

Oregon OSHA

FACT SHEET

Using sulfur dioxide to sanitize wine barrels and corks

OAR 437
Division 2

Sulfur dioxide is legally classified as a pesticide under federal and Oregon laws when it is labeled to sanitize wine barrels and wine corks.

Sulfur dioxide products that have instructions for sanitizing barrels and corks must be registered as pesticides with the U.S. Environmental Protection Agency and the [Oregon Department of Agriculture \(ODA\)](#). The product's label must have an [EPA registration number](#) and a statement of the product's intended use.

In Oregon, only one sulfur dioxide product is currently registered to sanitize barrels and corks: Airgas Sulfur Dioxide (EPA Reg. No. 89867-2). Airgas Sulfur Dioxide is a restricted use pesticide. Never add this product directly to wine.

Oregon
OSHA

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What is a restricted use pesticide?

A restricted use pesticide or RUP is a pesticide not available to the general public in the United States. The restricted use classification limits a product, or its uses, to a certificated pesticide applicator or those under the direct supervision of a certified applicator.

What are the requirements to purchase and use a restricted use pesticide?

You must be currently and appropriately [licensed](#) by the Oregon Department of Agriculture to purchase restricted use pesticides and to use or supervise the use of restricted use pesticides. When you supervise the use of a restricted use pesticide, you must provide detailed application instructions to the people you supervise. Applicators must follow the instructions on the label and the instructions on application manual that comes with the purchased sulfur dioxide product.

Oregon Department of Agriculture licensing requirements

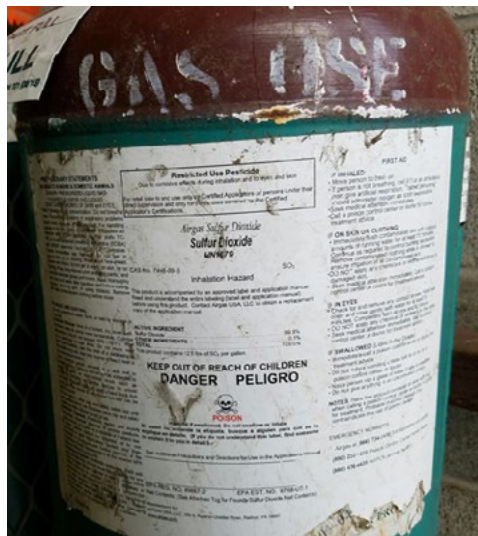
The type of pesticide applicator license required by the ODA to purchase or use a restricted use pesticide may vary depending on the situation. Generally, to obtain an applicator's license, you must first pass one or more [ODA exams](#). (In limited circumstances, those with pesticide licenses issued in Idaho or Washington may be able to obtain an [Oregon license](#) without taking ODA exams.)

Using sulfur dioxide to sanitize wine barrels and corks – *continued*

Your required licenses and exams depend on the source of your grapes and where your barrels and corks are treated. The table below summarizes the requirements:

Winery situation	Licenses required	Exams required
Your wine is 100% estate grown <i>and</i> you treat your own barrels <i>and</i> corks on property that you or your employer owns or rents.	Private applicator license	Private applicator exam
Your wine is <i>not</i> 100% estate grown <i>and</i> you treat your own barrels <i>and</i> corks on property that you or your employer owns or rents.	Commercial applicator license	Laws and safety exam <i>and</i> IIHS*: Space fumigation exam
Your barrels <i>and</i> corks are treated by someone else on land that you own or rent, or at another location.	The person who treats your barrels and corks must have a commercial applicator license <i>and</i> their business must have a commercial operator license.	Laws and safety exam <i>and</i> IIHS*: Space fumigation exam

*(Industrial, institutional, health, and structural)



Respiratory protection program requirements

The application manual requires that you use a specific type of respirator when you use sulfur dioxide as a sanitizer; you must also have a written respiratory protection program that meets the requirements in [1910.134, Respiratory protection](#). The program must describe how you will:

- Select appropriate respirators for employees
- Conduct medical evaluations for all employees who use respirators
- Fit-test employees who use tight-fitting respirators
- Ensure that employees correctly use the respirators
- Ensure that respirators are clean and properly maintained
- Ensure air quality in atmosphere-supplying respirators
- Train employees to protect themselves from respiratory hazards
- Evaluate the program's effectiveness



Personal protective equipment requirements

Applicators must wear, in addition to a long-sleeved shirt and long pants, all of the following:

- Chemical-resistant coveralls such as Tychem SL or Saranex, or a chemical-resistant apron and coveralls
- Chemical-resistant footwear and socks
- Sulfur dioxide-resistant gloves (butyl rubber or neoprene are examples)
- A NIOSH-approved full-face respirator with acid gas or combination organic vapor/acid gas cartridges

Application: Label and manual requirements

You must follow the instructions on the label and the instructions in the sulfur dioxide application manual. The manual, which is considered part of the label, is included with registered sulfur dioxide product that you purchase. The application manual describes the product's physical and chemical hazards, and your requirements for:

- Respirators
- Personal protective equipment
- Air monitoring
- Recordkeeping
- Posting warning signs
- Storing sulfur dioxide cylinders



Sanitized wine corks must also be labeled. When you sanitize wine corks with sulfur dioxide, you must label the corks "SO2 treated."