



Pesticides Exempt from the Posting, Notification, and Recordkeeping Requirements of the Healthy Schools Act of 2000 (HSA)

To determine whether a particular pesticide product is exempt from the recordkeeping, posting, and notification requirements of the HSA, answer the following questions.

Exemptions notwithstanding, DPR recommends that schools and child day care facilities keep complete records of *all* pest management activities as part of a sound integrated pest management program.

- 1.) Is the product registered by the United States Environmental Protection Agency and/or the California Department of Pesticide Regulation?**

Note: A product is registered if you see the "EPA Reg. No." or "CA Reg. No." on the label.

YES: GO ON TO STEP 2

NO: Product may be EXEMPT. GO ON TO STEP 5

- 2.) Is the product an antimicrobial (including sanitizers, disinfectants, and medical sterilants)?**

Note: The federal language defining antimicrobial pesticides is attached (see Reference 1). If you can't tell from the label, you can look up specific products on DPR's website at <http://www.cdpr.ca.gov/docs/label/prodnam.htm>.

YES: EXEMPT from HSA recordkeeping, posting, and notification requirements

NO: GO ON TO STEP 3

3.) Is the product a self-contained bait or trap?

Note: Determining whether a bait or trap is "self-contained" is the responsibility of the user since the law does not specify a definition.

YES: EXEMPT from HSA recordkeeping, posting, and notification requirements

NO: GO ON TO STEP 4

4.) Is the product a gel or paste deployed as a crack and crevice treatment?

Notes:

- "Gel or paste" refers to the formulation type. If in doubt, check the label or the DPR database at <http://www.cdpr.ca.gov/docs/label/m4.htm>
- "Crack and crevice treatment" is defined under the HSA (see Reference 2 attached).

YES: EXEMPT from HSA recordkeeping, posting, and notification requirements

NO: NOT EXEMPT. All other registered pesticide products are subject to the posting, recordkeeping, and notification requirements of the Healthy Schools Act of 2000.

That is, the product is registered at the federal and/or California level and:

- is not an antimicrobial.
- is not used in a self-contained bait or trap.
- is not a gel/paste used for crack and crevice treatments.

5.) If the product is not registered, there are two possibilities:

A.) *The product is illegal for use as a pesticide in California.*

-OR-

B.) The product is specifically exempt from federal registration under the Federal Insecticide, Fungicide and Rodenticide Act (section 25b) (see Reference 3 attached) and California registration under the California Code of Regulations,

Section 6147 (see Reference 4 attached or <http://www.cdpr.ca.gov/docs/inhouse/calcode/020101.htm#a6147>); and therefore, **EXEMPT** from HSA recordkeeping, posting, and notification requirements.

To ensure your product is exempt from registration, verify that all active ingredients are listed in 3 CCR section 6147 and all inert ingredients are on the “Inert Ingredients Eligible for FIFRA 25(b) Pesticide Products List” found at http://www.epa.gov/opprd001/inerts/section25b_inerts.pdf (or see Reference 5 for non-food use pesticides).

For any questions, contact Rachel Kubiak of the Department of Pesticide Regulation at 916-324-3939 or rkubiak@cdpr.ca.gov.

REFERENCE 1

Definition of antimicrobial pesticides under 7 U.S. Code 136

(mm) Antimicrobial pesticide

(1) In general

The term "antimicrobial pesticide" means a pesticide that -

(A) is intended to -

- (i) disinfect, sanitize, reduce, or mitigate growth or development of microbiological organisms; or
- (ii) protect inanimate objects, industrial processes or systems, surfaces, water, or other chemical substances from contamination, fouling, or deterioration caused by bacteria, viruses, fungi, protozoa, algae, or slime; and

(B) in the intended use is exempt from, or otherwise not subject to, a tolerance under section 346a of title 21 or a food additive regulation under section 348 of title 21.

(2) Excluded products

The term "antimicrobial pesticide" does not include -

(A) a wood preservative or antifouling paint product for which a claim of pesticidal activity other than or in addition to an activity described in paragraph (1) is made;

(B) an agricultural fungicide product; or

(C) an aquatic herbicide product.

(3) Included products

The term "antimicrobial pesticide" does include any other chemical sterilant product (other than liquid chemical sterilant, products exempt under subsection (u) of this section), any other disinfectant product, any other industrial microbiocide product, and any other preservative product that is not excluded by paragraph (2).

