

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

April 6, 2016

Mardel Belotinsky Registration Manager TriEst Ag Group, Inc. P.O. Box 448 Greenville, NC 27835-0448

Subject: Label and CSF Amendment – Correction of Nominal A.I. %, addition of me-too

uses (sweet corn, mint, sugar beets), revised CSF

Product Name: Strike 85CP Fumigant EPA Registration Number: 87994-6

Application Date: 4/16/2015 Decision Number: 503952

Dear Ms. Belotinsky:

The amended label and CSF referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Please note that the record for this product currently contains the following CSF:

Basic CSF dated 06/25/2015

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false

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or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact me by phone at 703-305-5410, or via email at johnson.hope@epa.gov.

Sincerely,

Hope Johnson, Product Manager 21 Fungicide Branch Registration Division (7505P) Office of Pesticide Programs

Enclosure

RESTRICTED USE PESTICIDE DUE TO ACUTE TOXICITY

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.

STRIKE 85CP Fumigant

ACTIVE INGREDIENT:

*Contains petroleum distillates.

ACCEPTED

Apr 06, 2016

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under

EPA Reg. No. 87994-6

This product weighs 12.0 lbs./gal. at 68 °F (20 °C). Contains 10.3 lbs./gal. chloropicrin.

KEEP OUT OF REACH OF CHILDREN



DANGER

PELIGRO

POISON [Note: « Poison » will be printed in red.]

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.)

IN ALL CASES OF OVEREXPOSURE, GET MEDICAL ATTENTION IMMEDIATELY. TAKE PERSON TO A DOCTOR OR TO AN EMERGENCY TREATMENT FACILITY.

	FIRST AID										
If inhaled:	Move person to fresh air.										
	• If person is not breathing, call 911 or an ambulance; then give artificial										
	respiration, preferably by mouth-to-mouth, if possible.										
	 Call a poison control center or doctor for further treatment advice. 										
If on skin	Take off contaminated clothing.										
or	 Rinse skin immediately with plenty of water for 15-20 minutes. 										
clothing: - Call a poison control center or doctor for treatment advice.											
If in eyes: • Hold eye open and rinse slowly and gently with water for 15-20 minutes.											
	• Remove contact lens, if present, after the first 5 minutes; then continue rinsing.										
	 Call a poison control center or doctor for treatment advice. 										
If	■ Immediately call a poison control center or doctor.										
swallowed:	■ Do not induce vomiting unless told to by a poison control center or doctor.										
	■ Do not give any liquid to the person.										
	■ Do not give anything to an unconscious person.										
• For a	dditional information in case of an emergency, call toll free (1-800-424-9300).										
 Have 	the product container or label with you when calling a poison control center or										
docto	r, or going for treatment.										

NOTE TO PHYSICIAN

- Chloropicrin is a volatile liquid that is the active ingredient in tear gas. As a gas it is a powerful lachrymator. Early symptoms of overexposure are lachrymation, respiratory distress, and vomiting. Pulmonary edema may develop later. Treatment is symptomatic.
- Contains petroleum distillate--vomiting may cause aspiration pneumonia.

See side panels for additional precautionary statements.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. Fatal if inhaled or swallowed. Poisonous liquid and vapor. Corrosive. Liquid causes skin burns and irreversible eye damage. Do not breathe vapor or gas. Do not get in eyes, on skin or on clothing. Chloropicrin is readily identifiable by smell. Exposures to very low concentrations of vapor will cause irritation of eyes, nose and throat. Continued exposure after irritation occurs, or exposure to higher concentration may cause painful irritation or temporary blindness.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are listed below. PPE constructed of saranex, neoprene, and chlorinated polyethylene provide short-term contact or splash protection against liquid in this product. Longer-term protection is provided by PPE constructed of viton, Teflon, and EVAL barrier laminates (for example, responder suits manufactured by Life-guard or silvershield gloves manufactured by North). Where chemical-resistant materials are required, leather, canvas, or cotton materials offer no protection from this product and must not be worn as the sole article of protection when contact with this product is possible.

When performing tasks with NO potential for contact with liquid fumigant, all handlers (including applicators) must wear:

- Long-sleeved shirt and long pants, and
- Shoes and socks.

