimum requirements throughout the entire exposure period.

Every concentration reading must also show the time at which it was taken. When taking readings from more than one sampling tube, the time should be recorded after the final concentration reading was taken, and used as the time for all the readings in that set.

7.1 Concentration measuring instruments

There are a number of suitable monitoring instruments that can be used. While price is always a significant factor in choosing equipment, careful consideration should be given to the reliability and ease of use. Some of the brands on offer can be more difficult to use in the field then it would first appear. It would be prudent to carefully research what brand and model would represent the best choice to suit each fumigator's individual circumstances. When deciding on a fumigation monitoring instrument you should consider the following:

- accuracy
- detection range

- durability
- reliability
- sensitivity to other factors such as carbon dioxide and moisture
- cycle time between readings
- ease of use
- portability if required
- calibration and maintenance requirements
- after sales service
- purchase price and ongoing costs for maintenance and repair.

The detection range should be between 2 g to 200 g/m³ (1 g/m³ = 250 ppm)

Figure 4, Figure 5 and Figure 6 are three of the most widely used instruments for monitoring methyl bromide fumigations.

Figure 4 Fumiscope version 5.0 and 5.1 range = 0 to 2999 g/m³



Note: Fumiscope version 5.1 operation manual <u>fumiscope.com/pdf/51englishlanguagefumiscopemanual.pdf</u> (PDF 15.78KB)

Figure 5 Riken FI-21 range = 0 to 200 g/m³



Note: Riken FI-21 instruction manual rkiinstruments.com/pdf/mFI-21.pdf (PDF 546KB)

Figure 6 Uniphos 251PM-F range = 0 to 200 g/m³



Some perishable commodities (for example; garlic, onions or mangoes) release high amounts of carbon dioxide and this affects gas measurements in some instruments. It is particularly important to maintain the carbon dioxide and moisture filters fitted to instruments.

It is not uncommon to see experienced fumigators using their equipment incorrectly, so it is important for all fumigators to read and understand the user's manual for their instrument even if they are trained by a colleague.

Maintenance and calibration records must be kept for all monitors.

7.2 Monitoring frequency

There may be times when it is necessary for the fumigator to take concentration readings in addition to the mandatory readings. If the fumigator is concerned that fumigant levels may fall below the required concentration, then the fumigator should carefully monitor the fumigant levels and take preventative measures if needed.

The minimum gas retention rates assume that there will be a certain amount of gas loss during the fumigation due to leakage and/or sorption. The rate of gas loss tends to be highest at the start of the fumigation and then stabilises. If there are any leaks then the enclosure will be losing gas until the leaks are found and fixed. Any sorption will happen early in the exposure period until the product becomes saturated.

Another important factor is the degree of penetration into the commodity. The goods will occupy a volume of space within the enclosure making less air space available for the fumigant. Due to this, the initial concentrations measured will be somewhat higher as the dose is calculated assuming an empty enclosure. If the goods are porous, timber for example, then the methyl bromide will progressively penetrate into the goods, reducing the methyl bromide in the surrounding space. The rate and extent of penetration depends on a number of factors and will vary considerably depending on the nature of the goods.

To account for these factors the minimum concentration levels allow for a 50% loss of gas in the first 4 hours. If the rate of loss is greater than this it is almost certain that the concentration levels are going to fall below the minimum levels and the fumigation will fail unless the problem is identified and addressed.

7.3 Start time of the fumigation

The fumigation exposure period starts when the following occurs.

- 1. All concentration readings are equal to or above the standard concentration, and
- 2. Equilibrium has been established.

It is a common mistake for fumigators to start the exposure period as soon as they get equilibrium and overlook the need for the concentration to be above the required level. Whenever any concentration readings are taken the fumigator must first check if they are at or above the required level for the time at which they were taken.

7.4 Minimum concentration levels

If any of the readings show that the concentration level has fallen below the standard concentration specified for the time the reading was taken then, technically, the fumigation has failed. Rather than automatically requiring the fumigation to be conducted again it is permitted, in some circumstances, to add additional methyl bromide to the enclosure to get the concentration levels back to a satisfactory level and continue the fumigation.