REFERENCE 2

Definition of crack and crevice treatments under the Healthy Schools Act of 2000

17609. The definitions set forth in this section govern the construction of this article unless the context clearly requires otherwise:

(a) "Antimicrobial" means those pesticides defined by the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. Sec. 136(mm)).

(b) "Crack and crevice treatment" means the application of small quantities of a pesticide consistent with labeling instructions in a building into openings such as those commonly found at expansion joints, between levels of construction and between equipment and floors.

REFERENCE 3

Federal regulations pertaining to exemption from registration under FIFRA 25(b)

Code of Federal Regulations, Title 40, Volume 16

152.25; Exemptions for pesticides of a character not requiring FIFRA regulation.

The pesticides or classes of pesticides listed in this section have been determined to be of a character not requiring regulation under FIFRA, and are therefore exempt from all provisions of FIFRA when intended for use, and used, only in the manner specified.

(a) *Treated articles or substances.* An article or substance treated with, or containing, a pesticide to protect the article or substance itself (for example, paint treated with a pesticide to protect the paint coating, or wood products treated to protect the wood against insect or fungus infestation), if the pesticide is registered for such use.

(b) *Pheromones and pheromone traps.* Pheromones and identical or substantially similar compounds labeled for use only in pheromone traps (or labeled for use in a manner which the Administrator determines poses no greater risk of adverse effects on the environment than use in pheromone traps), and pheromone traps in which those compounds are the sole active ingredient(s).

(1) For the purposes of this paragraph, a pheromone is a compound produced by an arthropod which, alone or in combination with other such compounds, modifies the behavior of other individuals of the same species.

(2) For the purposes of this paragraph, a synthetically produced compound is identical to a pheromone only when their molecular structures are identical, or when the only differences between the molecular structures are between the stereochemical isomer ratios of the two compounds, except that a synthetic compound found to have toxicological properties significantly different from a pheromone is not identical.

(3) When a compound possesses many characteristics of a pheromone but does not meet the criteria in paragraph (a)(2) of this section, it may, after review by the Agency, be deemed a substantially similar compound.

(4) For the purposes of this paragraph, a pheromone trap is a device containing a pheromone or an identical or substantially similar compound used for the sole purpose of attracting, and trapping or killing, target arthropods. Pheromone traps are intended to achieve pest control by removal of target organisms from their natural environment and do not result in increased levels of pheromones or identical or substantially similar compounds over a significant fraction of the treated area.

(c) *Preservatives for biological specimens.*

(1) Embalming fluids.

(2) Products used to preserve animal or animal organ specimens, in mortuaries, laboratories, hospitals, museums and institutions of learning.

(3) Products used to preserve the integrity of milk, urine, blood, or other body fluids for laboratory analysis.

(d) *Foods.* Products consisting of foods and containing no active ingredients, which are used to attract pests.

(e) *Natural cedar.*

(1) Natural cedar blocks, chips, shavings, balls, chests, drawer liners, paneling, and needles that meet all of the following criteria:

(i) The product consists totally of cedarwood or natural cedar.

(ii) The product is not treated, combined, or impregnated with any additional substance(s).

(iii) The product bears claims or directions for use solely to repel arthropods other than ticks or to retard mildew, and no additional claims are made in sale or distribution. The labeling must be limited to specific arthropods, or must exclude ticks if any general term such as "arthropods," "insects," "bugs," or any other broad inclusive term, is used. The exemption does not apply to natural cedar products claimed to repel ticks.

(2) The exemption does not apply to cedar oil, or formulated products which contain cedar oil, other cedar extracts, or ground cedar wood as part of a mixture.

(f) *Minimum risk pesticides—*

(1) *Exempted products.* Products containing the following active ingredients are exempt from the requirements of FIFRA, alone or in combination with other substances listed in this paragraph, provided that all of the criteria of this section are met.

