### Module 5 Soil Fumigant RED Requirements

# Protections for Handlers & Workers (2010)



### Restricted Use Pesticide Classification

#### **Before reregistration:**

-Restricted use:

- methyl bromide
- 1,3-dichloropropene
- chloropicrin

#### -Non-restricted use products

- (most) metam sodium/potassium
- (most) dazomet

#### After reregistration: ALL are restricted use



## Who is a "handler"?





### Handler activities include:

- Participating in the application
  - as supervisors, loaders, drivers, tractor co-pilots, shovelers, cross ditchers, or as other direct application activities;
- Using air sampling devices to monitor fumigant concentrations;
- Cleaning up fumigant spills
- Handling or disposing of fumigant containers;
- Cleaning, handling, adjusting, or repairing parts of equipment that may contain fumigant residues;
- Installing, repairing, operating, or removing irrigation equipment in application block or buffer zone;
- Entering application block or buffer zone to perform scouting, crop advising, or monitoring tasks;
- Installing, perforating, removing, repairing, or monitoring tarps;
- Performing any handling tasks as defined by the Worker Protection Standard.



# **Supervision of Handlers**

Non-water run applications (e.g., shank, hot gas)

 "Certified applicators must be at the fumigation site in the line of sight of the application and must directly supervise all persons performing handling activities"

Water run applications (e.g., center pivot, drip)

- Certified applicator must be at site to begin the application
- Certified applicator or handlers under supervision of certified applicator must return every two hours to check on application
- Handlers communicate with certified applicator via cell phone or other means



## **Respiratory Protection for Handlers**

If experiencing sensory irritation, handlers must either:

- 1. Stop work, leave area and monitor air concentrations
  - Resume work only when concentrations are below trigger level and irritation is gone

OR

- 2. Wear a respirator & resume work
  - Measure air concentration every 2 hours
  - Stop work if having sensory irritation while wearing respirator, or measured concentration exceeds upper working limit of respirator
  - If still having sensory irritation, can resume work only when concentrations are below trigger level, irritation is gone, and have changed respirator cartridge

Note: air purifying respirators are required for methyl bromide products with less than 20% chloropicrin



#### Figure A. Requirements when handlers cease operations





Resume operations.

#### Figure B. Requirements when handlers resume work while using a respirator



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8

#### Number of Handlers and Respirators Required On-site During Handler Activities

| Product/<br>Formulation   | Min # of<br>Handlers | Min # of Air-<br>Purifying Respirators | Min # of<br>SCBAs |
|---|----------------------|--|-------------------|
| Methyl bromide or<br>chloropicrin combo<br>product with $\geq 20\%$<br>chloropicrin | 2                    | 2 Full-face                            | 1                 |
| Methyl bromide<br>product with < 20%<br>chloropicrin                                | 2                    | 2 Half-mask                            | 1                 |
| Metam sodium/<br>potassium  | 1                    | 1 Full-face                            | 0                 |
| Dazomet   | 1                    | 1 Full-face                            | 0                 |



#### Handlers who use respirators must be:



fit-tested 



#### trained



#### physically fit to wear a respirator\*

Module 5: Protections for Handlers & Workers



10

\* http://www.osha.gov/pls/oshaweb/owadisp.show\_document?p\_table=STANDARDS&p\_id=9783

## **Review Question**

1. True or False?

All handlers who use a respirator must be fit tested, trained, and pass a full medical exam.



## **Review Question**

2. How many air purifying respirators must be on site when applying a 100% chloropicrin product ?

a. at least oneb. at least twoc. one for each handler



# **Tarp Perforation & Removal**

#### **Perforation**

5 days after fumigant application is complete

#### <u>Removal</u>

2 hours after perforation is complete

#### **Planting**

- Less than 14 days after application:
  - Plant 48 hours after tarp perforation is complete
- 14 days or more after application:
  - Perforate and plant simultaneously



## **Early Tarp Perforation & Removal**

Early removal (before 5 days) for broadcast applications

 Only if integrity of tarp is compromised by adverse weather conditions & tarp poses a safety hazard

Early perforation - flood prevention activities





### Tarp Perforation Requirements -Manual Perforation

- May only occur:
  - At the beginning of each row when a coulter blade is used on a motorized vehicle such as an ATV
  - In fields that are 1 acre or less
  - During flood prevention activities
- If these conditions are not met, they must use mechanical methods



### Tarp Perforation Requirements -Broadcast Applications

- Must perforate each panel of tarp
- Complete before noon
- Cannot perforate if rainfall is expected within 12 hours





## **Review Questions**

- 3. Under normal conditions, how long must handlers wait before they can perforate tarps?
- 4. Can planting and perforation take place at the same time? If so, when?
- 5. True or False?

