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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON DC 20460

OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

Krystal Bailey  
AMVAC Chemical Corporation  
4695 MacArthur Court Suite 1200  
Newport Beach CA 92660

OCT 02 2012

Subject Application for Pesticide Notification (PRN 98 10)  
Submission date 8/6/2012  
Product Name Vapam HL Soil Fumigant  
EPA Reg No 5481 468  
EPA Decision Number 469586

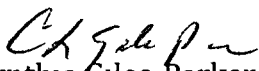
Dear Ms Bailey

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98 10 The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98 10 and finds that the action(s) requested fall within the scope of PRN 98 10

The Agency acknowledges the update to the Warranty Statement

The label submitted with the application has been stamped Notification and will be placed in our records If you have questions concerning this letter please contact Heather Garvie at 703 308 0034 or me at 703 308 9443

Sincerely

  
Cynthia Giles Parker  
Acting Product Manager (20)  
Fungicide Branch  
Registration Division (7504P)

Please read instructions on reverse before completing form

Form Approved, OMB No 2070-0060



United States  
Environmental Protection Agency  
Washington DC 20460

 Registration  
 Amendment  
 Other

OPP Identifier Number

Application for Pesticide Section I

1 Company/Product Number 5481 468	2 EPA Product Manager Howard	3 Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4 Company/Product (Name) Vapam HL Soil Fumigant	PM# 20	
5 Name and Address of Applicant (Include ZIP Code) AMVAC Chemical Corporation 4695 MacArthur Court Suite 1200 Newport Beach CA 92660 <input type="checkbox"/> Check if this is a new address	6 Expedited Review In accordance with FIFRA Section 3(c)(3) (b)(i) my product is similar or identical in composition and labeling to EPA Reg No _____ Product Name _____	

Section II

<input type="checkbox"/> Amendment Explain below	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> Me Too Application
<input checked="" type="checkbox"/> Notification Explain below	<input type="checkbox"/> Other Explain below

Explanation Use additional page(s) if necessary (For section I and Section II)

Notification to update Warranty Statement per PR Notice 98 10

Section III

1 Material This Product Will Be Packaged In				2 Type of Container	
Child Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	If Yes Unit Packaging wgt No per container		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If Yes Package wgt No per container			
3 Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4 Size(s) Retail Container		5 Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6 Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section IV

1 Contact Point (Complete items directly below for identification of individual to be contacted if necessary to process this application)					
Name Krystal Bailey		Title Regulatory Specialist		Telephone No ( include Area Code) 949 221 6146	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true accurate and complete I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law					6 Date Application Received  (Stamped)
2 Signature 		3 Title Regulatory Specialist			
4 Typed Name Krystal Bailey		5 Date Aug 6 2012			



3/74

August 6 2012

Mr Marcel Howard PM 20  
U S Environmental Protection Agency  
Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
Room S4900 One Potomac Yard  
2777 Crystal Drive  
Arlington VA 22202

Dear Mr Howard

**RE VAPAM HL Soil Fumigant (EPA Reg No 5481-468)  
Notification of Changes in Warranty Statement per PR Notice 98 10**

AMVAC would like to amend the above named product by updating the warranty statement on page 71 on the enclosed label This amendment is being submitted via Notification per the guidelines of Agency PR Notice 98 10

In support of this request please find enclosed the following documents

- 1) Application for Pesticide Registration (EPA form 8570 1) form
- 2) One copy of the final product labeling
- 3) Certification with Respect to Label Integrity form
- 4) A CD containing the label in electronic format

**This notification is consistent with the provisions of PR Notice 98 10 and EPA regulations at 40 CFR 152 46 and no other changes have been made to the labeling or the confidential statement of formula of this product I understand that it is a violation of 18 U S C Sec 1001 to willfully make any false statement to EPA I further understand that if this notification is not consistent with the terms of PR Notice 98 10 and 40 CFR 152 46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA**

If you have any questions or require additional information please feel free to contact me at 949 221 6146 or email me at [KrystalB@amvac.chemical.com](mailto:KrystalB@amvac.chemical.com)

Kind regards

A handwritten signature in black ink, appearing to read 'Krystal Bailey'.

Krystal Bailey Regulatory Specialist  
AMVAC Chemical Corporation

cc C Davis AMVAC

**RESTRICTED USE PESTICIDE**  
 Due to acute inhalation toxicity to humans  
 For retail sale to and use by certified applicators or persons under their direct supervision and only for those uses covered by the certified applicator's certification

# VAPAM<sup>®</sup> HL

## SOIL FUMIGANT

**A SOIL FUMIGANT SOLUTION FOR SPECIFIC CROPS AS LISTED IN THIS LABEL**  
 MAY BE APPLIED BY WATER RUN APPLICATIONS (e.g. CHEMIGATION) SOIL INJECTION OR SOIL BEDDING EQUIPMENT TO SUPPRESS AND/OR CONTROL SOIL BORNE PESTS IN LISTED ORNAMENTALS FOOD AND FIBER CROPS For the control or suppression of Weeds Diseases and Nematodes Controls or suppresses weeds such as Bermudagrass Chickweed Dandelion Ragweed Henbit Lambsquarter Pigweed Watercress Amaranths species Watergrass Johnsongrass Nightshade Nutsedge Wild Morning Glory and Purslane Nematodes and Symphyllids Soil borne diseases such as Rhizoctonia Pythium Phytophthora Verticillium Sclerotinia Oak Root Fungus and Club Root of Crucifers Refer to specific cropping and application methods to determine control or suppression of the target

<b>ACTIVE INGREDIENT</b>	
Sodium methyldithiocarbamate (anhydrous)*	42.0%
<b>OTHER INGREDIENTS</b>	58.0%
<b>TOTAL</b>	100.0%

\*Contains 4.26 lbs Metam Sodium per gallon

### KEEP OUT OF REACH OF CHILDREN

### DANGER - PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle  
 (If you do not understand the label find someone to explain it to you in detail)

FIRST AID	
<b>If on skin or clothing</b>	Take off contaminated clothing Rinse skin immediately with plenty of water for 15-20 minutes Call a poison control center or doctor for treatment advice
<b>If in eyes</b>	Hold eye open and rinse slowly and gently with water for 15-20 minutes Remove contact lenses if present after the first 5 minutes then continue rinsing eye Call a poison control center or doctor for treatment advice
<b>If inhaled</b>	Move person to fresh air If person is not breathing call 911 or an ambulance then give artificial respiration preferably mouth-to-mouth if possible Call a poison control center or doctor for further treatment advice
<b>If swallowed</b>	Call a poison control center or doctor immediately for treatment advice Have a person sip a glass of water if able to swallow Do not induce vomiting unless told to do so by a poison control center or doctor Do not give anything by mouth to an unconscious person
EMERGENCY INFORMATION	
Have the product container or label with you when calling a poison control center or doctor or going for treatment	
<b>FOR THE FOLLOWING EMERGENCIES PHONE 24 HOURS A DAY</b>	
For Medical Emergencies phone	1 888 681 4261
For Transportation Emergencies including spill leak or fire phone CHEMTREC	1 800 424 9300
For Product Use Information phone AMVAC	1 888 462 6822
NOTE TO PHYSICIAN	
Possible mucosal damage may contraindicate the use of gastric lavage This product may pose an aspiration pneumonia hazard	

**SEE SIDE/BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND DIRECTIONS FOR USE**

EPA Reg No 5481 468  
 EPA Est No    Other \_\_\_\_\_

Net Weight  
 As Marked on Container



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## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**DANGER** Corrosive Causes skin damage May be fatal if absorbed through the skin Do not get on skin or clothing Prolonged or frequent repeated skin contact may cause allergic reactions in some individuals Harmful if swallowed or inhaled Irritating to eyes nose and throat Avoid breathing vapor or spray mist Do not get in eyes

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical resistant to this product are barrier laminate or viton  $\geq$  14 mils For more options follow the instructions for category H on the chemical resistance category selection chart

Handlers applying via weed sprayer (see *Terms used in this labeling section*) while irrigation system is operating or handlers who may be exposed to liquid spray while repairing a malfunctioning chemigation system or shutting off equipment must wear

- Chemical resistant coveralls over long sleeve shirt and long pants
- Chemical resistant gloves
- Chemical resistant footwear plus socks
- Chemical resistant headgear and
- Respirator of the type specified in the respiratory protection section in the PPE requirements on this label

Handlers wearing chemical resistant attire are limited to 30 minutes of exposure in any 60 minute period to prevent heat illness and as required by the Worker Protection Standard for Agricultural Pesticides employers of these handlers must take any necessary steps to avoid heat illness

Except as required above handlers transferring or loading liquid formulations handlers operating motorized ground equipment with open cabs handlers repairing or inactivating irrigation or chemigation equipment during application and handlers cleaning up spills or equipment must wear

- Coveralls over long sleeve shirt and long pants
- Chemical resistant gloves
- Chemical resistant footwear plus socks
- Chemical resistant apron if transferring or loading the fumigant or cleaning up spills or equipment
- Protective eyewear and
- Respirator of the type specified in the PPE requirements for respiratory protection section in the PPE requirements on this label if triggered

All other handlers including handlers operating motorized ground equipment with closed cabs (except for handlers who set up and calibrate chemigation and irrigation equipment and start the application from inside the application block) as stated in this labeling must wear

- Long sleeve shirt and long pants
- Shoes plus socks and
- Respirator of the type specified in the respiratory protection section in the PPE requirements or this label if triggered

All handlers who set up and calibrate chemigation and irrigation equipment and start the application from inside the application block must wear

- Long sleeve shirt and long pants
- Shoes plus socks
- Protective eyewear and

- Respirator of the type specified in the respiratory protection section in the PPE requirements on this label if triggered

**PERSONAL PROTECTIVE EQUIPMENT (PPE) FOR RESPIRATORY PROTECTION**

When an air purifying respirator is required under this label s Directions for Use Protection for Handlers Respiratory Protection and/or Stop Work Triggers section handlers must wear at minimum either

- A NIOSH certified full facepiece air purifying respirator equipped with an organic vapor (OV NIOSH approval prefix TC 23C) cartridge and a particulate pre filter (Type N R P or HE NIOSH approval number prefix TC 84A) or
- A gas mask with a canister approved for organic vapor (NIOSH approval number prefix TC-14G)

Cartridges or canisters must be replaced when odor or sensory irritation from this product becomes apparent during use if the measured concentration of MITC is greater than 6000 ppb (6 ppm) or in the absence of any other instructions or indications of service life at the end of each day s work period whichever occurs first

**USER SAFETY REQUIREMENTS**

Follow manufacturer s instructions for cleaning/maintaining PPE If no such instructions for washables exist use detergent and hot water Keep and wash PPE separately from other laundry

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product s concentrate Do not reuse them

DO NOT transport contaminated clothing inside a closed vehicle unless stored in a sealed container Wash or dispose as specified

**USER SAFETY RECOMMENDATIONS**

**Users should**

- Wash hands before eating drinking chewing gum using tobacco or using the toilet
- Remove clothing immediately if pesticide gets inside Then wash thoroughly and put on clean clothing
- Remove PPE immediately after handling product Wash the outside of gloves before removing As soon as possible wash thoroughly and change into clean clothing

**ENVIRONMENTAL HAZARDS**

This pesticide is toxic to mammals birds aquatic invertebrates and fish Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark Do not contaminate water when disposing of equipment wash waters or rinsate

Metam sodium has certain properties and characteristics in common with chemicals that have been detected in groundwater (highly soluble in water and has low adsorption to soil)

For untarped applications leaching and runoff may occur if there is heavy rainfall after soil fumigation

**DIRECTIONS FOR USE**

**Restricted Use Pesticide**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling Do not apply this product in a way that will contact workers or other persons either directly or through drift Do not apply when wind speed favors

drift beyond the area intended for treatment Only handlers may be in the application block from the start of the application until the entry restricted period ends and in the buffer zone during the buffer zone period For any requirements specific to your State or Tribe consult the agency responsible for pesticide regulation

**AGRICULTURAL USE REQUIREMENTS**

Use this product only in accordance with its labeling and with the Worker Protection Standard 40 CFR Part 170 This Standard contains requirements for the protection of agricultural workers on farms forests nurseries greenhouses and handlers of agricultural pesticides It contains requirements for training decontamination notification and emergency assistance For the entry restricted period and notification requirements see the *Entry Restricted Period and Notification* sections of this labeling

**PPE For Entry During the Entry-Restricted Period** PPE for entry that is permitted by this labeling is listed in the *Personal Protective Equipment (PPE)* section of this labeling

**TERMS USED IN THIS LABELING**

Soil Fumigant Training Program Certified applicator training that provides information on (1) how to correctly apply the fumigant including how to comply with new label requirements (2) how to protect handlers and bystanders (3) how to determine buffer zone distances (4) how to complete an FMP and the post application summary (5) how to determine when weather and other site specific factors are not favorable for fumigant application (6) how to comply with required GAPs and how to document compliance with GAPs in the FMP and (7) how to develop and implement emergency response plans

Fumigant Safe Handling Information Information that must be provided annually to handlers that must include the following (1) what fumigants are and how they work (2) safe application and handling of soil fumigants (3) air monitoring and respiratory protection requirements for handlers (4) early signs and symptoms of exposure (5) appropriate steps to take to mitigate exposures (6) what to do in case of an emergency and (7) how to report incidents

Application Block Area within the perimeter of the fumigated portion of a field (including furrows irrigation ditches roadways) The perimeter of the application block is the border that connects the outermost edges of total area treated with the fumigant product

Application Rate The ratio of fumigant mass applied compared to the soil surface area (e.g lbs of product per acre) The application rate is expressed on this labeling in terms of either the treated area application rate or the broadcast equivalent application rate The treated area application rate relates to only the rate of fumigant applied to the portion of the field that is fumigated (e.g rate within the bed or strips) The broadcast equivalent application rate relates to the rate of fumigant applied within the entire perimeter of the application block For bedded and strip applications the broadcast equivalent application rate must be calculated to determine the buffer zone distance required by this labeling

Start of the Application The time at which the fumigant is first delivered/dispensed into the soil in the application block

Application is Complete The time at which the fumigant has stopped being delivered/dispensed into the soil and the soil has been sealed drip lines have been purged (if applicable) For applications with water seals the application is complete at the time at which the fumigant has stopped being delivered/dispensed into the soil

Entry Restricted Period This period begins at the start of the application and expires depending on the application method and if tarps are used when the tarps are perforated and removed Entry into the application block during this period is only allowed for appropriately PPE equipped handlers performing handling tasks See the *Entry Restricted Period and Notification* section for additional information



Buffer Zone An area established around the perimeter of each application block. The buffer zone must extend outward from the edge of the application block perimeter equally in all directions.

Buffer Zone Period Begins at the start of the application and lasts for a minimum of 48 hours after the application is complete. Non handlers must be excluded from the buffer zone during the buffer zone period.

Difficult to Evacuate Sites Pre K to Grade 12 schools, state licensed daycare centers, nursing homes, assisted living facilities, hospitals, in patient clinics, and prisons.

Owner Any person who has a present possessory interest (fee leasehold, rental, or other) in an agricultural establishment. A person who has both leased such agricultural establishment to another person and granted that same person the right and full authority to manage and govern the use of such agricultural establishment is not an owner. See definition of owner in WPS (40 CFR §170.3).

Roadway Portion of a street or highway improved, designed, or ordinarily used for vehicular travel, exclusive of the sidewalk or shoulder, even if such sidewalk or shoulder is used by persons riding bicycles. In the event a highway includes two or more separated roadways, the term roadway shall refer to any such roadway separately.

Representative Handling Task For air monitoring, the locations and handler activities sampled must represent each handler's exposure occurring within the application block. For example, for an application consisting of a seven handler crew (1 tractor driver, 1 tractor co pilot, 4 shovelers, and 1 certified applicator supervising), two breathing zone samples could be collected, one sample for the tractor co pilot and one sample for a downwind shoveler. Results of previous sampling may indicate which tasks and locations are worst case and therefore representative of all handlers.

High Release Height Center Pivot or Lateral Move Irrigation Applications (1) Release height OR spray height greater than 8 feet, and (2) there is greater than 30 lbs PSI at the sprinkler head.

Medium Release Height Center Pivot or Lateral Move Irrigation Applications (1) Release height AND spray height is less than 8 feet, AND (2) 29 lbs or less PSI at the sprinkler head, AND (3) there are no end guns.

Low Release Height Solid Stream Center Pivot or Lateral Move Irrigation Applications (1) Release height and spray height is less than 4 feet, AND (2) 29 lbs or less PSI at the sprinkler head, AND (3) application system produces a solid stream, and (4) there are no end guns.

Solid Stream An uninterrupted liquid stream that remains generally as a coarse flow until contacting the intended target. An example of a solid stream application is Smart Drop® also known as drizzle boom. Any application system that employs sprayheads or nozzles with moving parts that produce a rotating or oscillating spray pattern (e.g. rotators, spinner, nutators, and wobblers) or that otherwise break up the stream into droplets does not qualify as a solid stream nozzle.

Weed Sprayer In this labeling, weed sprayer refers to a tank that holds 100-500 gallons combined with an off set spray boom that creates a swath about 4 feet on each side of an orchard tree row, leaving the untreated grassy middle to grow.

**USE SITES**

Only for use on the following:

Cover crops (i.e. crops planted between periods of regular crop production to prevent soil erosion). The terminated crop must not be used for any food or feed purposes after VAPAM HL has been applied. Crops grown solely for feed, as well as pre-plant soil uses for (in alphabetical order): alfalfa, amaranth (including leafy amaranth, Chinese spinach, tampala), anise, apple (including balsam crabapple), apricot, artichokes, arugula (roquette), asparagus (nursery production only), barley, basil, beans (including lima, green fava, seed beans), beet (including garden), berry (including black satin berry).

blackberry blueberry boysenberry chesterberry lowberry wild raspberry youngberry darrowberry dewberry cloudberry elderberry Cherokee blackberry coryberry European barberry huckleberry hullberry gooseberry cranberry highbush cranberry Himalayaberry jostaberry juneberry saskatoon berry lingonberry loganberry lavacaberry lucretiaberry mammoth blackberry marionberry bingleberry mountain pepper berries mulberry olallieberry dirksen thornless berry nectarberry Oregon evergreen berry partridgeberry phenomenalberry rangeberry raspberry (black and red) ravenberry riberry rossberry schisandra berry serviceberry Shawnee blackberry strawberry) bok choy broccoli brussels sprouts cabbage (including Napa) calabaza calamondin cardoon carrot casaba cauliflower celeriac celery (including Chinese) celtuce chayote (fruit) che cherry (including sweet and tart chokecherry pincherry) chervil cheyenne Chilean guava Chinese greens Chinese okra Chinese waxgourd (Chinese preserving melon) chinquapin chironja chrysanthemum cilantro citrus citron citrus hybrids collard corn salad corn cotton cress (including upland yellow rocket winter cress) cucumber (including Chinese cucumber) cucuzza currant (including black red native and other varieties and hybrids) dandelion dill dock (sorrel) eggplant endive (escarole) fennel Florence (finochio) forest seedlings garland garlic gherkin ginger gourd grape grapefruit hechima herbs (all) honey balls honeysuckle hyotan kale kiwifruit (including fuzzy and hardy) kohlrabi kumquat leek lemon lettuce (including head and leaf) lime loquat mandarin (including tangerine and satsuma) mango mayhaw maypop melon (including bitter melon cantaloupe hybrids and/or cultivars citron melon crenshaw melon golden pershaw melon mango melon honeydew melon muskmelon Persian melon pineapple melon Santa Claus melon snake melon watermelon) mint muntries mustard nectarine nursery stock (fruit seedlings and rose bushes only) nursery tree crops (including crops like maple ash dogwood) nut (including almond beech nut cashew chestnut hickory nut Brazil nut macadamia nut (bush nut) filbert (hazelnut) pecan pistachio walnut (black and English/Persian) onion orach orange (including sour and sweet) ornamentals parsley peas (including English and garden) peach peanut pear (including oriental and balsam) pepper phalsa plum (including Chickasaw and Damson) plumcot potato prune (fresh) pummelo pumpkin purslane (including garden and winter) quince radicchio (red chicory) radish (including Oriental) rappini rhubarb rye salal sea buckthorn soybean spinach (including New Zealand Malabar Indian) squash (including summer winter butternut straightneck Acorn crookneck hubbard scallop spaghetti) sugar beet sweet potato swiss chard tangelo tangor tobacco tomatoes tree nuts (orchard replant only) turf (including golf courses) turnip vegetable marrow wheat, yams zucchini

**USE METHOD RESTRICTIONS**

The use of this product is restricted to the methods described in this label

Use in greenhouses or any other enclosed structure or confined area is prohibited Application with handheld equipment is prohibited Application with cement grinder and shredder equipment is prohibited Open pour applications are prohibited Do not apply this product through traveler or big gun application systems

**CERTIFIED APPLICATOR TRAINING**

Any certified applicator supervising a soil fumigant application must have successfully completed one of the soil fumigant training programs listed on the following EPA website [http //www epa gov/fumiganttraining](http://www.epa.gov/fumiganttraining) for the active ingredient in this product The training must be completed in the time frames listed on the website The FMP must document the date and location where the soil fumigant training program was completed

**HANDLERS**

The following activities are prohibited from being performed by anyone other than persons who have been appropriately trained and equipped as handlers in accordance with the requirements in the Worker Protection Standard (40 CFR Part 170)

- Monitoring fumigant air concentrations
- Cleaning up fumigant spills (this does not include emergency personnel not associated with the fumigat on application)
- Handling or disposing of fumigant containers

- Cleaning handling adjusting or repairing the parts of fumigation equipment that may contain fumigant residues and
- Performing any handling tasks as defined by the Worker Protection Standard (40 CFR 170)

The following activities are prohibited from being performed in the application block from the start of the application until the entry restricted period ends and in the buffer zone during the buffer zone period by anyone other than persons who have been appropriately trained and equipped as handlers in accordance with the requirements in WPS (40 CFR Part 170) (NOTE persons repairing and monitoring tarps are considered handlers for the duration listed below) Prohibited activities (except for trained and equipped handlers) include

- Participating in the application as supervisors loaders drivers tractor co pilots shovelers cross ditchers or as other direct application participants
- Installing repairing operating or removing irrigation equipment
- Performing scouting crop advising or monitoring tasks
- Installing perforating (cutting punching slicing poking) or removing tarps and
- Repairing or monitoring tarps until 14 days after application is complete if tarps are not perforated and removed during those 14 days NOTE See *Tarp Perforation and/or Removal* section on this labeling for requirements about when tarps are allowed to be perforated

Handlers do not include local state or federal officials performing inspection sampling or other similar official duties

## PROTECTION FOR HANDLERS

### Supervision of Handlers

For all applications except water run from the start of the application until the application is complete a certified applicator must be at the application block in the line of sight of the application and must directly supervise all persons performing handling activities

For water run applications (e.g. sprinkler/chemigation wheel line center pivot lateral move drip flood etc) a certified applicator must be in the line of sight of the application at the start of the application including set up calibration and initiation of the application A certified applicator may leave but must return at least every two hours to visually inspect the equipment to ensure proper functioning and must directly supervise all WPS trained handlers until the application is complete WPS trained handlers may perform these monitoring functions in place of a certified applicator but they must be under the supervision of a certified applicator and be able to communicate with a certified applicator at all times during monitoring activities via cell phone or other means

For handling activities that take place after the application is complete until the entry restricted period expires the certified applicator is not required to be on site but must have communicated in a manner that can be understood by the site owner and handlers responsible for carrying out those activities the information necessary to comply with the label and procedures described in the FMP (e.g. emergency response plans and procedures)

**IMPORTANT** This requirement does not override the requirements in the Worker Protection Standard for Agricultural Pesticides for information exchange between operators of agricultural establishments and commercial pesticide applicators

The certified applicator must provide **Fumigant Safe Handling Information** to each handler or confirm that within the past 12 months each handler has received **Fumigant Safe Handling Information** in a manner that he/she can understand **Fumigant Safe Handling Information** will be provided where this product is purchased or at <http://www.epa.gov/fumigantraining>

**Exclusion of Non Handlers from the Application Block and Buffer Zone**

The certified applicator supervising the application and the owner of the establishment where the application is taking place must make sure that all persons who are not trained and PPE equipped and who are not performing one of the handling tasks as stated in this labeling are

- excluded from application block during the entry restricted period and
- excluded from the buffer zone during the buffer zone period (see buffer zone exemption for transit on roadways in Buffer Zone Requirements section)

Local state or federal officials performing inspection sampling or other similar official duties are not excluded from the application block or the buffer zone by this labeling. The certified applicator supervising the application and the owner of the establishment where the application is taking place are not authorized to or responsible for excluding those officials from the application block or the buffer zone.