STANDARD CONCENTRATIONS REQUIRED AT SPECIFIC MONITORING TIMES *Concentration of original fumigant required Monitoring times* 15 – 30 minutes 85% or more 30 minutes – 1 hour 75% or more 1 hour 70% or more 2 hours 60% or more 4 hours 50% or more 12 hours 35% or more 24 hours 30% or more 48 hours 25% or more

Below is a table outlining the standard methyl bromide concentrations required at specific monitoring times.

7.5 End of exposure period

If any of the readings show that the concentration level has fallen below the standard concentration specified for the time the reading was taken then, technically, the fumigation has failed. Rather than automatically requiring the fumigation to be conducted again it is permitted, in some circumstances, to add additional methyl bromide to the enclosure to get the concentration levels back to a satisfactory level and continue the fumigation.

8 Topping-up to compensate for low concentrations

8.1 Topping-up

If concentration monitoring indicates that fumigant levels are at risk of falling below the standard concentration, then the target of the fumigation may not be exposed to the minimum lethal dose needed to for effective treatment. Therefore, in some circumstances, the fumigator can add extra methyl bromide to increase the concentration levels to prevent the fumigation from failing.

If the concentration falls below the standard concentration before even gas distribution has been achieved there is probably excessive leakage from the enclosure. For sheeted enclosures it is most likely due to fumigation sheets not being suitable or in poor condition, a porous fumigation surface or proper care was not taken to create a good seal between the sheet and the fumigation surface. Before adding any additional methyl bromide the fumigator must find and fix the cause of the problem.

8.2 Calculating the top-up amount

Start of the fumigation

Once the problem has been identified and fixed the fumigator needs to take another set of readings to determine how much fumigant remains in the enclosure, as the fumigant would have continued to leak until the problem was fixed.

Use the lowest of these readings to calculate the amount of additional methyl bromide to add by subtracting the lowest reading from the initial dose concentration to give a value in g/m^3 . This is then multiplied by the enclosure volume to give you the amount of methyl bromide to be added to the enclosure.

The fumigation now effectively starts again and all the requirements for injecting the gas, even gas distribution and start time apply.

If start point can be achieved then the fumigation can proceed but it would be sensible to take some additional readings an hour or so after the start to check that the concentration levels have been maintained.

8.3 Restrictions on topping-up

Topping up is not permitted for perishable fumigations as over exposure to the fumigant can harm the product, such as reduced shelf-life, and this may not become apparent until sometime after the commodity has been treated. It is important that the fumigator takes this into account when preparing to fumigate and take appropriate measures to ensure the fumigation will be effective without the need to top-up.

Topping-up is not permitted to compensate for excessive leakage from the enclosure. The fumigator is responsible for ensuring that the enclosure is sufficiently gas-tight that the required fumigant retention is met without the need to top-up.

8.4 Topping-up during the exposure period

The need to top-up during the exposure period could be a result of sorption, leakage or a combination of both. The process of sorption occurs mostly at the start of the fumigation and then tapers off as the consignment becomes saturated. Therefore, there should be no need to top-up due to sorption once the fumigation start time has been achieved. If the need to top-up is because of leakage then this will continue unless the leak is found and fixed.

If the enclosure has been carefully leak checked and there is a need to top-up more than once during the exposure period, then it would indicate that the fumigation sheet is not suitable and is unable to retain the methyl bromide for the required time. If the sheets are not made of a suitable material the gas will pass through the sheet. The cumulative effect over a large surface area can be significant and lead to excessive gas loss even if it can't be directly detected. If this is the case, the fumigation sheet needs to be replaced before re-starting the fumigation with one that is suitable.

8.5 Topping-up at the end of the exposure period

If a top-up is necessary at the end of the exposure period, the only difference between this and topping up during the exposure period is the need to extend the exposure period by 4 hours. If this is a regular occurrence it is indicative of poor gas retention. The fumigator should identify and address the problem before conducting any further fumigations.

9 Ventilating the enclosure

At the end of the exposure period the enclosure must be safely vented to remove the fumigant from the consignment by exposure to fresh air until the concentration of fumigant is below the required TLV.

Sufficient free airspace and turning the fans on will help to ventilate the enclosure more quickly. The time taken to ventilate depends on a number of factors such as the size of the enclosure, how tightly packed the commodity is, whether there is sorptive materials in the enclosure and the degree of penetration into the goods.

