SOIL FUMIGANT LABEL CHANGES: PHASE 2

EMERGENCY PREPAREDNESS AND RESPONSE

Monica DeAnda 2012
EMERGENCY PREPAREDNESS AND RESPONSE MEASURES

Helps

- Prevent risks from the use of fumigants
- Prepare in case of an emergency
EMERGENCY PREPAREDNESS AND RESPONSE MEASURES

Only required *when triggered*

If occupied structures are in close proximity to a buffer zone, the certified applicator must choose either:

- Fumigant Site Monitoring
- Response Information for Neighbors

*Only required when triggered*
DISTANCES THAT TRIGGER REQUIREMENTS

Applicators must:
(1) monitor the site, OR
(2) provide information to neighbors

<table>
<thead>
<tr>
<th>If the buffer zone is</th>
<th>AND occupied structures are within from the edge of the buffer zone,</th>
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</thead>
<tbody>
<tr>
<td>25 feet and to 100 feet</td>
<td>50 feet</td>
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<tr>
<td>101 feet to 200 feet</td>
<td>100 feet</td>
</tr>
<tr>
<td>201 feet to 300 feet</td>
<td>200 feet</td>
</tr>
<tr>
<td>Greater than 300 feet</td>
<td>300 feet</td>
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</table>
OPTION 1: FUMIGANT SITE MONITORING

- Monitor for sensory irritation
  - Perimeter of buffer zone, between the buffer and occupied structures
  - at dawn, dusk, day, night at minimum
- Use devices for MeBr formulations with <20% chloropicrin
- Activate emergency response 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 (no more than 4 weeks)
- May use door hangers, mail, phone, etc.
- Describe method in FMP; may attach copies
OPTION 2: RESPONSE INFORMATION FOR NEIGHBORS

Information included:

- Location of application block
- Name of the fumigant and product, EPA Reg. No.
- Contact information of applicator and property owner and/or operator
- Expected time period for fumigation and BZ
- Early signs and symptoms of exposure
- What to do if exposed (call 911 in most cases)
Emergency Preparedness Zone

- Emergency Preparedness Zone: 100 ft.
- Buffer Zone: 125 ft.
- Treated Field
- 45 ft.
- 288 ft.
- 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 house with the grey roof and the buffer zone, or give residents of that house information
- The house with the red roof is outside of buffer zone, no action required
DIFFICULT TO EVACUATE SITES

- Address the challenges that would be associated with an accident in a difficult to evacuate site
- Reduce the risk of exposure to the occupants

Includes:

- State licensed daycare centers
- Assisted living facilities
- Schools (Pre K - 12)
- Nursing homes
- Hospitals
- In-patient clinics
- Prisons
PROXIMITY TO DIFFICULT TO EVACUATE SITES

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>
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<tbody>
<tr>
<td>300 ft. or less</td>
<td>1/8 mile (660 ft.)</td>
</tr>
<tr>
<td>Greater than 300 ft.</td>
<td>1/4 mile (1320 ft.)</td>
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</tbody>
</table>
SUMMARY

If The Emergency Preparedness And Response Measures Are Triggered:

- Certified Applicator must do (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 DES if the buffer is 300 feet or less

- Applications are prohibited within 1/4 mile of DES if the buffer is more than 300 feet