

US EPA ARCHIVE DOCUMENT

Module 8

Soil Fumigant RED Requirements

- Emergency Preparedness and Response
 - Difficult to Evacuate Sites**
 - Notice to State Lead Agencies****
- (2011)**

Emergency Preparedness and Response

If occupied structures are in close proximity to a buffer zone, the certified applicator must choose either:

- “Fumigant Site Monitoring”

Or

- “Response Information for Neighbors”

Distances that trigger requirements

If the buffer zone is _____:	AND occupied structures are within _____ from the edge of the buffer zone,
> 25 feet and ≤ to 100 feet	50 feet
> 100 feet and ≤ 200 feet	100 feet
> 200 feet and ≤ 300 feet	200 feet
> 300 feet	300 feet

Applicators must:

- (1) monitor the site, OR**
- (2) provide information to neighbors**

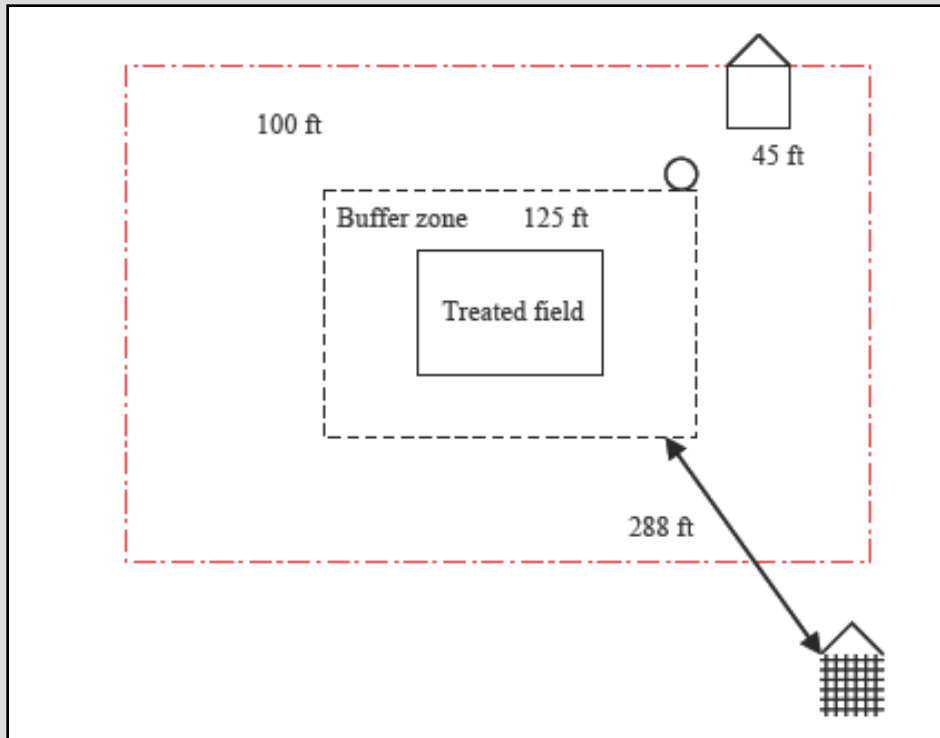
Option 1: Fumigant Site Monitoring

- Monitor:
 - *outside* the buffer zone, between the buffer and occupied structures
 - at dawn, dusk, once each during the day and night
 - for sensory irritation
- Use devices for MeBr formulations with <20% chloropicrin
- Put emergency response into action If experiencing sensory irritation or the action level is exceeded

Option 2: Response Information for Neighbors

- Applicators provide information directly to neighbors at least 48 hours before the application:
 - Location of application block
 - Name of the fumigant and product, EPA Reg. No.
 - Contact information
 - Expected time period for fumigation and buffer zone
 - Early signs and symptoms of exposure
- May use door hangers, mail, phone, etc.
- Describe method in FMP; may attach copies

