



Pesticides Exempt

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

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.

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

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

YES: GO ON TO STEP 2

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

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

- 2) Is the product a self-contained bait or trap?**

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

NO: GO ON TO STEP 3

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

- 3) Is the product a gel or paste used as a crack and crevice treatment?**

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

NO: GO ON TO STEP 4

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 1 attached).

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

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 HSA.

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

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

Note: The federal language defining antimicrobial pesticides is attached (see Reference 2). 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>.

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 registration therefore, EXEMPT from the HSA recordkeeping, posting, and notification requirements.

To confirm whether your product is exempt from registration, look to see that each of the active ingredients on your product's label are on Appendix 1 and that each of the inert (other) ingredients on your product's label are on Appendix 2.

Appendix 1: A list of exempted active ingredients that are listed in 3 CCR § 6147 and CFR § 152.25(f)

Appendix 2: A list of inert (inactive) ingredients that are on the "Inert Ingredients Eligible for FIFRA 25(b) Pesticide Products List" listed in CFR § 180.950

For more details about pesticides exempt from registration or if one or some of the ingredients are not listed in these appendices and you believe the product is not illegal to use as a pesticide, check the links to the California Code of Regulations (CCR), Code of Federal Regulations (CFR) and Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and additional references below and on the appendices:

1) CCR § 6147: <http://www.cdpr.ca.gov/docs/inhouse/calcode/020101.htm#a6147>

2) CFR § 180.950: <http://www.epa.gov/lawsregs/search/40cfr.html>

3) "Inert Ingredients Eligible for FIFRA 25(b) Pesticide Products List":
http://www.epa.gov/opprd001/inerts/section25b_inerts.pdf

4) FIFRA 25(b): <http://agriculture.senate.gov/Legislation/Compilations/Fifra/FIFRA.pdf>

5) CFR § 152.25 Exemptions from pesticides of a character not requiring FIFRA regulation. *Note: the items listed in CFR § 152.25 may not be included in the appendices as many require conditions. See this link for details: <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=22f85fdafb%20403b0fd0775e7%20dd913c602&rqn=div8&view=text&node=40:23.0.1.1.3.2.1.2&idno=40>

For any questions, contact Richard Spas of the Department of Pesticide Regulation at (916) 322-9522 or rspas@cdpr.ca.gov.

APPENDIX 1: Exempt Active Ingredients

Active Ingredients Allowed in Exempted Pesticide Products under FIFRA 25(b) and the California Code of Regulations (CCR) § 6147

EXEMPT ACTIVE INGREDIENTS

CAS #	Chemical Name	CAS #	Chemical Name
8001-79-4	Castor oil (U.S.P. or equivalent)	8001-26-1	Linseed oil
N/A	Cedar oil ¹	6915-15-7	Malic acid ¹
N/A	Cinnamon	N/A	Mint
N/A	Cinnamon oil ¹	N/A	Mint oil ¹
77-92-9	Citric acid ¹	N/A	Peppermint ²
5949-29-1	Citric acid, monohydrate	8006-90-4	Peppermint oil ^{1,2}
N/A	Citronella (non-topical uses only)	122-70-3	2-Phenethyl propionate ¹
8000-29-1	Citronella oil (non-topical uses only)	122-70-3	2-phenylethyl propionate ¹
N/A	Cloves ²	590-00-1	Potassium sorbate ¹
8000-34-8	Clove oil ^{1,2}	N/A	Putrescent whole egg solids
N/A	Corn gluten meal	N/A	Rosemary ²
8001-30-7	Corn oil	8000-25-7	Rosemary oil ^{1,2}
N/A	Cottonseed oil	N/A	Sesame (includes ground sesame plant)
N/A	Dried blood	8008-74-0	Sesame oil
97-53-0	Eugenol ^{1,2}	7647-14-5	Sodium chloride (common salt)
N/A	Garlic	151-21-3	Sodium lauryl sulfate ^{1,2}
8008-99-9	Garlic oil ¹	8001-22-7	Soybean oil
106-24-1	Geraniol ²	N/A	Thyme ²
8000-46-2	Geranium oil ²	8007-46-3	Thyme oil ^{1,2}
N/A	Lauryl sulfate ¹	N/A	White pepper ¹
8007-02-1	Lemongrass oil ¹	7440-66-6	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.

