

**THIS SHEET DOES NOT REPLACE INFORMATION FOUND IN THE TELONE™ II BY TELEOS LABEL, SDS, OR STORAGE AND HANDLING GUIDE.**

This tip sheet outlines EPA expectations for securing pesticide storage areas for your TELONE™ by Teleos bulk tanks and refillable cylinders. The regulations under 40 CFR Part 165 aren't complicated, but they do leave a lot of room for interpretation. In practice, it comes down to a few key principles: valves should be locked when the site is unattended, product should be stored within a secured area, and equipment should be maintained so it can't release product or be tampered with no one is around. These steps aren't just about compliance, they will ensure your site is safe in case bad actors, or equipment failure ever arise.

## 1. LOCKABLE VALVES ON BULK TANKS

Bulk storage tanks are required to be secured when unattended to prevent unauthorized access or release. CFR 165.45(b)(5), 165.85(b)(5), 165.90(b)(5)

- Equip all bottom-load and discharge lines with a lockable shut-off valve or a removable handle.
- Padlock or chain valve handles when the site is unattended.
- For rail or nurse tanks used as temporary bulk storage, cap and lock both discharge and vapor return lines.
- Maintain locks that resist corrosion from fumigant vapors and weather.
- Document valve inspections monthly in the tank maintenance record.



Padlock on valve in closed position when not in service.

**Do NOT consider these safeguards optional; they form part of your containment compliance under the Pesticide Container and Containment Rule.**

## 2. FENCING AND SITE SECURITY

EPA expects all bulk pesticide facilities to be “secured against unauthorized access.” That doesn't always mean a fence, but fencing is the most direct way to demonstrate compliance. 40 CFR 165.45(d)(1) and EPA PR Notice 2007-2

- 6-foot minimum fence enclosing all tanks, containment, and transfer piping.
- Store cylinders upright and restrained within a fenced pad.
- Lockable gate with posted signage: “Danger-Pesticide Storage Area/Authorized Personnel Only.”
- For sites adjacent to public right-of-way or near occupied buildings, fencing is considered best practice, even if not explicitly mandated.
- Alternative compliance may include locked buildings or supervised, access-controlled areas.
- Lighting and surveillance systems add further deterrence, especially hazardous materials like TELONE™.

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### 3. RECORDKEEPING AND INSPECTIONS

- Maintain inspection logs for locks, gates, valves, and containment integrity for at least three years.
- Record dates when locks are replaced, damaged, or tested.
- For fumigants or acutely toxic products, enhanced security (double locks, lighting, and CCTV) is strongly advised.

Refer to current regulations if clarification is needed. Helpful references include:

- 40 CFR Part 165 -Pesticide Container and Containment Regulations
- EPA PR Notice 2007-2 - EPA Pesticide Container and Containment Rule
- EPA Agricultural Retailer Compliance Assistance Center - Physical Security for Bulk Pesticide Storage



Security fencing around bulk tank.

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