

## Soil Fumigant Mitigation Factsheet:

# Training and Exam Options for Pesticide Applicators of Soil Fumigant Products

## *Information for Pesticide State Lead Agencies and Applicators*

EPA is requiring important new safety measures for soil fumigant pesticides to increase protections for agricultural workers and bystanders -- people who live, work, or otherwise spend time near fields that are fumigated. These measures are for the soil fumigants chloropicrin, dazomet, metam sodium/potassium and methyl bromide.

This fact sheet summarizes new requirements to protect applicators, other fumigant handlers and bystanders from fumigant exposures. The new Applicator Training requirement is being implemented during the second of two phases. When new Phase 2 fumigant labels appear in the market place in late 2012, fumigant users will need to comply with this new requirement.

### Training and Exam Options for Pesticide Applicators of Soil Fumigant Products

The Phase 2 soil fumigant product labels will include the following label statement which requires certified applicators to successfully complete training specific to soil fumigation:

*“Any certified applicator supervising a soil fumigant application must have successfully completed one of the soil fumigant training programs listed on the following EPA Web page (<http://www.epa.gov/fumigantraining>) for the active ingredient(s) in this product. The training must be completed in the time frames listed on the Web page. The FMP must document the date and location where the soil fumigant training program was completed.”*

Registrants of soil fumigant products offer EPA-approved on-line training (and possibilities for in-person training) with exams. Although not required, pesticide State Lead Agencies (SLAs) may also provide applicators EPA-approved alternatives to registrant-sponsored training.

Note that compliance with the label-required training is a condition of product use. Because soil fumigants are Restricted Use Products, only certified applicators may purchase them. Contact the registrant about additional requirements they may have for persons purchasing their products.

EPA’s Soil Fumigant Toolbox includes registrant-developed training programs and identifies states with certified applicator training options and requirements in addition to registrants’ programs. State options may include:

- 1) certification in a recently updated soil fumigation category or sub-category
- 2) training, independent of certification, administered by the state or
- 3) a “challenge exam” administered by the state, independent of state certification or training.

Criteria for Soil Fumigant Training Programs

Content Check List for Soil Fumigant Training Programs

More information on these state options is provided below. All programs must include an exam or other means to determine whether participants successfully completed the program.

Additionally, before EPA will add programs to the website, EPA must review them and determine that they meet the criteria outlined below.

**Criteria for Soil Fumigant Training Programs**

**Approved training programs**

- ✓ Provide applicators with documentation of successful completion
- ✓ Include a database of all applicators who have successfully completed the program so pesticide enforcement officials can verify applicators' compliance
- ✓ Have a process to evaluate the quality of training and incorporate improvements as necessary
- ✓ Cover the general topics listed below under "*Content Check List for Soil Fumigant Training Programs*"

**Content Check List for Soil Fumigant Training Programs**

- A. Correct application of fumigants and compliance with new label requirements  
Information on the following soil fumigants:
  - \_\_\_ Methyl bromide
  - \_\_\_ Chloropicrin
  - \_\_\_ 1, 3-Dichloropropene
  - \_\_\_ Dimethyl disulfide (DMDS)
  - \_\_\_ Metam sodium and metam potassium
  - \_\_\_ Dazomet
- B. Protecting handlers and bystanders
  - Safety information to handlers involved in the application
  - Posting and where to place signs
  - Respiratory protection requirements, and conditions for using a respirator
  - Entry restricted period – when entry into a treated area is permitted, and who may enter during the entry restricted period
  - Tarp perforation and removal restrictions
  - Restrictions near Difficult-to-Evacuate Sites
  - Triggers for Emergency Preparedness and Response Measures and options for complying
  - Emergency response planning
- C. Buffer zone distance calculations
- D. Fumigation Management Plan requirements
- E. Post- application Summary requirements
- F. Weather and site-specific conditions unfavorable for fumigant applications
- G. Good Agricultural Practices requirements
- H. Emergency response plan implementation

(1) State Option -  
Certification in a Soil  
Fumigation Category or  
Subcategory

(2) State Option –  
Training Independent  
of SLA Applicator  
Certification Program