**Providing, Cleaning, and Maintaining PPE**

The employer of any handler (as stated in this label) must make sure that all handlers are provided and correctly wear the required PPE. The PPE must be cleaned and maintained as required by the Worker Protection Standard for Agricultural Pesticides.

**Air Purifying Respirator Availability**

The employer of any handler must confirm that an air purifying respirator and appropriate cartridges of the type specified in the PPE section of this labeling are immediately available for each handler who will wear one. At least one handler must have the appropriate air purifying respirator and cartridges available (see *Respirator Fit Testing Medical Qualification and Training* section for additional requirements).

Exception: Air purifying respirators do not need to be made available for handlers performing fumigant site monitoring tasks outside of the buffer zone.

**Respirator Fit Testing Medical Qualification and Training**

Using a program that conforms to OSHA's requirements (see 29 CFR Part 1910.134), employers must verify that any handler who uses a respirator is

- Fit tested and fit checked
- Trained and
- Examined by a qualified medical practitioner to ensure physical ability to safely wear the style of respirator to be worn. A qualified medical practitioner is a physician or other licensed health care professional who will evaluate the ability of a worker to wear a respirator. The initial evaluation consists of a questionnaire that asks about medical conditions (such as a heart condition) that would be problematic for respirator use. If concerns are identified, then additional evaluations such as a physical exam might be necessary. The initial evaluation must be done before respirator use begins. Handlers must be reexamined by a qualified medical practitioner if their health status or respirator style or use conditions change.

Upon request by local/state/federal/tribal enforcement personnel, employers must provide documentation demonstrating how they have complied with these requirements.

**Respiratory Protection and Stop Work Triggers**

The following procedures must be followed to determine whether an air purifying respirator is required or if operations must cease for any person performing a handling task (except for fumigant site monitoring outside of the buffer zone) as stated in this label:

- If at any time any handler experiences sensory irritation (tearing, burning of the eyes or nose), then either

- An air purifying respirator must be worn by all handlers who remain in the application block or surrounding buffer zone or
- Operations must cease and handlers not wearing an air purifying respirator must leave the application block and surrounding buffer zone
- Handlers can remove air purifying respirators or resume operations if two consecutive breathing zone samples taken at the handling site at least 15 minutes apart show that levels of MITC have decreased to less than 600 ppb (0.6 ppm) provided that handlers do not experience sensory irritation. During the collection of air samples an air purifying respirator must be worn by the handler taking the air samples. Samples must be taken at the location where the irritation was first experienced.
- When using monitoring devices to monitor air concentration levels a direct read detection device such as an electronic device or a colorimetric device (e.g. Draeger Sensidyne) must be used. The devices must have sensitivity of at least 600 ppb (0.6 ppm) for MITC. Persons using direct read detection devices must follow the manufacturer's directions.
- When breathing zone samples are required they must be taken outside respiratory protection equipment and within a 10 inch radius of the handler's nose and mouth.
- When air purifying respirators are worn air monitoring samples must be collected at least every 2 hours in the breathing zone of a handler performing a representative handling task.
- If at any time (1) a handler experiences sensory irritation when wearing an air purifying respirator or (2) a MITC air sample is greater than or equal to 6 000 ppb (6 ppm) then all handler activities must cease and handlers must be removed from the application block and surrounding buffer zone.
- Handlers can resume work activities without air purifying respirators if two consecutive breathing zone samples taken at the handling site at least 15 minutes apart show levels of MITC have decreased to less than 600 ppb (0.6 ppm) provided that handlers do not experience sensory irritation. During the collection of air samples an air purifying respirator must be worn by the handler taking the air samples. Samples must be taken at the location where the irritation was first experienced or where sample(s) were greater than or equal to 6 000 ppb (6 ppm).
- Handlers can resume work activities if all of the following conditions exist provided that the appropriate air purifying respirator is worn
  - Two consecutive breathing zone samples for MITC taken at the handling site at least 15 minutes apart must be less than 6 000 ppb (6 ppm)
  - Handlers do not experience sensory irritation while wearing an air purifying respirator and
  - Filter cartridges/canisters have been changed
  - During the collection of air samples an air purifying respirator must be worn by the handler taking the air samples. Samples must be taken at the location where the irritation was first experienced or where sample(s) were greater than or equal to 6 000 ppb (6 ppm)

## TARP PERFORATION AND/OR REMOVAL

**IMPORTANT** Persons perforating, repairing, removing, and/or monitoring tarps are defined within certain time limitations as handlers (see *Handlers* section) and they must be provided the PPE and other protections for handlers as required on this labeling and in the Worker Protection Standard for Agricultural Pesticides.

- Tarps must not be perforated until a minimum of 5 days (120 hours) have elapsed after the application is complete unless a weather condition exists which necessitates early tarp perforation or removal (see *Early Tarp Removal for Broadcast Applications Only* and *Early Tarp Perforation during Flood Prevention Activities for Bedded Applications Only* requirements).
- If tarps are perforated within 14 days after the application is complete tarp removal must not begin until at least 2 hours after tarp perforation is complete.
- If tarps are perforated but not removed within 14 days after the application is complete planting or transplanting must not begin until at least 48 hours after the tarp perforation is complete.
- If tarps are not perforated or removed within 14 days after the application is complete planting or transplanting may take place while the tarps are being perforated.
- Each tarp panel used for broadcast fumigation must be perforated.
- Tarps may be perforated manually ONLY for the following situations:

- At the beginning of each row where a coultter blade (or other device which performs similarly) is used on a motorized vehicle such as an ATV
- In fields that are 1 acre or less
- During flood prevention activities
- In all other instances tarps must be perforated (cut punched poked or sliced) only by mechanical methods
- Tarp perforation for broadcast fumigations must be completed before noon
- For broadcast fumigations tarps must not be perforated if rainfall is expected within 12 hours
- Early Tarp Removal for Broadcast Applications Only
  - Tarps may be removed before the required 5 days (120 hours) if adverse weather conditions have compromised the integrity of the tarp provided that the compromised tarp poses a safety hazard *Adverse weather* includes high wind hail or storms that blow tarps off the field and create a hazard e.g. tarps blowing into power lines and onto roads. A *compromised tarp* is a tarp that due to an adverse weather condition is no longer performing its intended function and is creating a hazard
- Early Tarp Perforation during Flood Prevention Activities for Bedded Applications Only
  - Tarp perforation is allowed before the 5 days (120 hours) have elapsed
  - Tarps must be immediately retucked and packed after soil removal

## ENTRY RESTRICTED PERIOD AND NOTIFICATION

### Entry Restricted Period

Entry into the application block (including early entry that would otherwise be permitted under the WPS) by any person – other than a correctly trained and PPE equipped handler who is performing a handling task listed on this labeling – is PROHIBITED from the start of the application until

- 5 days (120 hours) after the application is complete for untarped applications or
- 5 days (120 hours) after application is complete if tarps are not perforated and removed for at least 14 days after the application is complete or
- 48 hours after tarp perforation is complete if tarps will be perforated within 14 days after the application is complete and will not be removed for at least 14 days after the application is complete or
- Tarp removal is completed if tarps are both perforated and removed less than 14 days after the application is complete

### NOTE

- See *Tarp Perforation and/or Removal* section on this labeling for requirements about when tarps are allowed to be perforated
- If early tarp removal occurs for a broadcast application the entry restricted period is a minimum of 5 days after the application is complete
- When listing application information for soil fumigant applications to comply with part 170.122 of the WPS list the entry restricted period time frame in place of the REI

### Notification

Notify workers of the application by warning them orally and by posting Fumigant Treated Area signs. The signs must bear the skull and crossbones symbol and state

- DANGER/PELIGRO
- Area under fumigation DO NOT ENTER/NO ENTRE
- Metam Sodium Fumigant in USE
- The date and time of fumigation
- The date and time the entry restricted period is over
- VAPAM HL and
- Name address and telephone number of the certified applicator in charge of the fumigation

Post Fumigant Treated Area sign instead of the WPS sign for this application but follow all WPS requirements pertaining to location legibility text size and sign size (40 CFR § 170.120)

Post the Fumigant Treated Area signs at all entrances to the application block no sooner than 24 hours prior to application

Fumigant Treated Area signs must remain posted for no less than the duration of the entry restricted period

Fumigant Treated Area signs must be removed within 3 days after the end of the entry restricted period

**MANDATORY GOOD AGRICULTURAL PRACTICES (GAPS)**

The following GAPS must be followed during all fumigant applications

**Shank Applications**

*Weather Conditions*

- To determine if unfavorable weather conditions exist or are predicted (see *Identifying Unfavorable Weather Conditions* section) and whether an application should proceed the National Weather Service weather forecast must be checked by the certified applicator supervising the application
  - on the day of but prior to the start of the application and
  - on a daily basis during the application if the time period from the start of the application until the application is complete is greater than 24 hours
- Do not apply if an air stagnation advisory issued by the National Weather Service is in effect for the area in which the application is planned during the application or the 48 hours after the application is complete
- Do not apply if light wind conditions (< 2 mph) are forecast to persist for more than 18 consecutive hours from the time the application starts until 48 hours after the application is complete
- Detailed National Weather Service forecasts for local weather conditions wind speed and air stagnation advisories may be obtained on line at [http //www nws noaa gov](http://www.nws.noaa.gov) on NOAA weather radio or by contacting your local National Weather Service Forecasting Office

*Identifying Unfavorable Weather Conditions*

- Unfavorable weather conditions block upward movement of air which results in trapping fumigant vapors near the ground The resulting air mass can move off site in unpredictable directions These conditions typically exist within an hour prior to sunset and continue past sunrise and persist as late as noontime Unfavorable conditions are common on nights with limited cloud cover and light to no wind and their presence can be indicated by ground fog or smog and can also be identified by smoke from a ground source that flattens out below a ceiling layer and moves laterally in a concentrated cloud

*Soil Conditions Injection Depth and Soil Sealing*

- Soil must be in good tilth free of large clods and tilled at a minimum to the depth of the treatment zone Large clods can prevent effective soil sealing and reduce effectiveness of the application If subsurface soil compaction layers (hardpans) are present within the intended fumigation treatment zone a deep tillage to fracture these layers must occur prior to or during the soil fumigant application
- Plant residue that is present must not interfere with the application or the soil seal Non decomposed plant material may harbor pests that will not be controlled by fumigation Crop residue that is present must lie flat to permit the soil to be sealed effectively and limit the natural chimneys that may occur in the soil when plant residue is present These chimneys allow the soil fumigants to move through the soil quickly and escape into the atmosphere This may create potentially harmful conditions for workers and bystanders and limits the efficacy of the fumigant Plant residue on the field serves to prevent soil erosion from both wind and water

The injection point for bedded and broadcast shank injection applications shall be a minimum of 3 inches from the final soil/air interface. Chisel traces must be eliminated following an application and the soil surface must be sealed immediately after application using one or more of the following methods

- Compaction with a bed shaper roller press wheel coil packer ring packer or by similar device OR
- Covering the treated soil with 3 6 inches of untreated soil OR
- Applying a minimum of a ¼ inch of water beginning immediately after application begins and completing the water treatment within four hours OR
- Covering treated area with a tarp

*Tarps (when tarps are used in VAPAM HL applications)*

- A written tarp plan must be developed and included in the FMP
- Once a tarp is perforated the application is no longer considered tarped
- Tarps must be installed immediately after the fumigant is applied to the soil

*Soil Temperature*

- At the beginning of the application the soil temperature at the injection depth must be between 35° and 90°F
- If air temperatures have been above 100°F in any of the three days prior to application then soil temperature must be measured and recorded in the FMP. Record temperature measurements at the application depth or 12 inches whichever is shallower

*Soil Moisture*

- The soil moisture in the top six inches of soil must be between 60% to 80% of available water capacity immediately prior to the application subject to the exception below
- EXCEPTION In areas where soil moisture must exceed available water capacity to form a bed (e.g. certain regions in Florida) soil moisture content may exceed 80%
- If appropriate measuring equipment is not used to determine whether the soil moisture in the top six inches of soil is between 60% to 80% available water capacity immediately prior to the application the USDA *Feel and Appearance Method* test may be used to estimate whether the 60% to 80% soil moisture content requirement is met
  - For **coarse** textured soils (fine sand and loamy fine sand) there must be enough moisture (50% to 75% of available water capacity) to form a weak ball with loose and clustered sand grains on fingers darkened color moderate water staining on fingers will not ribbon
  - For **moderately coarse** textured soils (sandy loam and fine sandy loam) there must be enough moisture (50% to 75% of available water capacity) to form a ball with defined finger marks very light soil/water staining on fingers darkened color will not stick
  - For **medium** textured soils (sandy clay loam loam and silt loam) there must be enough moisture (50% to 75% of available water capacity) to form a ball very light staining on fingers darkened color pliable and forms a weak ribbon between the thumb and forefinger
  - For **fine** textured soils (clay clay loam and silty clay loam) there must be enough moisture (50% to 75% of available water capacity) to form a smooth ball with defined finger marks light soil/water staining on fingers ribbons between thumb and forefinger
  - For **fields with more than one soil texture** soil moisture content in the lightest textured (most sandy) areas must comply with this soil moisture requirement. The field may be divided into areas of similar soil texture and the soil moisture of each area should be adjusted as needed. Coarser textured soils can be fumigated under conditions of higher soil moisture than finer textured soils however if the soil moisture is too high fumigant movement will be retarded and effectiveness of the treatment will be reduced. Previous and/or local experience with the soil to be treated or the crop to be planted can often serve as a guide to conditions that will be acceptable. If there is uncertainty in determining the soil moisture content of the area to be treated a local extension service or soil conservation st or pest control advisor (agriculture consultant) should be consulted for assistance



- If there is insufficient moisture throughout the top six inches of soil immediately prior to the application the soil moisture must be adjusted. If there is adequate soil moisture below six inches soil moisture can be brought to the surface by tillage before or during injection. To conserve existing soil moisture tillage should be done as close to the time of application as possible.

#### *Application and Equipment Considerations*

- Do not apply or allow fumigant to spill onto the soil surface. Injectors must be below the soil surface before product flow begins. Each injection line either have a check valve located as close as possible to the final injection point or drain/purge the line of any remaining fumigant prior to lifting injection shanks from the ground. Do not lift injection shanks from the soil until the shut off valve has been closed and the fumigant has been depressurized (passively drained) or purged (actively forced out via air compressor) from the system.
- Application equipment must be in good working order.
- All tanks, hoses, fittings, valves and connections must be serviceable, tightened, sealed and not leaking.
- Dry disconnect couplings (closed transfer system) must be installed on all tanks and transfer hoses.
- Sight gauges and pressure gauges must be properly functioning.
- Nozzles and metering devices must be the correct size and sealed and unobstructed.
- Use only tanks, hoses and fittings designed to withstand the pressure of the system and resistant to metam.
- Each nozzle must be equipped with a flow monitor, e.g. mechanical, electronic, or Red-ball type monitor.
- For undiluted product, aluminum, brass, copper, galvanized iron, and zinc materials cannot be used.
- All rigs must include a filter to remove any particulates from the fumigant, and a check valve that is visible to the tractor driver during application to prevent backflow of the fumigant into the pressurizing cylinder.
- All rigs must include a flow meter or a flow monitoring device.
- All rigs must have a constant pressure system with orifice plates to ensure the proper amount of fumigant is applied.
- Valves (e.g. backflow shut off), vacuum relief valves, and low pressure drains must be in place, operational, and leak free.
- Use only positive displacement pumps. Do NOT use impellers made of brass, aluminum, or galvanized material.
- Before using a fumigation rig for the first time, or when preparing it for use after storage, the operator must check the following items carefully:
  - Check the filter, and clean or replace the filter element as required.
  - Check all tubes and chisels/shanks to make sure they are free of debris and obstructions.
  - Check and clean the orifice plates.

## Spray Blade Applications (includes bed top blade and soil cap applications)

### *Weather Conditions*

- To determine if unfavorable weather conditions exist or are predicted (see *Identifying Unfavorable Weather Conditions* section) and whether application should proceed the National Weather Service weather forecast must be checked by the certified applicator supervising the application
  - on the day of but prior to the start of the application and
  - on a daily basis during the application if the time period from the start of the application until the application is complete is greater than 24 hours
- Do not apply if an air stagnation advisory issued by the National Weather Service is in effect for the area in which the application is planned during the application or the 48 hours after the application is complete
- Do not apply if light wind conditions (< 2 mph) are forecast to persist for more than 18 consecutive hours from the time the application starts until 48 hours after the application is complete
- Detailed National Weather Service forecasts for local weather conditions wind speed and air stagnation advisories may be obtained on line at <http://www.nws.noaa.gov> on NOAA weather radio or by contacting your local National Weather Service Forecasting Office

### *Identifying Unfavorable Weather Conditions*

- Unfavorable weather conditions block upward movement of air which results in trapping fumigant vapors near the ground The resulting air mass can move off site in unpredictable directions These conditions typically exist prior to sunset and continue past sunrise and persist as late as noontime Unfavorable conditions are common on nights with limited cloud cover and light to no wind and their presence can be indicated by ground fog or smog and can also be identified by smoke from a ground source that flattens out below a ceiling layer and moves laterally in a concentrated cloud

### *Soil Conditions Injection Depth and Soil Sealing*

- Soil must be in good tilth free of large clods and tilled at a minimum to the depth of the treatment zone Large clods can prevent effective soil sealing and reduce effectiveness of the application If subsurface soil compaction layers (hardpans) are present within the intended fumigation treatment zone a deep tillage to fracture these layers must occur prior to or during the soil fumigant application
- Plant residue that is present must not interfere with the application or the soil seal Non decomposed plant material may harbor pests that will not be controlled by fumigation Crop residue that is present must lie flat to permit the soil to be sealed effectively and limit the natural chimneys that may occur in the soil when plant residue is present These chimneys allow the soil fumigants to move through the soil quickly and escape into the atmosphere This may create potentially harmful conditions for workers and bystanders and limits the efficacy of the fumigant Plant residue on the field serves to prevent soil erosion from both wind and water

Apply the product mixture on the soil immediately ahead of the bed shaping equipment or tiller The soil surface must be compacted immediately after application using one or more of the following methods

- Compaction with a bed shaper roller press wheel coil packer ring packer or similar device OR
- Covering the treated soil with 3 6 inches of untreated soil OR
- Applying a minimum of a ¼ inch of water beginning immediately after application begins and completing the water treatment within four hours OR
- Covering treated area with a tarp

### *Tarps (when tarps are used in VAPAM HL applications)*

- A written tarp plan must be developed and included in the FMP
- Once a tarp is perforated the application is no longer considered tarped

### *Soil Temperature*

- At the beginning of the application the soil temperature at the injection depth must be between 35° and 90°

- If air temperatures have been above 100°F in any of the three days prior to application then soil temperature must be measured and recorded in the FMP Record temperature measurements at the application depth or 12 inches whichever is shallower

*Soil Moisture*

- The soil moisture in the top six inches of soil must be between 60% to 80% of available water capacity immediately prior to the application subject to the exception below
- EXCEPTION In areas where soil moisture must exceed available water capacity to form a bed (e.g. certain regions in Florida) soil moisture content may exceed 80%
- If appropriate measuring equipment is not used to determine whether the soil moisture in the top six inches of soil is between 60% to 80% available water capacity immediately prior to the application the USDA *Feel and Appearance Method* test may be used to estimate whether the 60% to 80% soil moisture content requirement is met
  - For **coarse** textured soils (fine sand and loamy fine sand) there must be enough moisture (50% to 75% of available water capacity) to form a weak ball with loose and clustered sand grains on fingers darkened color moderate water staining on fingers will not ribbon
  - For **moderately coarse** textured soils (sandy loam and fine sandy loam) there must be enough moisture (50% to 75% of available water capacity) to form a ball with defined finger marks very light soil/water staining on fingers darkened color will not stick
  - For **medium** textured soils (sandy clay loam loam and silt loam) there must be enough moisture (50% to 75% of available water capacity) to form a ball very light staining on fingers darkened color pliable and forms a weak ribbon between the thumb and forefinger
  - For **fine** textured soils (clay clay loam and silty clay loam) there must be enough moisture (50% to 75% of available water capacity) to form a smooth ball with defined finger marks light soil/water staining on fingers ribbons between thumb and forefinger
  - For **fields with more than one soil texture** soil moisture content in the lightest textured (most sandy) areas must comply with this soil moisture requirement The field may be divided into areas of similar soil texture and the soil moisture of each area should be adjusted as needed Coarser textured soils can be fumigated under conditions of higher soil moisture than finer textured soils however if the soil moisture is too high fumigant movement will be retarded and effectiveness of the treatment will be reduced Previous and/or local experience with the soil to be treated or the crop to be planted can often serve as a guide to conditions that will be acceptable If there is uncertainty in determining the soil moisture content of the area to be treated a local extension service or soil conservationist or pest control advisor (agriculture consultant) should be consulted for assistance
- If there is insufficient moisture throughout the top six inches of soil immediately prior to the application the soil moisture must be adjusted If there is adequate soil moisture below six inches soil moisture can be brought to the surface by tillage before or during injection To conserve existing soil moisture tillage should be done as close to the time of application as possible

*Application and Equipment Considerations*

- Do not apply or allow fumigant to drain or drip onto the soil surface
- Application equipment must be in good working order
- All tanks hoses fittings valves and connections must be serviceable tightened sealed and not leaking
- Dry disconnect couplings (closed transfer system) must be installed on all tanks and transfer hoses
- Sight gauges and pressure gauges must be properly functioning
- Nozzles and metering devices must be the correct size and sealed and unobstructed