The list above was generated using the following resources:

- 3 CCR § 6147
- 40 CFR § 152.25 (f)

If an active ingredient in your product is not included on the list above, please consult the most recent ingredient lists and reference materials, which can be found at the following websites:

- U.S. EPA Minimal Risk Pesticides Web page:
http://www.epa.gov/pesticides/biopesticides/regtools/25b_list.htm#activeingredients
- California Code of Regulations § 6147 at:
<http://www.cdpr.ca.gov/docs/legbills/calcode/25.htm>

APPENDIX 2: Exempt Inert (inactive) Ingredients

Includes ingredients from: FIFRA List 4A "Minimal Risk Inerts" and 40 CFR 180.950

Exempt Inert Ingredients

CAS #	Chemical Name	CAS #	Chemical Name
5743-26-0	Acetic acid, calcium salt, monohydrate [Calcium acetate monohydrate]	7585-39-9	beta-cyclodextrin
127-08-2	Acetic acid, potassium salt [Potassium acetate]	68409-75-6	Bone meal
127-09-3	Acetic acid, sodium salt [Sodium acetate]	N/A	Bran
77-90-7	Acetyl tributyl citrate [Citric acid, 2-(acetyloxy)-, tributyl ester]	N/A	Bread crumbs
9002-18-0	Agar	34451-19-9	(+)-Butyl lactate [Lactic acid, n-butyl ester, (S)]
N/A	Almond hulls	138-22-7	Butyl lactate [Lactic acid, n-butyl ester]
N/A	Almond shells	123-95-5	Butyl stearate [Octadecanoic acid, butyl ester]
10016-20-3	alpha-cyclodextrin	57455-37-5	C.I. pigment blue 29 [Ultramarine blue]
1327-36-2	Aluminatesilicate	N/A	Calcareous shale
1327-43-1	Aluminum magnesium silicate [Silicic acid, aluminum magnesium salt]	13397-26-7	Calcite (Ca(CO ₃))
12736-96-8	Aluminum potassium sodium silicate [Silicic acid, aluminum potassium sodium salt]	62-54-4	Calcium acetate
1335-30-4	Aluminum silicate	5743-26-0	Calcium acetate monohydrate [Acetic acid, calcium salt, monohydrate]
1344-00-9	Aluminum sodium silicate [Silicic acid, aluminum sodium salt]	2090-05-3	Calcium benzoate [Benzoic acid, calcium salt]
12003-51-9	Aluminum sodium silicate (1:1:1) [Silicic acid (H ₄ SiO ₄), aluminum sodium salt (1:1:1)]	471-34-1	Calcium carbonate
1863-63-4	Ammonium benzoate [Benzoic acid, ammonium salt]	7693-13-2	Calcium citrate [Citric acid, calcium salt]
1002-89-7	Ammonium stearate [Octadecanoic acid, ammonium salt]	6107-56-8	Calcium octanoate
113894-85-	Amylopectin, acid-hydrolyzed, 1-octenylbutanedioate	12168-85-3	Calcium oxide silicate (Ca ₃ O(SiO ₄))
125109-81-	Amylopectin, hydrogen 1-octadecenylbutanedioate	1344-95-2	Calcium silicate [Silicic acid, calcium salt]
N/A	Animal glue	1592-23-0	Calcium stearate [Octadecanoic acid, calcium salt]
N/A	Anise	7778-18-9	Calcium sulfate
N/A	Apple pomace	10101-41-4	Calcium sulfate dihydrate
50-81-7	L-Ascorbic acid [Vitamin C]	10034-76-1	Calcium sulfate hemihydrate
137-66-6	Ascorbyl palmitate	N/A	Canary seed
12174-11-7	Attapulgite-type clay	7440-44-0	Carbon
N/A	Basil	124-38-9	Carbon dioxide
8012-89-3	Beeswax	546-93-0	Carbonic acid, magnesium salt (1:1) [Magnesium carbonate]
1302-78-9	Bentonite	298-14-6	Carbonic acid, monopotassium salt [Potassium bicarbonate]
85049-30-5	Bentonite, sodian	144-55-8	Carbonic acid, monosodium salt [Sodium bicarbonate]
121-33-5	Benzaldehyde, 4-hydroxy-3-methoxy- [Vanillin]	9000-11-7	Carboxymethyl cellulose [Cellulose, carboxymethyl ether]
1863-63-4	Benzoic acid, ammonium salt [Ammonium benzoate]	N/A	Cardboard
2090-05-3	Benzoic acid, calcium salt [Calcium benzoate]	8015-86-9	Carnauba wax
582-25-2	Benzoic acid, potassium salt [Potassium benzoate]	9000-40-2	Carob gum [Locust bean gum]
532-32-1	Benzoic acid, sodium salt [Sodium benzoate]	9000-07-1	Carrageenan
		9000-71-9	Caseins
		8001-79-4	Castor oil