When performing tasks with potential for contact with liquid fumigant, all handlers (including applicators) must wear:

- Long-sleeved shirt and long pants,
- Chemical-resistant gloves,
- Chemical-resistant apron,
- Protective eyewear (Do NOT wear goggles), and
- Chemical-resistant footwear with socks.

In addition, when an air-purifying respirator is required under this label's *Directions for Use*, *Protection for Handlers, Respiratory Protection and Stop Work Triggers* sections, 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).

IMPORTANT: A self-contained breathing apparatus (SCBA) is not permitted for routine handler tasks. If responding to an emergency when corrective action is needed to reduce air concentrations to acceptable levels, wear an SCBA. Escape-only SCBA respirators must not be used by handlers for responding to emergencies. In addition wear PPE required for potential contact with liquid fumigant.

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.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE immediately if pesticide gets on clothing. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this 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 and birds. 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 washwaters or rinsate.
- Chloropicrin has certain properties and characteristics in common with chemicals that have been detected in groundwater (chloropicrin is highly soluble in water and has low adsorption to soil).
- For untarped applications of chloropicrin, leaching and runoff may occur if there is heavy rainfall after soil fumigation.

PHYSICAL OR CHEMICAL HAZARDS

Do not use containers or application equipment made of magnesium, aluminum, or their alloys, as under certain conditions this fumigant may be severely corrosive to such metals. [See the *Calibration, Set-up, Repair and Maintenance for Application Rigs* section of this labeling for further requirements for application equipment.] Do not permit water to be used to clean the fumigant pressure system, as corrosion will result. Diesel oil is satisfactory for this purpose.

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. 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, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard (WPS). No instructions elsewhere on this labeling relieve users from complying with the requirements of the WPS.

For the entry restricted period and notification requirements, see the *Entry Restricted Period and Notification* section 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.

<u>Fumigant Safe Handling Information:</u> Information that must be provided annually to handlers 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.

<u>Application Block:</u> 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., pounds 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.

<u>Start of the Application:</u> The time at which the fumigant is first delivered/dispensed into the soil in the application block.

<u>Application is Complete:</u> 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).

<u>Entry Restricted Period:</u> 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.

<u>Buffer Zone</u>: 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. <u>Buffer Zone Period</u>: 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.

<u>Difficult to Evacuate Sites:</u> 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).

<u>Roadway:</u> 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.

Application Restrictions

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

Product Information

STRIKE 85CP FUMIGANT is a pre-plant fumigant for the control of soil-borne pests, such as wireworms and nematodes, and diseases caused by certain species of *Pythium, Phytophthora, Fusarium, Verticillium* and *Streptomyces scabies* (Potato Scab) on specified uses.

Use Precautions

- This fumigant is a highly hazardous material and must be handled with care only by certified applicators or persons under their direct supervision who are trained with its proper use.
- Comply with all local regulations and ordinances. Obtain an application permit from Agricultural Regulatory Agencies as required.
- Obtain medical assistance at once in case of illness after exposure, and do not allow conditions which could accidently cause further exposure until recovery is complete.
- Never fumigate alone. It is imperative to always have an assistant and proper protection equipment, to aid in case of an accident.
- Drivers of application equipment must advise other workers of all precautions and procedures. In addition, drivers must instruct their helpers in the mechanical operation of the tractor and how to work with the tractor driver while fumigating.
- Handle this fumigant in the open, when possible, with the operator "upwind" from the container where there is good ventilation.
- Keep pets, livestock, and other domestic animals out of the treated area during application and during tarp perforation and/or removal if a tarp is used.
- Fumigation may temporarily raise the level of ammonia nitrogen and soluble salts in the soil. This is most likely to occur when heavy rates of fertilizer and fumigant are applied to soils that are either cold, wet, acid, or high in organic matter. To avoid injury to plant roots, fertilize as indicated by soil tests made after fumigation. To avoid ammonia injury and/or nitrate starvation to crops, avoid using fertilizers containing ammonia salts and use only fertilizers containing nitrates until after the crop is well established and the soil temperature is about 65 °F. Liming highly acid soils before fumigation stimulates nitrification and reduces the possibility of ammonia toxicity.