(3) State Option –  
Challenge Exam  
Independent of SLA  
Applicator Certification  
Program

### **(1) State Option - Certification in a Soil Fumigation Category or Subcategory**

If a state has a certification category or subcategory in soil fumigation that has been updated to cover the content listed above, applicators in that state will not need to complete the training offered by registrants IF:

- ✓ The SLA requests that EPA review the program and list it on the EPA website
- ✓ EPA verifies that the content is at least equal to the content required for other programs, and
- ✓ EPA lists the program on the website  
(<http://www.epa.gov/fumigantraining>)

### **(2) State Option – Training Independent of SLA Applicator Certification Program**

States may also choose to provide training to certified applicators in their states independent of certifying applicators in a soil fumigation category.

- This is optional and would serve to provide additional opportunities for applicators to meet the label requirement to successfully complete training offered by registrants.
- Such training must meet the same criteria outlined above for approved programs, including a means, such as an exam, to determine whether participants have successfully completed the training.
- States interested in offering this option must provide to EPA a description of their plans to meet the criteria above as well as a copy of the proposed program materials that cover the content listed above.
- EPA will review the training materials and exam and upon approval, list them on the website  
(<http://www.epa.gov/fumigantraining>)

### **(3) State Option - Challenge Exam Independent of SLA Applicator Certification Program**

A third option available to states is to offer a “challenge exam” to determine whether applicators have acquired competency in soil fumigation, including the content outlined above, independent of certification in soil fumigation or other training offered by the state.

If a state chooses to offer this option, the exam must:

- ✓ Assess knowledge and understanding of soil fumigation principles, protection of workers and bystanders, and labeling requirements outlined above under “*Content Check List for Soil Fumigant Training Programs*”
- ✓ Be administered by SLA or by a party approved by SLA (e.g., Cooperative Extension Service or independent third party under contract with the state)
- ✓ Be reviewed by EPA and listed on the website  
(<http://www.epa.gov/fumigantraining>)

## New Resource

States interested in offering the challenge exam option must provide to EPA a description of their plans to meet the criteria above, as well as a copy of the proposed exam and a description of how it will be administered. Applicators must retest (or take training if the option is available) every 36 months. This is generally expected to be a temporary offering until an SLA is able to adopt a soil fumigation category.

### New Resource

The NASDA Research Foundation (NASDARF) under a cooperative agreement with the EPA has developed a manual, exam blueprint and item bank to incorporate the new requirements for soil fumigant applications. All three products include the content described above and are EPA-approved. SLA programs will meet EPA content requirements (described above) by adopting the three products as is. The manual is available on-line. For information, contact Carol (Ramsay) Black, EPA Project Director for the NASDA Research Foundation, at telephone (208) 301-3654 Pacific Time or [carol@nasda.org](mailto:carol@nasda.org). For information on the exam blueprint and item bank, contact Jeanne Kasai, [kasai.jeanne@epa.gov](mailto:kasai.jeanne@epa.gov).

## Certified Applicator Options for Complying with the Soil Fumigant Training Requirement

### Certified Applicator Options for Complying with the Soil Fumigant Training Requirement

Certified Private or Commercial Applicators can purchase but not legally use soil fumigants until at least one of the following options is taken.

#### 1) Soil fumigant training offered by Registrant

- Web-based or in-person training course
- Exam
- Receive documentation of completion
- Applicators must retrain every 36 months

#### 2) Certification in a Soil Fumigation Category or Subcategory

- Established or revised in 2012 or after
- Certification exam
- Receive state certification
- Applicator retraining falls within SLA's recertification program and cycle

#### 3) Soil fumigant training offered by SLA

- Web-based or in-person training course
- Exam or other means to determine successful completion
- Receive documentation of completion
- Applicators must retrain every 36 months

#### 4) SLA Challenge Exam

- Web-based or in-person exam
- Receive documentation of completion
- Applicators must retest or retrain every 36 months

For additional information, please see EPA's Soil Fumigant Toolbox, [www.epa.gov/oppsrrd1/reregistration/soil\\_fumigants/](http://www.epa.gov/oppsrrd1/reregistration/soil_fumigants/).