APPENDIX 2: Exempt Inert (inactive) Ingredients

Includes ingredients from: FIFRA List 4A "Minimal Risk Inerts" and 40 CFR 180.950

CAS #	Chemical Name	CAS #	Chemical Name
8001-78-3	Castor oil, hydrogenated	6132-04-3	Citric acid, trisodium salt, dihydrate
N/A	Cat food		[Trisodium citrate dihydrate]
9004-34-6	Cellulose	6858-44-2	Citric acid, trisodium salt, pentahydrate
9004-35-7	Cellulose acetate		[Trisodium citrate pentahydrate]
9000-11-7	Cellulose, carboxymethyl ether	N/A	Citrus meal
	[Carboxymethyl cellulose]	9000-69-5	Citrus pectin
9004-32-4	Cellulose, carboxy methyl ether, sodium salt	68514-76-1	Citrus pulp
	[Sodium carboxymethyl cellulose]	N/A	Clam shells
9004-62-0	Cellulose, 2-hydroxyethyl ether	N/A	Cloves
	[Hydroxyethyl cellulose]	8002-31-1	Cocoa
9004-64-2	Cellulose, 2-hydroxypropyl ether	N/A	Cocoa shell flour
	[Hydroxypropyl cellulose]	N/A	Cocoa shells
9004-65-3	Cellulose, 2-hydroxypropyl methyl ether	8001-69-2	Cod-liver oil
	[Hydroxypropyl methyl cellulose]	68916-18-7	Coffee grounds
9004-67-5	Cellulose, methyl ether	N/A	Cookies
	[Methylcellulose]	61789-98-8	Cork
51395-75-6	Cellulose, mixture with cellulose carboxymethyl ether, sodium salt	N/A	Corn cobs
65996-61-4	Cellulose, pulp	N/A	Cotton
68442-85-3	Cellulose, regenerated	68424-10-2	Cottonseed meal
N/A	Cheese	N/A	Cracked wheat
479-61-8	Chlorophyll a	50-70-4	D-glucitol
519-62-0	Chlorophyll b		[Sorbitol]
N/A	Cinnamon	26402-22-2	Decanoic acid, monoester with 1,2,3-propanetriol
77-92-9	Citric acid	9004-53-9	Dextrins
77-90-7	Citric acid, 2-(acetyloxy)-, tributyl ester	50-99-7	Dextrose
	[Acetyl tributyl citrate]	61790-53-2	Diatomaceous earth (less than 1% crystalline silica)
7693-13-2	Citric acid, calcium salt	61790-53-2	[Kieselguhr; Diatomite]
	[Calcium citrate]		Diatomite
813-94-5	Citric acid, calcium salt (2:3)	49553-76-6	[Diatomaceous earth (less than 1% crystalline silica)]
	[Tricalcium citrate]		Diglyceryl monooleate
3609-96-9	Citric acid, dipotassium salt	12694-22-3	[9-Octadecenoic acid, ester with 1,2,3-propanetriol]
	[Dipotassium citrate]		Diglyceryl monostearate
144-33-2	Citric acid, disodium salt		[9-Octadecanoic acid, monoester with
	[Disodium citrate]	27638-00-2	oxybis(propanediol)]
5949-29-1	Citric acid, monohydrate		Dilaurin
866-83-1	Citric acid, monopotassium salt		[Dodecanoic acid, diester with 1,2,3-propanetriol]
	[Monopotassium citrate]	108-32-7	1,3-Dioxolan-2-one, 4-methyl-
18996-35-5	Citric acid, monosodium salt		[1,2-Propylene carbonate]
	[Monosodium citrate]	26657-95-4	Dipalmitin
7778-49-6	Citric acid, potassium salt		[Hexadecanoic acid, diester with 1,2,3-propanetriol]
	[Potassium citrate]	3609-96-9	Dipotassium citrate
77-93-0	Citric acid, triethyl ester		[Citric acid, dipotassium salt]
	[Triethyl citrate]	144-33-2	Disodium citrate
866-84-2	Citric acid, tripotassium salt		[Citric acid, disodium salt]
	[Tripotassium citrate]	7727-73-3	Disodium sulfate decahydrate
6100-05-6	Citric acid, tripotassium salt, monohydrate	142-18-7	Dodecanoic acid, 2,3-dihydroxypropyl ester
	[Tripotassium citrate monhydrate]		[1-Monolaurin]
994-36-5	Citric acid, sodium salt	53998-07-1	Decanoic acid, diester with 1,2,3-propanetriol
	[Sodium citrate]		[Monomyristin]
68-04-2	Citric acid, trisodium salt	27215-38-9	Dodecanoic acid, monoester with 1,2,3-propanetriol
	[Trisodium citrate]	16389-88-1	Dolomite
		N/A	Douglas fir bark