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 www.epa.gov/fumiganttraining for the active ingredient(s) 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 WPS (40 CFR Part 170):

- Monitoring fumigant air concentrations;
- Cleaning up fumigant spills (this does not include emergency personnel not associated with the application);
- Handling or disposing of fumigant containers;
- Cleaning, handling, adjusting, or repairing the parts of application equipment that may contain furnigant residues; and
- Performing any handling tasks as defined by the WPS (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, 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 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 www.epa.gov/fumiganttraining.

For all handling tasks at least two handlers must be present.

Exception: After the application is complete, only one trained handler is required to perform fumigant site monitoring tasks outside of the buffer zone.

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 the 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/canisters of the type specified in the *PPE* section of this labeling are immediately available for each handler who will wear one. At a minimum two handlers must have the appropriate air-purifying respirator and cartridges/canisters 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.

Cartridges or canisters must be replaced when odor or sensory irritation from this product becomes apparent during use, if the measured concentration of chloropicrin is greater than or equal to 1.5 ppm, or after 8 hours of cumulative use, whichever occurs first.

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 (full facepiece or gas mask) 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:
 - o An air-purifying respirator (full facepiece or gas mask) must be worn by all handlers who remain in the application block or surrounding buffer zone, or
 - o 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 (full facepiece or gas mask) or resume operations if two consecutive breathing zone samples taken at the handling site at least 15 minutes apart show that levels of chloropicrin have decreased to less than 0.15 ppm, provided that handlers do not experience sensory irritation. During the collection of air samples, an air-purifying respirator (full facepiece or gas mask) 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., Matheson-Kitagawa,
 Draeger, or Sensidyne) must be used. The devices must have sensitivity of at least 0.15 ppm
 for chloropicrin. 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 (full facepiece or gas mask) 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 (full facepiece or gas mask), or (2) a chloropicrin air sample is greater than or equal to 1.5 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 (full facepiece or gas mask) if two consecutive breathing zone samples taken at the handling site at least 15 minutes apart show levels of chloropicrin have decreased to less than 0.15 ppm, provided that handlers do not experience sensory irritation. During the collection of air samples an air-purifying respirator (full facepiece or gas mask) 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 the sample(s) were greater than or equal to 1.5 ppm.
- Handlers can resume work activities if all of the following conditions exist provided an airpurifying respirator (full facepiece or gas mask) is worn:
 - o two consecutive breathing zone samples for chloropicrin taken at the handling site at least 15 minutes apart must be less than 1.5 ppm.
 - o handlers do not experience sensory irritation while wearing the air-purifying respirator (full facepiece or gas mask), and
 - o filter cartridges/canisters have been changed.

O During the collection of air samples an air-purifying respirator (full facepiece or gas mask) 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 the sample(s) were greater than or equal to 1.5 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 application must be perforated.
- Tarps may be perforated manually ONLY for the following situations:
 - o At the beginning of each row when a coulter blade (or other device which performs similarly) is used on a motorized vehicle such as an ATV.
 - o In fields that are 1 acre or less.
 - o 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 applications must be completed before noon.
- For broadcast applications, tarps must not be perforated if rainfall is expected within 12 hours.
- Early Tarp Removal for Broadcast Applications Only:
 - O 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:
 - o Tarp perforation is allowed before the 5 days (120 hours) have elapsed.
 - o 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 the 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.

NOTES:

- 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,"
- -- "Chloropicrin Fumigant in USE,"
- -- "the date and time of fumigation,
- -- the date and time entry restricted period is over.
- -- "STRIKE 85CP FUMIGANT", and
- -- Name, address, and telephone number of the certified applicator in charge of the fumigation.

Post the 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 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.

Tarps (when tarps are used in STRIKE 85CP FUMIGANT 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.