- Use only tanks hoses and fittings designed to withstand the pressure of the system and resistant to metam
- Each nozzle must be equipped with a flow monitor e.g. mechanical electronic or Red-ball type monitor
- For undiluted product aluminum brass copper galvanized iron and zinc materials cannot be used
- All rigs must include a filter to remove any particulates from the fumigant and a check valve that is visible to the tractor driver during application to prevent backflow of the fumigant into the pressurizing cylinder
- Before using a fumigation rig for the first time or when preparing it for use after storage the operator must check the following items carefully
  - Check the filter and clean or replace the filter element as required
  - Check all tubes and chisels to make sure they are free of debris and obstructions
  - Check and clean the orifice plates

**Rotary Tiller Applications**

*Weather Conditions*

- To determine if unfavorable weather conditions exist or are predicted (see *Identifying Unfavorable Weather Conditions* section) and whether application should proceed the National Weather Service weather forecast must be checked by the certified applicator supervising the application
  - on the day of but prior to the start of the application and
  - on a daily basis during the application if the time period from the start of the application until the application is complete is greater than 24 hours
- Do not apply if an air stagnation advisory issued by the National Weather Service is in effect for the area in which the application is planned during the application or the 48 hours after the application is complete
- Do not apply if light wind conditions (< 2 mph) are forecast to persist for more than 18 consecutive hours from the time the application starts until 48 hours after the application is complete
- Detailed National Weather Service forecasts for local weather conditions wind speed and air stagnation advisories may be obtained on line at [http //www nws noaa gov](http://www.nws.noaa.gov) on NOAA weather radio or by contacting your local National Weather Service Forecasting Office

*Identifying Unfavorable Weather Conditions*

- Unfavorable weather conditions block upward movement of air which results in trapping fumigant vapors near the ground The resulting air mass can move off site in unpredictable directions These conditions typically exist prior to sunset and continue past sunrise and persist as late as noontime Unfavorable conditions are common on nights with limited cloud cover and light to no wind and their presence can be indicated by ground fog or smog and can also be identified by smoke from a ground source that flattens out below a ceiling layer and moves laterally in a concentrated cloud

*Soil Conditions Injection Depth and Soil Sealing*

- Soil must be in good tilth free of large clods and tilled at a minimum to the depth of the treatment zone Large clods can prevent effective soil sealing and reduce effectiveness of the application If subsurface soil compaction layers (hardpans) are present within the intended fumigation treatment zone a deep tillage to fracture these layers must occur prior to or during the soil fumigant application
- Plant residue that is present must not interfere with the application or the soil seal Non decomposed plant material may harbor pests that will not be controlled by fumigation Crop residue that is present must lie flat to permit the soil to be sealed effectively and limit the natural chimneys that may occur in the soil when plant residue is present These chimneys allow the soil fumigants to move through the soil quickly and escape into the atmosphere This may create potentially harmful conditions for workers and bystanders and limits the efficacy of the fumigant Plant residue on the field serves to prevent soil erosion from both wind and water

Spray or drip the product mixture on the soil immediately ahead of the bed shaping equipment or tiller. The soil surface must be compacted immediately after application using one or more of the following methods

- Compaction with a bed shaper roller press wheel coil packer ring packer or similar device OR
- Covering the treated soil with 3-6 inches of untreated soil OR
- Applying a minimum of a 1/4 inch of water beginning immediately after application begins and completing the water treatment within four hours OR
- Covering treated area with a tarp

*Tarps (when tarps are used in VAPAM HL applications)*

- A written tarp plan must be developed and included in the FMP
- Once a tarp is perforated the application is no longer considered tarped

*Soil Temperature*

- At the beginning of the application the soil temperature at the injection depth must be between 35° and 90°F
- If air temperatures have been above 100 F in any of the three days prior to application then soil temperature must be measured and recorded in the FMP. Record temperature measurements at the application depth or 12 inches whichever is shallower

*Soil Moisture*

- The soil moisture in the top six inches of soil must be between 60% to 80% of available water capacity immediately prior to the application subject to the exception below
- EXCEPTION In areas where soil moisture must exceed available water capacity to form a bed (e.g. certain regions in Florida) soil moisture content may exceed 80%
- If appropriate measuring equipment is not used to determine whether the soil moisture in the top six inches of soil is between 60% to 80% available water capacity immediately prior to the application the USDA *Feel and Appearance Method* test may be used to estimate whether the 60% to 80% soil moisture content requirement is met
  - For **coarse** textured soils (fine sand and loamy fine sand) there must be enough moisture (50% to 75% of available water capacity) to form a weak ball with loose and clustered sand grains on fingers darkened color moderate water staining on fingers will not ribbon
  - For **moderately coarse** textured soils (sandy loam and fine sandy loam) there must be enough moisture (50% to 75% of available water capacity) to form a ball with defined finger marks very light soil/water staining on fingers darkened color will not stick
  - For **medium** textured soils (sandy clay loam loam and silt loam) there must be enough moisture (50% to 75% of available water capacity) to form a ball very light staining on fingers darkened color pliable and forms a weak ribbon between the thumb and forefinger
  - For **fine** textured soils (clay clay loam and silty clay loam) there must be enough moisture (50% to 75% of available water capacity) to form a smooth ball with defined finger marks light soil/water staining on fingers ribbons between thumb and forefinger
  - For **fields with more than one soil texture** soil moisture content in the lightest textured (most sandy) areas must comply with this soil moisture requirement. The field may be divided into areas of similar soil texture and the soil moisture of each area should be adjusted as needed. Coarser textured soils can be fumigated under conditions of higher soil moisture than finer textured soils however if the soil moisture is too high fumigant movement will be retarded and effectiveness of the treatment will be reduced. Previous and/or local experience with the soil to be treated or the crop to be treated can often serve as a guide to conditions that will be acceptable. If there is uncertainty in determining the soil moisture content of the area to be treated a local extension service or soil conservation or pest control advisor (agriculture consultant) should be consulted for assistance
- If there is insufficient moisture throughout the top six inches of soil immediately prior to the application the soil moisture must be adjusted. If there is adequate soil moisture below six inches soil moisture can be brought to

the surface by tillage before or during injection To conserve soil moisture tillage should be done as close to the time of application as possible

*Application and Equipment Considerations*

- Do not apply or allow fumigant to drain or drip onto the soil surface
- Dry disconnect couplings (closed transfer system) must be installed on all tanks and transfer hoses
- Application equipment must be in good working order
- All tanks hoses fittings valves and connections must be serviceable tightened sealed and not leaking
- Sight gauges and pressure gauges must be properly functioning
- Nozzles and metering devices must be the correct size and sealed and unobstructed
- Use only tanks hoses and fittings designed to withstand the pressure of the system and resistant to metam
- Each nozzle must be equipped with a flow monitor e.g. mechanical electronic or Red-ball type monitor
- For undiluted product aluminum brass copper galvanized iron and zinc materials cannot be used
- All rigs must include a filter to remove any particulates from the fumigant and a check valve that is visible to the tractor driver during application to prevent backflow of the fumigant into the pressurizing cylinder
- Before using a fumigation rig for the first time or when preparing it for use after storage the operator must check the following items carefully
  - Check the filter and clean or replace the filter element as required
  - Check all tubes and chisels shanks to make sure they are free of debris and obstructions
  - Check and clean the orifice plates

**Center Pivot and Lateral Move Applications**

*Wind Speed*

- For lateral move or center pivot applications 1) not using a solid stream type nozzle OR 2) having a release height or spray height greater than 4 feet OR 3) having 30 lbs or greater PSI at the sprinkler head wind speed at the application site *must* be a minimum of 2 mph at the start of the application or forecasted to reach 5 mph during the application and the maximum wind speed is 10 mph
- For lateral move or center pivot applications using 1) a solid stream AND 2) having release height and spray height less than 4 feet AND 3) having 29 lbs or less PSI at the sprinkler head wind speed at the application site *must* be a minimum of 2 mph at the start of the application or forecasted to reach 5 mph during the application and the maximum wind speed is 25 mph

*Weather Conditions*

- To determine if unfavorable weather conditions exist or are predicted (see *Identifying Unfavorable Weather Conditions* section) and whether application should proceed the National Weather Service weather forecast must be checked by the certified applicator supervising the application
  - on the day of but prior to the start of the application and
  - on a daily basis during the application if the time period from the start of the application until the application is complete is greater than 24 hours

- Do not apply if an air stagnation advisory issued by the National Weather Service is in effect for the area in which the application is planned during the application or the 48 hours after the application is complete
- Do not apply if light wind conditions (< 2 mph) are forecast to persist for more than 18 consecutive hours from the time the application starts until 48 hours after the application is complete
- Detailed National Weather Service forecasts for local weather conditions wind speed and air stagnation advisories may be obtained on line at <http://www.nws.noaa.gov> NOAA weather radio or by contacting your local National Weather Service Forecasting Office

*Identifying Unfavorable Weather Conditions*

- Unfavorable weather conditions block upward movement of air which results in trapping fumigant vapors near the ground. The resulting air mass can move off site in unpredictable directions. These conditions typically exist prior to sunset and continue past sunrise and persist as late as noontime. Unfavorable conditions are common on nights with limited cloud cover and light to no wind and their presence can be indicated by ground fog or smog and can also be identified by smoke from a ground source that flattens out below a ceiling layer and moves laterally in a concentrated cloud

*Soil Conditions*

- Soil must be in good tilth free of large clods and tilled at a minimum to the depth of the treatment zone. Large clods can prevent effective soil sealing and reduce effectiveness of the application. If subsurface soil compaction layers (hardpans) are present within the intended fumigation treatment zone a deep tillage to fracture these layers must occur prior to or during the soil fumigant application
- Plant residue that is present must not interfere with the application or the soil seal. Non decomposed plant material may harbor pests that will not be controlled by fumigation. Except when applying over cover crops as set forth in the Product Instructions crop residue that is present must lie flat to permit the soil to be sealed effectively and limit the natural chimneys that may occur in the soil when plant residue is present. These chimneys allow the soil fumigants to move through the soil quickly and escape into the atmosphere. This may create potentially harmful conditions for workers and bystanders and limits the efficacy of the fumigant. Plant residue on the field serves to prevent soil erosion from both wind and water

*Soil Temperature*

- At the beginning of the application the soil temperature must be between 35° and 90 F measured at 3 inches in depth
- If air temperatures have been above 100°F in any of the three days prior to application then soil temperature must be measured and recorded in the FMP. Record temperature measurements at the application depth or 12 inches whichever is shallower

*Soil Moisture*

- The soil moisture in the top six inches of soil must be between 60% to 80% of available water capacity immediately prior to the application subject to the exception below
- EXCEPTION In areas where soil moisture must exceed available water capacity to form a bed (e.g. certain regions in Florida) soil moisture content may exceed 80%
- If appropriate measuring equipment is not used to determine whether the soil moisture in the top six inches of soil is between 60% to 80% available water capacity immediately prior to the application the USDA *Feel and Appearance Method* test may be used to estimate whether the 60% to 80% soil moisture content requirement is met
  - For **coarse** textured soils (fine sand and loamy fine sand) there must be enough moisture (70% to 75% of available water capacity) to form a weak ball with loose and clustered sand grains on fingers and darkened color. Moderate water staining on fingers will not ribbon
  - For **moderately coarse** textured soils (sandy loam and fine sandy loam) there must be enough moisture (50% to 75% of available water capacity) to form a ball with defined finger marks. Very light soil/water staining on fingers. Darkened color will not stick

- For **medium** textured soils (sandy clay loam loam and silt loam) there must be enough moisture (50% to 75% of available water capacity) to form a ball very light staining on fingers darkened color pliable and forms a weak ribbon between the thumb and forefinger
- For **fine** textured soils (clay clay loam and silty clay loam) there must be enough moisture (50% to 75% of available water capacity) to form a smooth ball with defined finger marks light soil/water staining on fingers ribbons between thumb and forefinger
- For **fields with more than one soil texture** soil moisture content in the lightest textured (most sandy) areas must comply with this soil moisture requirement The field may be divided into areas of similar soil texture and the soil moisture of each area should be adjusted as needed Coarser textured soils can be fumigated under conditions of higher soil moisture than finer textured soils however if the soil moisture is too high fumigant movement will be retarded and effectiveness of the treatment will be reduced Previous and/or local experience with the soil to be treated or the crop to be planted can often serve as a guide to conditions that will be acceptable If there is uncertainty in determining the soil moisture content of the area to be treated a local extension service or soil conservationist or pest control advisor (agriculture consultant) should be consulted for assistance
- If there is insufficient moisture throughout the top six inches below the surface of soil immediately prior to the application the soil moisture must be adjusted If there is adequate soil moisture below six inches soil moisture can be brought to the surface by tillage prior to the application To conserve soil moisture tillage should be done as close to the time of application as possible

#### *Flushing Irrigation Lines*

- Do not allow fumigant to remain in the irrigation system after the application is complete After application of the fumigant flush the injection and irrigation system with untreated water The flush time must be adequate to purge the fumigant from the injection and irrigation system but should be less than the amount that could over saturate the beds If common lines are used for both the fumigant application and the water treatment/seal (if applied) these lines must be adequately flushed before starting the water treatment/seal

#### *Application and Equipment Considerations*

- Anti siphon and backflow prevention devices must be installed and in working order
- Tanks must be in good condition to ensure product does not spill or leak
- Tanks must have sealable covers on access ports
- Tanks must have proper pesticide labels affixed to them
- All tanks hoses fittings valves and connections must be serviceable tightened sealed and not leaking
- Use only tanks hoses and fittings designed to withstand the pressure of the system and resistant to metam
- Use only positive displacement pumps Do NOT use impellers made of brass aluminum or galvanized material
- For undiluted product aluminum brass copper galvanized iron and zinc materials cannot be used
- The system must contain a functional check valve vacuum relief valve inspection port and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow
- The pesticide injection pipeline must contain a functional automatic quick closing check valve to prevent the flow of fluid toward the injection pump



- The pesticide injection pipeline must also contain a functional normally closed solenoid operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down
- The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops
- The irrigation line or water pump must include a functional pressure switch that will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected
- Systems must use a metering pump such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock
- Any alternatives to the required safety devices in this label must conform to the list of EPA approved alternative devices

### **Solid Set Sprinkler Applications**

#### *Wind Speed*

- Wind speed at the application site *must* be a minimum of 2 mph at the start of the application or forecasted to reach 5 mph during the application and the maximum wind speed is 10 mph

#### *Weather Conditions*

- To determine if unfavorable weather conditions exist or are predicted (see *Identifying Unfavorable Weather Conditions* section) and whether application should proceed the National Weather Service weather forecast must be checked by the certified applicator supervising the application
  - on the day of but prior to the start of the application and
  - on a daily basis during the application if the time period from the start of the application until the application is complete is greater than 24 hours
- Do not apply if an air stagnation advisory issued by the National Weather Service is in effect for the area in which the application is planned during the application or the 48 hours after the application is complete
- Do not apply if light wind conditions (< 2 mph) are forecast to persist for more than 18 consecutive hours from the time the application starts until 48 hours after the application is complete
- Detailed National Weather Service forecasts for local weather conditions wind speed and air stagnation advisories may be obtained on line at <http://www.nws.noaa.gov> on NOAA weather radio or by contacting your local National Weather Service Forecasting Office

#### *Identifying Unfavorable Weather Conditions*

- Unfavorable weather conditions block upward movement of air which results in trapping fumigant vapors near the ground. The resulting air mass can move off site in unpredictable directions. These conditions typically exist prior to sunset and continue past sunrise and persist as late as noontime. Unfavorable conditions are common on nights with limited cloud cover and light to no wind and their presence can be indicated by ground fog or smog and can also be identified by smoke from a ground source that flattens out below a ceiling layer and moves laterally in a concentrated cloud

#### *Soil Conditions*

- Soil must be in good tillage free of large clods and tilled to a minimum to the depth of the treatment zone. Large clods can prevent effective soil sealing and reduce effectiveness of the application. If subsurface soil compaction layers (hardpans) are present within the intended fumigation treatment zone a deep tillage to fracture these layers must occur prior to or during the soil fumigant application

- Plant residue that is present must not interfere with the application or the soil seal. Non decomposed plant material may harbor pests that will not be controlled by fumigation. Except when applying over cover crops as set forth in the Product Instructions, crop residue that is present must lie flat to permit the soil to be sealed effectively and limit the natural chimneys that may occur in the soil when plant residue is present. These chimneys allow the soil fumigants to move through the soil quickly and escape into the atmosphere. This may create potentially harmful conditions for workers and bystanders and limits the efficacy of the fumigant. Plant residue on the field serves to prevent soil erosion from both wind and water.

*Soil Temperature*

- At the beginning of the application, the soil temperature must be between 35° and 90°F measured at 3 inches in depth.
- If air temperatures have been above 100°F in any of the three days prior to application, then soil temperatures must be measured and recorded in the FMP. Record temperature measurements at the application depth or 12 inches, whichever is shallower.

*Soil Moisture*

- The soil moisture in the top six inches of soil must be between 60% to 80% of available water capacity immediately prior to the application, subject to the exception below.
- EXCEPTION: In areas where soil moisture must exceed available water capacity to form a bed (e.g. certain regions in Florida), soil moisture content may exceed 80%.
- If appropriate measuring equipment is not used to determine whether the soil moisture in the top six inches of soil is between 60% to 80% available water capacity immediately prior to the application, the USDA *Feel and Appearance Method* test may be used to estimate whether the 60% to 80% soil moisture content requirement is met.
  - For **coarse** textured soils (fine sand and loamy fine sand) there must be enough moisture (50% to 75% of available water capacity) to form a weak ball with loose and clustered sand grains on fingers, darkened color, moderate water staining on fingers, will not ribbon.
  - For **moderately coarse** textured soils (sandy loam and fine sandy loam) there must be enough moisture (50% to 75% of available water capacity) to form a ball with defined finger marks, very light soil/water staining on fingers, darkened color will not stick.
  - For **medium** textured soils (sandy clay loam, loam, and silt loam) there must be enough moisture (50% to 75% of available water capacity) to form a ball, very light staining on fingers, darkened color, pliable and forms a weak ribbon between the thumb and forefinger.
  - For **fine** textured soils (clay, clay loam, and silty clay loam) there must be enough moisture (50% to 75% of available water capacity) to form a smooth ball with defined finger marks, light soil/water staining on fingers, ribbons between thumb and forefinger.
  - For **fields with more than one soil texture**, soil moisture content in the lightest textured (most sandy) areas must comply with this soil moisture requirement. The field may be divided into areas of similar soil texture and the soil moisture of each area should be adjusted as needed. Coarser textured soils can be fumigated under conditions of higher soil moisture than finer textured soils, however, if the soil moisture is too high, fumigant movement will be retarded and effectiveness of the treatment will be reduced. Previous and/or local experience with the soil to be treated or the crop to be planted can often serve as a guide to conditions that will be acceptable. If there is uncertainty in determining the soil moisture content of the area to be treated, a local extension service or soil conservation/pest control advisor (agriculture consultant) should be consulted for assistance.
- If there is insufficient moisture throughout the top six inches below the surface of soil immediately prior to the application, the soil moisture must be adjusted. If there is adequate soil moisture below six inches, soil moisture can be brought to the surface by tillage prior to the application. To conserve soil moisture, tillage should be done as close to the time of application as possible.

*Flushing Irrigation Lines*

- Do not allow fumigant to remain in the irrigation system after the application is complete After application of the fumigant flush the injection and irrigation system with untreated water The flush time must be adequate to purge the fumigant from the injection and irrigation system but should be less than the amount that could over saturate the beds If common lines are used for both the fumigant application and the water treatment/seal (if applied) these lines must be adequately flushed before starting the water treatment/seal

*Application and Equipment Considerations*

- Anti siphon and backflow prevention devices must be installed and in working order
- Tanks must be in good condition to ensure product does not spill or leak
- Tanks must have sealable covers on access ports
- Tanks must have proper pesticide labels affixed to them
- All tanks hoses fittings valves and connections must be serviceable tightened sealed and not leaking
- Use only tanks hoses and fittings designed to withstand the pressure of the system and resistant to metam
- Use only positive displacement pumps Do NOT use impellers made of brass aluminum or galvanized material
- For undiluted product aluminum brass copper galvanized iron and zinc materials cannot be used
- The system must contain a functional check valve vacuum relief valve inspection port and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow
- The pesticide injection pipeline must contain a functional automatic quick closing check valve to prevent the flow of fluid toward the injection pump
- The pesticide injection pipeline must also contain a functional normally closed solenoid operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down
- The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops
- The irrigation line or water pump must include a functional pressure switch that will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected
- Systems must use a metering pump such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock
- Any alternatives to the required safety devices in this label must conform to the list of EPA approved alternative devices

## Drench Applications

### *Weather Conditions*

- To determine if unfavorable weather conditions exist or are predicted (see *Identifying Unfavorable Weather Conditions* section) and whether application should proceed the National Weather Service weather forecast must be checked by the certified applicator supervising the application
  - on the day of but prior to the start of the application and
  - on a daily basis during the application if the time period from the start of the application until the application is complete is greater than 24 hours
- Do not apply if an air stagnation advisory issued by the National Weather Service is in effect for the area in which the application is planned during the application or the 48 hours after the application is complete
- Do not apply if light wind conditions (< 2 mph) are forecast to persist for more than 18 consecutive hours from the time the application starts until 48 hours after the application is complete
- Detailed National Weather Service forecasts for local weather conditions wind speed and air stagnation advisories may be obtained on line at <http://www.nws.noaa.gov> on NOAA weather radio or by contacting your local National Weather Service Forecasting Office

### *Identifying Unfavorable Weather Conditions*

- Unfavorable weather conditions block upward movement of air which results in trapping fumigant vapors near the ground. The resulting air mass can move off site in unpredictable directions. These conditions typically exist prior to sunset and continue past sunrise and persist as late as noontime. Unfavorable conditions are common on nights with limited cloud cover and light to no wind and their presence can be indicated by ground fog or smog and can also be identified by smoke from a ground source that flattens out below a ceiling layer and moves laterally in a concentrated cloud

### *Soil Conditions*

- Soil must be in good tilth free of large clods and tilled at a minimum to the depth of the treatment zone. Large clods can prevent effective soil sealing and reduce effectiveness of the application. If subsurface soil compaction layers (hardpans) are present within the intended fumigation treatment zone a deep tillage to fracture these layers must occur prior to or during the soil fumigant application
- Plant residue that is present must not interfere with the application or the soil seal. Non decomposed plant material may harbor pests that will not be controlled by fumigation. Crop residue that is present must lie flat to permit the soil to be sealed effectively and limit the natural chimneys that may occur in the soil when plant residue is present. These chimneys allow the soil fumigants to move through the soil quickly and escape into the atmosphere. This may create potentially harmful conditions for workers and bystanders and limits the efficacy of the fumigant. Plant residue on the field serves to prevent soil erosion from both wind and water

### *Soil Temperature*

- At the beginning of the application the soil temperature is must be between 35° and 90°F measured at 3 inches in depth
- If air temperatures have been above 100°F in any of the three days prior to application then soil temperature must be measured and recorded in the FMP. Record temperature measurements at the application depth or 12 inches whichever is shallower

