Metam RED
Re-registration Eligibility Document
What Will Be Implemented in 2010

- Restricted Use Product
- Field management plans (FMP’s)
- Good agricultural practices (GAP’s)
- Training and certification
- Community outreach
- Handler PPE
- 5-day re-entry period
Restricted Use Product

- Other fumigants are already RUP’s
- Doesn’t mean a lot to growers, except license required for purchase
- Probably a good idea
Fumigant Management Plans

- Will be site specific
- Plan all aspects of a safe & effective fumigation
- Prevent accidents & identify procedures for accidents
- Demonstrate compliance with the label and a tool for verification
- These will be extensive and contain everything from application location, rates, and products to response plans in case of off-gassing
- Templates will be provided
Good Agricultural Practices

- Both mandatory and advisory GAP’s
- Maximum air temp-90°
- Wind speeds-2 mph minimum for all
  - 8 mph max for normal release center pivot (probably will be 8-10 after next RED)
  - 25 mph for SmartDrop
- Maximum soil temp-90°
- Soil moisture-60-80% FC
- Field stubble or trash-some discussion going on still
- Inversion language is not clear, but bottom line cannot apply during one.
Training, Certification and Outreach

- Registrant
  - Stewardship training
  - Materials and fact sheets
  - Posting signs

- States and EPA
  - Training and seminars
  - Compliance assistance
  - Training manual and exam
  - Web based IPM planner and buffer calculator
  - Templates.
Training and Certification

- Applicator/handler training every 3 years
- Will require certification and record keeping
- AMVAC has done stewardship training every year and will continue to do so.
- AMVAC only metam supplier to conduct training in ID in past several years. We are the leader in stewardship training!!
- BOTTOM LINE—No incidences or complaints!!
Handler PPE

- Must be certified or under supervision
- Do not need PPE or air monitoring unless you smell or feel it.
  - If you do, put on respirator or leave field
  - Applies to both shank or chemigation applied
Site Monitoring

- Shank applications
  - Cert. applicator must be on site at all times and supervise others

- Chemigation
  - Cert. applicator must be on site and supervise others
  - Can leave but must return at least every 2-hours
  - A little unclear- but may be able to be in phone or radio contact
5-Day Reentry Prohibition

- Changed from 2-days
- Certified/trained handlers can go in as needed provided they have the required PPE
What Will Be Implemented in 2011

- Buffer zones
  - Posting
- Monitoring
  - Applicators
  - Buffer zone
Buffer Zone Requirements

- 120 acre pivot, 42 gallon rate
- High release >8 ft.—1150 ft., no overlap for 12 hrs.
- Medium release <8 ft.—950 ft., no overlap for 12 hrs.
- Low release/SmartDrop™ <4 ft—700 ft., can overlap
- Shank injection—313 ft., presently no overlap-EPA trying to explain that one
Conventional Application
SmartDrop™ Application
Would like to see every pivot fumigation application made with this system.
Buffer Zone Credits

- Can get up to 80% credit, but impossible in PNW
- Organic matter: 10% for 1-2%, 10% for higher OM
- Soil temps: 10% for 50-70F, 10% for <50F
- PNW max credit is probably about 30%
Air Monitoring

- No colorimetric tubes required unless an odor is detected in which case they must be utilized.
- Can use your nose but must be done every two hours.
- If detected will trigger FMP response.
Buffer Zone Posting

- Slight victory
- Only at entries to field or places where pedestrians might enter BZ
- Reduced some of the requirements on the signs, so will not have to be changed if application changes.
- Will still need treated area postings as well
Community Outreach

- New requirement
- Training for all first responders
- Notification required for all within a buffer zone one week before application
- Must let them know what the symptoms are
Timelines

- 9/1/09 submit revised labels to EPA
- 12/09 EPA reviews/approves labels for 2010
- 2009-2010 begin first responder and community outreach training and applicator training
- 9/1/10 Submit revised labels with all new RED requirements
- 2011 all RED requirements will be implemented
- Will be an amended RED again in Spring 2010—will consider results from a 2009 WSU emission study and include a final training statement
2009 Idaho Vapam/K-Pam Stewardship Training

- Sept. 8, Idaho Falls, Shiloh 9:00 AM
- Sept. 9, Pocatello, Red Lion 9:00 AM
- Sept. 10, Burley, Burley Inn 9:00 AM
- Sept. 11, Nampa, Holiday Inn Express 9:00 AM