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, 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 may 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 Temperature

- The maximum soil temperature at the depth of injection must not exceed 90 °F at the beginning of the application.
 - o If air temperatures have been above 100 °F in any of the three days prior to the start of the 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 Preparation

- Soil must be properly prepared and at the surface generally be free of large clods. The area to be fumigated must be tilled to a depth of 5 to 8 inches.
- Field trash must be properly managed. Residue from a previous crop must be worked into the soil to allow for decomposition prior to the start of the application. Little or no crop residue shall be present on the soil surface. Crop residue that is present must not interfere with the soil seal. Removing the crop residue prior to the start of the application is important to limit the natural "chimneys" that occur in the soil when crop 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 limit the efficacy of the fumigant. However, crop residue on the field serves to prevent soil erosion from both wind and water and is an important consideration. To accommodate erosion control, fumigant efficacy, and human health protection, clear fields of crop residue as close to the start of the application as possible to limit the length of time that the soil would be exposed to potentially erosive weather conditions.
- Trash pulled by the shanks to the ends of the field must be covered with tarp, or soil, depending on the application method before making the turn for the next pass.

Application Methods and Equipment

- Apply STRIKE 85CP FUMIGANT with chisel equipment or a Noble plow.
- For shallow (injection depth minimum 8-10 inches) broadcast work, use a shank spacing of 9-12 inches.
- For deep applications (injection depth minimum 18 inches), a shank spacing up to 24 inches may be used; however, it is recommended that the shank spacing not exceed 18 inches.
- When applying STRIKE 85CP FUMIGANT with a Noble plow, use an outlet spacing of 9-12 inches along the sweeps.

Application Depth

- For Tarped-Broadcast and Tarped-Bedded Applications: The injection point must be a minimum of 8 inches from the nearest final soil/air interface.
- For Untarped-Bedded Applications: The injection point must be a minimum of 12 inches from the nearest final soil/air interface.
- For Untarped-Broadcast Applications: The injection point must be a minimum of 10 inches from the nearest final soil/air interface.
- For Untarped-Broadcast Deep Applications: The injection point must be a minimum of 18 inches from the nearest final soil/air interface.

Soil Sealing

- For Broadcast Untarped Applications: Use a disc or similar equipment to uniformly mix the soil to at least a depth of 3 to 4 inches to eliminate the chisel or plow traces. Following elimination of the chisel trace, the soil surface must be compacted with a cultipacker, ring roller, and roller in combination with tillage equipment.
- For Bedded Applications: Preformed beds must be sealed by disruption of the chisel trace using press sealers, bed shapers, cultipackers, or by re-shaping (e.g., relisting, lifting, replacing) the beds immediately following injection. Beds formed at the time of application must be sealed by disrupting the chisel trace using press sealers, or bed shapers.

• For Tarped Applications: The use of a tarp does not eliminate the need to minimize chisel traces prior to application of the tarp, such as by using a Noble plow or other injection shank that disrupts the chisel traces.

Soil Moisture

- The soil must be moist 9 inches below the surface. The amount of moisture needed in this zone will vary according to soil type. Surface soil generally dries rapidly and must not be considered in this determination.
- Soil moisture must be determined using one of the following methods:
 - o the USDA Feel and Appearance Method for testing (see below), or
 - o an instrument, such as a tensiometer.
- Available water capacity must be equal to or greater than 50% for shank applications. If there is less than 50% available water capacity 9 inches below the surface, the soil moisture must be adjusted. If irrigation is not available and there is adequate soil moisture below 9 inches, soil moisture can be adjusted by discing or plowing before the start of the application. To conserve existing soil moisture, pretreatment irrigation or pretreatment tillage should be done as close to the start of the application as possible.
- Measure soil moisture at a depth of 9 inches at either end of the field, no more than 48 hours prior to the start of the application.

The USDA Feel and Appearance Method for estimating soil moisture as appropriate for the soil texture:

- For **coarse** textured soils (fine sand and loamy fine sand), the soil is moist enough (50 to 75% 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), the soil is moist enough (50 to 75% 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), the soil is moist enough (50 to 75% 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), the soil is moist enough (50 to 75% 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. Whenever possible, the field should 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 agent, soil conservationist, or pest control advisor (agriculture consultant) should be consulted for assistance

Prevention of End Row Spillage

- Do not apply or allow fumigant to spill onto the soil surface. For 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.