The methyl bromide in the air around the commodity will dissipate rapidly once the enclosure has been opened. If, however, the methyl bromide has penetrated into the commodity, for example timber or cardboard boxes, then it will take considerably longer for the gas to diffuse out of the goods. This process could take 24 hours or more depending on the nature and configuration of the commodity. The fumigator needs to plan for this prior to starting the fumigation.

9.1 Threshold limit value – time weighted average (TLV-TWA)

The TLV is the maximum concentration of fumigant that the average person can be safely exposed to day after day over a working lifetime without adverse health effects. The TLV is an estimate based on the known toxicity in humans or animals of a given chemical substance. The limits specified are subject to change as new information emerges that may modify the risk

assessment for a particular substance. Therefore it is strongly advised that any exposure to fumigants be minimised as much as possible unless proper respiratory protection is worn.

The TLV-TWA for fumigants are expressed as parts per million (ppm) or part parts per billion (ppb).

Three types of TLVs for chemical substances are defined:

- Threshold limit value Time weighted average (TLV-TWA): average exposure on the basis of an 8 hour/day, 40 hour/week work schedule. For methyl bromide the TLV-TWA is widely accepted as 5 ppm.
- 2) Threshold limit value Short-term exposure limit (TLV-STEL): spot exposure for a duration of 15 minutes, that cannot be repeated more than 4 times per day with at least 60 minutes between exposure periods. For methyl bromide the TLV-STEL is widely accepted as 15 ppm.
- 3) Threshold limit value Ceiling limit (TLV-C): absolute exposure limit that should not be exceeded at any time. There is currently no TLV-C defined for methyl bromide.

The TLV is different for each fumigant and may also vary from country to country. The TLV for methyl bromide is 5 ppm.

The equipment used to test for TLV must be sensitive enough to accurately and reliably detect concentrations in ppm below the TLV.

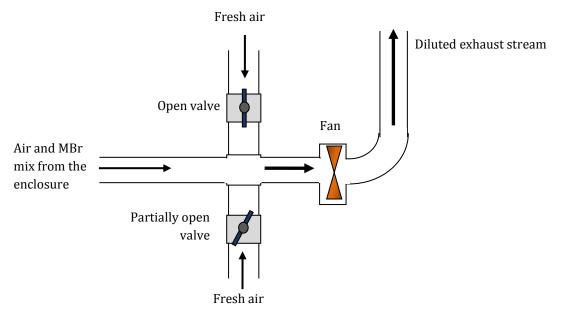
9.2 Releasing the fumigant from the enclosure

Releasing the fumigant from the enclosure is the only time a fumigator knowingly exposes themselves and possibly others to methyl bromide. The fumigator needs to actively manage the risk to themselves and anyone in the vicinity. The fumigator should control the rate of release by progressively opening up the enclosure so the fumigant is not released as a large plume which can travel further and in higher concentrations than it would otherwise do.

If electronic leak detection equipment is available these should be used to verify that the buffer zone around the enclosure is sufficient and when and by how much it can be decreased as the ventilation proceeds.

If there are local regulations that set a maximum concentration that can be released from the enclosure the fumigator must dilute the exhaust stream to restrict the concentration under the level specified. This is normally achieved by drawing the air from the enclosure through a duct attached to a tall chimney so the gas is released high above ground level. The exhaust stream is diluted by valves along the duct that controls the amount of fresh air drawn in from the surrounding area (Figure 7).





Procedure for ventilating a sheeted enclosure

Remove all the sand snakes except a few down both sides of the enclosure. At one end, lift the sheet on both corners to no more than waist height and secure, use the belly rope if there is one. Do this first on the downwind direction so the wind doesn't get under the sheet and lift it off before you are ready. Repeat this procedure at the upwind end, then pull the sheets out at the sides. The few sand snakes that were left down the sides will hold the sheets in place creating a wind tunnel effect. Wait for 5 minutes to 10 minutes until most of the fumigant has dissipated then remove the sheet entirely.

Procedure for ventilating an un-sheeted shipping container

Remove the tape from the vents then open the right-hand door slightly and leave ajar. In windy conditions a rope or chain can be used to prevent it from blowing open and a block of wood or similar can be inserted to prevent the door from closing. After 10 or so minutes both doors can be open fully and the container left until ventilation is complete.