Example Site Map - Emergency Preparedness and Response Measures



- If buffer zone is 125 feet, requirements apply to residences within 100 feet of buffer zone
- Applicator has option to monitor the air in the area between the plain house and the buffer zone, or give residents of the plain house information
- Cross-hatched house is outside of buffer zone, no action required

Treated Area:
Shank Application
80 lbs ai/A; 100 A

Review Question

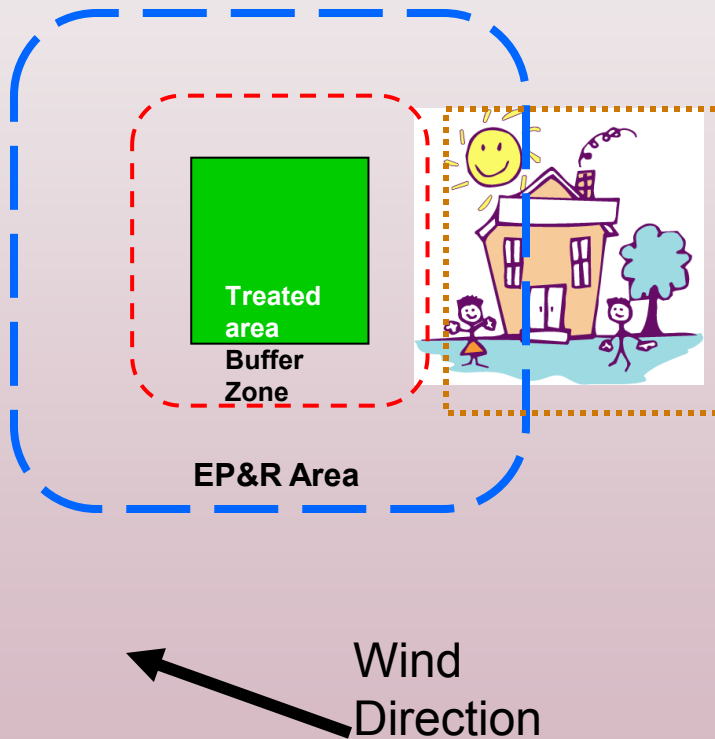
True or False?

1. Some situations require an applicator to carry out both Option 1 (monitoring) and Option 2 (neighbor response information).

Review Questions

1. In this example, the wind is blowing AWAY from the occupied house.

2. Are emergency preparedness & response measures required?



Review Question

3. What are examples of effective methods for providing emergency preparedness and response information to neighbors?

- A) Phone call
- B) Letter via certified mail
- C) Hand delivered notice
- D) Newspaper ad
- E) Radio ad
- F) All of the above
- G) A, B and C

What are “Difficult To Evacuate Sites”?

- Include:
 - Schools (Pre-K – 12)
 - State licensed daycare centers
 - Nursing homes
 - Assisted living facilities
 - Hospitals
 - In-patient clinics
 - Prisons

Proximity to Difficult to Evacuate Sites (DES)

*If occupied during the application or within
36 hours after the application*

<i>If the buffer zone is:</i>	<i>Then applications are prohibited within this distance from a “DES”:</i>
> 300 ft	1/4 mile (1320 ft.)
≤ 300 ft	1/8 mile (660 ft.)

Example of Application & Proximity to Difficult To Evacuate Sites (DES)

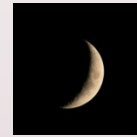
DES cannot be occupied during, and for 36-hours after, the application.