APPENDIX 2: Exempt Inert (inactive) Ingredients

Includes ingredients from: FIFRA List 4A "Minimal Risk Inerts" and 40 CFR 180.950

CAS #	Chemical Name	CAS #	Chemical Name
N/A	Eggs	26657-95-4	Hexadecanoic acid, diester with 1,2,3-propanetriol
N/A	Eggshells		[Dipalmitin]
687-47-8	(+)-Ethyl lactate	26657-96-5	Hexadecanoic acid, monoester with 1,2,3-propanetriol
	[Lactic acid, ethyl ester (S)]		[Monopalmitin]
97-64-3	Ethyl lactate	68514-28-3	Humic acid, potassium salt
	[Lactic acid, ethyl ester]		[Potassium humate]
68476-25-5	Feldspar	1413-93-6	Humic acid
N/A	Fenugreek	68131-04-4	Humic acid, sodium salt
N/A	Fish meal		[Sodium humate]
8016-13-5	Fish oil [not conforming to 40 CFR §180.950]	68334-00-9	Hydrogenated cottonseed oil
57-48-7	Fructose	84681-71-0	Hydrogenated rapeseed oil
8031-18-3	Fuller's earth	8016-70-4	Hydrogenated soybean oil
110-17-8	Fumaric acid	9004-62-0	Hydroxyethyl cellulose
17465-86-0	gamma-cyclodextrin		[Cellulose, 2-hydroxyethyl ether]
9000-70-8	Gelatins	9004-64-2	Hydroxypropyl cellulose
71010-52-1	Gellan gum		[Cellulose, 2-hydroxypropyl ether]
68476-37-9	Glue (as depolymd. animal collagen)	9004-65-3	Hydroxypropyl methyl cellulose
56-81-5	Glycerin		[Cellulose, 2-hydroxypropyl methyl ether]
	[1,2,3-propanetriol]	8013-17-0	Invert sugar
56-81-5	Glycerol	12068-86-9	Iron magnesium oxide (Fe ₂ MgO ₄)
	[Glycerin; 1,2,3-propanetriol]	1309-37-1	Iron oxide (Fe ₂ O ₃)
111-03-5	Glycerol monooleate	12259-21-1	Iron oxide (Fe ₂ O ₃), hydrate
	[9-Octadecenoic acid (Z)-, 2,3-dihydroxypropyl ester]	1317-61-9	Iron oxide (Fe ₃ O ₄)
36354-80-0	Glyceryl dicaprylate	1345-25-1	Iron oxide (FeO)
	[Octanoic acid, diester with 1,2,3-propanetriol]	67-63-0	Isopropanol