Checking the TLV-TWA

Ventilation of the enclosure and aeration of the commodity must continue until concentration levels in the enclosure are at or below the TLV-TWA. Attach the TLV measuring instrument to the monitoring tubes positioned in the centre or back of enclosures to check if TLV has been reached at all points.

The concentration levels in the free airspace will fall relatively quickly compared to the rate of methyl bromide diffusion back out of the commodity. It is particularly important that the consignment is fully aerated if it is fumigated in a shipping container. Once the container is closed, concentrations levels can increase again to unsafe levels as the methyl bromide continues to diffuse out of the commodity. This has the potential for unprotected personnel to be exposed to unsafe levels of fumigant when the container is opened at its destination.

9.3 Releasing the consignment from the fumigator's control

The fumigator is responsible for the consignment while it is being fumigated. It can only be released from the fumigator's control once methyl bromide concentration are at or below safe levels (5 ppm for methyl bromide).

10 Documentation

The specific details for each fumigation must be recorded to the extent necessary to demonstrate that the fumigation complied with all the requirements of the methodology. If mandatory information such as concentration readings or times of readings are not recorded, then they are considered to not have occurred. This will result in non-compliance with the methodology.

10.1 Completing the record of fumigation

Figure 8 Information to include within the job details section of the record of fumigation

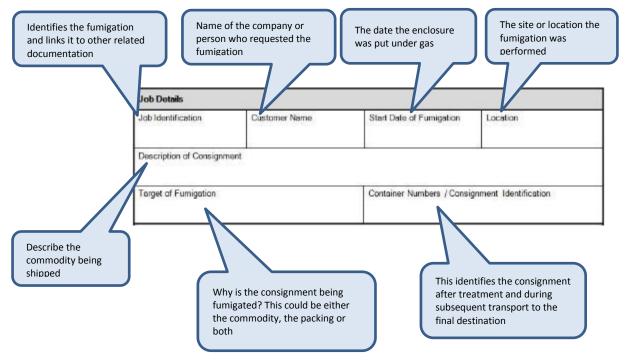


Figure 9 Information to include within the fumigation details section of the record of fumigation

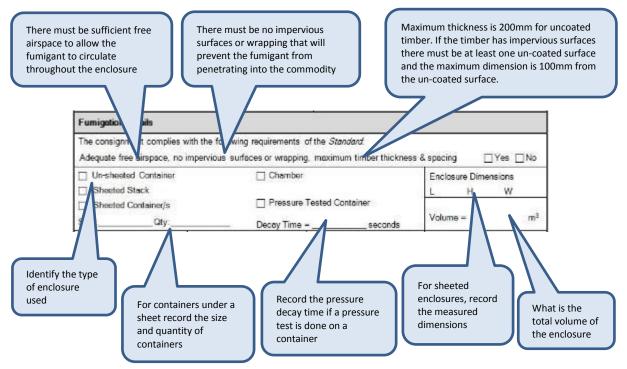
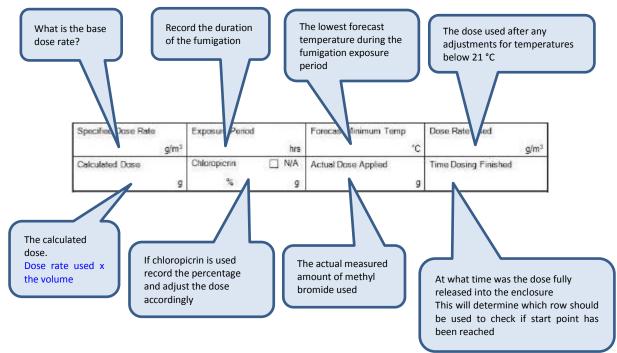
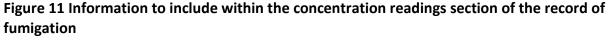


Figure 10 Information to include within the fumigation details section of the record of fumigation—additional