Manual perforation is never allowed.



## **Review Question**

 Seventy-two hours after a broadcast application, part of a tarp blows off a field. The remaining tarp could blow onto a nearby road.

Can the tarp be removed?



# **Entry Restricted Period**

- Old labels allow reentry after 48 hours
- Reentry time lengthened
  - Highly variable fumigant dissipation rate (soil conditions, application method, and tarp type) so could still have high concentrations after 48 hours

## Entry Restricted Period ≠ REI



### Four Scenarios for Entry Restricted Periods











### **Entry Restricted Period by Scenario**

| <i>If</i><br>application<br>is… | <i>and</i><br>tarp<br>is…               | days<br>after application<br>is completed | workers<br>may<br>enter…                   |
|---------------------------------|---|---|--|
| 1. Untarped                     | -                                       | -   | 5 days after<br>application is<br>complete |
| 2. Tarped                       | Perforated & Removed                    | within<br>14 days                         | after tarp is<br>removed                   |
| 3. Tarped                       | Perforated<br>BUT <u>Not</u><br>Removed | within<br>14 days                         | 48 hours after perforating tarps           |
| 4. Tarped                       | Perforated<br>and/or<br>Remove          | more than<br>14 days                      | 5 days after<br>application is<br>complete |



### Scenario 1 - Entry Restricted Period for Untarped Applications

**5 days after application is complete** 



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#### Scenario 1 – Example of Entry Restricted Period for Untarped Application



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#### Scenario 2 - Entry Restricted Period for Tarped Applications



If tarps are perforated & removed less than 14 days...

Enter after tarp is removed



#### Scenario 2 – Example of Entry Restricted Period for Tarped Application



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#### Scenario 3 - Entry Restricted Period for Tarped Applications



When tarps remain on field at least 14 days, but perforated within 14 days...

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Enter 48 hours after perforating tarps



#### Scenario 3 – Example of Entry Restricted Period for Tarped Application



#### Scenario 4 - Entry Restricted Period for Tarped Applications



When tarps remain on field at least 14 days and are *not perforated* for 14 days or

Enter after 5 days

more...



#### Scenario 4 – Example of Entry Restricted Period for Tarped Application



## **Review Questions**

#### True or False?

- 7. Handlers can enter a treated field before the entry restricted period expires.
- 8. An application to a tarped bedded field is completed at 5 pm on Monday. Tarps will not be perforated for 3 weeks. When can workers reenter the field?



## **Review Question**

9. True or False?

Removing irrigation equipment in the treated area 48 hours after the application has stopped is NOT a handler activity.



## Summary

- All soil fumigants will be restricted use
- "Handlers" is defined and activities listed on label
- Handlers must stop work or wear a respirator if experiencing sensory irritation
- Tarps must remain on treated fields for 5 days after application, with some exceptions
- Only protected handlers can enter the application block during the entry restricted period
- Entry restricted period varies by application scenario



# **EPA Contact Information**

Leader: (703) 305-6703 John Leahy **Team Leaders:** (703) 308-8293 **Steven Weiss** (703) 308-0136 Cathryn O'Connell **Chemical Review Managers:** Methyl bromide: Susan Bartow (703) 603-0065 Metam sodium: Dana Friedman (703) 347-8827 and Jose Gayoso (703) 347-8652 (703) 347-8827 Dazomet: Dana Friedman (703) 308-0122 1,3-D & Chloropicrin: Andrea Carone

#### E-mail: lastname.firstname@epa.gov

www.epa.gov/oppsrrd1/reregistration/soil\_fumigants