53563-63-6	Glyceryl dimyristate		[Isopropyl alcohol]
	[Tetradecanoic acid, diester with 1,2,3-propanetriol]	67-63-0	Isopropyl alcohol
25637-84-7	Glyceryl dioleate		[2-Propanol]
	[9-Octadecenoic acid (9Z)-, diester with 1,2,3-propanetriol]	110-27-0	Isopropyl myristate
1323-83-7	Glyceryl distearate	1332-58-7	Kaolin
27214-38-6	Glyceryl monomyristate	61790-53-2	Kieselguhr
	[Tetradecanoic acid, monoester with 1,2,3-propanetriol]		[Diatomaceous earth (less than 1% crystalline silica)]
26402-26-6	Glyceryl monooctanoate	97-64-3	Lactic acid, ethyl ester
	[Octanoic acid, monoester with 1,2,3-propanetriol]		[Ethyl lactate]
25496-72-4	Glyceryl monooleate	687-47-8	Lactic acid, ethyl ester, (S)
	[9-Octadecenoic acid (9Z)-, monoester with 1,2,3-propanetriol]		[(+)-Ethyl lactate]
31566-31-1	Glyceryl monostearate	138-22-7	Lactic acid, n-butyl ester
	[Octadecanoic acid, monoester with 1,2,3-propanetriol]		[Butyl lactate]
11099-07-3	Glyceryl stearate	34451-19-9	Lactic acid, n-butyl ester, (S)
	[Octadecanoic acid, ester with 1,2,3-propanetriol]		[(+)-Butyl lactate]
N/A	Granite	63-42-3	Lactose
N/A	Grape pumice	64044-51-5	Lactose monohydrate
7782-42-5	Graphite	8006-54-0	Lanolin
9000-30-0	Guar gum	N/A	Latex rubber
9000-01-5	Gum arabic	143-07-7	Lauric acid
9000-65-1	Gum tragacanth	8002-43-5	Lecithins
13397-24-5	Gypsum	8030-76-0	Lecithins, soya
1317-60-8	Hematite (Fe ₂ O ₃)		[Soya lecithins]
N/A	Herbs, food commodity	68916-91-6	Licorice extract
57-10-3	Hexadecanoic acid	12001-27-3	Lime (chemical) dolomitic
	[Palmitic acid]	1317-65-3	Limestone
		8001-26-1	Linseed oil

APPENDIX 2: Exempt Inert (inactive) Ingredients

Includes ingredients from: FIFRA List 4A "Minimal Risk Inerts" and 40 CFR 180.950