Department of Agriculture and Water Resources



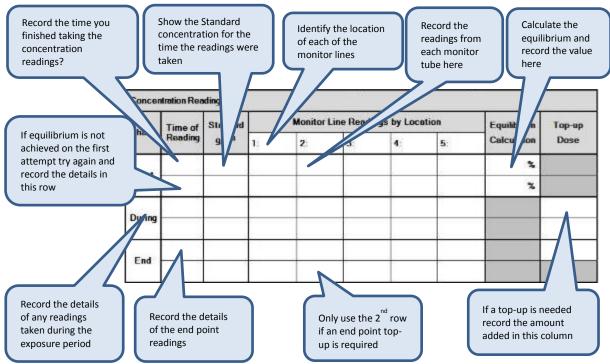
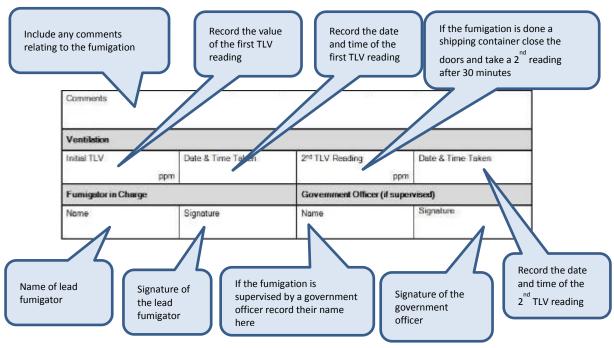


Figure 12 Information to include within the ventilation and fumigator in charge sections of the record of fumigation



Department of Agriculture and Water Resources

Record of fumigation – Perishables

Additional information required for the Record of Fumigation for perishables.

Methyl Bromide - Record of Fumigation for Perishables

Job Details					
Job Identification	Customer Name	Date of Fumigation	Location		
Consignment Identification		Certificate Reference			
Description of Consignment		Description of Packaging			

Furnigation Details									
Treatment	t Dose Rate	Treatme	ent Temp	Dose Rate	Used	Volume		Dose Am	ount
g/m	n³ hrs		°C		g/m³		r	m ³	g
L	.oad Factor:	Maximu	ım:%	Pro	be location:	🗖 Inside	packaging	Time Dos	ing Finished
		Estimate	ed:%			🛛 Insert	ed into pulp	>	
Temperat	ure Readings	;							т
1:	2:	3	1	<u>`</u>	5:	6:			Time
Concentra	Record the correading from inside the fun enclosure	the free air	n rspace	Record the readings fr packaging	concentratio om inside the here.		Calcu conce	alate the equilibitentration reading and r	ium of the
		_			~	•			%
Start			+ +					+	%
End									
Comment:	s rin Charge				Governme	ent Officer (Time A	nal TLV chieved	ppm
Name		S	õignature		Name		S	ignature	

10.2 Fumigation treatment certificate

The fumigation certificate is an official export document issued by the fumigator to declare that the fumigation has been performed in accordance with the requirements of the Methyl Bromide Fumigation Methodology. The fumigation certificate must accompany the consignment.

How to complete the approved standard fumigation certificate

Details of the consignment and information relating to the fumigation must be included on the fumigation certificate for it to be accepted by the department. This information should be on a single page and in a format consistent with the fumigation treatment certificate template in the methodology. Following is advice on completing this fumigation certificate template.

Fumigation certificates from ICCBA and AFAS countries will only be accepted if they are issued by a treatment provider listed on the relevant Acceptable Treatment Providers list.

Certificate must be on the treatment provider's letterhead

The letterhead must include the address of the fumigation treatment provider that matches the address published on the department's relevant treatment providers list (TPL). Where a company has more than one branch, the address on the letterhead must match that on the relevant TPL for the branch that issues the certificate.

Certificate number/registration number

Each certificate must include a unique certificate number issued by the treatment provider and the treatment provider's Registration Number. For audit and investigation purposes the certificate number must link to the treatment provider's fumigation records for the treatment covered by the certificate.

Target of the fumigation details

Select the option that best describes the target of the fumigation. This may be the commodity (goods), the packaging (including pallets and/or container) or both.

Consignment link

The certificate must include a link to some other official documentation related to the consignment such as: a bill of lading number, a commercial invoice number, a preferential tariff certificate number, a packing list number, a letter of credit number or container number. If there is insufficient room on the certificate you may use the additional declarations field or attach a complete list to the certificate.

Consignment details

The certificate must also include the quantity, the country of origin, the intended port of loading and country of destination as well as the name and addresses of the exporter and importer.