### *Soil Moisture*

- The soil moisture in the top six inches of soil must be between 60% to 80% of available water capacity immediately prior to the application subject to the exception below
- EXCEPTION In areas where soil moisture must exceed available water capacity to form a bea (e.g. certain regions in Florida) soil moisture content may exceed 80%
- If appropriate measuring equipment is not used to determine whether the soil moisture in the top six inches of soil is between 60% to 80% available water capacity immediately prior to the application the USDA *Feel and*

*Appearance Method* test may be used to estimate whether the 60% to 80% soil moisture content requirement is met

- For **coarse** textured soils (fine sand and loamy fine sand) there must be enough moisture (50% to 75% of available water capacity) to form a weak ball with loose and clustered sand grains on fingers darkened color moderate water staining on fingers will not ribbon
- For **moderately coarse** textured soils (sandy loam and fine sandy loam) there must be enough moisture (50% to 75% of available water capacity) to form a ball with defined finger marks very light soil/water staining on fingers darkened color will not stick
- For **medium** textured soils (sandy clay loam loam and silt loam) there must be enough moisture (50% to 75% of available water capacity) to form a ball very light staining on fingers darkened color pliable and forms a weak ribbon between the thumb and forefinger
- For **fine** textured soils (clay clay loam and silty clay loam) there must be enough moisture (50% to 75% of available water capacity) to form a smooth ball with defined finger marks light soil/water staining on fingers ribbons between thumb and forefinger
- For **fields with more than one soil texture** soil moisture content in the lightest textured (most sandy) areas must comply with this soil moisture requirement The field may be divided into areas of similar soil texture and the soil moisture of each area should be adjusted as needed Coarser textured soils can be fumigated under conditions of higher soil moisture than finer textured soils however if the soil moisture is too high fumigant movement will be retarded and effectiveness of the treatment will be reduced Previous and/or local experience with the soil to be treated or the crop to be planted can often serve as a guide to conditions that will be acceptable If there is uncertainty in determining the soil moisture content of the area to be treated a local extension service or soil conservationist or pest control advisor (agriculture consultant) should be consulted for assistance
- If there is insufficient moisture throughout the top six inches below the surface of soil immediately prior to the application the soil moisture must be adjusted If there is adequate soil moisture below six inches soil moisture can be brought to the surface by tillage before to the application To conserve soil moisture tillage should be done as close to the time of application as possible
- Applications must be followed immediately with 0.20 to 0.50 inches of water through solid set sprinklers
- A minimum of two more water seals must be applied one water seal on the first evening of the application and the second on the evening of the day after application

#### *Application and Equipment Considerations*

- Anti siphon and backflow prevention devices must be installed and in working order
- Tanks must be in good condition to ensure product does not spill or leak
- Tanks must have sealable covers on access ports
- Tanks must have proper pesticide labels affixed to them
- All tanks hoses fittings valves and connections must be serviceable tightened sealed and not leaking
- Dry disconnect couplings (closed transfer system) must be installed on all tanks and transfer hoses
- Use only tanks hoses and fittings designed to withstand the pressure of the system and resistant to metam
- For undiluted product aluminum brass copper galvanized iron and zinc materials cannot be used
- Each nozzle must be equipped with a flow monitor e.g. mechanical electronic or Red ball type monitor
- Nozzles and metering devices are of correct size and are sealed and unobstructed

- To inject fumigant use a metering system effectively designed and constructed of materials that are compatible with the fumigant and capable of being fitted with system interlocking controls
- The system must contain a functional check valve vacuum relief valve inspection port and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow
- The pesticide injection pipeline must contain a functional automatic quick closing check valve to prevent the flow of fluid toward the injection pump
- The pesticide injection pipeline must also contain a functional normally closed solenoid operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down
- The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops
- The irrigation line or water pump must include a functional pressure switch that will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected
- Systems must use a metering pump such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock
- Any alternatives to the required safety devices in this label must conform to the list of EPA approved alternative devices

**Drip Applications**

*Weather Conditions*

- To determine if unfavorable weather conditions exist or are predicted (see *Identifying Unfavorable Weather Conditions* section) and whether application should proceed the National Weather Service weather forecast must be checked by the certified applicator supervising the application
  - on the day of but prior to the start of the application and
  - on a daily basis during the application if the time period from the start of the application until the application is complete is greater than 24 hours
- Do not apply if an air stagnation advisory issued by the National Weather Service is in effect for the area in which the application is planned during the application or the 48 hours after the application is complete
- Do not apply if light wind conditions (< 2 mph) are forecast to persist for more than 18 consecutive hours from the time the application starts until 48 hours after the application is complete
- Detailed National Weather Service forecasts for local weather conditions wind speed and air stagnation advisories may be obtained on line at <http://www.nws.noaa.gov> on NOAA weather radio or by contacting your local National Weather Service Forecasting Office

*Identifying Unfavorable Weather Conditions*

- Unfavorable weather conditions block upward movement of air which results in trapping fumigant vapors near the ground. The resulting air mass can move off site in unpredictable directions. These conditions typically exist prior to sunset and continue past sunrise and persist as late as noontime. Unfavorable conditions are common on nights with limited cloud cover and light to no wind and their presence can be indicated by ground fog or smog and can also be identified by smoke from a ground source that flattens out below a ceiling layer and moves laterally in a concentrated cloud

### Soil Conditions

- Soil must be in good tilth free of large clods and tilled at a minimum to the depth of the treatment zone. Large clods can prevent effective soil sealing and reduce effectiveness of the application. If subsurface soil compaction layers (hardpans) are present within the intended fumigation treatment zone a deep tillage to fracture these layers must occur prior to or during the soil fumigant application.
- Plant residue that is present must not interfere with the application or the soil seal. Non decomposed plant material may harbor pests that will not be controlled by fumigation. Crop residue that is present must lie flat to permit the soil to be sealed effectively and limit the natural chimneys that may occur in the soil when plant residue is present. These chimneys allow the soil fumigants to move through the soil quickly and escape into the atmosphere. This may create potentially harmful conditions for workers and bystanders and limits the efficacy of the fumigant. Plant residue on the field serves to prevent soil erosion from both wind and water.

### Soil Temperature

- At the beginning of the application the soil temperature must be between 35° and 90°F measured at 3 inches in depth.
- If air temperatures have been above 100°F in any of the three days prior to application then soil temperature must be measured and recorded in the FMP. Record temperature measurements at the application depth or 12 inches whichever is shallower.

### Soil Moisture

- The soil moisture in the top six inches of soil must be between 60% to 80% of available water capacity immediately prior to the application subject to the exception below.
- **EXCEPTION** In areas where soil moisture must exceed available water capacity to form a bed (e.g. certain regions in Florida) soil moisture content may exceed 80%.
- If appropriate measuring equipment is not used to determine whether soil moisture in the top six inches of soil is between 60% to 80% available water capacity immediately prior to the application the USDA *Feel and Appearance Method* test may be used to help estimate whether the 60% to 80% soil moisture content requirement is met.
  - For **coarse** textured soils (fine sand and loamy fine sand) there must be enough moisture (50% to 75% of available water capacity) to form a weak ball with loose and clustered sand grains on fingers darkened color moderate water staining on fingers will not ribbon.
  - For **moderately coarse** textured soils (sandy loam and fine sandy loam) there must be enough moisture (50% to 75% of available water capacity) to form a ball with defined finger marks very light soil/water staining on fingers darkened color will not stick.
  - For **medium** textured soils (sandy clay loam loam and silt loam) there must be enough moisture (50% to 75% of available water capacity) to form a ball very light staining on fingers darkened color pliable and forms a weak ribbon between the thumb and forefinger.
  - For **fine** textured soils (clay clay loam and silty clay loam) there must be enough moisture (50% to 75% of available water capacity) to form a smooth ball with defined finger marks light soil/water staining on fingers ribbons between thumb and forefinger.
  - For **fields with more than one soil texture** soil moisture content in the lightest textured (most sandy) areas must comply with this soil moisture requirement. The field may be divided into areas of similar soil texture and the soil moisture of each area should be adjusted as needed. Coarser textured soils can be fumigated under conditions of higher soil moisture than finer textured soils however if the soil moisture is too high fumigant movement will be retarded and effectiveness of the treatment will be reduced. Previous and/or local experience with the soil to be treated or the crop to be planted can often serve as a guide to conditions that will be acceptable. If there is uncertainty in determining the soil moisture content of the area to be treated a local extension service or soil conservationist or pest control advisor (agriculture consultant) should be consulted for assistance.
- If there is insufficient moisture throughout the top six inches below the surface of soil immediately prior to the application the soil moisture must be adjusted. If there is adequate soil moisture below six inches soil moisture

can be brought to the surface by tillage prior to the application. To conserve soil moisture tillage should be done as close to the time of application as possible.

#### *Tarps (when tarps are used in VAPAM HL applications)*

- A written tarp plan must be developed and included in the FMP
- Application to blocks with previously laid and perforated tarps is allowed but once a tarp is perforated the application is no longer considered tarped. Therefore the application would not be eligible for tarp buffer zone credits.

#### *Flushing Drip Irrigation Lines*

- After application of the fumigant continue to irrigate the area with water to flush the injection and irrigation system with untreated water. Do not allow fumigant to remain in the irrigation system after the application is complete. The total volume of water must be adequate to completely remove the fumigant from the irrigation system but should be less than the amount that could over saturate the beds. If common lines are used for both the fumigant application and the water treatment/seal (if applied) these lines must be adequately flushed before starting the water treatment/seal and/or normal irrigation practices.

#### *Application and Equipment Considerations*

- Anti siphon and backflow prevention devices must be installed and in working order
- Tanks must be in good condition to ensure product does not spill or leak
- Tanks must have sealable covers on access ports
- Tanks must have proper pesticide labels affixed to them
- All tanks hoses fittings valves and connections must be serviceable tightened sealed and not leaking
- Use only tanks hoses and fittings designed to withstand the pressure of the system and resistant to metam
- For undiluted product aluminum brass copper galvanized iron and zinc materials cannot be used
- The drip irrigation system (main lines headers drip tape) must be thoroughly checked for leaks before the start of the application. An adequate run time and pressure are needed to detect leaks. Look for puddling along major pipes (holes on pipes or leaky joints) at the top and ends of rows (leaky connections open drip tape) in the furrows and on the bed surface (damaged drip tape malfunctioning emitters)
- To inject fumigant use a metering system effectively designed and constructed of materials that are compatible with the fumigant and capable of being fitted with system interlocking controls
- Nozzles and metering devices are of correct size and are sealed and unobstructed
- The system must contain a functional check valve vacuum relief valve inspection port and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow
- The pesticide injection pipeline must contain a functional automatic quick closing check valve to prevent the flow of fluid toward the injection pump
- The pesticide injection pipeline must also contain a functional normally closed solenoid operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down



- The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops
- The irrigation line or water pump must include a functional pressure switch that will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected
- Systems must use a metering pump such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock
- Any alternatives to the required safety devices in this label must conform to the list of EPA approved alternative devices

### **Flood Basin, Furrow and Border Application**

#### *Weather Conditions*

- To determine if unfavorable weather conditions exist or are predicted (see *Identifying Unfavorable Weather Conditions* section) and whether application should proceed the National Weather Service weather forecast must be checked by the certified applicator supervising the application
  - on the day of but prior to the start of the application and
  - on a daily basis during the application if the time period from the start of the application until the application is complete is greater than 24 hours
- Do not apply if an air stagnation advisory issued by the National Weather Service is in effect for the area in which the application is planned during the application or the 48 hours after the application is complete
- Do not apply if light wind conditions (< 2 mph) are forecast to persist for more than 18 consecutive hours from the time the application starts until 48 hours after the application is complete
- Detailed National Weather Service forecasts for local weather conditions wind speed and air stagnation advisories may be obtained on line at <http://www.nws.noaa.gov> on NOAA weather radio or by contacting your local National Weather Service Forecasting Office

#### *Identifying Unfavorable Weather Conditions*

- Unfavorable weather conditions block upward movement of air which results in trapping fumigant vapors near the ground. The resulting air mass can move off site in unpredictable directions. These conditions typically exist prior to sunset and continue past sunrise and persist as late as noontime. Unfavorable conditions are common on nights with limited cloud cover and light to no wind and their presence can be indicated by ground fog or smog and can also be identified by smoke from a ground source that flattens out below a ceiling layer and moves laterally in a concentrated cloud

#### *Soil Conditions*

- Soil must be in good tilth free of large clods and tilled at a minimum to the depth of the treatment zone. Large clods can prevent effective soil sealing and reduce effectiveness of the application. If subsurface soil compaction layers (hardpans) are present within the intended fumigation treatment zone a deep tillage to fracture these layers must occur prior to or during the soil fumigant application
- Plant residue that is present must not interfere with the application or the soil seal. Non decomposed plant material may harbor pests that will not be controlled by fumigation. Crop residue that is present must lie flat to permit the soil to be sealed effectively and limit the natural chimneys that may occur in the soil when plant residue is present. These chimneys allow the soil fumigants to move through the soil quickly and escape into the atmosphere. This may create potentially harmful conditions for workers and bystanders and limits the efficacy of the fumigant. Plant residue on the field serves to prevent soil erosion from both wind and water

### *Tarps (when tarps are used in VAPAM HL applications)*

- A written tarp plan must be developed and included in the FMP
- Once a tarp is perforated the application is no longer considered tarped

### *Soil Temperature*

- At the beginning of the application the soil temperature must be between 35° and 90°F measured at 3 inches in depth
- If air temperatures have been above 100°F in any of the three days prior to application then soil temperature must be measured and recorded in the FMP Record temperature measurements at the application depth or 12 inches whichever is shallower

### *Soil Moisture*

- The soil moisture in the top six inches of soil must be between 60% to 80% of available water capacity immediately prior to the application subject to the exception below
- **EXCEPTION** In areas where soil moisture must exceed available water capacity to form a bed (e.g. certain regions in Florida) soil moisture content may exceed 80%
- If appropriate measuring equipment is not used to determine whether the soil moisture in the top six inches of soil is between 60% to 80% available water capacity immediately prior to the application the USDA *Feel and Appearance Method* test may be used to estimate whether the 60% to 80% soil moisture content requirement is met
  - For **coarse** textured soils (fine sand and loamy fine sand) there must be enough moisture (50% to 75% of available water capacity) to form a weak ball with loose and clustered sand grains on fingers darkened color moderate water staining on fingers will not ribbon
  - For **moderately coarse** textured soils (sandy loam and fine sandy loam) there must be enough moisture (50% to 75% of available water capacity) to form a ball with defined finger marks very light soil/water staining on fingers darkened color will not stick
  - For **medium** textured soils (sandy clay loam loam and silt loam) there must be enough moisture (50% to 75% of available water capacity) to form a ball very light staining on fingers darkened color pliable and forms a weak ribbon between the thumb and forefinger
  - For **fine** textured soils (clay clay loam and silty clay loam) there must be enough moisture (50% to 75% of available water capacity) to form a smooth ball with defined finger marks light soil/water staining on fingers ribbons between thumb and forefinger
  - For **fields with more than one soil texture** soil moisture content in the lightest textured (most sandy) areas must comply with this soil moisture requirement The field may be divided into areas of similar soil texture and the soil moisture of each area should be adjusted as needed Coarser textured soils can be fumigated under conditions of higher soil moisture than finer textured soils however if the soil moisture is too high fumigant movement will be retarded and effectiveness of the treatment will be reduced Previous and/or local experience with the soil to be treated or the crop to be planted can often serve as a guide to conditions that will be acceptable If there is uncertainty in determining the soil moisture content of the area to be treated a local extension service or soil conservationist or pest control advisor (agriculture consultant) should be consulted for assistance
- If there is insufficient moisture throughout the top six inches below the surface of soil immediately prior to the application the soil moisture must be adjusted If there is adequate soil moisture below six inches soil moisture can be brought to the surface by tillage prior to the application To conserve existing soil moisture tillage should be done as close to the time of application as possible

### *Application and Equipment Considerations*

- Systems using a gravity flow pesticide dispersing system must meter the pesticide into the water at the head of the field and downstream of a hydraulic discontinuity such as a drop structure or weir box to decrease potential for water source contamination from backflow if water flow stops

- Meter at a steady rate into 3 to 18 inches of water per treated acre during irrigation **IMPORTANT** Prior to starting the application always inspect ditches and border areas to ensure containment of the irrigation waters Apply only into field head ditch **DO NOT APPLY INTO ANY LATERAL DITCHES**
- Backflow prevention devices must be installed and in working order
- Tanks must be in good condition to ensure product does not spill or leak
- Dry disconnect couplings (closed transfer system) must be installed on all tanks and transfer hoses
- Tanks must have sealable covers on access ports
- Tanks must have proper pesticide labels affixed to them
- All tanks hoses fittings valves and connections must be serviceable tightened sealed and not leaking
- Use only tanks hoses and fittings designed to withstand the pressure of the system and resistant to metam
- For undiluted product aluminum brass copper galvanized iron and zinc materials cannot be used
- To inject fumigant use a metering system effectively designed and constructed of materials that are compatible with the fumigant and capable of being fitted with system interlocking controls
- Flow rates must be calibrated and checked for each application
- All previous materials applied with the system must be cleaned thoroughly prior to fumigant application
- System must be flushed after application to totally remove all fumigant

**MAXIMUM APPLICATION RATES FOR PRE PLANT SOIL USES**

<p><b>Maximum Application Rates for Pre Plant Soil Uses</b></p> <ul style="list-style-type: none"> <li>• Maximum application rate is 320 lbs metam sodium/A and 75 gallons product per treated acre</li> </ul>
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**CALCULATING THE BROADCAST EQUIVALENT APPLICATION RATE**

**To calculate the broadcast equivalent rate for bedded or strip applications the following information is needed**

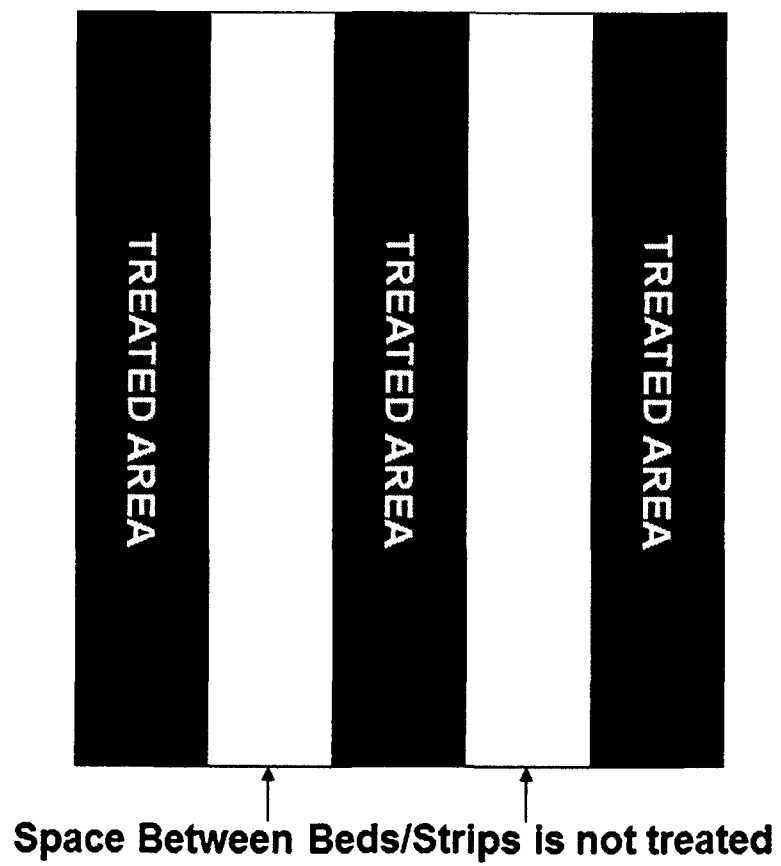
- gallons of product per treated acre
- strip or bed bottom width (inches)
- center to center row spacing (inches)
- application block size (acres)

**Figure 1 Bedded/Strip Application (1 acre application block)**

gallons of product **per treated acre** is the ratio of total amount of product applied to the size of the **total area treated** (e g the rate of product applied in the bed) For bedded or strip applications the **total area treated** is the summation of the area (i e length x width) of each treated bed bottom or strip that is located within the application

block as shown by the black areas in Figure 1 (e.g. black areas are 0.6A or 60% of the area within the application block) The area of the space between the beds/strips is not factored in the total area treated

The **application block size** is the acreage within the perimeter of the fumigated portion of a field (including furrows irrigation ditches roadways) The perimeter of the application block is the border that connects the outermost edges of total area treated with the fumigant product



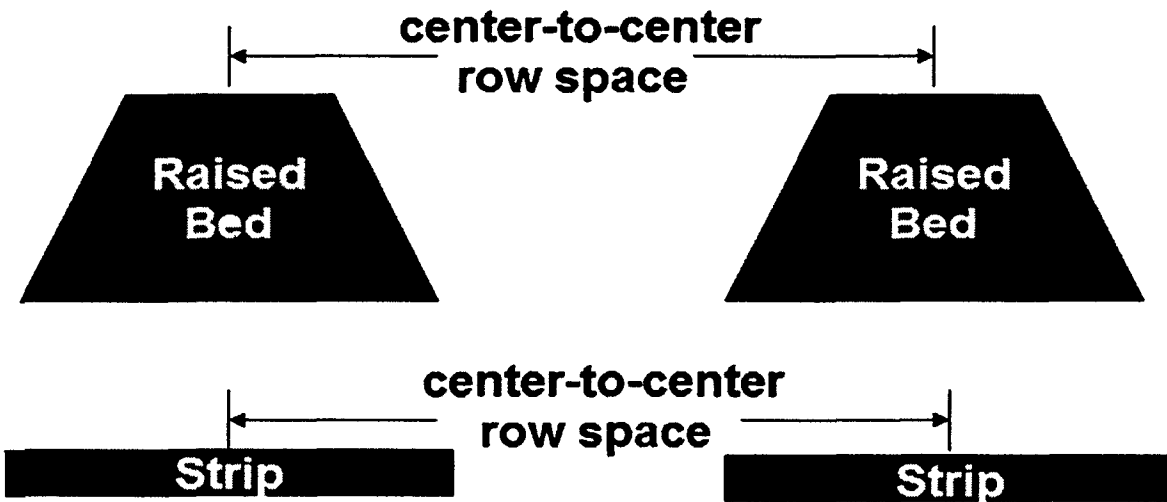
The broadcast equivalent rate must be calculated with the following formula

$$\text{Broadcast equivalent rate (pounds (or gallons) product/acre)} = \frac{\text{strip or bed bottom width (inches)}}{\text{center to center row spacing (inches)}} \times \text{pounds (or gallons) product/ treated acre applied in the strip or bed}$$

The bed width must be measured from the bottom of the bed

- The center to center row spacing must be calculated as shown in Figure 2
- If there are any ditches waterways drive rows and other areas that are not fumigated that are in the application block multiply the above broadcast equivalent equation by **(total area of strips or beds + row spacing)/(application block size)** A sample calculation is provided below