Calibration, Set-up, Repair, and Maintenance for Application Rigs

- Brass, carbon steel, or stainless steel fittings must be used throughout. Polyethylene tubing, polypropylene tubing, Teflon® tubing or Teflon® -lined steel braided tubing must be used for all low pressure lines, drain lines, and compressed gas or air pressure lines. All other tubing must be Teflon® -lined steel braided.
- Galvanized, PVC, nylon, or aluminum pipe fittings must not be used.
- All rigs must include a filter to remove any particulates from the fumigant and for pressurized systems a check valve to prevent backflow of the fumigant into the pressurizing cylinder or the compressed air system.
- Rigs must include a flow meter or a constant pressure system with orifice plates to ensure the proper amount of fumigant is applied.
- To prevent the backflow of fumigant into the compressed gas cylinder (e.g., nitrogen, other inert gas, compressed air), if used, applicators must:
 - o Ensure that positive pressure is maintained in the compressed gas cylinder at not less than 200 psi during the entire time it is connected to the application rig, if a compressed gas cylinder is used. (*This is not required for a compressed air system that is part of the application rig because if the compressor system fails the application rig will not be operable.*)
 - Ensure that application rigs are equipped with properly functioning check valves between the compressed gas cylinder or compressed air system and the fumigant cylinder. The check valve is best placed on the outlet side of the pressure regulator, and is oriented to only allow compressed gas to flow out of the cylinder or compressed air out of the compressed air system.
 - o A pressure relief valve must be installed between the regulator and the check valve to ensure a regulator failure does not overpressurize the fumigant cylinder.
 - o Always pressurize the system with compressed gas or by use of a compressed air system before opening the fumigant cylinder valve.
- 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:
 - o Check the filter, and clean or replace the filter element as required.
 - o Check all tubes and chisels to make sure they are free of debris and obstructions.
 - o Check and clean the orifice plates and screen checks, if installed.
 - o Pressurize the system with compressed gas or compressed air, and check all fittings, valves, and connections for leaks using soap solution.
- Install the fumigant cylinder, and connect and secure all tubing. Slowly open the compressed gas or compressed air valve, and increase the pressure to the desired level. Slowly open the fumigant cylinder valve, always watching for leaks.

- In case of the rupture of a hose or fitting while applying the fumigant, immediately stop the tractor or motor. Get off the tractor and get to a place where the problem can be observed without exposure to the fumes. Approach from upwind, with respiratory protection if required and make the necessary repairs.
- When changing cylinders, be certain they are turned off and the fumigant system is not under pressure.
- When the application is complete, close the fumigant cylinder valve and blow residual fumigant out of the fumigant lines into the soil using compressed gas or compressed air. If the rig uses a centrifugal pump instead of compressed gas to inject fumigant into the soil, you may clear residual fumigant from the fumigant lines using an application wand connected to the system's low point via a drain hose. Place the wand in the soil until all residual fumigant has drained from the system. The wand and drain hose must be free of dirt to allow proper drainage. At the end of the application season, disconnect all fumigant cylinders from the application rig. At the end of the season, seal all tubing openings with tape to prevent the entry of insects and dirt.

Application equipment must be calibrated and all control systems must be working properly. Proper calibration is essential for application equipment to deliver the correct amount of fumigant uniformly to the soil. Refer to the manufacturer's instructions on how to calibrate your equipment, usually the equipment manufacturer, fumigant dealer, or Cooperative Extension Service can provide assistance.

Planting Interval

After application, leave the soil undisturbed for 10 to 14 days. Wet soil retards diffusion of the fumigant, thus requiring a longer soil exposure period. At the end of the soil exposure period, aerate the soil by plowing or deep cultivation. If heavy rains accompanied by low temperatures occur during the soil exposure period, working the soil several times is essential for thorough aeration. Aeration is usually complete when the odor of the fumigant is no longer evident.

TABLE 1¹
PREPLANT SOIL FUMIGATION USES

Field soils to be planted to	Application Rate (pounds product/ treated acre) for untarped shank broadcast applications	Application Rate (pounds product/ treated acre) for tarped shank bed, strip and broadcast; untarped shank bed; and untarped deep shank broadcast applications
Carrots, Onions, Potatoes,	204	150 - 409
Mint, Sweet Corn, Sugar Beets		

¹ Do not exceed specified maximum application rates in Table 1.