Treatment details

- date fumigation completed: is the date on which the fumigation exposure period is complete
- place of fumigation: is the general location in which the fumigation took place, for example. Town/City

- prescribed dose rate (g/m³): is the prescribed concentration of methyl bromide required to effectively treat the target of the fumigation
- exposure period (hrs): is the prescribed duration of the fumigation
- forecast minimum temperature (°C): is the minimum temperature in degrees Celsius forecast by an official source for the period of fumigation
- applied dose rate (g/m³): is the concentration of methyl bromide applied to the fumigation enclosure including adjustments made to the prescribed dosage to compensate for forecast minimum temperatures between 21 °C and 10 °C
- how was the fumigation conducted: Select the fumigation enclosure type and include container number/s if the treatment was conducted in the container/s the target of the fumigation will be shipped in
- does the target of the fumigation conform to the plastic wrapping, impervious surface and timber thickness requirements at the time of fumigation? This declaration identifies that at the time of fumigation all plastic wrapping, impervious surface and timber thickness requirements have been met. If there is no plastic wrapping or impervious surfaces on the target of fumigation, the fumigator should answer 'yes' as all plastic wrapping and impervious surface requirements are met. Where there requirements are not met the fumigation should not be conducted
- ventilation, final TLV reading (ppm): The final threshold limit value (TLV) reading is when the methyl bromide concentration within the enclosure falls to 5 ppm or below. Record the methyl bromide concentration reading to declare the enclosure is gas free. Where multiple containers are fumigated in one enclosure, TLV is required for each container. Where a stack or permanent chamber fumigation is performed, answer 'NA' (not applicable) as no TLV is required.

Declaration

The AFAS accredited fumigator (or accredited officer if the certificate is endorsed by the relevant regulatory authority) responsible for ensuring that the treatment is effective and performed according to the requirements of the *Methyl Bromide Fumigation Methodology* must sign and date the certificate and print their name and accreditation number. They may also wish to stamp the certificate with their company stamp.

Additional information

Any additional information that the fumigator wishes to supply may be included in the Additional Declarations field.

False declarations may result in accreditation being revoked.

Appendix 1: Commodities where problems may arise

Commodity	Notes
 Foodstuffs: a) Butter, lard and fats b) Iodised salt stabilised with sodium hyposulphite c) Full fat soybean flour, whole wheat flour, other high protein flours and baking powders d) Nuts with high oil content e) Certain baking sodas, cattle licks, salt blocks, or other foodstuffs containing reactive sulphur compounds f) Bone meal. Leather Goods 	Never exceed the recommended dosage or exposure periods for food or foodstuff commodities.
	sulphur processes.
3. Woollens	Caution should be used in the fumigation of Angora woollens. Some adverse effects have been noted on woollen socks, sweaters, shawls and yarn.
4. Viscose rayon	Rayons processed or manufactured with the use of carbon bisulfide.
5. Photographic chemicals	Excluding camera film or X-ray film.
 6. Paper: a) Silver polishing papers b) Certain writing and other papers cured by sulphide processes c) Photographic prints "Carbonless" carbon paper d) Blueprint papers. 7. Rubber Goods:	
 a) Sponge rubber b) Foam rubber, such as rug padding, pillows, cushions, mattresses, and some car seals c) Rubber stamps and other similar forms of reclaimed rubber. 	
8. Vinyl	
9. Furs	
10. Feathers	Especially in feather pillows.
11. Charcoal, cinder blocks and activated carbon	
12. Horsehair articles	
13. Oil artworks	
14. Sulphur-based paint	
15. Cellophane	
16. Polystyrene packaging and containers	Polystyrene can absorb large quantities of methyl bromide, which may take a long time to desorb.

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Commodity	Notes
17. Perishable plant products including fruit and vegetables	Both fresh and dry vegetables are generally tolerant to treatment with methyl bromide.
	Some varieties of fruit may be susceptible to injury resulting in external markings on the skin or internal injury appearing as browning of the flesh
18. Live plants, bulbs, seeds	Methyl bromide is one of the few fumigants that may be used safely on a wide range of living plants without causing harmful effects. However, there are a number of genera known to be adversely affected by methyl bromide and some species should only be fumigated when fully dormant. Actively growing plants are more susceptible to harm than dormant plants.