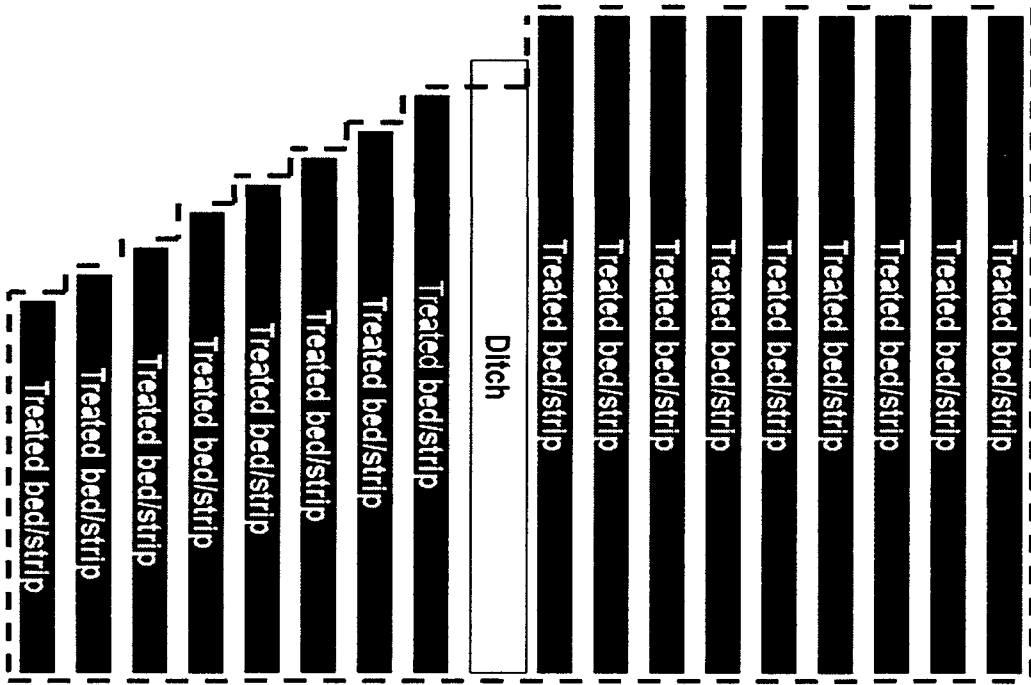
Figure 2 Center Row Spacing



Sample broadcast equivalent rate calculation

Assumptions

- o Application method is shank bedded
- o Bed width is 30 inches (measured at the bottom of bed)
- o Center to center row spacing is 60 inches
- o 200 pounds of product per treated acre is applied in the beds
- o Total application block size is 10 acres
- o Ditch in the middle of application block is 0.25 acres
- o Area of beds + row spacing is 9.75 acres



$$\begin{aligned}
 &\text{broadcast equivalent rate (pounds product/acre)} \\
 &= \frac{\text{strip or bed bottom width (inches)}}{\text{center to center row spacing (inches)}} \times \frac{\text{area of strip or bed + row spacing application block size}}{\text{application block size}} \times \text{pounds product/ treated acre applied in the bed} \\
 &= \frac{30 \text{ inch width beds}}{60 \text{ inch row spacing}} \times \frac{9.75 \text{ acres}}{10 \text{ acres}} \times 200 \text{ lbs product/ treated acre} \\
 &= 97.5 \text{ lbs product/acre}
 \end{aligned}$$

## BUFFER ZONE REQUIREMENTS

A buffer zone must be established for every fumigant application. The following describes the general buffer zone requirements:

- An area established around the perimeter of each application block. The buffer zone must extend outward from the edge of the application block perimeter equally in all directions.
- All non handlers including field workers, residents, pedestrians, and other bystanders must be excluded from the buffer zone during the buffer zone period except for transit (see *Buffer Zone Exemptions for Transit on Roadways*).
- Local state or federal officials performing inspection, sampling, or other similar official duties are not excluded from the application block or the buffer zone by this labeling. The certified applicator supervising the application and the owner of the establishment where the application is taking place are not authorized to or responsible for excluding those officials from the application block or the buffer zone.
- The buffer zone period begins at the start of the application and lasts for a minimum of 48 hours after the application is complete.

### Buffer Zone Proximity

- Before the start of application, the certified applicator must determine whether their buffer zone will overlap any metam sodium or metam potassium (or other MITC generating pesticides) buffer zone(s).
- To reduce the potential for off site movement from multiple fumigated fields, buffer zones from multiple metam sodium or metam potassium (or other MITC generating pesticides) application blocks must not overlap UNLESS
  1. A minimum of 12 hours have elapsed from the time the earlier application(s) is complete until the start of the later application, and
  2. *Fumigant Site Monitoring* or *Response Information for Neighbors* have been implemented if there are any residences or businesses within 300 feet of any of the buffer zones.

In addition, only for Low Release Height Solid Stream Center Pivot Applications:

- Before the application begins, the certified applicator must determine whether the application block or its resulting buffer will overlap with a buffer that is already in effect.
- To reduce the potential for off site movement from multiple fumigated fields, buffer zones from multiple metam sodium or metam potassium application blocks may not overlap UNLESS
  - Both application blocks are treated using low release height solid stream center pivot systems. The 12 hour waiting period does not apply in this instance.

NOTE: Under this exception, buffer zones may only overlap with those from application blocks that are not within the same field (i.e., application blocks must be in separate fields that are treated with a different center pivot rig also equipped with low release height, etc.). For buffers from application blocks within the same field to overlap, 12 hours must elapse from the completion of the first application until the start of the subsequent application.

- Emergency preparedness and response measures specified in the label have been implemented if there are any homes, businesses, or property not within the control of the fumigator within 300 feet of each buffer zone.

### Structures Under the Control of the Owner of the Application Block

- Buffer zones must not include buildings used for storage (e.g., sheds, barns, garages) UNLESS
  - The storage buildings are not occupied during the buffer zone period, and
  - The storage buildings do not share a common wall with an occupied structure.

**Areas Not Under the Control of the Owner of the Application Block**

- Buffer zones must not include residential areas (e.g. employee housing private property) buildings (e.g. commercial industrial) outdoor residential areas (e.g. lawns gardens play areas) and other areas that people may occupy UNLESS
  - 1 The occupants provide written agreement prior to the start of the application that they will voluntarily vacate the buffer zone during the entire buffer zone period and
  - 2 Reentry by occupants and other non handlers must not occur until
    - o The buffer zone period has ended and
    - o Sensory irritation is not experienced upon re entry
- Buffer zones must not include agricultural areas owned and/or operated by persons other than the owner of the application block UNLESS
  - 1 The owner of the application block can ensure that the buffer zone will not overlap with a metam sodium or metam potassium (or other MITC generating pesticides) buffer zone from any other property owners except as provided in the *Buffer Zone Proximity* section and
  - 2 The owner of the other property provides written agreement to the applicator that they their employees and other persons will stay out of the buffer zone during the entire buffer zone period
- Buffer zones must not include roadways and rights of way UNLESS
  - 1 The area is not occupied during the buffer zone period and
  - 2 Entry by non handlers is prohibited during the buffer zone period

Buffer Zone Exemptions for Transit on Roadways

Vehicular and bicycle traffic on public and private roadways through the buffer zone is permitted (NOTE Buffer zones are not permitted to include bus stops or other locations where persons wait for public transit )

- For all other publicly owned and/or operated areas such as parks sidewalks permanent walking paths playgrounds and athletic fields buffer zones must not include these areas UNLESS
  - 1 The area is not occupied during the buffer zone period
  - 2 Entry by non handlers is prohibited during the buffer zone period and
  - 3 Written permission to include the public area in the buffer zone is granted by the appropriate state and/or local authorities responsible for management and operation of the area

Certified applicators must comply with all local laws and regulations

See the *Posting* section for additional requirements that may apply

**BUFFER ZONE DISTANCES**

Buffer zone distances must be calculated using the application rate and the size of the application block

- Buffer zone distances must be based on look up tables in this labeling (25 feet is the minimum distance regardless of site specific application parameters)
- If after applying all applicable buffer zone credits the buffer zone is greater than ½ mile (2 640 ft) then the application is prohibited
- Tables 1-12 as appropriate for the method of application must be used to determine the minimum buffer distances Round up to the nearest rate and block size where applicable Applications are prohibited for rates or block sizes that exceed what is presented in the buffer zone tables









Table 4 Spray Blade and Rotary Tiller Applications Buffer Zone Distance in Feet

Gal/A	Application Block Size (acres)															
	1	5	6	7	8	9	10	20	30	40	50	60	70	80		
8	25	25	25	25	25	25	25	25	25	25	25	25	25	25		
13	25	25	25	25	25	25	25	25	25	25	25	25	25	25		
19	25	25	25	25	25	25	25	25	25	25	25	25	25	25		
23	25	25	25	25	25	25	25	25	25	25	25	25	25	25		
28	25	25	25	25	25	25	25	25	25	25	25	25	25	25		
33	25	25	25	25	25	25	25	25	25	25	25	25	25	25		
38	25	25	25	25	25	25	25	25	25	25	25	25	25	25		
42	25	25	25	25	25	25	25	25	25	25	42	57	64	72		
47	25	25	25	25	25	25	25	25	25	25	58	88	103	118		
52	25	25	25	25	25	25	25	25	25	25	74	119	142	164		
56	25	25	25	25	25	25	25	25	25	25	90	150	180	210		
61	25	25	27	29	30	2	34	49	64	75	135	188	218	248		
66	25	25	29	32	36	39	43	73	10	125	180	225	255	285		
70	25	25	30	36	41	47	52	97	142	275	225	263	293	323		
75	25	25	32	39	46	53	60	120	180	225	270	300	330	360		

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Table 5 Center Pivot and Lateral Move Application (High Release Height\*) Buffer Zone Distance in Feet

Gal/A	Application Block Size (acres)															
	1	5	10	20	30	40	50	60	70	80	90	100	110	120	140	160
8	50	50	50	75	75	100	100	200	200	200	250	300	350	400	600	800
13	80	100	100	138	138	200	200	300	300	300	350	400	450	500	700	900
19	125	150	150	200	200	300	00	400	400	400	450	500	550	600	800	1000
23	160	188	200	250	269	363	382	475	488	500	550	600	650	700	900	1100
28	185	225	250	300	338	425	463	550	575	600	650	700	750	800	1000	1200
33	205	263	300	350	407	488	544	625	663	700	750	800	850	900	1100	1300
38	220	300	50	400	475	550	625	700	750	800	850	900	950	1000	1200	1400
42	235	313	375	450	557	638	719	825	888	950	1000	1050	1100	1150	1350	1550
47	250	325	400	500	638	725	81	950	1025	1100	1150	1200	1250	1300	1500	1700
52	262	338	425	550	719	813	907	1075	1163	1250	1300	1350	1400	1450	1650	1850
56	275	350	450	600	800	900	1000	1200	1300	1400	1450	1500	1550	1600	1800	2000
61	288	363	488	650	850	975	1100	1300	1400	1500	1563	1625	1688	1750	1950	2150
66	300	375	525	700	900	1050	1200	1400	1500	1600	1675	1750	1825	1900	2100	2300
70	312	389	56	750	950	1125	1300	1500	1600	1700	1788	1875	196	2050	2250	2450
75	325	400	600	800	1000	1200	1400	1600	1700	1800	1900	2000	2100	2200	2400	2600

\* This buffer zone distance table is for center pivot and lateral move irrigation equipment in which the 1) release height OR spray height greater than 8 feet and 2) there is > 30 lbs psi at the sprinkler head

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Table 6 Center Pivot and Lateral Move Application (Medium Release Height\*\*) Buffer Zone Distance in Feet

Gal/A	Application Block Size (acre )															
	1	5	10	20	30	40	50	60	70	80	90	100	110	120	140	160
8	25	25	25	25	25	50	50	75	75	75	88	100	150	200	400	600
13	25	38	50	50	50	75	75	138	138	138	169	200	250	300	500	700
19	25	50	75	75	75	100	100	200	200	200	250	300	350	400	600	800
23	37	63	94	107	125	163	182	275	288	300	350	400	450	500	700	900
28	50	75	113	138	175	225	263	350	375	400	450	500	550	600	800	1000
33	62	88	132	169	225	288	344	425	463	500	550	600	650	700	900	1100
38	75	100	150	200	275	350	425	500	550	600	650	700	750	800	1000	1200
42	87	113	175	250	357	438	519	625	688	750	800	850	900	950	1150	1350
47	100	125	200	300	438	525	613	750	825	900	950	1000	1050	1100	1300	1500
52	112	138	225	350	519	613	707	875	963	1050	1100	1150	1200	1250	1450	1650
56	125	150	250	400	600	700	800	1000	1100	1200	1250	1300	1350	1400	1600	1800
61	138	163	288	450	650	775	900	1100	1200	1300	1363	1425	1488	1550	1750	1950
66	150	175	325	500	700	850	1000	1200	1300	1400	1475	1550	1625	1700	1900	2100
70	162	188	363	550	750	925	1100	1300	1400	1500	1588	1675	1763	1850	2050	2250
75	175	200	400	600	800	1000	1200	1400	1500	1600	1700	1800	1900	2000	2200	2400

\*\* This buffer zone distance table is for center pivot and lateral move irrigation equipment in which the 1) release height AND spray height is less than 8 feet AND 2) 29lbs or less PSI at the sprinkler head AND 3) there are no end guns

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Table 7 Center Pivot and Lateral Move Application (Low Release Height Solid Stream\*\*\*) Buffer Zone Distance in Feet

Gal/A	Application Block Size (acres)															
	1	5	10	20	30	40	50	60	70	80	90	100	110	120	140	160
8	25	25	25	25	25	25	25	50	63	75	88	100	125	150	350	550
13	25	25	38	38	38	50	50	75	100	125	150	188	225	225	425	625
19	25	25	50	50	50	75	100	138	175	188	200	200	250	300	500	700
23	30	35	63	70	75	107	119	150	192	232	254	275	325	375	575	775
28	35	50	75	89	100	138	163	200	244	288	319	350	400	450	650	850
33	40	63	88	107	125	169	207	250	297	344	385	425	475	525	725	925
38	50	75	100	125	150	200	250	300	350	400	450	500	550	600	800	1000
42	60	94	125	157	188	238	294	363	419	475	532	588	644	700	900	1100
47	70	113	150	188	225	275	338	425	488	550	613	675	738	800	1000	1200
52	85	132	175	219	263	313	382	488	557	625	694	763	832	900	1100	1300
56	105	150	200	250	300	350	425	550	625	700	775	850	925	1000	1200	1400
61	125	163	225	288	350	413	494	613	694	775	857	938	1019	1100	1300	1500
66	145	175	250	325	400	475	563	675	763	850	938	1025	1113	1200	1400	1600
70	165	188	275	363	450	538	632	738	832	925	1019	1113	1207	1300	1500	1700
75	185	200	300	400	500	600	700	800	900	1000	1100	1200	1300	1400	1600	1800

\*\*\* This buffer zone distance table is for center pivot and lateral move irrigation equipment in which the 1) release height AND spray height is less than 4 feet AND 2) 29lbs or less PSI at the sprinkler head AND 3) application system produces a solid stream (e.g. drizzle boom Smart Drop®) AND 4) there are no end guns

Table 8 Solid Set Sprinkler Application Buffer Zone Distance in Feet

G I/A	2	3	4	5	6	7	8	9	10	15	20	30	40	0	60	70	80	90	100	110	200
8	25	25	25	25	25	25	25	25	25	25	25	25	25	50	75	75	75	88	100	150	200
13	38	38	38	38	40	43	45	48	50	50	50	50	50	75	138	138	138	169	200	250	300
19	50	50	50	50	55	60	65	70	75	75	75	75	100	100	200	200	200	250	300	350	400
23	55	57	58	63	69	75	81	87	94	107	125	125	163	182	275	288	300	350	400	450	500
28	62	65	67	70	75	83	88	94	105	113	138	175	225	263	450	450	450	500	500	550	600
33	68	73	76	83	88	9	106	114	123	132	169	225	288	344	425	463	500	550	600	650	700
38	75	81	88	94	100	110	120	130	140	150	200	275	350	425	500	550	600	650	700	750	800
42	80	88	97	105	113	125	138	150	163	175	250	357	438	519	625	688	750	800	850	900	950
47	87	97	106	116	125	1	140	146	155	200	300	438	525	613	750	825	900	950	1000	1050	1100
52	93	104	116	127	138	155	173	190	208	225	350	519	63	707	875	963	1050	1100	1150	1200	1250
56	100	113	125	138	150	170	190	210	230	250	400	00	700	800	1000	1100	1200	1100	1300	1350	1400
61	115	152	189	226	263	268	273	278	283	288	450	650	775	900	1100	1200	1300	1363	1425	1488	1550
66	125	138	150	163	175	205	235	265	295	325	500	700	850	1000	1200	1300	1400	1475	1550	1625	1700
70	137	150	163	175	188	223	258	293	328	363	550	750	925	1100	1300	1400	1500	1588	1675	1763	1850
75	150	163	175	188	200	240	280	320	360	400	600	800	1000	1200	1400	1500	1600	1700	1800	1900	2000



Table 9 Drench Application Buffer Zone Distances in Feet

	1	2	3	4	5	6	7	8	9	10	15	20	30	40	50	60	70	80	90	100	150	200
1	6	8	3	34	3	9	2	44	2	55	7	84	3	94	2	15	64	80	95	100	95	234
2	34	3	44	7	1	6	84	3	133	9	200	25	250	288	33	35	31	25	34	25	81	234
3	40	44	58	77	1	77	38	50	6	133	200	25	250	288	33	35	31	25	34	25	81	234
4	50	54	58	77	1	77	38	50	6	133	200	25	250	288	33	35	31	25	34	25	81	234
5	62	68	73	7	02	09	143	72	188	2	250	281	3	328	35	31	25	34	25	81	234	69
6	8	7	80	86	20	155	189	2	26	3	275	309	344	6	395	6	395	6	395	6	464	6
7	8	7	80	86	20	155	189	2	26	3	275	309	344	6	395	6	395	6	395	6	464	6
8	68	7	81	94	106	66	3	22	131	69	206	25	44	63	300	338	75	394	31	469	506	56
9	88	88	95	102	117	75	1	2	131	69	206	25	44	63	300	338	75	394	31	469	506	56
10	95	109	117	125	133	141	149	157	165	173	181	189	197	205	213	221	229	237	245	253	261	269
11	108	116	124	132	140	148	156	164	172	180	188	196	204	212	220	228	236	244	252	260	268	276
12	121	129	137	145	153	161	169	177	185	193	201	209	217	225	233	241	249	257	265	273	281	289
13	134	142	150	158	166	174	182	190	198	206	214	222	230	238	246	254	262	270	278	286	294	302
14	147	155	163	171	179	187	195	203	211	219	227	235	243	251	259	267	275	283	291	299	307	315
15	160	168	176	184	192	200	208	216	224	232	240	248	256	264	272	280	288	296	304	312	320	328
16	173	181	189	197	205	213	221	229	237	245	253	261	269	277	285	293	301	309	317	325	333	341
17	186	194	202	210	218	226	234	242	250	258	266	274	282	290	298	306	314	322	330	338	346	354
18	199	207	215	223	231	239	247	255	263	271	279	287	295	303	311	319	327	335	343	351	359	367
19	212	220	228	236	244	252	260	268	276	284	292	300	308	316	324	332	340	348	356	364	372	380
20	225	233	241	249	257	265	273	281	289	297	305	313	321	329	337	345	353	361	369	377	385	393
21	238	246	254	262	270	278	286	294	302	310	318	326	334	342	350	358	366	374	382	390	398	406
22	251	259	267	275	283	291	299	307	315	323	331	339	347	355	363	371	379	387	395	403	411	419
23	264	272	280	288	296	304	312	320	328	336	344	352	360	368	376	384	392	400	408	416	424	432
24	277	285	293	301	309	317	325	333	341	349	357	365	373	381	389	397	405	413	421	429	437	445
25	290	298	306	314	322	330	338	346	354	362	370	378	386	394	402	410	418	426	434	442	450	458
26	303	311	319	327	335	343	351	359	367	375	383	391	399	407	415	423	431	439	447	455	463	471
27	316	324	332	340	348	356	364	372	380	388	396	404	412	420	428	436	444	452	460	468	476	484
28	329	337	345	353	361	369	377	385	393	401	409	417	425	433	441	449	457	465	473	481	489	497
29	342	350	358	366	374	382	390	398	406	414	422	430	438	446	454	462	470	478	486	494	502	510
30	355	363	371	379	387	395	403	411	419	427	435	443	451	459	467	475	483	491	499	507	515	523
31	368	376	384	392	400	408	416	424	432	440	448	456	464	472	480	488	496	504	512	520	528	536
32	381	389	397	405	413	421	429	437	445	453	461	469	477	485	493	501	509	517	525	533	541	549
33	394	402	410	418	426	434	442	450	458	466	474	482	490	498	506	514	522	530	538	546	554	562
34	407	415	423	431	439	447	455	463	471	479	487	495	503	511	519	527	535	543	551	559	567	575
35	420	428	436	444	452	460	468	476	484	492	500	508	516	524	532	540	548	556	564	572	580	588
36	433	441	449	457	465	473	481	489	497	505	513	521	529	537	545	553	561	569	577	585	593	601
37	446	454	462	470	478	486	494	502	510	518	526	534	542	550	558	566	574	582	590	598	606	614
38	459	467	475	483	491	499	507	515	523	531	539	547	555	563	571	579	587	595	603	611	619	627
39	472	480	488	496	504	512	520	528	536	544	552	560	568	576	584	592	600	608	616	624	632	640
40	485	493	501	509	517	525	533	541	549	557	565	573	581	589	597	605	613	621	629	637	645	653
41	498	506	514	522	530	538	546	554	562	570	578	586	594	602	610	618	626	634	642	650	658	666
42	511	519	527	535	543	551	559	567	575	583	591	599	607	615	623	631	639	647	655	663	671	679
43	524	532	540	548	556	564	572	580	588	596	604	612	620	628	636	644	652	660	668	676	684	692
44	537	545	553	561	569	577	585	593	601	609	617	625	633	641	649	657	665	673	681	689	697	705
45	550	558	566	574	582	590	598	606	614	622	630	638	646	654	662	670	678	686	694	702	710	718
46	563	571	579	587	595	603	611	619	627	635	643	651	659	667	675	683	691	699	707	715	723	731
47	576	584	592	600	608	616	624	632	640	648	656	664	672	680	688	696	704	712	720	728	736	744
48	589	597	605	613	621	629	637	645	653	661	669	677	685	693	701	709	717	725	733	741	749	757
49	602	610	618	626	634	642	650	658	666	674	682	690	698	706	714	722	730	738	746	754	762	770
50	615	623	631	639	647	655	663	671	679	687	695	703	711	719	727	735	743	751	759	767	775	783
51	628	636	644	652	660	668	676	684	692	700	708	716	724	732	740	748	756	764	772	780	788	796
52	641	649	657	665	673	681	689	697	705	713	721	729	737	745	753	761	769	777	785	793	801	809
53	654	662	670	678	686	694	702	710	718	726	734	742	750	758	766	774	782	790	798	806	814	822
54	667	675	683	691	699	707	715	723	731	739	747	755	763	771	779	787	795	803	811	819	827	835
55	680	688	696	704	712	720	728	736	744	752	760	768	776	784	792	800	808	816	824	832	840	848
56	693	701	709	717	725	733	741	749	757	765	773	781	789	797	805	813	821	829	837	845	853	861
57	706	714	722	730	738	746	754	762	770	778	786	794	802	810	818	826	834	842	850	858	866	874
58	719	727	735	743	751	759	767	775	783	791	799	807										