CAS #	Chemical Name	CAS #	Chemical Name
9000-40-2	Locust bean gum (Carob gum)	557-04-0	Octadecanoic acid, magnesium salt [Magnesium stearate]
553-70-8	Magnesium benzoate	31566-31-1	Octadecanoic acid, monoester with 1,2,3-propanetriol [Glyceryl monostearate]
546-93-0	Magnesium carbonate [Carbonic acid, magnesium salt (1:1)]	593-29-3	Octadecanoic acid, potassium salt [Potassium stearate]
1309-48-4	Magnesium oxide	36354-80-0	Octanoic acid, diester with 1,2,3-propanetriol [Glyceryl dicaprylate]
12207-97-5	Magnesium oxide silicate (Mg ₃ O(Si ₂ O ₅) ₂), monohydrate	26402-26-6	Octanoic acid, monoester with 1,2,3-propanetriol [Glyceryl monoctanoate]
1343-88-0	Magnesium silicate	764-71-6	Octanoic acid, potassium salt
1343-90-4	Magnesium silicate hydrate	1984-06-1	Octanoic acid, sodium salt
14987-04-3	Magnesium silicon oxide (Mg ₂ Si ₃ O ₈)	822-16-2	Octadecanoic acid, sodium salt [Sodium stearate]
557-04-0	Magnesium stearate [Octadecanoic acid, magnesium salt]	557-05-1	Octadecanoic acid, zinc salt [Zinc stearate]
7487-88-9	Magnesium sulfate	12694-22-3	9-Octadecanoic acid, monoester with oxybis(propanediol) [Diglyceryl monostearate]
10034-99-8	Magnesium sulfate heptahydrate	25637-84-7	9-Octadecenoic acid (9Z)-, diester with 1,2,3-propanetriol [Glyceryl dioleate]
6915-15-7	Malic acid	25496-72-4	9-Octadecenoic acid (9Z)-, monoester with 1,2,3-propanetriol [Glyceryl monooleate]
8002-48-0	Malt extract	71012-10-7	9-Octadecenoic acid (9Z)-, monoester with tetraglycerol [Tetraglyceryl monooleate]
N/A	Malt flavor	143-18-0	9-Octadecenoic acid (9Z)-, potassium salt [Potassium oleate]
9050-36-6	Maltodextrin	111-03-5	9-Octadecenoic acid (Z)-, 2,3-dihydroxypropyl ester [Glycerol monooleate]
N/A	Meat meal [As described in 40 CFR §180.950(b)]	7492-30-0	9-Octadecenoic acid, 12-hydroxy-, monopotassium salt, (9Z,12R)- [Potassium ricinoleate]
9004-67-5	Methylcellulose [Cellulose, methyl ether]	5323-95-5	9-Octadecenoic acid, 12-hydroxy-, monosodium salt, (9Z,12R)- [Sodium ricinoleate]
12003-38-2	Mica	49553-76-6	9-Octadecenoic acid, ester with 1,2,3-propanetriol [Diglyceryl monooleate]
12001-26-2	Mica-group minerals	1592-23-0	Octadecanoic acid, calcium salt [Calcium stearate]
8049-98-7	Milk	8007-69-0	Oils, almond
N/A	Millet seed	68917-73-7	Oils, wheat
8012-95-1	Mineral oil (U.S.P.)	112-80-1	Oleic acid
142-18-7	1-Monolaurin [Dodecanoic acid, 2,3-dihydroxypropyl ester]	N/A	Oyster shells
589-68-4	1-Monomyristin [Tetradecanoic acid, 2,3-dihydroxypropyl ester]	8002-75-3	Palm oil
53998-07-1	Monomyristin [Decanoic acid, diester with 1,2,3-propanetriol]	68514-74-9	Palm oil, hydrogenated
26657-96-5	Monopalmitin [Hexadecanoic acid, monoester with 1,2,3-propanetriol]	57-10-3	Palmitic acid [Hexadecanoic acid]
866-83-1	Monopotassium citrate [Citric acid, monopotassium salt]	N/A	Paper
18996-35-5	Monosodium citrate [Citric acid, monosodium salt]	8002-74-2	Paraffin wax
1318-93-0	Montmorillonite	N/A	Peanut butter
544-63-8	Myristic acid	N/A	Peanut shells
37244-96-5	Nepheline syenite	N/A	Peanuts
7727-37-9	Nitrogen	N/A	Peat moss
N/A	Nutria meat	9000-69-5	Pectin
N/A	Nylon	130885-09-5	Perlite
57-11-4	Octadecanoic acid [Stearic acid]		
1002-89-7	Octadecanoic acid, ammonium salt [Ammonium stearate]		
123-95-5	Octadecanoic acid, butyl ester [Butyl stearate]		
11099-07-3	Octadecanoic acid, ester with 1,2,3-propanetriol [Glyceryl stearate]		

APPENDIX 2: Exempt Inert (inactive) Ingredients

Includes ingredients from: FIFRA List 4A "Minimal Risk Inerts" and 40 CFR 180.950