Calculating the Broadcast Equivalent Application Rate

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

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

Pounds 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

TREATED AREA

Space Between Beds/Strips is not treated

STRIKE 85CP Fumigant, EPA Reg. No. 87994-6, Draft Specimen Labeling, 2016 April 5, p. 17

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:

- 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.

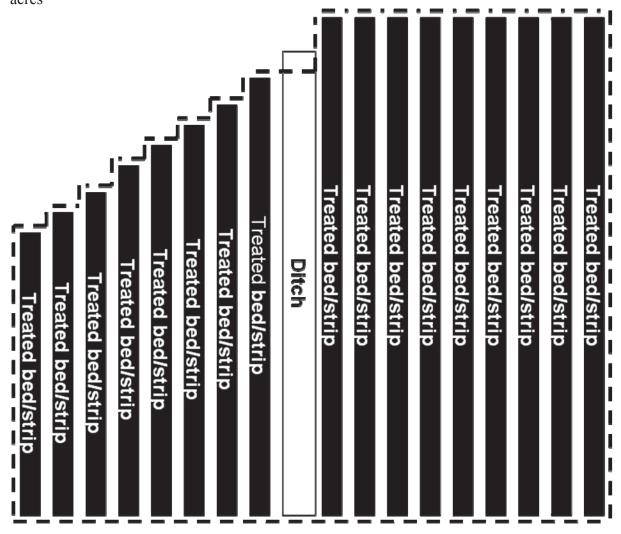
center-to-center row space Raised Raised Bed Bed center-to-center row space

Figure 2. Center Row Spacing

Sample broadcast equivalent rate calculation

Assumptions:

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



broadcast equivalent rate (pounds product/acre) =
$$\frac{30 \text{ inch width beds}}{60 \text{ inch row spacing}} = \frac{30 \text{ inch width beds}}{60 \text{ inch row spacing}} \times \frac{30 \text{ inch width beds}}{x} \times \frac{9.75 \text{ acres}}{10 \text{ acres}} \times \frac{200 \text{ pounds}}{x} \times \frac{10 \text{ acres}}{x} \times \frac{9.75 \text{ acres}}{x} \times \frac{200 \text{ pounds}}{x} \times \frac{10 \text{ acres}}{x} \times \frac{10 \text{ ac$$

Buffer Zone Requirements

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

- 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 Exemption for Transit on Roadways*).
 - O 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 chloropicrin buffer zone(s).
- To reduce the potential for off-site movement from multiple fumigated fields, buffer zones from multiple chloropicrin 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.

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:
 - 1. The storage buildings are not occupied during the buffer zone period, and
 - 2. 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,
 - 1) The buffer zone period has ended, and
 - 2) 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 chloropicrin 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
 - Entry by non-handlers is prohibited during the buffer zone period.
 <u>Buffer Zone Exemption for Transit on Roadways</u>
 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.
- For all other applications Tables 2 to 7 must be used to determine the minimum buffer distances as appropriate for the method of application. 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 2. Strip Tarp Buffer Zone Distances in Feet