Table 10 Drip Application Buffer Zone Distances in Feet

Gal/A	Appl cat on Block Size (acres)																
	1	2	3	4	5	6	7	8	9	10	20	30	40	50	60	70	80
4	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25
7	25	25	25	25	25	25	25	25	25	25	38	38	50	50	63	76	88
9	25	25	25	25	25	25	25	25	25	25	50	50	75	75	100	125	150
12	25	25	25	25	25	26	28	29	31	32	57	57	82	82	111	140	163
14	25	25	25	25	25	28	30	33	35	38	63	63	88	88	125	150	175
16	25	25	25	25	25	29	33	36	40	44	69	69	94	94	138	163	188
19	25	25	25	25	25	30	35	40	45	50	75	75	100	100	150	175	200
21	25	27	29	30	32	37	42	47	52	57	82	82	113	125	175	207	238
23	25	28	32	35	8	43	48	53	58	63	88	113	125	150	200	250	275
26	25	30	35	39	44	49	54	59	64	69	94	132	138	175	225	269	313
28	25	31	38	44	50	55	60	65	70	75	100	150	150	200	250	300	350
31	32	37	41	46	50	56	63	69	76	82	125	188	200	250	300	350	400
33	38	41	44	47	50	58	65	73	80	88	150	225	250	300	350	400	450
35	44	46	47	49	50	59	68	76	85	94	175	263	300	350	400	450	500
38	50	50	50	50	50	60	70	80	90	100	200	300	350	400	450	500	550
40	51	52	53	54	55	64	74	85	96	106	213	319	372	425	478	531	584
42	52	54	56	58	60	68	79	90	101	113	225	338	394	450	506	563	634
45	53	56	59	62	65	71	83	95	107	119	238	356	416	475	534	594	684
47	54	58	62	66	70	75	88	100	113	125	250	375	438	500	563	625	734
49	55	60	65	70	75	79	92	105	118	131	263	394	459	525	591	656	784
52	56	62	68	74	80	83	96	110	124	138	275	413	481	550	619	688	834
54	57	64	71	78	85	86	101	115	129	144	288	431	503	575	647	719	884
56	58	66	75	82	90	90	105	120	135	150	300	450	525	600	675	750	934

Broadcat Equivalent Application Rate (Gallons product/A)



Table 12 Weed Sprayer Application Buffer Zone Distances in Feet

Gal/A	Application Block Size (acres)													
	1	5	10	20	30	40	50	60	70	80	90	100	110	120
8	50	50	50	75	75	100	100	200	200	200	250	300	350	400
13	80	100	100	138	138	200	200	300	300	300	350	400	450	500
19	125	150	150	200	200	300	300	400	400	400	450	500	550	600
23	160	188	200	250	269	363	382	475	488	500	550	600	650	700
28	185	225	250	300	338	425	463	550	575	600	650	700	750	800
33	205	263	300	350	407	488	544	625	663	700	750	800	850	900
38	220	300	350	400	475	550	625	700	750	800	850	900	950	1000
42	235	313	375	450	557	638	719	825	888	950	1000	1050	1100	1150
47	250	325	400	500	638	725	813	950	1025	1100	1150	1200	1250	1300
52	262	338	425	550	719	813	907	1075	1163	1250	1300	1350	1400	1450
56	275	350	450	600	800	900	1000	1200	1300	1400	1450	1500	1550	1600
61	288	363	488	650	850	975	1100	1300	1400	1500	1563	1625	1688	1750
66	300	375	525	700	900	1050	1200	1400	1500	1600	1675	1750	1825	1900
70	312	389	563	750	950	1125	1300	1500	1600	1700	1788	1875	1963	2050
75	325	400	600	800	1000	1200	1400	1600	1700	1800	1900	2000	2100	2200

Broadcast Equivalent Application Rate (Gallons product/A)

## BUFFER ZONE CREDITS

The buffer zone distances for VAPAM HL applications may be reduced by the percentages listed below. Credits may be added but credits cannot exceed 80%. Also the minimum buffer zone distance is 25 feet regardless of buffer zone credits available.

- See [www.tarpcredits.epa.gov](http://www.tarpcredits.epa.gov) for a list of tarps that have been tested and determined to qualify for buffer reduction credits. Only tarps listed on this website qualify for buffer reduction credits.
- 10% reduction in buffer zone distance IF the organic content of the soil in the application block is  $\geq 1\%$ . 2% a 20% reduction in buffer zone distance IF the organic content of the soil in the application block is  $>2\%$ . 3% and a 30% reduction in the buffer zone distance IF the organic content of the soil in the application block is  $>3\%$ .
- 10% reduction in buffer zone distance IF the soil temperature is measured to be 50°F or less. Record temperature measurements at the application depth or 12 inches whichever is shallower.
- 10% reduction in the buffer zone distance IF the clay content of the soil in the application block is greater than 27%.

### Examples of Buffer Zone Calculations with Credits Applied

If the buffer zone is 50 feet and the application qualifies for a buffer zone reduction credit since the soil organic content is 1.5% then the buffer zone can be reduced by 10% i.e. reduced by 5 feet based on the following calculation: 50 feet – (50 feet x 10%) = 45 feet

If the buffer zone is 50 feet and the application qualifies for two buffer zone credits since the soil organic content is 1.5% and the clay content is greater than 27% then the buffer zone can be reduced by 20% (10% organic content credit + 10% clay content credit) i.e. reduced by 10 feet based on the following calculation: 50 feet – (50 feet x 20%) = 40 feet

## POSTING FUMIGANT BUFFER ZONES

- Posting of a **buffer zone** is required unless there is a physical barrier that prevents bystander access to the buffer zone.
- Buffer Zone signs must be placed along or outside the perimeter of the buffer zone at all usual points of entry and along likely routes of approach from areas where people not under the owner's control may approach the buffer zone.
  - Some examples of points of entry include but are not limited to roadways, sidewalks, paths, and bike trails.
  - Some examples of likely routes of approach include but are not limited to the area between a buffer zone and a roadway or the area between a buffer zone and a housing development.
  - When posting, the certified applicator supervising the application must ensure compliance with all local laws and regulations.
- Buffer Zone signs must meet the following criteria:
  - The printed side of the sign must face away from the application block toward areas from which people could approach.
  - Signs must remain legible during the entire posting period and must meet the general standards outlined in the WPS for sign size, text size, and legibility (see 40 CFR §170.120).
  - Signs must be posted no sooner than 24 hours prior to the start of the application and remain posted until the buffer zone period has expired.
  - Signs must be removed within 3 days after the end of the buffer zone period.
  - Buffer Zone signs which meet the criteria above will be provided at points of sale for applicators to use. Templates may be downloaded from [http://www.epa.gov/pesticides/reregistration/soil\\_fumigar+ /](http://www.epa.gov/pesticides/reregistration/soil_fumigar+/)
  - The Buffer Zone signs must contain the following information:
    - The Do Not Walk symbol
    - DO NOT ENTER/NO ENTRE
    - Metam Sodium VAPAM HL Fumigant BUFFER ZONE
    - Contact information for the certified applicator in charge of the fumigation

Exception If multiple contiguous blocks are fumigated within a 14 day period the entire periphery of the contiguous blocks buffer zones may be posted Buffer Zone signs must be posted no sooner than 24 hours prior to the start of the first application The signs must remain posted until the last buffer zone period expires and signs must be removed within 3 days after the buffer zone period for the last block has expired

**RESTRICTIONS FOR DIFFICULT TO EVACUATE SITES**

Difficult to evacuate sites are pre K to grade 12 schools state licensed daycare centers nursing homes assisted living facilities hospitals in patient clinics and prisons

- No fumigant application with a buffer zone greater than 300 feet is permitted within 1/4 mile (1320 feet) of difficult to evacuate sites unless the site is not occupied by children from state licensed day care centers students (pre K to grade 12) patients or prisoners during the application and the 36 hour period following the end of the application
- No fumigant application with a buffer zone of 300 feet or less is permitted within 1/8 mile (660 feet) of difficult to evacuate sites unless the site is not occupied by children from state licensed day care centers students (pre K to grade 12) patients or prisoners during the application and the 36 hour period following the end of the application

**EMERGENCY PREPAREDNESS AND RESPONSE MEASURES**

If the buffer zone is 25 feet then the *Emergency Preparedness and Response Measures* are not applicable

**Triggers for Emergency Preparedness and Response Measures**

The certified applicator must either follow the directions under the *Fumigant Site Monitoring* section or follow the directions under the *Response Information for Neighbors* section if

- the buffer zone is greater than **25 feet** but less than or equal to **100 feet** and there are residences or businesses within **50 feet** from the outer edge of the buffer zone or
- the buffer zone is greater than **100 feet** but less than or equal to **200 feet** and there are residences or businesses within **100 feet** from the outer edge of the buffer zone or
- the buffer zone is greater than **200 feet** but less than or equal to **300 feet** and there are residences or businesses within **200 feet** from the outer edge of the buffer zone or
- the buffer zone is greater than **300 feet** or the **buffer zones overlap** and there are residences or businesses within **300 feet** from the outer edge of the buffer zone

**Fumigant Site Monitoring**

NOTE *Fumigant Site Monitoring* is ONLY required if the *Emergency Preparedness and Response Measures* are triggered AND directions from the *Response Information for Neighbors* section are not followed

From the start of the application until the buffer zone period expires a certified applicator or handler(s) under his/her supervision must

- Monitor for sensory irritation in areas between the buffer zone outer perimeter and residences and businesses that trigger this requirement
- Monitoring for sensory irritation must begin in the evening on the day of application and continue until the buffer zone period expires Monitor a minimum of 8 times during the buffer zone period including these periods
  - 1 hour before sunset
  - during the night
  - 1 hour after sunrise and
  - during daylight hours

Implement the emergency response plan immediately if a handler monitoring experiences sensory irritation

**Response Information for Neighbors**

NOTE *Response Information for Neighbors* is ONLY required if the *Emergency Preparedness and Response Measures* are triggered AND directions from the *Fumigant Site Monitoring* section are not followed

The certified applicator supervising the application must ensure that residences and businesses that trigger the requirement have been provided the response information at least **1 week** before the application starts. The information provided may include application dates that range for no more than **4 weeks**. If the application does not occur when specified, the information must be delivered again.

Information that must be included

- The location of the application block
- Fumigant(s) applied including the active ingredient name of the fumigant product(s) and the EPA Registration number
- Contact information for the applicator and property owner
- Time period in which the application is planned to take place (must not range more than 4 weeks)
- Early signs and symptoms of exposure to the fumigant(s) applied, what to do, and who to call if you believe you are being exposed (911 in most cases)
- How to find additional information about fumigants

The method used to share the response information for neighbors can be accomplished through mailings, door hangers, or other methods that will effectively inform the residences and businesses within the required distance from the edge of the buffer zone.

#### **NOTICE TO STATE AND TRIBAL LEAD AGENCIES**

If your state and/or tribal lead agency requires notice, information must be provided to the appropriate state or tribal lead agency prior to the application. Please refer to [www.epa.gov/fumigantstatenotice](http://www.epa.gov/fumigantstatenotice) for a list of states and tribal lead agencies that require notice and information on how to submit the information.

The information that must be provided to state and tribal lead agencies includes the following:

- Location of the application blocks
- Fumigant(s) applied including EPA registration number
- Applicator and property owner contact information, and
- Time period that fumigation may occur

#### **EMERGENCY RESPONSE PLAN**

The certified applicator must include in the FMP a written emergency response plan that identifies:

- evacuation routes
- locations of telephones
- contact information for first responders and local/state/federal/tribal personnel, and
- emergency procedures/responsibilities (e.g., adding water to the field, repairing tarps, fixing equipment, evacuating upwind) if
  - there is an incident
  - sensory irritation is experienced outside of the buffer zone, and/or there are equipment/tarp/seal failure or complaints, or other emergencies

#### **SITE SPECIFIC FUMIGATION MANAGEMENT PLAN (FMP)**

Prior to the start of application, the certified applicator supervising the application must verify that a site specific FMP exists for each application block. In addition, an agricultural operation fumigating multiple application blocks may

format the FMP in a manner whereby all of the information that is common to all the application blocks is captured once and any information unique to a particular application block or blocks is captured in subsequent sections

The FMP must be prepared by the certified applicator the site owner registrant or other party

The certified applicator must verify in writing (sign and date) that the site specific FMP(s) reflects current site conditions before the start of application

Each site specific FMP must contain the following elements

#### Certified Applicator Supervising the Application

- Name
- Phone number
- Pesticide applicator license and/or certificate number
- Specify if commercial or private applicator
- Employer name
- Employer address and
- Date and location of completing EPA approved soil fumigant training program

#### General site information

- Application block location (e.g. county township range section quadrant) address or global positioning system (GPS) coordinates
- Name address and phone number of application block owner
- Map aerial photo or detailed sketch showing
  - application block location
  - application block dimensions
  - buffer zone dimensions
  - property lines
  - roadways
  - rights of ways
  - sidewalks
  - permanent walking paths
  - bus stops
  - nearby application blocks
  - surrounding structures (occupied and non occupied)
  - locations of Buffer Zone signs and
  - locations of difficult to evacuate sites with distances from the application block labeled

#### General application information

- Target application date/window
- Fumigant Product Name and
- EPA registration number

#### Tarp Plan (if tarp is used)

- Schedule for checking tarps for damage tears and other problems
- Minimum size of damage that will be repaired
- Factors used to determine when tarp repair will be conducted
- Equipment/methods used to perforate tarps
- Target dates for perforating tarps and
- Target dates for removing tarps

#### Soil conditions

- Description of soil texture and moisture in application block
- Method used to determine soil moisture and
- Soil temperature measurement if air temperatures were above 100°F in any of the 3 days prior to the application

#### Buffer zones

- Application method



- Injection depth
- Application rate from lookup table on label
- Application block size from lookup table on label
- Credits applied and measurements taken (if applicable)
  - Tarp brand name lot number thickness manufacturer batch number and part number
  - Organic matter content
  - Clay content
  - Soil temperature
- Buffer zone distance and
- Description of areas in the buffer zone that are not under the control of the owner of the application block If buffer zones extend onto areas not under the control of the owner attach the written agreement and keep it with the FMP

Record Emergency Response Plan as described in the *Emergency Response Plan* section

Posting of Fumigant Treated Area and Buffer Zone

- Person(s) who will post and remove (if different) Fumigant Treated Area and Buffer Zone signs and
- Location of Buffer Zone signs

Emergency Preparedness and Response Measures (if applicable)

- Fumigant site monitoring (if applicable)
  - When and where it will be conducted
- Response information for neighbors (if applicable)
  - List of residences and businesses informed
  - Name and phone number of person providing information and
  - Method of providing the information

State and/or tribal lead agency advance notification (if state and/or tribal lead agency requires notice provide a list of contacts that were notified and date notified)

Plan describing how communication will take place between the certified applicator supervising the application the owner and other on site handlers (e.g. tarp perforators/removers irrigators) for complying with label requirements (e.g. buffer zone location buffer zone start and end times timing of tarp perforation and removal PPE)

- Name and phone number of persons contacted by the certified applicator and
- Date contacted

Handler (including Certified Applicators) Information and PPE

- Names addresses and phone numbers of handlers
- Names addresses and phone numbers for employers of handlers
- Tasks that each handler is authorized and trained to perform
- Date of PPE training for each handler
- Applicable handler PPE including
  - Long sleeved shirts/long pants shoes socks
  - Chemical resistant apron
  - Chemical resistant footwear and socks
  - Protective eyewear (not goggles)
  - Chemical resistant gloves
  - Air purifying respirators
    - Respirator make model type style size and cartridge/canister type
  - Other PPE
- For handlers Confirmation of receipt of Fumigant Safe Handling Information
- For certified applicator(s) supervising the application Completion date and location of the soil fumigant training program listed on the following EPA website <http://www.epa.gov/fumigantraining> for the active ingredient( ) in this product
- For handlers designated to wear air purifying respirators
  - date of medical qualification to wear a respirator
  - date of respirator training and
  - date of fit testing for the respirator

- Unless exempted in the *Protection of Handlers* section verify that
  - at minimum 1 handler has the appropriate respirators and cartridges/canisters during handler activities and
  - the employer has confirmed that the appropriate respirator and cartridges/canisters are immediately available for each handler who will wear one

#### Air monitoring plan

- If sensory irritation is experienced indicate whether operations will cease or operations will continue with use of an air purifying respirator
- For monitoring the breathing zone
  - Representative handler tasks to be monitored
  - Monitoring equipment to be used and
  - Timing of the monitoring

#### Good Agricultural Practices (GAPs)

- Identify (e.g. list attach applicable label section) applicable mandatory GAPs

#### Pesticide Product Labels and Material Safety Data Sheets (MSDS)

- Ensure that labels and MSDS are on site and readily available for employees to review

### Record Keeping Procedures

The owner of the application block as well as the certified applicator supervising the application must keep a signed copy of the site specific FMP for 2 years from the date of application

For situations where an initial FMP is developed and certain elements do not change for multiple application blocks (e.g. applicator information, certified applicator, handlers, record keeping procedures, emergency procedures) only elements that have changed need to be updated in the site specific FMP provided the following

- The certified applicator supervising the application has verified that those elements are current and applicable to the application block before it is fumigated
- Record keeping requirements are followed for the entire FMP (including elements that do not change)

The certified applicator must make a copy of the FMP immediately available for viewing by handlers involved in the fumigation. The certified applicator or the owner of the application block must provide a copy of the FMP to any local/state/federal/tribal enforcement personnel who request the FMP. In the case of an emergency, the FMP must be made immediately available when requested by local/state/federal/tribal emergency response and enforcement personnel. The certified applicator supervising the application must ensure the FMP is at the application block during all handler activities.

Within 30 days after the application is complete, the certified applicator supervising the application must complete a Post Application Summary.

### POST-APPLICATION SUMMARY

The Post Application Summary must contain the following elements:

Actual date and time of the application

Application rate

Size of application block

Weather Conditions

- Summary of the National Weather Service weather forecast during the application and the 48 hours after the application is complete including
  - wind speed and
  - air stagnation advisory (if applicable)
- Forecast must be checked on the day of, but prior to the start of the application, and on a daily basis during the application if the time period from the start of the application until the application is complete is greater than 24 hours.

Tarp damage and repair information (if applicable)

- Date of tarp damage discovery
- Location and size of tarp damage
- Description of tarp/tarp seal/tarp equipment failure and
- Date and time of tarp repair completion

Tarp perforation/removal details (if applicable)

- Date and time tarps were perforated
- Date and time tarps were removed and
- Record if tarps were perforated and/or removed early Describe the conditions that caused early tarp perforation and/or removal

Complaint details (if applicable)

- Person filing complaint (e.g. on site handler person off site)
- If off site person name address and phone number of person filing complaint and
- Description of control measure or emergency procedures followed after complaint

Description of incidents equipment failure or other emergency and emergency procedures followed (if applicable)

Air monitoring results

- When sensory irritation was experienced
  - Date time location and handler task/activity where irritation was observed and
  - Resulting action (e.g. implement emergency response plan cease operations continue operations with air purifying respirators)
- When using a direct read detection device
  - Sample date(s) time(s) location(s) and concentration(s)
  - Handler task/activity monitored (if applicable) and
  - Resulting action (e.g. cease operations continue operations with air purifying respirators)

Water run application monitoring

- Record monitoring date(s) and time(s)
- Name of person(s) monitoring
- Record observations
  - Is the equipment functioning properly
  - Description of corrective action (if applicable) and
  - Other comments

Fumigant Treated Area and Buffer Zone Signs

- Dates of posting and removal
- Any deviations from the FMP(e.g. changes in emergency response actions changes in handler information changes in handlers responsible for completing emergency tasks changes in communication between certified applicator owner and other handlers)

**Record Keeping Procedures**

The owner of the application block as well as the certified applicator supervising the application must keep a signed copy of the Post Application Summary for 2 years from the date of application

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**PRODUCT INSTRUCTIONS**

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If fumes become detectable during treatment apply more water to seal the fumes into the soil where they should be confined to achieve maximum fumigation benefit Use promptly after mixing with water Do not allow to stand If sensory irritation is experienced follow the directions under the *Respiratory Protection* and *Stop Work Triggers* section

**Mycorrhizae** There are occasions when VAPAM HL is known to temporarily reduce mycorrhizae in agricultural soils For those crops that are mycorrhizae dependent and planted into VAPAM HL treated soils it is necessary to practice a good fertilizer program until the mycorrhizae repopulate the treated area

### Product Information

VAPAM HL is a water soluble liquid. When applied to soil the liquid is converted into a volatile fumigant (Methylisothiocyanate MITC). After a sufficient interval of time the fumigant degrades/dissipates leaving the soil ready for planting.

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#### WHEN TO USE MAXIMUM AND MINIMUM RATES

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The application rate of VAPAM HL is dependent on the soil type to be treated and the position in the soil of the pest to be suppressed or controlled. For maximum control or suppression an understanding of the pest, its location and its respiring state will ensure maximum performance of VAPAM HL. Generally a light sandy soil requires a lower application rate than a heavier mineral soil. In addition, if the pest is in the upper portion of the soil profile (annual weeds) a lower application rate is generally required than if the pest is deeper in the soil profile and deeper penetration is desired (perennial weed seeds and nematodes). When a range of application rates is given in this label, consult your local agricultural extension service for more specific information.

**Nematodes and Nutsedge** Nematode suppression is achieved when VAPAM HL converts to MITC and makes contact with active forms of the nematodes, preferably juveniles. Endo parasites in plant residue may not be suppressed. Plant residues from previously infected crops should be completely decomposed prior to VAPAM HL application to ensure maximum exposure. Eggs are more difficult to suppress than juveniles, but are susceptible. Pre irrigation has been demonstrated to stimulate egg hatch of some species and may enhance overall VAPAM HL performance. Nutsedge may be suppressed with VAPAM HL if actively growing and a high use rate is used (75 gal/acre). More often rhizomes, roots and shoots will be controlled but the tuber will remain viable and at a later time regrow. Treatments made immediately prior to a crop planting (after the necessary waiting period) will give a weed free period for crop establishment.

#### Use Precautions

Keep children and pets out of treated areas. VAPAM HL uses described on this label are intended for pre plant soil preparation only. All plant foliage and any established plants growing on the treatment sites will be either severely damaged or destroyed. Keep the product off of any desirable turf or plants. Do not apply within 3 feet of the drip line of desirable plants, shrubs, or trees. Keep container tightly closed when not in use. Do not store near feed or food. NOTE: VAPAM HL will suppress and/or control only those pests in the fumigation zone at the time of treatment. Reinfestation may occur subsequent to the fumigant's degradation/dissipation from the soil.