Castor oil (U.S.P. or equivalent)
Cedar oil
Cinnamon and cinnamon oil
Citric acid
Citronella and citronella oil
Cloves and clove oil
Corn gluten meal
Corn oil
Cottonseed oil
Dried blood
Eugenol
Garlic and garlic oil
Geraniol
Geranium oil
Lauryl sulfate
Lemongrass oil
Linseed oil
Malic acid
Mint and mint oil
Peppermint and peppermint oil
2-Phenethyl propionate (2-phenylethyl propionate)
Potassium sorbate
Putrescent whole egg solids
Rosemary and rosemary oil
Sesame (includes ground sesame plant) and sesame oil
Sodium chloride (common salt)
Sodium lauryl sulfate
Soybean oil
Thyme and thyme oil
White pepper
Zinc metal strips (consisting solely of zinc metal and impurities)

(2) *Permitted inerts.* A pesticide product exempt under paragraph (f)(1) of this section may only include inert ingredients listed in the most current List 4A. This list is updated periodically. The most current list may be obtained by contacting the Registration Division at the appropriate address as set forth in 40 CFR 150.17(a) or (b).

(3) *Other conditions of exemption.* All of the following conditions must be met for products to be exempted under this section:

(i) Each product containing the substance must bear a label identifying the name and percentage (by weight) of each active ingredient and the name of each inert ingredient.

(ii) The product must not bear claims either to control or mitigate microorganisms that pose a threat to human health, including but not limited to disease transmitting bacteria or viruses, or claims to control insects or rodents carrying specific diseases, including, but not limited to ticks that carry Lyme disease.

(iii) The product must not include any false and misleading labeling statements, including those listed in 40 CFR 156.10(a)(5)(i) through (viii).

[53 FR 15977, May 4, 1988, as amended at 59 FR 2751, Jan. 19, 1994; 61 FR 8878, Mar. 6, 1996; 66 FR 64764, Dec. 14, 2001; 71 FR 35545, June 21, 2006]

REFERENCE 4

California regulations pertaining to pesticides exempt from registration (3 CCR 6147)

Title 3 (Food and Agricultural Code), Division 6, Chapter 2, Section 6147. Exempted Pesticide Products.

- (a) Manufacturers of, importers of, and dealers in the following pesticide products or classes of pesticide products are exempt from the requirements of Division 7 of the Food and Agricultural Code, provided the pesticide products are exempt pursuant to section 25(b)(2) of the Federal Insecticide, Fungicide, and Rodenticide Act [7 U.S.C. sec. 136w(b)(2)]:
- (1) Pheromones and identical or substantially similar compounds labeled for use only in pheromone traps (or labeled for use in a manner which the Director determines poses no greater risk of adverse effects on the environment than use in pheromone traps), and pheromone traps in which those compounds are the sole active ingredient(s), as specified in 40 Code of Federal Regulations 152.25(b).
 - (2) Preservatives for biological specimens, including:
 - (A) Embalming fluids;
 - (B) Products used to preserve animal or animal organ specimens, in mortuaries, laboratories, hospitals, museums and institutions of learning; and
 - (C) Products used to preserve the integrity of milk, urine, blood, or other body fluids for laboratory analysis.
 - (3) Products consisting of foods that are used to attract pests and which contain no active ingredient(s).
 - (4) (A) Natural cedar blocks, chips, shavings, balls, chests, drawer liners, paneling, and needles that meet all of the following criteria:
 1. The product consists totally of cedar wood or natural cedar.
 2. The product is not treated, combined, or impregnated with any additional substance(s).
 3. The product bears claims or directions for use solely to repel arthropods other than ticks or to retard mildew, and no additional claims are made in sale or distribution. The labeling must be limited to specific arthropods, or must exclude ticks if any general term such as "arthropods," "insects," "bugs," or any other broad inclusive term is used.(B) The exemption does not apply to natural cedar products claimed to repel ticks. The exemption also does not apply to cedar oil, or formulated products, which contain cedar oil, other cedar extracts, or ground cedar wood as part of a mixture.
 - (5) (A) Products containing the following active ingredients alone or in combination with other substances listed in paragraph (5)(A), provided that all the criteria specified in paragraphs (5)(C) and (5)(D) are met:

Castor oil (U.S.P. or equivalent)
Cedar oil¹
Cinnamon
Cinnamon oil¹
Citric acid¹
Citronella (non-topical uses only)
Citronella oil (non-topical uses only)
Cloves²
Clove oil^{1,2}
Corn gluten meal
Corn oil
Cottonseed oil
Dried blood
Eugenol^{1,2}
Garlic
Garlic oil¹
Geraniol²
Geranium oil²
Lauryl sulfate¹
Lemongrass oil¹
Linseed oil
Malic acid¹