1 401	e 2. N	эшр	raip	Dunc	LOII	C DIS	tarice.	3 1111	cci				Applic	ation	Block	Size (A	Acres)												
		1	2	3	4	5	6	7	8	9	10	15	20	25	30	35	40	50	60	70	80	90	100	110	120	130	140	150	160
	53	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	30	30	35	35
	59	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	30	35	38	41	44	47
	65	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	30	30	30	35	40	45	49	53	56	60
	71	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	30	36	50	55	60	65	70	76	81	87
	77	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	34	43	60	75	85	100	108	117	125	133
	82	25	25	25 25	25	25 25	25	25	25	25	25 25	25	25 25	25	25	25	25	25 46	25	38	50	75	100	115	130	141	152 175	163 188	173
	88 94	25 25	25 25	25	25 25	25	25 25	25 25	25 25	25 25	25	25 25	25	25 30	30	32	36 48	68	56 88	70 102	83 116	110	125 145	135 160	150 175	163 190	204	219	200
	100	25	25	25	25	25	25	25	25	25	25	25	25	30	34	46	59	89	119	134	149	164	179	194	209	226	244	261	279
	106	25	25	25	25	25	25	25	25	25	25	30	33	41	50	65	79	114	149	166	184	196	214	232	249	269	290	311	331
	112	25	25	25	25	25	25	25	25	25	25	37	49	64	80	94	108	142	176	198	221	236	258	279	298	323	348	373	397
	117	25	25	25	25	25	25	25	25	25	25	45	64	87	110	123	136	170	203	230	258	277	302	326	348	377	406	435	463
	123	25	25	25	25	25	25	25	25	25	25	53	80	110	140	153	165	198	230	263	295	325	355	382	407	441	475	509	543
	129	25	25	25	25	25	25	30	30	31	32	66	100	129	157	170	184	218	253	280	306	356	389	419	446	483	520	558	595
Acre	135	25	25	25	25	25	30	31	34	36	39	80	120	147	174	188	202	239	276	297	318	388	424	456	485	525	566	606	647
uct/,	141	25	25	25 25	25	25	30	34	38	42	46	93	140	166	191	206	221	260	299	314	329	419	458	493	524	568	611	655	699
rod	147 153	25 25	25 25	25	25 25	25 25	31	38 44	53	51 62	57 71	106 117	154 163	182 195	209 228	224	239 258	302	322 346	340 375	358 404	451 482	492 526	529 566	563 602	610 652	657 702	704 753	751 803
lbs I	158	25	25	25	25	25	37	49	61	74	86	129	171	209	246	261	276	324	371	410	449	514	561	603	641	694	748	801	855
ate (164	25	25	25	25	25	40	55	70	85	100	140	180	223	265	280	295	345	395	445	495	545	595	640	680	737	793	850	907
n R	170	25	30	31	34	36	52	68	83	99	114	154	194	238	282	301	319	371	424	474	525	577	629	677	721	781	841	901	961
atio	176	25	31	36	42	48	64	80	96	112	129	169	209	254	299	321	344	398	452	504	555	609	664	714	761	825	888	952	1015
oplic	182	25	34	42	51	59	76	93	109	126	143	183	223	270	316	342	368	424	481	533	585	641	698	751	802	869	936	1003	1070
t A J	188	25	36	46	57	68	85	102	118	135	152	194	235	283	330	360	389	448	506	561	615	674	732	789	843	913	983	1054	1124
aler	193	25	37	49	61	74	90	107	123	140	156	201	245	293	340	374	408	469	529	587	645	706	766	826	884	957	1031	1104	1178
quiv	199	25	39	52	66	79	96	112	128	144	161	208	255	303	350	388	426	489	552	614	675	738	801	863	924	1001	1078	1155	1232
ıst E	205 211	25 25	40	55 57	70 72	85 87	101 104	117 120	133 137	149	165 170	215 221	265 273	313	360 370	403	445 457	510 525	575 591	640 658	705 725	770 792	835 859	900 926	965 993	1045 1075	1126 1158	1206 1241	1287 1323
Broadcast Equivalent Application Rate (Ibs Product/Acre)	217	25	42	58	74	90	104	124	141	158	174	227	280	331	381	426	470	539	608	677	745	814	883	951	1020	1105	1190	1275	1360
Bro	223	25	43	60	76	92	110	127	144	162	179	233	288	340	391	438	483	554	624	695	765	836	907	977	1048	1135	1222	1310	1397
	229	25	45	61	78	95	113	131	148	166	184	240	295	349	401	449	496	568	641	713	785	858	930	1003			1255		1434
	234	25	46	63	80	97	115	134	152	170	189	246	303	358	411	461	509	583	657	731	805	880	954	1029	1103	1195	1287	1379	1470
	240	25	47	64	82	100	118	137	156	175	193	252	310	367	422	472	521	597	674	750	825	902	978	1054	1130	1225	1319	1413	1507
	246	30	48	66	84	102	121	140	160	179	198	258	318	376	432	484	534	612	690	768	846	924	1002		1158	1255	1351	1448	1544
	252	30	49	68	86	104	124	144	163	183	203	264	326	385	442	495	547	627	706	786	866	946	1026	1106		1284	1383	1482	1581
	258	31	50	69	88	107	127	147	167	187	207	270	333	393	453	507	559	641	723	805	886	968				1314			
	264 270	32	51	71 72	90	109	130	150	171	192 196	212	276	341	402	463	518	572 585	656	739 756	823 841	906 927	990	1074	1157 1183				1551 1585	
	275	34	54	74	92	112	136	154	175 179	200	222	289	356	411	483	541	598	670	772	859	947		1121	1209				1620	1728
	281	34	55	75	96	117	139	160	182	204	226	295	363	429	494	553	610	699	789	878	967			1234			-	1654	
	287	35	56	77	98	119	141	164	186	209	231	301	371	438	504	564	623	714	805	896	987				1351			1689	
	293	36	57	79	100	121	144	167	190	213	236	307	379	447	514	576	636	729	821	914	1007			1286		1493	1608	1723	1838
	299	36	58	80	102	124	147	171	194	217	240	313	386	456	525	587	648	743	838	933	1027	1122	1217	1311	1406	1523	1641	1758	1875
	305	37	59	82	104	126	150	174	198	221	245	319	394	465	535	599	661	758	854	951	1047	1144	1241	1337	1434	1553	1673	1792	1912
	310	38	61	83	106	129	153	177	201	225	250	326	401	474	545	610	674	772	870	969	1067	1166	1264	1363	1461	1583	1705	1827	1948