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#### TREATMENT GUIDELINES

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For optimum results, certain procedures should be observed at designated times in the treatment program. Described below are important guidelines for each of the four stages of the treatment process. Consult your Sales Representative for the appropriate treatment program for your particular needs.

- Pre Application
- Field Preparation Prior to Application
- Application
- Pre Planting After Application of VAPAM HL

#### Pre Application

VAPAM HL is applied post harvest and 14 to 21 days before a new crop is planted (see Testing of Treated Soil Before Planting section). In some areas, fall application is preferred as the product will degrade/dissipate over the winter that allows planting to begin as soon as favorable springtime conditions arrive.

**Application Rate**

Apply 37.5 to 75 gallons of product per treated acre depending on crop target pest and soil properties (or see crop specific considerations in the Additional Information section of this label) Some of the soil properties to consider when determining the application rate include soil texture percent organic matter and depth of soil to be treated

**Target Pest and Depth of Treatment**

When application rates for this product are given in ranges use the higher rate if pests (insects nematodes etc ) are present in high numbers or if the area to be treated has a history of pest problems Consult with your State nematologist entomologist and plant pathologist to determine if crop rotation is more feasible or desirable than fumigation NOTE This product will only suppress or control pests that are in the fumigated zone at time of treatment For control of weeds and fungi which cause seed or seedling diseases treatment of only the top 2 to 4 inches of soil may be required (see application specific requirements in the Good Agricultural Practices section of this label) Treatment depths greater than 4 inches may be required for control of nematodes and fungi which occur throughout the rhizosphere The required application rate should be increased proportionately with the depth of the treatment required Always choose the appropriate application method to evenly distribute this product throughout the soil to the required treatment depth

**Soil Characteristics**

Soil properties to consider when determining the application rate of this product include the depth of soil to be treated soil texture and percent organic matter Due to the absorbing effect of humus soils with high levels of organic matter under the surface require higher rates For example muck soil may require twice the rate that would be used in mineral soils Application rates will also vary with soil texture For example heavy clay soils require a higher rate than light sandy soils

**Phytotoxicity**

VAPAM HL is phytotoxic Protect valuable non target plants by stopping soil applications of this product at least three feet short of the drip line of trees shrubs and other desirable plants For sprinkler application crop injury and lack of effectiveness can result from non uniform distribution of the treated water

**Application of VAPAM HL**

Apply according to the methods and rates outlined below under the section 'Uses Rates and Application Methods

**Use of Diluted VAPAM HL**

Do not store the diluted product Do not allow the diluted solution to stand overnight Use the diluted solution promptly after mixing with water Flush all equipment with water after each day s use disassemble valves and clean carefully

**Application in Tank Mix with Liquid Fertilizer**

VAPAM HL may be injected in a mixture with liquid fertilizers however a dual injection system is preferred Since the composition of liquid fertilizers vary considerably the physical compatibility of each VAPAM HL/fertilizer tank mix should be checked by using the following procedure

Mix a small quantity of VAPAM HL and liquid fertilizer in the same ratio as they will be applied to the field e.g. if 37.5 gallons of VAPAM HL and 37.5 gallons of liquid fertilizer are to be applied per treated acre then the mixture should be mixed in a 37.5:37.5 or 1:1 ratio Mix in a glass container Mixing should be done outdoors and out of direct sunlight Agitate the liquids to attain a complete uniform mixture IF A UNIFORM MIX CANNOT BE MADE THE MIXTURE SHOULD NOT BE USED! If the mixture remains uniform for 30 minutes without agitation the combination may be used Should the mixture separate after 30 minutes but is readily remixed with agitation the mixture can be used if adequate agitation is maintained in the tank

**DO NOT PLACE CAPS ON MIX JAR AS INCOMPATIBLE MIXES MAY EVOLVE HYDROGEN SULFIDE GAS USE PROMPTLY AFTER MIXING WITH WATER OR FERTILIZER DO NOT ALLOW THE**

**SOLUTION TO STAND FLUSH ALL EQUIPMENT WITH WATER AFTER EACH DAY'S USE  
DISASSEMBLE VALVES AND CLEAN CAREFULLY**

**Chemigation of VAPAM HL**

When applying by chemigation methods the following directions or warnings must be observed

Apply this product only through sprinkler systems including center pivot lateral move end tow side (wheel) roll solid set or hand move flood (basin) furrow border or drip (trickle) irrigation systems DO NOT APPLY this product through any other type of irrigation system Crop injury lack of effectiveness or illegal pesticide residues in the crop can result from non uniform distribution of treated water If you have questions about calibration you should contact your State Extension Service Specialists equipment manufacturers or other experts Do not connect an irrigation system used for pesticide application to a public water system unless prescribed safety devices for public water systems stated on the pesticide label are in place A person knowledgeable of the chemigation system and responsible for its operation or under the supervision of the responsible person shall shut the system down and make necessary adjustments should the need arise

**Chemigation Using a Public Water System**

NOTE AMVAC does not encourage connection of chemigation systems to public water systems The following information is provided for users who have evaluated alternative application and water source options before choosing to make such a connection

**OBSERVE THE FOLLOWING PRECAUTIONS IF YOUR CHEMIGATION SYSTEM IS CONNECTED TO A PUBLIC WATER SYSTEM** Public water system is defined as a system for the provision to the public of piped water for human consumption if such system has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days out of the year Chemigation systems must contain a functional reduced pressure zone (RPZ) backflow preventer or the functional equivalents in the upstream water supply line from the point of pesticide introduction As an option to the RPZ the water from the public water system should be discharged into a reservoir tank prior to pesticide introduction There shall be a complete physical break (air gap) between the outlet end of the fill pipe and top of overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe The pesticide injection pipeline must contain a functional automatic quick closing check valve to prevent the flow of fluid toward the injection pump

*Any alternatives to the required safety devices in this label must conform to the list of EPA approved alternative devices*

**Sprinkler & Drip Chemigation Systems**

See Field Application Where Entire Area is Being Treated under Use Rates and Application Methods section of this label

**PRE PLANTING AFTER APPLICATION OF VAPAM HL**

**Effects of Rain**

If rain occurs within 24 hours after a VAPAM HL application lack of control at and near the soil surface may occur

**Recontamination**

Precautions must be taken to prevent recontamination of treated fields with plant pathogenic fungi plant parasitic nematodes or weed seed Use clean seeds or plants Before farm equipment is driven into the treated area it should be rinsed free of untreated soil and weed seeds from other fields

**Days to Cultivating or Planting After Application**

Because VAPAM HL is harmful to germinating seeds and living plants an appropriate interval must be observed between treatments and planting On well drained soils which have a light to medium texture and which are not

excessively wet or cold (when soil is colder than 40°F or contains more moisture than 80% available water capacity) following the application planting can begin 14 to 21 days after the application is complete. If soils are heavy or especially high in organic matter or if the soil remains wet and/or cold (below 60°F) following the application a minimum interval of 21 days or greater should be observed. The interval before planting should be extended until the soil is sufficiently dry to allow for cultivation.

#### **Cultivation of Soil Before Planting**

**IMPORTANT** Heavier soils including soils high in clay or organic matter should be allowed to aerate and dry thoroughly after treatment with VAPAM HL. During cold and/or wet (when soil is colder than 40°F or contains more moisture than 80% available water capacity) weather frequent shallow cultivation can aid dissipation of VAPAM HL from the treated soil.

On heavy wet soils light surface cultivation to break up crusting and promote drying should be done 5 to 7 days after treatment if planting is to occur within 14 to 21 days after treatment. This cultivation may be repeated as necessary.

**NOTE OF CAUTION** To avoid contaminating treated soils care should be taken to assure that untreated soils are not mixed with treated soils.

#### **Testing of Treated Soils Before Planting**

Fields are fumigated to control soil borne fungi, nematodes, insects, and weeds. The length of time required for fumigants to dissipate/escape from the soil before plants can safely be planted varies greatly. Typically 14 to 21 days are needed under typical conditions, however, circumstances which do not favor evaporation of the fumigant can greatly lengthen the waiting period as much as up to 30 days. The release period is short with (1) low rates of fumigants, (2) light soil, (3) high soil temperatures, (4) low soil moisture, (5) shallow application depth, and (6) repeated cultivations after fumigation. Seeded crops are less susceptible to residual soil fumigant injury than transplanted crops. In general, fumigants escape slowly from cold, wet, heavy soils.

If in doubt, perform either the lettuce seed test or the tomato transplant test as described elsewhere in this label. If germination occurs in 1 to 3 days or if tomato plant shows signs of wilting or root burn in 2 days, the product is still available and an extended wait period must be observed.

#### **PACIFIC NORTHWEST STATES OF IDAHO, NEVADA, OREGON AND WASHINGTON**

**NOTE** When applied in the spring, allow a minimum of 14 to 21 days before planting, providing no fumes are detectable. When the soil temperature is below 60°F, allow a minimum of 21 days before planting. Check for fumes and aerate as needed. Use a seedling indicator plant with a hot cap to check for activity or fumes (or follow instructions in preceding paragraph). **DO NOT** plant if fumes are detectable or injury to plant has occurred. Re-aerate the soil and check again.

The information below describes two simple tests to assay for harmful residual soil fumigants before planting.

#### **Lettuce Seed Test**

- 1 With a trowel, dig into the treated soil to or just below the depth of application. Remove 2 to 4 small (1 to 2 oz) soil samples, mix lightly, and immediately place a portion in an air-tight jar so that fumes will not escape. Use mason wheat germ or similar jars with gas-tight lids.
- 2 Sprinkle lettuce seeds on the moistened surface of the soil and recap immediately. Prepare a similar jar with untreated soil (untreated check) for comparison.
- 3 Keep the jars at 65°F to 85°F. Do not place in direct sunlight. Direct sunlight may kill the seed by overheating. Lettuce seed will not germinate in the dark.
- 4 Inspect the jars for germination in 1 to 3 days.
- 5 The soil is safe for planting if seeds in the treated jar germinate the same as seeds in the untreated jar.

IMPORTANT Be sure (1) to sample the field properly in several areas particularly low wet areas (2) that the lids are air tight and have no grit under the seal and (3) that the jars are placed in indirect sunlight

### **Tomato Transplant Test**

Transplant 5 to 10 succulent fast growing tomato seedlings into fumigated beds approximately 4 to 6 inches deep Do the same in a non fumigated area If there is variation in the field plant into the heaviest wettest soil Inspect the seedlings in 2 days for wilting or root burn If plants in the fumigated zone look the same as those in the non fumigated zone it is safe to plant

### **Which Test is Best?**

Both the lettuce seed and tomato transplant tests can serve the purpose The response of tomato seedlings varies somewhat depending on how succulent they are the relative humidity soil moisture and temperature Relative differences between plants in fumigated and non fumigated areas are key to detecting low level residues High concentrations should produce clear cut symptoms Lettuce seed tested in jars are not subjected to the variations in the field that can affect the response of tomato transplants However the process of collecting a soil sample allows some fumigant to escape prior to sealing the jar In addition excess soil moisture can inhibit normal lettuce seed germination reducing the sensitivity of the test

## **USES, RATES AND APPLICATION METHODS**

### **FIELD APPLICATION WHERE ENTIRE AREA IS BEING TREATED**

**SHANK APPLICATION** Apply VAPAM HL at the rate of 37.5 to 75 gallons per treated acre (or see crop specific considerations in the Additional Information section of this label) Follow immediately with a roller to smooth and compact the soil surface Light watering or tarping after rolling helps prevent fumigant escape It may be necessary to stagger the injector placement on two or more tool bars to prevent soil build up during application

When setting up your soil injection equipment with either spray blades injection knives or coulters make sure they are evenly and closely placed to create an even application width and depth To accomplish this it may require multiple tool bars with the injection tools staggered This will help prevent build up of trash and aid in the soil sealing For example apply VAPAM HL through injectors placed 4 inches below the soil surface and 5 inches apart

**SPRAY BLADE APPLICATION** Apply VAPAM HL at the rate of 37.5 to 75 gallons per treated acre (or see crop specific considerations in the Additional Information section of this label) Follow immediately with a roller to smooth and compact the soil surface Light watering or tarping after rolling helps prevent fumigant escape It may be necessary to stagger the injector placement on two or more tool bars to prevent soil build up during application

When setting up your soil injection equipment with either spray blades injection knives or coulters make sure they are evenly and closely placed to create an even application width and depth To accomplish this it may require multiple tool bars with the injection tools staggered This will help prevent build up of trash and aid in the soil sealing For example apply VAPAM HL through injectors placed 4 inches below the soil surface and 5 inches apart

**ROTARY TILLER APPLICATION** VAPAM HL may be applied as a broadcast application immediately in front of soil covering equipment such as bed shapers rotary tillers discs etc to a minimum depth of 6 inches using a single pass to incorporate Use 37.5 to 75 gallons of VAPAM HL per treated acre (or see crop specific considerations in the Additional Information section of this label) followed immediately by a roller/packer to smooth and compact the soil surface

Spray VAPAM HL immediately in front of the tiller or mulcher set to the depth to where control is desired Use 37.5 to 75 gallons per treated acre (or see crop specific considerations in the Additional Information section of this label) Follow immediately with a roller power roller or bed shaper to seal soil surface Light watering or a tarp after rolling may be used to help prevent fumigant escape



**CENTER PIVOT AND LATERAL MOVE APPLICATION** Use only those systems which give large water droplets to prevent excessive loss. Use 37.5 to 75 gallons of VAPAM HL per treated acre (or see crop specific considerations in the Additional Information section of this label). Meter continuously throughout the injection period all of the VAPAM HL required to come in contact with the targeted pest in the treated zone. The desired depth of treatment obtained may be contingent upon soil moisture and type. Soil conditions must facilitate even moisture penetration without runoff. Flush lines following injection of VAPAM HL. For proper application rate and placement consult your local VAPAM HL Sales Representative or County Extension Expert.

**SOLID SET SPRINKLER APPLICATION** Use only those sprinkler systems which give large water droplets to prevent excessive loss. Use 37.5 to 75 gallons of VAPAM HL per treated acre (or see crop specific considerations in the Additional Information section of this label). Meter continuously throughout the injection period all of the VAPAM HL required to come in contact with the targeted pest in the treated zone. The desired depth of treatment obtained may be contingent upon soil moisture and type. Soil conditions must facilitate even moisture penetration without runoff. Flush lines following injection of VAPAM HL. For proper application rate and placement consult your local VAPAM HL Sales Representative or County Extension Expert.

**DRIP APPLICATION** VAPAM HL must be applied through a drip irrigation system designed to wet the soil thoroughly in the area being treated. Meter 37.5 to 75 gallons of VAPAM HL per treated acre (or see crop specific considerations in the Additional Information section of this label) into the drip system during the entire irrigation period. Flush irrigation system with adequate water after completion of application.

**Important** WEED ELIMINATION WILL NOT BE SATISFACTORY IF TOO MUCH WATER IS APPLIED  
AN ADEQUATE CONCENTRATION OF VAPAM HL MUST BE PRESENT AT THE TIME OF WEED SEED GERMINATION IN ORDER TO BE EFFECTIVE

**NOTE** If VAPAM HL is applied to established plant beds under plastic tarps to terminate growth of a previous crop and to fumigate the bed in preparation of planting a subsequent crop the terminated crop must not be used for any food or feed purposes after VAPAM HL has been applied.

**FLOOD BASIN FURROW AND BORDER APPLICATION** Meter VAPAM HL at a steady rate into water during irrigation. Depending on the kind of pest and the treatment depth use 37.5 to 75 gallons per treated acre in 3 to 18 inches of water per acre. Meter VAPAM HL into the irrigation water at the head of the field at a point with enough turbulence to assure adequate mixing of the product in the water. **IMPORTANT** Prior to starting the application always inspect ditches and border areas to ensure containment of the irrigation waters. Damage to bordering crops will occur if leaks develop. Apply only into field head ditch. DO NOT APPLY INTO ANY LATERAL DITCHES

**Application Over Cover Crops** VAPAM HL can be applied through center pivot or solid set sprinkler systems on cover crops that are living and less than approximately eight inches tall such as alfalfa, clover, and grasses such as rye, oats, wheat, and sudan. When applied on cover crops no soil cultivation is required before the application. The terminated crop must not be used for any food or feed purposes after VAPAM HL has been applied.

**Prevention of Treatment Runoff** To prevent runoff of the treatment during a sprinkler application do not apply VAPAM HL at a rate greater than the absorption capacity of the field. Should runoff occur isolate it from growing crops and water sources. Once collected reapply to the treated field.

#### **PACIFIC NORTHWEST ONLY**

**SOIL INJECTION** VAPAM HL may be applied using (1) a single shank spaced no more than 6 inches apart and a spray nozzle 6 inches deep (2) a single shank spaced no more than 6 inches apart and spray nozzles spaced 6 to 12 inches deep (3) a single sweep spaced no more than 12 inches apart and sweep blades 12 inches wide with a spray nozzle that will give broadcast coverage from sweep tip to sweep tip (4) a double winged shank spaced no more than 12 inches apart

and 9 inches between the wings with spray nozzles giving uniform coverage (5) a Noble Plow Blade with spray nozzles spaced every 6 inches and set to 12 to 14 inches deep using a disc to immediately incorporate the VAPAM HL placed on the surface All soil injection applications must be followed immediately with a roller/packer to smooth and compact the soil surface Regardless of which method used you must use 37.5 to 75 gallons of VAPAM HL per treated acre (or see crop specific considerations in the Additional Information section of this label)

When applying VAPAM HL with injector blades such as Noble Plow Blades in spring the following precautions must be followed

- Apply all fertilizers after the VAPAM HL application Wait a minimum of 7 days before making the fertilizer application
- Thoroughly aerate the soil 5 to 7 days after the VAPAM HL application by plowing shallow ripping or discing or the combination thereof to allow the fumes to dissipate (if tarps are used refer to the Tarp Perforation and/or Removal Section for additional guidance on timing of these activities) Do not work soil deeper than the depth of treatment
- If soil temperatures are below 60°F delay planting for a minimum of 21 days from the day of the VAPAM HL application regardless of any other precautions that may have been taken
- In conjunction with the delayed planting set indicator plants (such as tomatoes) in various places in the treated field with a hot cap left undisturbed for a minimum of 24 hours to ensure all of the VAPAM HL has left the soil (See Testing of Treated Soil Before Planting section)

**FIELD APPLICATION TO BEDS OR ROWS**

**SOIL INJECTION (*Pre formed Beds*)** VAPAM HL may be injected into pre formed plant beds following the directions in the Soil Injection section above If a wider treated band is desired space 2 or more shanks at intervals of 5 inches to cover the desired treating width Use thin injection shanks and inject VAPAM HL 4 inches deep into well prepared soil Follow immediately with a bedshaper roller press wheel or similar device or cover with an adequate amount of soil to seal the fumigant into the soil Light watering or a tarp after rolling may be used to help prevent fumigant escape Apply at the rate of 37.5 to 75 gallons per treated acre (or see crop specific considerations in the Additional Information section of this label) (see Method of Determining Fluid Ounces per 100 Feet of Linear Row section) Place shanks 5 inches apart to cover the desired treating width

**SOIL INJECTION (*At Bed Forming Operation*)** VAPAM HL may be injected during the bedding or row building process or to pre formed beds using one of the following delivery systems (1) single narrow knife blade (2) a series of narrow knife blades set no more than 5 inches apart (3) a spray blade (4) tiered shanks (5) spray rake or (6) similar equipment that places VAPAM HL in contact with the pest to be controlled or suppressed The use rate for the above operations is 37.5 to 75 gallons per treated acre (or see crop specific considerations in the Additional Information section of this label) Reduced rates will vary depending upon the actual width of the treated band desired (see Method of Determining Fluid Ounces per 100 Feet of Linear Row section) Apply the VAPAM HL at the desired depth in the soil and follow immediately with the soil capping operation bedding process or roller/packer to seal the fumigant into the soil

**SOIL COVERING METHOD (*Bed Over Methods*)** VAPAM HL may be sprayed in a bed wide band onto the soil immediately ahead of bed shaping equipment Cover the VAPAM HL with soil to a depth of 3 to 6 inches The soil should be rolled and compacted immediately Apply at the rate of 37.5 to 75 gallons per acre of treated soil (or see crop specific considerations in the Additional Information section of this label) or 11 to 22 fluid ounces per 100 linear feet of row (12 inch bed) If a narrower or wider bed is to be treated adjust the fluid ounces/100 linear feet of row to reflect the actual treated acres (see Method of Determining Fluid Ounces per 100 Feet of Linear Row section)

**DRENCH APPLICATION ON BEDS OR ROWS** VAPAM HL may be applied to finished beds for control of shallow seeded weeds Cultivate the area to be treated and pre irrigate in accordance with Use Directions Apply 37.5 to 75 gallons of VAPAM HL per treated acre (or see crop specific considerations in the Additional Information section of this

label) in a band or bands in enough water to soak at least 2 inches deep (see Method of Determining Fluid Ounces per 100 Feet of Linear Row section) To avoid contamination by untreated soil do not disturb the treated area

**ROTARY TILLER OR POWER MULCHER** Spray VAPAM HL immediately in front of the tiller or mulcher set to the depth to where control is desired Use 37.5 to 75 gallons per treated acre (or see crop specific considerations in the Additional Information section of this label) (see Method of Determining Fluid Ounces per 100 Feet of Linear Row section) Follow immediately with a roller power roller or bedshaper to seal soil surface Light watering or a tarp after rolling may be used to help prevent fumigant escape

**Method of Determining Fluid Ounces per 100 Feet of Linear Row**

- 1 Determine width of treated band in feet by dividing width of band in inches by 12 (e.g. 8 in band = 8 in ÷ 12 in/ft = 0.666 ft)
- 2 Determine square feet in 100 linear feet of band by multiplying the width of the band by 100 (e.g. 0.666 ft x 100 ft = 66.66 sq ft)
- 3 Determine the treated acres per 100 linear feet of band by dividing the square feet by 43,560 (square feet in an acre) (e.g. 66.66 sq ft ÷ 43,560 = 0.0015)
- 4 To determine the fluid ounces per 100 linear feet
  - a) 1 gal = 128 fl oz 50 gals = 6400 fl oz 100 gals = 12,800 fl oz
  - b) Multiply fluid ounces by acres Example 50 gals = 6400 fl oz x 0.0015 = 9.6 fl oz per 100 linear feet row

**ADDITIONAL INFORMATION**

**SEED TREATMENT** A suitable fungicide should be used to treat all crop seed being planted into the treated soil

**PEANUTS** For suppression and/or control of *Cylindrocladium Black Rot* (CBR) and nematodes apply VAPAM HL at the rate of 7.5 gallons per treated acre (6.61 fl oz per 100 linear feet of row) Use with partially resistant cultivators (NC 10C or others as designated by your local Agricultural Extension Service) in cases of severe disease pressure Plant other varieties only in cases of light CBR pressure