Mint
Mint oil ¹
Peppermint ²
Peppermint oil ^{1,2}
2-Phenethyl propionate (2-phenylethyl propionate) ¹
Potassium sorbate ¹
Putrescent whole egg solids
Rosemary ²
Rosemary oil ^{1,2}
Sesame (includes ground sesame plant)
Sesame oil
Sodium chloride (common salt)
Sodium lauryl sulfate ^{1,2}
Soybean oil
Thyme ²
Thyme oil ^{1,2}
White pepper ¹
Zinc metal strips (consisting solely of zinc metal and impurities)

¹ Products containing 8.5% or more of this active ingredient in the formulated product must at a minimum bear the signal word “CAUTION,” the phrase “Keep Out of Reach of Children,” appropriate precautionary language, and a requirement for appropriate protective eyewear and gloves.

² Products containing this active ingredient intended for topical application to human skin must at a minimum bear the signal word “CAUTION,” the phrase “Keep Out of Reach of Children,” a dermal sensitization precautionary statement, a prohibition against application to the hands of children, and use directions requiring adult supervision during application to children.

- (B) Topical use products containing less than or equal to 1% of the following active ingredients alone or in combination with each other, provided: the product label carries as a minimum the signal word “CAUTION,” the phrase “Keep Out of Reach of Children,” a dermal sensitization precautionary statement, a prohibition against application to the hands of children, and use directions requiring adult supervision during application to children, and (ii) all the criteria specified in paragraphs (5)(C) and (5)(D) are met:
Citronella
Citronella oil
- (C) A pesticide product exempt under paragraphs (5)(A) and (5)(B) of subsection (a) may include as inert ingredients only those substances listed in the U.S. Environmental Protection Agency’s most current List 4A “Inerts of Minimal Concern.” U.S. EPA’s list of minimal risk inert ingredients is updated periodically and is published in the Federal Register.
- (D) In addition, all of the following conditions must be met for products to be exempted under subsection (a)(5):
1. Each product containing the substance must bear a label identifying the name and percentage (by weight) of each active ingredient and the name of each inert ingredient.
 2. The product must not bear claims either to control or mitigate microorganisms that pose a threat to human health, including but not limited to disease transmitting bacteria or viruses, or claims to control insects or rodents carrying specific diseases, including, but not limited to ticks that carry Lyme disease.
 3. The product must not include any false and misleading labeling statements, including those listed in 40 CFR 156.10(a)(5)(i) through (viii).
- (b) Whenever the manufacturer of, importer of, or dealer in any product exempted pursuant to this section has factual or scientific evidence of any adverse effect or risk to human health or the environment that has not previously been submitted to the department, the manufacturer, importer, or dealer shall report the evidence to the department within 60 days of learning of the information.

NOTE: Authority cited: Section 11456, 12781, and 12803, Food and Agricultural Code.

Reference: Section 12803, Food and Agricultural Code.

REFERENCE 5--List 4A, "Minimal Risk Inerts"
Inert Ingredients Allowed in Pesticide Products under FIFRA 25(b)

Note: This list is only for non-food use products. If your product is intended for use on or around food, food crops, food contact surfaces, or animal feed, or if you have general questions about the list below, please contact Rachel Kubiak of the Department of Pesticide Regulation at 916-324-3939 or rkubiak@cdpr.ca.gov.

The list below was generated using the inert ingredients listed in http://www.epa.gov/opprd001/inerts/section25b_inerts.pdf (version dated March 3, 2009) as well as specific chemical substances listed in [40 CFR §180.950\(e\)](#).

