



**OREGON  
DEPARTMENT OF  
AGRICULTURE**

*Protect. Promote. Prosper.*

**Pesticides Program**  
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## Pesticide Advisory

**Attention Commercial Wineries: No sulfur dioxide (SO<sub>2</sub>) product is currently registered in Oregon for sanitizing barrels or corks**

May 23, 2025

When sulfur dioxide is used to sanitize wine barrels and corks it is classified as a pesticide. If a sulfur dioxide product is intended to sanitize wine barrels or corks, it must be registered with the Environmental Protection Agency (EPA) and the Oregon Department of Agriculture (ODA) to be legally sold, offered for sale, or distributed in Oregon. Unfortunately, in 2024, the registration for the only sulfur dioxide product available in Oregon, Airgas Sulfur Dioxide (EPA Registration Number 89867-2), was cancelled. Currently, there is no sulfur dioxide product registered in Oregon that is intended for sanitizing barrels or corks. ODA is aware of the issue and is exploring options.

ODA understands the challenge facing the wine industry relating to the need to sanitize barrels and corks; therefore, we have prepared the following Question & Answer Sheet to help wine makers navigate pesticide regulations.

### **What is a pesticide?**

A pesticide is defined as any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest. See ORS 634.006(11) for a complete definition. Many antimicrobial products, such as sanitizers and disinfectants, are pesticides. Any substance that is intended to be used for sanitization of wine barrels is a pesticide. By federal law, except in limited circumstances, pesticides are required to be registered with the EPA prior to sale and distribution in the United States. Registered pesticides will have an EPA Registration Number with two or three sets of numbers (for example, EPA Reg. No. 12345-67, or 12345-67-890). By state law, pesticides are also required to be registered with ODA before they can be sold, offered for sale, or distributed in Oregon. To search for pesticide products that are registered in Oregon visit <https://oda.direct/SearchRegisteredPesticides>.

### **Why are pesticides registered with EPA?**

During the registration process, EPA assesses a pesticide's ingredients, uses, application rates, toxicology data, and potential ecological and human health risks. Precautions, first aid, personal protective equipment (PPE), restrictions, and application directions are developed based on the assessment. Pesticides are required to be labeled with this information to allow for safe and effective use of the product.

### **What are the risks if I use an unregistered pesticide?**

Since unregistered pesticides have not been evaluated, the risks to human health and the environment are unknown. The pesticide applicator may not know what PPE is necessary to protect themselves or others, or the first aid actions needed in the event of exposure. Pesticide labels also specify the correct application rate or concentration, timing, and method to achieve the desired result, such as sanitization. Without these specific directions on a label, the pesticide applicator may not know if their barrels were sanitized or if there are any pesticide residue concerns. Furthermore, unless a tolerance or exemption from the requirement of a tolerance is in effect, any pesticide residue in or on food is considered adulterated. Registered pesticides have labels that provide important information to applicators, handlers, and other workers about the products' risks, PPE, and use directions. Additionally, each product must be registered before being applied commercially on a customer's property. The label must always be followed. Pesticide labels are lawfully

enforceable, and include the statement, “It is a violation of Federal law to use this product in a manner inconsistent with its labeling.” In other words, the label is the law.

### **What are my obligations to protect my workers when they sanitize wine barrels?**

Oregon OSHA enforces health and safety requirements to protect workers. Employers need to perform a hazard assessment and implement control measures. Workers have a right to know about hazardous substances that are used in the workplace, and employers must provide adequate personal protective equipment and training. Oregon OSHA [Consultation](#) services can provide guidance, as can the employer’s workers’ compensation insurance provider.

### **What about use of sulfur dioxide to halt the fermentation process? Why don’t I need to use a registered pesticide?**

There are non-pesticidal uses of sulfur dioxide during the winemaking process which do not require the use of a registered pesticide. However, worker safety requirements still apply even if the product is not labelled as a pesticide. Consult with Oregon OSHA for health and safety requirements for workers.

### **Can I use sulfur wicks, potassium metabisulfite, soda ash (sodium carbonate), sodium percarbonate, or peroxyacetic acid to sanitize my wine barrels?**

ODA has received inquiries about the potential use of other substances to sanitize wine barrels and corks. An abundance of information is also available online suggesting how to sanitize barrels with specific substances. Any substance that is distributed, sold, or intended to be used for sanitization of wine barrels is a pesticide. Pesticides must be registered with the EPA and ODA prior to sale and distribution in Oregon. Additionally, the pesticide label must include use directions for sanitization of wine barrels. To date, ODA is unaware of any registered pesticides containing these chemicals that are labeled specifically for sanitization of wine barrels. Also refer to the question “**What are the risks if I use an unregistered pesticide?**”.

There are registered pesticides that contain some of the above listed chemicals, but they have other uses. Some of these pesticides are labeled for use in food processing facilities, wineries, breweries, and beverage plants, but the sanitization claims are typically limited to hard, non-porous surfaces of food preparation surfaces, processing equipment, pipelines, tanks, vats, fillers, evaporators, and pasteurizers. Wine barrels and corks are porous surfaces.

### **Do I need a pesticide applicator license to use any of these substances?**

To purchase or use pesticides that are labeled as Restricted Use Pesticides (RUPs), you must be a certified and licensed applicator. The Noncommercial Pesticide Applicator (NPA) license is required for those who apply, use, or supervise the use of RUPs on property they or their employer owns or leases for a purpose other than the production of an agricultural commodity. This includes employees of wineries who fumigate their wine barrels or corks with sulfur dioxide. Please see the [NPA License Fact Sheet for Wine Producers](#) for more information. For more information on applicator licensing visit <https://oda.direct/PesticideLicensing>.

### **What other options do I have to sanitize my wine barrels?**

Other purported methods to sanitize barrels include the use of hot water, steam, dry steam, ozone washing, ultraviolet light, and ultrasound. Some of these methods involve the use of pesticidal devices (e.g., ozone generators), which are minimally regulated by EPA. EPA does not review device data or claims for safety or efficacy, as it does for pesticides, and devices are not subject to EPA registration. Pesticidal devices are not currently reviewed or registered by ODA. Consult the device instructions and manufacturer to determine if you can use the device to sanitize wine barrels. Consult with Oregon OSHA for health and safety requirements for workers.

### **Do I need a pesticide applicator license in Oregon to use a pesticidal device (e.g., ozone generators)?**



No, pesticidal devices are not currently reviewed or registered by ODA.

## Resources

[What is a Pesticide?](#) - EPA

[About Pesticide Registration](#) - EPA

[About Pesticide Products](#) - ODA

[Pesticides Must be Registered with EPA](#) - EPA

[Illegal, Cancelled, and Restricted Pesticides](#) - NPIC

[Pesticide Devices: A Guide for Consumers](#) - EPA

Search pesticides registered in Oregon:

[Pesticide Product Registrations search](#) - ODA

[Pesticide Information Center OnLine \(PICOL\) Database](#) - WSU

Licensing information:

[Explore Licensing Requirements](#) - ODA

[NPA License Fact Sheet for Wine Producers](#) - ODA

Employer and worker resources:

[Worker Rights and Responsibilities](#) – Oregon-OSHA

[Employer Essentials](#) – Oregon OSHA

[Consultation Services](#) – Oregon OSHA

[Eyewash and Safety Showers](#) – Oregon OSHA

Information on sulfur:

[Sulfur General Fact Sheet](#) - NPIC

[Can I Burn Sulfur for Pest Control?](#) - NPIC