**Soil Preparations** Before applying VAPAM HL all residues from the previous crop should be decomposed (enhance by fall discing) and plowed under in the spring with a moldboard plow Soil incorporated pre plant herbicides must be applied prior to the application of VAPAM HL

**Application** Apply 8 to 10 inches below seed placement with injector shank or coulter type applicator placed in front of a bedshaper to mark rows Soil temperatures must be in the range of 60°F to 90°F at a 3 inch depth at time of treatment

**Tillage and Planting After Application** Do not mix untreated soil with treated soil by tillage or other cultural practices Plant the peanuts in the center of the treated beds no earlier than 14 days after the application is complete An at planting nematocide treatment will be necessary in fields with heavy infestations of *Root Knot* ring and/or sting nematodes

**MINT (SUPPRESSION OF VERTICILLIUM WILT)** When infestation is limited to small spots in a field the spread of *Verticillium* can be reduced by treating the infected spots Apply at the rate of up to 75 gallons of VAPAM HL per treated acre using injector blade or thin shank injector rig Follow directions for Field Application Where Entire Area Is Being Treated

**POTATOES** For suppression of potato pests such as nematodes weed seeds and *Verticillium dahliae* (Early Maturity Disease)

For soil injection apply a minimum of 37.5 gallons to a maximum of 75 gallons of VAPAM HL per treated acre following the directions for Field Application Where Entire Area Is Treated VAPAM HL may also be applied at the rate of 50 to 75 gallons per treated acre using a Noble Plow Blade set to 12 to 14 inches deep with spray nozzles spaced

every 6 inches apart to give uniform coverage plus a surface application using a disc to immediately incorporate the VAPAM HL placed on the surface

**Early Maturity Diseases Of Potatoes In The Pacific Northwest** Apply 40 gallons VAPAM HL per treated acre using the soil injection method as described in the Field Application Where Entire Area Is Being Treated section

**TREATMENT OF TREE REPLANT SITES IN COMMERCIAL ORCHARDS**

After removing dead or diseased trees and as much of the root system as possible make a shallow basin over the planting site Application with handheld equipment is prohibited Add VAPAM HL to the stream of water while filling the basin Use 3/4 qt of VAPAM HL per 100 sq ft in sufficient water (depending on the soil type) to penetrate at least 6 ft For control of Oak Root Fungus use a basin of at least 20 ft x 20 ft increase dosage to 1 1/2 quarts per 100 sq ft in sufficient water to penetrate to the depth of the root system If water is tanked to the planting site add VAPAM HL to the water and mix before filling the basin

**ESTABLISHMENT OF TRANSPLANT ORCHARDS AND VINEYARDS** Apply 50 to 75 gallons of VAPAM HL per broadcast acre to properly prepared fields by chemigation in sufficient water (e.g. 3 to 18 acre inches) to place the VAPAM HL in contact with the target pest in the treated zone and to penetrate the desired root zone (to 6") of the crop to be transplanted The percent available water capacity of the soil prior to irrigation will help determine the amount of water to use to penetrate the desired zone A lethal concentration of VAPAM HL must be present while the target species is actively respiring VAPAM HL should be placed at or slightly below the soil level of the target pest Deep soil ripping is recommended prior to treatment

**SYMPHYLID SUPPRESSION** Soil should be in good seedbed condition to a depth of 8 to 10 inches Maintain adequate moisture during the spring season to bring symphylids to the upper soil surface Treat during July to August when symphylids are in the upper soil surface Apply a minimum of 15 gallons of VAPAM HL per treated acre (0.3 pts / 100 sq ft of treated soil) using blade or thin blade chisel injectors spaced 5 inches apart Inject below the level of symphylid concentration usually 6 to 8 inches Pack soil immediately after the application

**TOBACCO PLANT BEDS** Fall applications are recommended whenever possible Read and follow the use directions carefully

**DRENCH METHOD** Apply 1.875 gallons VAPAM HL in 150 to 200 gallons of water per 100 square yards Application may be made with sprinklers sprayers with nozzles or any suitable equipment Follow directions given above for Field Applications Where Entire Area is Being Treated section

**TANK MIX WITH TILLAM® 6E HERBICIDE (TOMATOES ONLY)** A tank mix of VAPAM HL soil fumigant plus TILLAM 6E herbicide may be used to provide the additional benefit of residual weed control The mixture must be applied pre plant to tomatoes if all directions and precautions pertaining to both VAPAM HL and TILLAM 6E are followed Apply through a spray blade by shank injection or (Western Region only) through solid set sprinkler systems Maintain constant agitation of the mixture throughout the filling and application Use in accordance with the more restrictive of label limitations and precautions No label dosage rates should be exceeded This product cannot be mixed with any product containing a label prohibition against such mixing Do not tank mix with other chemicals unless prior use has proven compatibility

**PACIFIC NORTHWEST (IDAHO, NEVADA, OREGON AND WASHINGTON)**

**CARROTS** Apply a broadcast application of 37.5 to 75 gallons per treated acre of VAPAM HL for the suppression of *Root Knot* Nematodes or 30 to 75 gallons for pre plant suppression of soil borne diseases

**MINT (including Peppermint and Spearmint)** Apply a pre plant broadcast application of 37.5 to 75 gallons per treated acre of VAPAM HL for the suppression of *Root Knot* Nematodes and *Verticillium dahliae*

**ONIONS** Apply a broadcast or banded application of 37.5 to 75 gallons per treated acre of VAPAM HL for the suppression of *Root Knot* Nematodes or 30 to 75 gallons for suppression of soil borne diseases

**POTATOES** Apply a broadcast sprinkler application of 37.5 to 75 gallons per treated acre of VAPAM HL for the suppression of *Root Knot* Nematodes and *Verticillium dahliae*. Apply a broadcast soil application of 37.5 to 75 gallons per treated acre VAPAM HL for the suppression of *Verticillium dahliae*

**SUGAR BEETS** Apply a broadcast or a banded application of 37.5 to 75 gallons per treated acre of VAPAM HL for the suppression of soil borne disease. A fall application of RO NEET herbicide followed by or tank mixed with VAPAM HL in a broadcast application or band application will enhance the overall weed control

**ORCHARD RE-PLANT** Apply a broadcast application rate of 56 to 75 gallons per treated acre of VAPAM HL in a minimum of 1 acre inch of water through a sprinkler system or a row treatment of 56 to 75 gallons broadcast equivalent to the future tree row using a weed sprayer (see *Terms used in this labeling* section) by applying multiple passes of VAPAM HL while the sprinklers are running until the desired rate has been applied for the treatment of specific orchard replant disease. Trees should not be replanted into the replant site for at least 21 days after the application is complete. Check for fumes in the soil before planting. VAPAM HL may also be applied at the rate of 50 to 75 gallons per treated acre using a Noble Plow Blade set 12 to 14 inches deep with spray nozzles spaced every 6 inches apart to give uniform coverage with a surface application using a disc to immediately incorporate the VAPAM HL placed on the surface

**WHEAT AND BARLEY** Apply VAPAM HL at a rate of 1.88 to 7.5 gallons per treated acre 14 to 21 days prior to planting for the suppression of certain early season soil fungi which cause root diseases of small grains. VAPAM HL may be diluted with water or if compatible non acidic liquid fertilizers (see *Application in Tank Mix with Liquid Fertilizer* section) and injected into moist soil 5 to 8 inches before planting

**IN THE PACIFIC NORTHWEST, IF THE FIELD HISTORY OR SOIL SAMPLING SHOWS HIGH POPULATIONS OF NEMATODES, FUMIGATION USING BOTH VAPAM HL AND TELONE II SHOULD BE USED. CONSULT YOUR AMVAC OR DOW AGROSCIENCES LLC REPRESENTATIVE FOR ADDITIONAL INFORMATION**

**NOTE** Read the label affixed to the container of TELONE II before applying. Carefully follow all precautionary statements and applicable use directions. Except as specified in this section, the labels affixed to the containers for TELONE II and VAPAM HL are subject to all user precautions and limitations imposed

**USE DIRECTIONS FOR SEQUENTIAL GROUND APPLICATION OF TELONE II AND VAPAM HL**

Sequential application of TELONE II and VAPAM HL for suppression of *Verticillium dahliae* and control of *Root Knot* and *Lesion* nematodes in soils to be planted to potatoes in the Pacific Northwest

The following use directions provide information for a sequential treatment program of applications of TELONE II soil fumigant and VAPAM HL soil fumigant. For best results, apply both TELONE II and VAPAM HL in the fall. Alternative treatment schedules include a fall application of TELONE II followed by a spring application of VAPAM HL, a fall application of VAPAM HL followed by a spring application of TELONE II, or a spring application of both products. Due to time constraints resulting from varying weather conditions, a spring application may result in delayed planting

**APPLICATION DIRECTIONS FOR TELONE II**

Soil conditions at the time of application of TELONE II that allow rapid diffusion of the fumigant as a gas through the soil normally give best results. Compacted soil layers within the desired treatment zone must be fractured before or during application of the fumigant. Soil temperature must be between 40°F and 80°F at the depth of injection. Moisture from

2 inches below the soil surface to at least 12 inches deep as determined by the feel method free of clods and with crop residue thoroughly incorporated into the soil at least at the time of application and sealing

Apply TELONE II as a broadcast treatment at the minimum rate of 15 gallons per treated acre (44.3 fl oz/1000 feet of row/outlet based on 12 inch centers) using either chisel (shank) Noble Plow (sweep) or modified Para Till application equipment Chisel equipment must have ripper type shanks Para Till equipment must be modified so that outlet spacing is evenly distributed under the tool bar With chisel and Para Till equipment a shank spacing of 12 to 24 inches is recommended Do not exceed a shank spacing of 24 inches Outlet depth should be at least 18 inches below the final soil surface Noble Plow equipment may be used only when either shallow soils (those less than 18 inches deep) or soils containing excessive live root material such as alfalfa or corn stubble prevents the use of shank application Noble Plow outlet spacing should not exceed 12 inches and application should be made to a depth of at least 15 inches Fumigant penetration may be limited if a plow pan exists below the depth of the Noble blade Do not use plow sole application Immediately after application of TELONE II use a disc paddle wheel or similar device to uniformly mix the top 4 to 6 inches of soil to effectively eliminate chisel traces Then follow immediately with a ring roller or multi packer to seal the soil surface Little or no crop residue should be exposed at the surface following the sealing operation Any remaining crop residue should lie flat following sealing Following application and sealing leave soil undisturbed for 7 to 14 days The longer undisturbed interval may be necessary if the soil is or becomes cold or wet during this period

**APPLICATION DIRECTIONS FOR VAPAM HL**

Soil conditions at the time of application of VAPAM HL must be between 35°F and 90 F in the treated zone and between 60% to 80% available water capacity If necessary pre irrigate about a week prior to treatment to adjust soil moisture to desired levels Immediately before application cultivate lightly if the soil has crusted

Apply VAPAM HL either by chemigation or by soil injection or surface incorporation as a sequential application with TELONE II When VAPAM HL is used prior to TELONE II allow a minimum of 7 days between treatments When TELONE II is applied prior to VAPAM HL allow a minimum of 7 days before disturbing the soil or beginning any pre irrigation for the application of VAPAM HL

For chemigation apply VAPAM HL at the minimum rate of 30 gallons per treated acre in a minimum of 0.5 acre inch of water to the desired depth of treatment Heavier soils may require a higher amount of water Use only those sprinkler systems that give large water droplets to prevent excessive fumigant loss If for any reason chemigation is interrupted prior to completion (e.g. excessive wind equipment malfunction etc.) back the system up prior to restarting to ensure full application to the area affected prior to shutting down the system and to allow full distribution of the VAPAM HL solution throughout the irrigation system prior to moving over untreated soil After application is completed flush equipment until all VAPAM HL is eliminated from the system

For soil injection apply VAPAM HL at the minimum rate of 30 gallons per treated acre using either shanks sweep blades double winged shanks or a Noble Plow Blade combined with a surface application Single shanks should be spaced no more than 6 inches apart with either single injection outlets no more than 6 inches deep or dual injection outlets spaced at 6 and 12 inches deep Single sweep blades should be spaced no more than 12 inches apart with sweeps 12 inches wide and a spray nozzle that will provide broadcast coverage from sweep tip to sweep tip Double winged shanks should be spaced no more than 12 inches apart with no more than 9 inches between adjacent wings and with spray nozzles that provide uniform coverage The Noble Plow blade should have spray nozzles spaced 6 inches apart to give uniform coverage an injection depth set at 12 to 14 inches deep and be combined with a surface application using a disc to immediately incorporate the VAPAM HL placed on the surface Follow all the above applications immediately with a roller/packer to smooth and compact the soil surface

For surface incorporation apply VAPAM HL at the minimum rate of 30 gallons per treated acre as a broadcast application to the soil surface immediately in front of soil covering equipment such as rotary tillers discs etc. to a minimum depth of 6 inches using a single pass incorporation followed immediately by a roller/packer to smooth and compact the soil surface

**SOIL FUMIGATION INTERVAL** Planting may take place only after odors of either TELONE II or VAPAM HL are no longer present within the zone of fumigation. If VAPAM HL follows TELONE II and is applied in the spring with the Noble Plow Blade, apply all fertilizers at least 7 days after the application of VAPAM HL. Thoroughly aerate the soil 5 to 7 days after the application of VAPAM HL by shallow plowing and/or discing to allow the fumigant odors to dissipate. Wait 14 to 21 days after the application of VAPAM HL before planting the crop. Use the 21 day interval if soil temperatures are below 35°F regardless of any other precautions that may have been taken. In addition to waiting 21 days, set indicator plants (e.g. tomato seedlings) in various places in the treated field and cover the plants with a hot cap, plastic sheeting, bucket, etc. to trap and confine any fumes present. Leave the plants undisturbed for a minimum of 24 hours, then examine for injury before planting the crop. Do not plant the crop if injury to indicator plants is observed. If fumes are noticeable at time of planting, stop planting and rework the soil. If TELONE II follows VAPAM HL and is applied in the spring, wait at least one week for each 10 gallons of TELONE II applied beyond the initial undisturbed period before planting the crop. If fumigant odors are present at planting, thoroughly aerate the soil following shallow ripping and/or discing to allow fumigant odors to dissipate. Do not till the soil so deep as to move untreated soil from below the treated zone into the treated soil.

**Special Considerations and Precautions**

Use of this sequential application program of reduced rates of TELONE II and VAPAM HL does not guarantee pest free potatoes at harvest.

Use of TELONE II and VAPAM HL according to these use directions will control *Root Knot* and *Lesion* nematode populations present within the fumigated zone at the time of fumigation. The fumigated zone can vary depending upon a number of factors such as fumigant rate, application methods used, depth of fumigant application, soil moisture, soil type, soil temperature and soil tilth (including soil compaction and soil porosity). The sequential combination of reduced rates of TELONE II and VAPAM HL will not control or prevent re-infestation subsequent to the treatments. Subsequent pest populations may infest the fumigated zone from irrigation water, equipment, potato seed or other sources of contamination or may invade the fumigated zone from surrounding untreated soil such as from beneath the fumigated zone or from non-fumigated pockets within the fumigated zone.

In fields with a history of severe *Columbia Root Knot* nematode problems, the maximum Federal label rate of 20 gallons TELONE II per treated acre is recommended in sequential combination with a minimum of 37.5 gallons to a maximum of 75 gallons of VAPAM HL per treated acre per these label directions.

If the application of TELONE II occurs in the fall and the application of VAPAM HL is not planned until spring, a cover crop such as wheat or grass can be planted following the undisturbed soil interval associated with the application of TELONE II to reduce the potential for over-winter soil erosion.

Refer to the product labels affixed to the containers for both TELONE II and VAPAM HL for recommended soil conditions. Product performance can be expected to improve as the soil conditions move toward optimum. Use of this sequential application program of TELONE II and VAPAM HL under soil conditions outside the recommended range of soil conditions can be expected to yield less than satisfactory performance.

**NOTE:** Read the label affixed to the container of TELONE II before applying. Carefully follow all precautionary statements and applicable use directions. Except as specified in this section, use of TELONE II or VAPAM HL is subject to all use precautions and limitations imposed by the labels affixed to the containers for TELONE II and VAPAM HL, respectively.

**USE DIRECTIONS FOR SIMULTANEOUS GROUND APPLICATION OF TELONE II AND VAPAM HL**

Simultaneous application of TELONE II and VAPAM HL for suppression of *Verticillium dahliae* and control of *Root Knot* and *Lesion* nematodes in soils to be planted to potatoes in the Pacific Northwest.

The following use directions provide information for simultaneous ground application of TELONE II soil fumigant and VAPAM HL soil fumigant. For best results, a fall application is recommended. Due to time constraints resulting from varying weather conditions, a spring application may result in delayed planting.

Note When TELONE II and VAPAM HL are applied simultaneously the most restrictive personal protective equipment buffer zones, worker notification and entry restrictions specified on labels for each product must be followed

**Soil Conditions**

Soil temperature must be between 40 F and 80°F in the treated zone

**Application Methods and Equipment**

Use a dual equipment setup to apply TELONE II and VAPAM HL during a single pass Calibrate equipment for simultaneous application of each product Because of shallower product placement and the need to disrupt chisel traces from application of TELONE II mount equipment for application of VAPAM HL behind that of TELONE II

Apply TELONE II as a broadcast treatment at a minimum rate of 15 gallons per treated acre (44.3 fl oz/1000 feet of row/outlet based on 12 inch centers) using either chisel (shank) noble (sweep) or modified Para Till application equipment Chisel equipment must have ripper type shanks Para Till equipment must be modified so that outlet spacing is evenly distributed under the tool bar With chisel and Para Till equipment a shank spacing of 12 to 24 inches is recommended Do not exceed a shank spacing of 24 inches Outlet depth should be at least 18 inches below the final soil surface Noble plow outlet spacing should not exceed 12 inches and application should be made to a depth of at least 15 inches Fumigant penetration may be limited if a plow pan exists below the depth of the noble blade Do not use plow sole application

**For soil injection** apply VAPAM HL as a broadcast treatment at a minimum rate of 30 gallons to a maximum rate of 75 gallons of VAPAM HL per treated acre using either shanks sweep blades or double winged shanks Single shanks should be spaced no more than 6 inches apart with either single injection outlets any more than 6 inches deep or dual injection outlets spaced at 6 and 12 inches deep Single sweep blades should be spaced no more than 12 inches apart with sweeps 12 inches wide and a spray nozzle that will provide broadcast coverage from sweep tip to sweep tip Double winged shanks should be spaced no more than 12 inches apart with no more than 9 inches between adjacent wings and with spray nozzles that provide uniform coverage

**For surface incorporation** apply VAPAM HL at the minimum rate of 30 gallons per treated acre as a broadcast application to the soil surface immediately in front of soil covering equipment such as rotary tillers discs etc set to a minimum depth of 6 inches

**Sealing The Soil After Application**

Immediately after application the soil must be sealed to prevent fumigant loss and ensure that an effective concentration of fumigant is maintained within the soil Chisel traces resulting from the TELONE II application must be disrupted to a depth of at least 4 to 6 inches This may be accomplished with the VAPAM HL applicator or with a disc or similar device

As a final step to compact the soil surface and help maximize soil sealing all above applications must be followed with a ring roller or culti packer

**Soil Fumigation Interval**

Planting may take place only after the odors of both TELONE II and VAPAM HL are no longer present Following application and sealing leave the soil undisturbed for 7 to 10 days The longer undisturbed interval may be necessary if the soil is or becomes cold or wet during this period For spring applications thoroughly aerate the soil after the initial undisturbed interval by shallow plowing and/or discing to allow the fumigant odors to dissipate Allow 21 days prior to planting In addition to waiting 21 days place indicator plants (e.g. potted tomato seedlings) in various places in the treated field and cover the plants with a hot cap plastic sheeting bucket etc to trap and confine any fumes present Leave the plants undisturbed for a minimum of 24 hours then examine for injury before planting the crop Do not plant the crop if injury to indicator plants is observed If fumes are noticeable at time of planting stop planting and rework the soil



### Special Considerations and Precautions

Use of this simultaneous application program of reduced rates of TELONE II and VAPAM HL does not guarantee pest free potatoes at harvest

Use of TELONE II and VAPAM HL according to these use directions will control *Root Knot* and *Lesion* nematode populations present within the fumigated zone at the time of fumigation. The fumigated zone can vary depending upon a number of factors such as fumigant rate, application methods used, depth of fumigant application, soil moisture, soil type, soil temperature and soil tilth (including soil compaction and soil porosity). The simultaneous combination of reduced rates of TELONE II and VAPAM HL will not control or prevent re-infestation subsequent to the treatment. Subsequent pest populations may infest the fumigated zone from irrigation water, equipment, potato seed or other sources of contamination, or may invade the fumigated zone from surrounding untreated soil such as from beneath the fumigated zone or from within non fumigated pockets within the fumigated zone.

In fields with a history of severe *Columbia Root Knot* nematode problems, the maximum Federal label rate of 20 gallons of TELONE II per treated acre is recommended in simultaneous combination with a minimum of 37.5 gallons to a maximum of 75 gallons of VAPAM HL per treated acre per these label directions.

With fall applications, a cover crop such as wheat or grass may be planted following the undisturbed soil interval associated with this application to reduce the potential for over winter soil erosion.

Refer to the product labels affixed to the containers for both TELONE II and VAPAM HL for further recommendations and precautions for optimum fumigant performance. Within the range of recommended soil conditions, product performance can be expected to improve as the soil conditions move towards optimum. Use of this simultaneous application program of TELONE II and VAPAM HL under soil conditions outside the recommended range of soil conditions can be expected to yield less than satisfactory performance.

**NOTE:** The Use Directions for the Pacific Northwest may be used in other areas of the country if not prohibited elsewhere on the label. Consult your local Sales Representative or extension personnel for further directions or recommendations.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**STORAGE:** Do not expose to extreme temperatures. Do not stack more than four drums high. Leaking or damaged drums should be placed in overpack drums for disposal. Spills should be absorbed in sawdust or sand and disposed of in a sanitary landfill. Keep container closed when not in use.

**PESTICIDE DISPOSAL:** Pesticide wastes are toxic. Improper disposal of excess pesticide spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Protection Agency or the Hazardous Waste representative at the nearest EPA Regional office for guidance.

### CONTAINER DISPOSAL

**Nonrefillable container:** Do not reuse or refill this container. Offer for recycling if appropriate. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank. Repeat this procedure two more times.

**Refillable container:** Refill this container with sodium or potassium methyldithiocarbamate only. Do not reuse this container for any other purpose. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full

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with water Agitate vigorously or recirculate water with the pump for 2 minutes Pour or pump rinsate into application equipment or rinsate collection system Repeat this rinsing procedure two more times

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conforms to the chemical description on the label (b) that this product is reasonably fit for the purposes set forth in the directions for use subject to the inherent risks referred to herein when it is used in accordance with such directions and (c) that the directions warnings and other statements on this label are based upon responsible experts evaluations of reasonable tests of effectiveness of toxicity to laboratory animals and to plants and residues on food crops and upon reports of field experience Tests have not been made on all varieties of food crops and plants or in all states or under all conditions

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