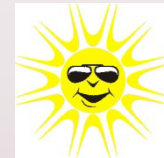
Saturday Morning



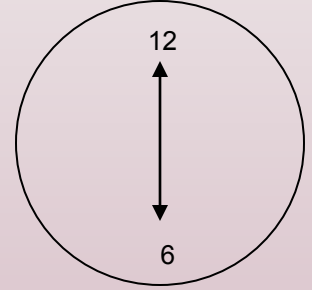
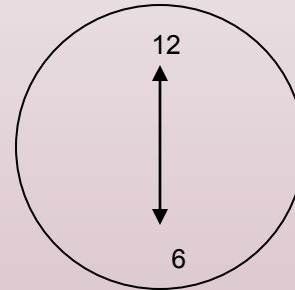
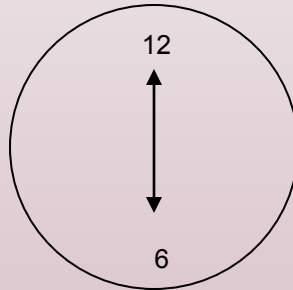
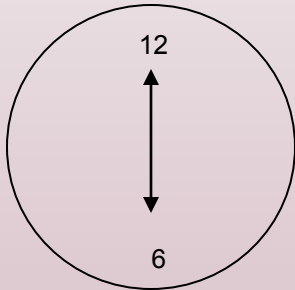
Saturday Evening



Sunday Evening



Monday Morning



**Begin Application
at 6 AM**

**Complete Application
by 6 PM**

**6AM: DES
unoccupied**

**6PM: DES
unoccupied**

**6 PM: DES
unoccupied 24 hrs
from end of
application**

**6 AM: DES
unoccupied 36 hrs
from end of
application**

Review Question

4. Which location is on the list of Difficult to Evacuate Sites?

- A) State licensed day care centers
- B) Non-licensed day care centers
- C) Dance schools
- D) Community baseball fields
- E) Neighborhood playgrounds

Review Question

True or False?

5. A difficult to evacuate site must be unoccupied after application for the same amount of time as the buffer zone period.

Buffer Zone = 250 ft

The image is an aerial photograph of a rural area. A large circular field is the central focus. A white arrow points from a text box to the inner circle of the field. A green double-headed arrow points from the bottom of the field to a red-outlined rectangular area below it, which contains a school and sports fields. A yellow hatched ring surrounds the circular field. The text 'Buffer Zone = 250 ft' is in a light blue box. The text 'Distance = 350 ft.' is in a yellow box. The background shows other fields, roads, and a school complex.

Distance = 350 ft.

Review Questions

- 6) How far does the application block need to be from the occupied site?
- 7) Can the grower fumigate this field?

Notice to State Lead Agencies

- Before making an application, check the website on the label:

http://www.epa.gov/pesticides/reregistration/soil_fumigants/

to determine if:

➡ your state or tribe requires notice,
and *if it does*,

➡ how to submit the information

What Information and How to Provide it?

- Information:
 - Location of the application block
 - Name and registration # of product
 - Applicator and property owner/operator contact information
 - Time period that fumigation may occur (within 2 week window)
 - Duration of buffer zone
- States advise how to notify

Review Question

True or False?

8. All states that meet the criteria for “high use” must be notified before a fumigant application takes place.

Summary

- Applications in close proximity to neighbors may require either (1) monitoring, OR (2) providing emergency preparedness and response information to the neighbors.
- Proximity is scaled to the size of the buffer zone.
- Applications are prohibited within 1/8 mile of Difficult to Evacuate Sites if the buffer is less than 300 ft.
- Applications are prohibited within 1/4 mile of Difficult to Evacuate Sites if the buffer is 300 ft. or larger.
- Some states may require notification; check the website on the label to find out if this is required for your application.

EPA Contact Information

- General Contact:
 - John Leahy (703) 305-6703
- Team Leaders:
 - Steven Weiss (703) 308-8293
 - Cathryn O'Connell (703) 308-0136
- Chemical Review Managers:
 - Methyl bromide: Susan Bartow (703) 603-0065
 - Metam sodium: Dana Friedman (703) 347-8827 and
Jose Gayoso (208) 347-5749
 - Dazomet: Dana Friedman (703) 347-8827
 - 1,3-D & Chloropicrin: Andrea Carone (703) 308-0122

E-mail: lastname.firstname@epa.gov