CAS #	Chemical Name	CAS #	Chemical Name
93763-70-3	Perlite, expanded	1327-43-1	Silicic acid, aluminum magnesium salt
26499-65-0	Plaster of paris		[Aluminum magnesium silicate]
9002-88-4	Polyethylene	12736-96-8	Silicic acid, aluminum potassium sodium salt
9007-48-1	Polyglyceryl oleate		[Aluminum potassium sodium silicate]
9009-32-9	Polyglyceryl stearate	1344-00-9	Silicic acid, aluminum sodium salt
127-08-2	Potassium acetate		[Aluminum sodium silicate]
	[Acetic acid, potassium salt]	12003-51-9	Silicic acid (H ₄ SiO ₄), aluminum sodium salt (1:1:1)
1327-44-2	Potassium aluminum silicate, anhydrous		[Aluminum sodium silicate (1:1:1)]
582-25-2	Potassium benzoate	1344-95-2	Silicic acid, calcium salt
	[Benzoic acid, potassium salt]		[Calcium silicate]
298-14-6	Potassium bicarbonate	13776-74-4	Silicic acid (H ₂ SiO ₃), magnesium salt (1:1)
	[Carbonic acid, monopotassium salt]	63231-67-4	Silica gel
7447-40-7	Potassium chloride	112926-00-8	Silica gel, precipitated, crystalline free
7778-49-6	Potassium citrate	10279-57-9	Silica, hydrate
	[Citric acid, potassium salt]	60676-86-0	Silica, vitreous
68514-28-3	Potassium humate	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)
	[Humic acids, potassium salts]		
13429-27-1	Potassium myristate	1393-03-9	Soapbark
	[Tetradecanoic acid, potassium salt]		[Quillaja saponin]
143-18-0	Potassium oleate	308076-02-0	Soapstone
	[9-Octadecenoic acid (9Z)-, potassium salt]	127-09-3	Sodium acetate
7492-30-0	Potassium ricinoleate		[Acetic acid, sodium salt]
	[9-Octadecenoic acid, 12-hydroxy-, monopotassium salt, (9Z,12R)-]	9005-38-3	Sodium alginate
24634-61-5	Potassium sorbate	532-32-1	Sodium benzoate
	[Sorbic acid, potassium salt]		[Benzoic acid, sodium salt]
593-29-3	Potassium stearate	144-55-8	Sodium bicarbonate
	[Octadecanoic acid, potassium salt]		[Carbonic acid, monosodium salt]
7778-80-5	Potassium sulfate	9004-32-4	Sodium carboxymethyl cellulose
7646-93-7	Potassium sulfate		[Cellulose, carboxymethyl ether, sodium salt]
	[Sulfuric acid, monopotassium salt]	7647-14-5	Sodium chloride
56-81-5	1,2,3-Propanetriol	994-36-5	Sodium citrate
	[Glycerol; Glycerin]		[Citric acid, sodium salt]
67-63-0	2-Propanol	68131-04-4	Sodium humate
	[Isopropyl alcohol; Isopropanol]		[Humic acids, sodium salts]
108-32-7	1,2-Propylene carbonate	143-19-1	Sodium oleate
	[1,3-Dioxalan-2-one, 4-methyl-]	5323-95-5	Sodium ricinoleate
1332-09-8	Pumice		[9-Octadecenoic acid, 12-hydroxy-, monosodium salt,(9Z,12R)-]
1393-03-9	Quillaja saponin	822-16-2	Sodium stearate
	[Soapbark]		[Octadecanoic acid, sodium salt]
N/A	Red cabbage color (expressed from edible red cabbage heads a pressing process using only acidified water)	7757-82-6	Sodium sulfate
N/A	Red cedar chips	24634-61-5	Sorbic acid, potassium salt
N/A	Red dog flour		[Potassium sorbate]
N/A	Red pepper	50-70-4	Sorbitol
9006-04-6	Rubber		[D-glucitol]
N/A	Sawdust	N/A	Soy protein
N/A	Shale	8030-76-0	Soya lecithins
7631-86-9	Silica (crystalline free)		[Lecithins, soya]
112945-52-	Silica, amorphous, fumed (crystalline free)	N/A	Soybean hulls
7699-41-4	Silica, amorphous, precipitated and gel	68308-36-1	Soybean meal

APPENDIX 2: Exempt Inert (inactive) Ingredients

Includes ingredients from: FIFRA List 4A "Minimal Risk Inerts" and 40 CFR 180.950