CAS #	Inert Ingredient	CAS #	Inert Ingredient	CAS #	Inert Ingredient
5743-26-0	Acetic acid, calcium salt, monohydrate	2090-05-03	Calcium benzoate	519-62-0	Chlorophyll b
127-09-3	Acetic acid, sodium salt	471-34-1	Calcium carbonate	77-92-9	Citric acid
9002-18-0	Agar	6107-56-8	Calcium octanoate	77-90-7	Citric acid, 2-(acetyloxy)-tributyl ester
N/A	Almond hulls	12168-85-3	Calcium oxide silicate (Ca3O(SiO4))	7693-13-2	Citric acid, calcium salt
N/A	Almond shells	1344-95-2	Calcium silicate	813-94-5	Citric acid, calcium salt (2:3)
10016-20-3	Alpha-cyclodextrin	1592-23-0	Calcium stearate	3609-96-9	Citric acid, dipotassium salt
1327-36-2	Aluminate silicate	7778-18-9	Calcium sulfate	144-33-2	Citric acid, disodium salt
1327-43-1	Aluminum magnesium silicate	10101-41-4	Calcium sulfate dehydrate	5949-29-1	Citric acid, monohydrate
12736-96-8	Aluminum potassium sodium silicate	10034-76-1	Calcium sulfate hemihydrate	866-83-1	Citric acid, monopotassium salt
1335-30-4	Aluminum silicate	N/A	Canary seed	18996-35-5	Citric acid, monosodium salt
1344-00-9	Aluminum sodium silicate	7440-44-0	Carbon	7778-49-6	Citric acid, potassium salt
12003-51-9	Aluminum sodium silicate (1:1:1)	124-38-9	Carbon dioxide	994-36-5	Citric acid, sodium salt
1863-63-4	Ammonium benzoate	546-93-0	Carbonic acid, magnesium salt (1:1)	77-93-0	Citric acid, triethyl ester
1002-89-7	Ammonium stearate	298-14-6	Carbonic acid, monopotassium salt	866-84-2	Citric acid, tripotassium salt
113894-85-2	Amylopectin, acid-hydrolyzed; 1-octenylbutanedioate	144-55-8	Carbonic acid, monosodium salt (sodium bicarbonate)	6100-05-6	Citric acid, tripotassium salt, monohydrate
125109-81-1	Amylopectin, hydrogen; 1-octadecenylbutanedioate	N/A	Cardboard	68-04-2	Citric acid, trisodium salt
N/A	Animal glue	8015-86-9	Carnauba wax	6132-04-3	Citric acid, trisodium salt, dihydrate
N/A	Apple pomace	9000-40-2	Carob gum (locust bean gum)	6858-44-2	Citric acid, trisodium salt, pentahydrate
50-81-7	Ascorbic acid (vitamin C)	9000-07-1	Carrageenan	N/A	Citrus meal
137-66-6	Ascorbyl palmitate	9000-71-9	Caseins	9000-69-5	Citrus pectin
12174-11-7	Attapulgite-type clay	8001-79-4	Castor oil	68514-76-1	Citrus pulp
8012-89-3	Beeswax	8001-78-3	Castor oil, hydrogenated	N/A	Clam shells
1302-78-9	Bentonite	N/A	Cat food	8002-31-1	Cocoa
85049-30-5	Bentonite, sodian	9004-34-6	Cellulose	N/A	Cocoa shell flour
121-33-5	Benzaldehyde, 4-hydroxy-3-methoxy-	9004-35-7	Cellulose acetate	N/A	Cocoa shells
1863-63-4	Benzoic acid, ammonium salt	9004-62-0	Cellulose, 2-hydroxyethyl ether	8001-69-2	Cod-liver oil
2090-05-03	Benzoic acid, calcium salt	9004-64-2	Cellulose, 2-hydroxypropyl ether	68916-18-7	Coffee grounds
582-25-2	Benzoic acid, potassium salt	9004-65-3	Cellulose, 2-hydroxypropyl methyl ether	N/A	Cookies
532-32-1	Benzoic acid, sodium salt	9004-32-4	Cellulose, carboxy methyl ether, sodium salt	61789-98-8	Cork
7585-39-9	Beta-cyclodextrin	9000-11-7	Cellulose, carboxymethyl ether	N/A	Corn cobs
68409-75-6	Bone meal	9004-67-5	Cellulose, methyl ether	N/A	Cotton
N/A	Bran	51395-75-6	Cellulose, mixture with cellulose carboxymethyl ether, sodium salt	68424-10-2	Cottonseed meal
N/A	Bread crumbs	65996-61-4	Cellulose, pulp	N/A	Cracked wheat
123-95-5	Butyl stearate	68442-85-3	Cellulose, regenerated	53998-07-1	Decanoic acid, diester with 1,2,3-propanetriol
N/A	Calcareous shale	N/A	Cheese	26402-22-2	Decanoic acid, monoester with 1,2,3-propanetriol
13397-26-7	Calcite (Ca(Co3))	479-61-8	Chlorophyll a	9004-53-9	Dextrins
62-54-4	Calcium acetate			50-70-4	D-Glucitol (sorbitol)
5743-26-0	Calcium acetate monohydrate			49553-76-6	Diglyceryl monooleate
				12694-22-3	Diglyceryl monostearate
				27638-00-2	Dilaurin

