Subsection C.7.4

Chloropicrin and Chloropicrin with 1,3-Dichloropropene (Field Fumigant) Recommended Permit Conditions

Introduction

These recommended permit conditions were developed to mitigate hazards of offsite movement of chloropicrin alone or chloropicrin with 1,3-Dichloropropene (1,3-D). They should be used in addition to the provisions in the California Food and Agricultural Code (FAC), Title 3, California Code of Regulations (3 CCR), and the product labeling.

The recommended permit conditions are based on the limited data that DPR has available. It does not cover all environmental conditions, climates, soil types, etc.

Scope

These recommended permit conditions apply to all of the following:

- Products that contain only chloropicrin
- Products that contain both chloropicrin and 1,3-D (such as Telone C-17)
- Simultaneous application of a chloropicrin-only product together with a product that contains only 1,3-D (such as Telone II)

Any application that includes 1,3-D is also subject to the recommended permit conditions in Subsection C.7.1.

When requirements differ

When requirements differ, the most stringent requirement should be followed, unless DPR has provided specific guidance about exceptions. County agricultural commissioners can establish more restrictive conditions based on the local use conditions.

Application block size limit

Application block size is limited to 40 acres at one location within a 24-hour period.

Buffer zone credits

If allowed by the label, buffer zone reduction credits are allowed for tarp usage and for post-application water treatments only. In contrast, label buffer zone reduction credits are not allowed for Symmetry application system, potassium thiosulfate, soil organic matter or clay content, or soil temperature.

Continued on next page

Buffer zone credit for post-application water treatments

Buffer zone reduction credits stated on the product label for post-application water treatments are allowed only for:

- Untarped applications.
- Applications that are tarped only in beds or strips, and that have untarped ground in between the beds or strips.

In contrast, label buffer zone reduction credits for water treatments are not allowed for tarped broadcast applications.

To qualify for a credit, a post-application water treatment must apply, on the day of application, a minimum of 0.25 – 0.50 inches of water to the application block, starting no earlier than 1 hour prior to sunset and completing by midnight.

Minimum buffer zone distance

Minimum buffer zone distances regardless of credits:

Tarps that qualify for a reduction credit of 60%	Tarps that do not qualify for a reduction credit of 60% or untarped applications	
	Application block less than or equal to 6 acres	Greater than 6 acres, up to 40 acres
25 feet	60 feet	100 feet

Tarpaulins that qualify for a buffer zone reduction credit of 60% are listed by fumigant active ingredient on the U.S. EPA website at http://www.tarpcredits.epa.gov/.

These minimum buffer zones do not apply to applications to:

- Golf courses.
- Replant of individual vine or tree-sites (tree holes) less than one contiguous acre.
- Raised-tarpaulin nursery fumigations of less than one acre.
- Potting soil.
- Greenhouses and other similar structures.

For such applications, follow labeling restrictions and, if the product contains 1,3-D, follow the recommended permit conditions in Subsection C.7.1.

Continued on next page

Overlapping buffer zones

If buffer zones for two or more applications overlap within 36 hours from the time the earlier application is complete until the start of the later application, certain restrictions apply based on the type of tarpaulin used (if any), as shown in the following table:

Restrictions when buffer zones (BZ) overlap within the first 36 hours:

If ...	Then ...
All application blocks use tarps that qualify for a reduction credit of 60%	• Combined acreage of application blocks shall not exceed 40 acres • BZ distance for each block based on individual block acreage, then on label BZ look-up tables
At least one application block uses tarps that do not qualify for a reduction credit of 60% or is untarped	• Combined acreage of application blocks shall not exceed 40 acres • BZ distance based on combined acreage of application blocks, then on label BZ look-up tables

Elapsed time is measured from the time the earlier application is complete until the start of the later application.

Tarpaulins that qualify for a buffer zone reduction credit of 60% are listed by fumigant active ingredient on the U.S. EPA website at http://www.tarpcredits.epa.gov/.

Tarp perforation and/or removal

Tarps that qualify for any percentage reduction in buffer zone distance must not be perforated until a minimum of 9 days (216 hours) have elapsed after the application is complete, and must not be removed until a minimum of 1 day (24 hours) after perforation, unless a weather condition exists which necessitates early tarp perforation or removal as specified by the label.

This page intentionally left blank.