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

<table>
<thead>
<tr>
<th>If the buffer zone is</th>
<th>AND occupied structures are within from the edge of the buffer zone,</th>
</tr>
</thead>
<tbody>
<tr>
<td>&gt; 25 feet and ≤ to 100 feet</td>
<td>50 feet</td>
</tr>
<tr>
<td>&gt; 100 feet and ≤ 200 feet</td>
<td>100 feet</td>
</tr>
<tr>
<td>&gt; 200 feet and ≤ 300 feet</td>
<td>200 feet</td>
</tr>
<tr>
<td>&gt; 300 feet</td>
<td>300 feet</td>
</tr>
</tbody>
</table>

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?
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

<table>
<thead>
<tr>
<th>If the buffer zone is:</th>
<th>Then applications are prohibited within this distance from a “DES”:</th>
</tr>
</thead>
<tbody>
<tr>
<td>&gt; 300 ft</td>
<td>1/4 mile (1320 ft.)</td>
</tr>
<tr>
<td>≤ 300 ft</td>
<td>1/8 mile (660 ft.)</td>
</tr>
</tbody>
</table>
Example of Application & Proximity to Difficult To Evacuate Sites (DES)

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

**Saturday Morning**

Begin Application at 6 AM

6AM: DES unoccupied

**Saturday Evening**

Complete Application by 6 PM

6PM: DES unoccupied

**Sunday Evening**

6 PM: DES unoccupied 24 hrs from end of application

**Monday Morning**

6 AM: DES unoccupied 36 hrs from end of application

Module 8: Difficult to Evacuate Sites
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
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

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