<u>CAS #</u>	<u>Inert Ingredient</u>	<u>CAS #</u>	<u>Inert Ingredient</u>	<u>CAS #</u>	<u>Inert Ingredient</u>
108-32-7	1,3-Dioxolan-2-one, 4-methyl-(propylene carbonate)	1317-61-9	Iron oxide (Fe3O4)	11099-07-3	Octadecanoic acid, ester with 1,2,3-propanetriol
26657-95-4	Dipalmitin	1345-25-1	Iron oxide (FeO)	557-04-0	Octadecanoic acid, magnesium salt
7727-73-3	Disodium sulfate decahydrate	110-27-0	Isopropyl myristate	31566-31-1	Octadecanoic acid, monoester with 1,2,3-propanetriol
142-18-7	Dodecanoic acid, 2,3-dihydroxypropyl ester	1332-58-7	Kaolin	593-29-3	Octadecanoic acid, potassium salt
27638-00-2	Dodecanoic acid, diester with 1,2,3-propanetriol	61790-53-2	Kieselguhr (less than 1% crystalline silica) (Diatomaceous earth)	822-16-2	Octadecanoic acid, sodium salt
27215-38-9	Dodecanoic acid, monoester with 1,2,3-propanetriol	97-64-3	Lactic acid, ethyl ester	557-05-1	Octadecanoic acid, zinc salt
16389-88-1	Dolomite	687-47-8	Lactic acid, ethyl ester, (S)	36354-80-0	Octanoic acid, diester with 1,2,3-propanetriol
N/A	Douglas fir bark	138-22-7	Lactic acid, n-butyl ester	26402-26-6	Octanoic acid, monoester with 1,2,3-propanetriol
N/A	Egg shells	34451-19-9	Lactic acid, n-butyl ester, (S)	764-71-6	Octanoic acid, potassium salt
N/A	Eggs	63-42-3	Lactose	1984-06-1	Octanoic acid, sodium salt
68476-25-5	Feldspar	64044-51-5	Lactose monohydrate	12694-22-3	9-Octadecanoic acid, monoester with oxybis(propanediol)
N/A	Fish meal	8006-54-0	Lanolin	25637-84-7	9-Octadecenoic acid (9Z)-, diester with 1,2,3-propanetriol
8016-13-5	Fish oil (not conforming to 40 CFR 180.950)	N/A	Latex rubber	25496-72-4	9-Octadecenoic acid (9Z)-, monoester with 1,2,3-propanetriol
8031-18-3	Fuller's earth	143-07-7	Lauric acid	71012-10-7	9-Octadecenoic acid (9Z)-, monoester with tetraglycerol
110-17-8	Fumaric acid	8002-43-5	Lecithins	143-18-0	9-Octadecenoic acid (9Z)-, potassium salt
17465-86-0	Gamma-cyclodextrin	8030-76-0	Lecithins, soya	111-03-5	9-Octadecenoic acid (Z)-, 2,3-dihydroxypropyl ester
9000-70-8	Gelatin	68916-91-6	Licorice Extract	7492-30-0	9-Octadecenoic acid, 12 hydroxy-, monopotassium salt, (9Z, 12R)-
71010-52-1	Gellan gum	12001-27-3	Lime (chemical) dolomitic	5323-95-5	9-Octadecenoic acid, 12-hydroxy-, monosodium salt, (9Z, 12R)-
68476-37-9	Glue (as depolymd. animal collagen)	1317-65-3	Limestone	49553-76-6	9-Octadecenoic acid, ester with 1,2,3-propanetriol
56-81-5	Glycerin	8001-26-1	Linseed oil	8007-69-0	Oils, almond
56-81-5	Glycerol (glycerin) (1,2,3-propanetriol)	553-70-8	Magnesium benzoate	68917-73-7	Oils, wheat