CAS #	Chemical Name	CAS #	Chemical Name
68513-95-1	Soybean flour	6132-04-3	Trisodium citrate dihydrate
8001-22-7	Soybean oil [As described in 40 CFR §180.950(c)(1)]		[Citric acid, trisodium salt, dihydrate]
N/A	Spices [as defined in 40 CFR §180.950(a)]	6858-44-2	Trisodium citrate pentahydrate
57-11-4	Stearic acid		[Citric acid, trisodium salt, pentahydrate]
	[Octadecanoic acid]	57455-37-5	Ultramarine blue
57-50-1	Sucrose		[C.I. pigment blue 29]
7704-34-9	Sulfur	57-13-6	Urea
7646-93-7	Sulfuric acid, monopotassium salt	121-33-5	Vanillin
	[Potassium sulfate]		[Benzaldehyde, 4-hydroxy-3-methoxy-]
N/A	Syrup [As described in 40 CFR §180.950(a)]	1318-00-9	Vermiculite
68425-17-2	Syrups, hydrolyzed starch, hydrogenated	8028-52-2	Vinegar (maximum 8% acetic acid in solution)
589-68-4	Tetradecanoic acid, 2,3-dihydroxypropyl ester	50-81-7	Vitamin C
	[1-Monomyristin]		[L-Ascorbic acid]
53563-63-6	Tetradecanoic acid, diester with 1,2,3-propanetriol	1406-18-4	Vitamin E
	[Glyceryl dimyristate]	N/A	Walnut flour
27214-38-6	Tetradecanoic acid, monoester with 1,2,3-propanetriol	N/A	Walnut shells
	[Glyceryl monomyristate]	7732-18-5	Water
13429-27-1	Tetradecanoic acid, potassium salt	N/A	Wheat
	[Potassium myristate]	N/A	Wheat flour
71012-10-7	Tetraglyceryl monooleate	8006-95-9	Wheat germ oil
	[9-Octadecenoic acid (9Z)-, monoester with tetraglycerol]	92129-90-3	Whey
813-94-5	Tricalcium citrate	8042-47-5	White mineral oil (petroleum)
	[Citric acid, calcium salt (2:3)]	68917-75-9	Wintergreen oil
77-93-0	Triethyl citrate	13983-17-0	Wollastonite (Ca(SiO ₃))
	[Citric acid, triethyl ester]	N/A	Wool
866-84-2	Tripotassium citrate	11138-66-2	Xanthan gum
	[Citric acid, tripotassium salt]	68876-77-7	Yeast
6100-05-6	Tripotassium citrate monohydrate	1318-02-1	Zeolites (excluding erionite (CAS # 66733-21-9))
	[Citric acid, tripotassium salt, monohydrate]	68989-22-0	Zeolites, NaA
68-04-2	Trisodium citrate	12063-19-3	Zinc iron oxide
	[Citric acid, trisodium salt]	1314-13-2	Zinc oxide (ZnO)
		557-05-1	Zinc stearate
			[Octadecanoic acid, zinc salt]

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, please contact Richard Spas of the Department of Pesticide Regulation at 916-322-9522 or rspas@cdpr.ca.gov.

The list above was generated using the following resources:

- "Inert Ingredients Eligible for FIFRA 25(b) Pesticide Products, Last Updated December 20, 2010"
- 40 CFR §180.950

If an inert ingredient in your product is not included on the list above, please consult the most recent ingredient lists and reference materials, which can be found at the following websites:

- Inert Ingredients Eligible for FIFRA 25(b) Pesticide Products at:
http://www.epa.gov/opprd001/inerts/section25b_inerts.pdf
- Code of Federal Regulation, Title 40, Chapter 1, Subchapter E, Part 180, Subpart D, §180.950 at:
<http://www.epa.gov/lawsregs/search/40cfr.html>
- U.S EPA Minimum Risk Pesticides: Permitted Inerts Web site:
<http://www.epa.gov/oppbppd1/biopesticides/regtools/25b/25b-inerts.htm>

REFERENCE 1: Definition of crack and crevice treatments under the Healthy Schools Act

California Education Code, Section 17609 (b)

(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 2: Definition of antimicrobial under 7 U.S. Code 136 treatments under the Healthy Schools Act

Title 7, Chapter 2, Subchapter II, § 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).