111-03-5	Glycerol monooleate	546-93-0	Magnesium carbonate [Carbonic acid, magnesium salt (1:1)]	112-80-1	Oleic acid
36354-80-0	Glyceryl dicaprylate	1309-48-4	Magnesium oxide	N/A	Oyster shells
53563-63-6	Glyceryl dimyristate	12207-97-5	Magnesium oxide silicate (Mg3O(Si2O5)2), monohydrate	8002-75-3	Palm oil
25637-84-7	Glyceryl dioleate	1343-88-0	Magnesium silicate	68514-74-9	Palm oil, hydrogenated
1323-83-7	Glyceryl distearate	1343-90-4	Magnesium silicate hydrate	57-10-3	Palmitic acid
27214-38-6	Glyceryl monomyristate	14987-04-3	Magnesium silicon oxide (Mg2Si3O8)	N/A	Paper
26402-26-6	Glyceryl monooctanoate	557-04-0	Magnesium stearate	8002-74-2	Paraffin wax
25496-72-4	Glyceryl monooleate	7487-88-9	Magnesium sulfate	N/A	Peanut butter
31566-31-1	Glyceryl monostearate	10034-99-8	Magnesium sulfate heptahydrate	N/A	Peanut shells
11099-07-3	Glyceryl stearate	6915-15-7	Malic acid	N/A	Peanuts
N/A	Granite	8002-48-0	Malt extract	N/A	Peat moss
N/A	Grape pumice	N/A	Malt flavor	9000-69-5	Pectin
7782-42-5	Graphite	9050-36-6	Maltodextrin	130885-09-5	Perlite
9000-30-0	Guar gum	12003-38-2	Mica	93763-70-3	Perlite, expanded
9000-01-5	Gum arabic	12001-26-2	Mica-group minerals	26499-65-0	Plaster of paris
9000-65-1	Gum tragacanth	8049-98-7	Milk	9002-88-4	Polyethylene
13397-24-5	Gypsum	N/A	Millet seed	9007-48-1	Polyglyceryl oleate
1317-60-8	Hematite (Fe2O3)	8012-95-1	Mineral oil (U.S.P.)	9009-32-9	Polyglyceryl stearate
57-10-3	Hexadecanoic acid	142-18-7	1-Monolaurin	1327-44-2	Potassium aluminum silicate, anhydrous
26657-95-4	Hexadecanoic acid, diester with 1,2,3-propanetriol	53998-07-1	Monomyristin	582-25-2	Potassium benzoate
26657-96-5	Hexadecanoic acid, monoester with 1,2,3-propanetriol	589-68-4	1-Monomyristin	298-14-6	Potassium bicarbonate
1413-93-6	Humic acid	26657-96-5	Monopalmitin		
68514-28-3	Humic acid, potassium salt	1318-93-0	Montmorillonite		
68131-04-4	Humic acid, sodium salt	544-63-8	Myristic acid		
68514-28-3	Humic acids, potassium salts	37244-96-5	Nepheline syenite		
68131-04-4	Humic acids, sodium salt	7727-37-9	Nitrogen		
68334-00-9	Hydrogenated cottonseed oil	N/A	Nutria meat		
84681-71-0	Hydrogenated rapeseed oil	N/A	Nylon		
8016-70-4	Hydrogenated soybean oil	57-11-4	Octadecanoic acid		
12068-86-9	Iron magnesium oxide (Fe2MgO4)	1002-89-7	Octadecanoic acid, ammonium salt		
1309-37-1	Iron oxide (Fe2O3)	123-95-5	Octadecanoic acid, butyl ester		
12259-21-1	Iron oxide (Fe2O3), hydrate	1344-95-2	Octadecanoic acid, calcium salt		

<u>CAS #</u>	<u>Inert Ingredient</u>	<u>CAS #</u>	<u>Inert Ingredient</u>	<u>CAS #</u>	<u>Inert Ingredient</u>
7447-40-7	Potassium chloride	1393-03-9	Soapbark (Quillaja saponin)	8042-47-2	White mineral oil (petroleum)
68514-28-3	Potassium humates	308076-02-0	Soapstone	68917-75-9	Wintergreen oil
13429-27-1	Potassium myristate	127-09-3	Sodium acetate	13983-17-0	Wollastonite (Ca(SiO ₃))
143-18-0	Potassium oleate	9005-38-3	Sodium alginate	N/A	Wool
7492-30-0	Potassium ricinoleate	532-32-1	Sodium benzoate	11138-66-2	Xanthan gum
593-29-3	Potassium stearate	144-55-8	Sodium bicarbonate	68876-77-7	Yeast
7646-93-7	Potassium sulfate	7647-14-5	Sodium chloride	1318-02-1	Zeolites (excluding erionite (CAS # 66733-21-9))
7778-80-5	Potassium sulfate	68131-04-4	Sodium humates	68989-22-0	Zeolites, NaA
67-63-0	2-Propanol (isopropyl alcohol)	143-19-1	Sodium oleate	12063-19-3	Zinc iron oxide
1332-09-8	Pumice	5323-95-5	Sodium ricinoleate	1314-13-2	Zinc oxide (ZnO)
N/A	Red cabbage color, expressed from edible red cabbage heads via a pressing process using only acidified water	822-16-2	Sodium stearate	557-05-1	Zinc stearate
N/A	Red cedar chips	7757-82-6	Sodium sulfate		
N/A	Red dog flour	24634-61-5	Sorbic acid, potassium salt		
9006-04-6	Rubber	50-70-4	Sorbitol		
N/A	Sawdust	N/A	Soy protein		
N/A	Shale	N/A	Soybean hulls		
7631-86-9	Silica (crystalline free)	68308-36-1	Soybean meal		
63231-67-4	Silica gel	68513-95-1	Soybean, flour		
112926-00-8	Silica gel, precipitated, crystalline-free	57-11-4	Stearic acid		
112945-52-5	Silica, amorphous, fumed (crystalline free)	7704-34-9	Sulfur		
7699-41-4	Silica, amorphous, precipitated and gel	7646-93-7	Sulfuric acid, monopotassium salt		
10279-57-9	Silica, hydrate	68425-17-2	Syrups, hydrolyzed starch, hydrogenated		
60676-86-0	Silica, vitreous	589-68-4	Tetradecanoic acid, 2,3-dihydroxypropyl ester		
13776-74-4	Silicic acid (H ₂ SiO ₃), magnesium salt (1:1)	53563-63-6	Tetradecanoic acid, diester with 1,2,3-propanetriol		
12003-51-9	Silicic acid (H ₄ SiO ₄), aluminum sodium salt (1:1:1)	27214-38-6	Tetradecanoic acid, monoester with 1,2,3-propanetriol		
1347-43-1	Silicic acid, aluminum magnesium salt	13429-27-1	Tetradecanoic acid, potassium salt		
12736-96-8	Silicic acid, aluminum potassium sodium salt	71012-10-7	Tetraglyceryl monooleate		
1344-00-9	Silicic acid, aluminum sodium salt	57455-37-5	Ultramarine blue (C.I. Pigment Blue 29)		
1344-95-2	Silicic acid, calcium salt	57-13-6	Urea		
N/A	Soap (The water soluble sodium or potassium salts of fatty acids produced by either the saponification of fats and oils, or the neutralization of fatty acid)	121-33-5	Vanillin		
		1318-00-9	Vermiculite		
		8028-52-2	Vinegar (maximum 8% acetic acid in solution)		
		50-81-7	Vitamin C		
		1406-18-4	Vitamin E		
		N/A	Walnut flour		
		N/A	Walnut shells		
		N/A	Wheat		
		N/A	Wheat flour		
		8006-95-9	Wheat germ oil		
		92129-90-3	Whey		

If you do not see an inert ingredient in your product on the list above, please consult [Title 40 of the Code of Federal Regulations \(CFR\), Part 180, Section 950](#). This section can also be viewed by entering in [Title 40, Part 180](#), and [Section 950](#) at <http://www.gpoaccess.gov/cfr/retrieve.html>. With some exceptions, U.S. EPA regulations also allow the following types of inert ingredients in non-food use 25(b) pesticide products:

- (a) Commonly consumed food commodities.
- (b) Animal feed items.
- (c) Edible fats and oils.

If you have any questions, please contact Rachel Kubiak of the Department of Pesticide Regulation at (916) 324-3939 or rkubiak@cdpr.ca.gov.

Notes:
CAS # = Chemical Abstracts Service Number
N/A = Not applicable