Table 3. Bed Tarp Buffer Zone Distances in Feet

140	3.1) (u 1)	шр Б	unci	Lone	Dista	inces	11110	Ct				Annlia	eation	Block	Size (A cres)											
		1	2	3	4	5	6	7	8	9	10	15	20	25	30	35	40	50	60	70	80	90	100	110	120	130	140	150	160
	88	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	30	35	40	45
	94	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	34	43	51	60	65	70	75	80
	100	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	43	60	78	95	103	111	119	127
	106	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	40	55	74	93	119	145	157	169	181	193
	112	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	55	85	105	125	160	195	211	228	244	260
	117	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	45	63	93	123	143	163	193	223	241	260	278	297
	123	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	65	100	130	160	180	200	225	250	271	292	313	333
	129	25	25	25	25	25	25	25	25	25	25	25	25	25	25	45	65	135	155	183	210	230	250	283	315	341	368	394	420
	135	25	25	25	25	25	25	25	25	25	25	25	25	25	43	70	95	145	168	203	238	256	275	310	345	374	403	431	460
	141	25	25	25	25	25	25	25	25	25	25	25	25	25	60	95	125	155	180	223	265	283	300	338	375	406	438	469	500
	147	25	25	25	25	25	25	25	25	25	25	25	25	55	78	110	143	188	210	251	293	315	338	388	438	474	510	547	583
c re)	153	25	25	25	25	25	25	25	25	25	25	25	25	85	95	125	160	220	240	280	320	348	375	438	500	542	583	625	667
t/A	158	25	25	25	25	25	25	25	25	25	25	25	50	103	113	143	180	230	253	300	348	374	400	463	525	569	613	656	700
Equivalent Application Rate (1bs Product/Acre	164	25	25	25	25	25	25	25	25	25	25	25	75	120	130	160	200	240	265	320	375	400	425	488	550	596	642	688	733
s Pro	170	25	25	25	25	25	25	25	25	25	25	45	100	135	160	175	220	275	300	350	400	438	475	528	580	628	677	725	773
(1b	176	25	25	25	25	25	25	25	25	25	25	70	120	148	178	200	248	298	325	379	433	466	500	555	610	661	712	763	813
\ ate	182	25	25	25	25	25	25	25	25	25	25	95	140	160	195	225	275	320	350	408	465	495	525	583	640	693	747	800	853
on F	188	25	25	25	25	25	25	25	25	25	25	108	153	178	213	243	283	330	373	428	483	523	563	613	663	718	773	828	883
cati	193	25	25	25	25	25	25	25	25	25	25	120	165	195	230	260	290	340	395	448	500	550	600	643	685	742	799	856	913
p p l i	199	25	25	25	25	25	29	33	37	41	45	128	173	213	245	278	310	360	410	474	538	588	638	678	718	777	837	897	957
t A	205	25	25	25	25	25	33	41	49	57	65	135	180	230	260	295	330	380	425	500	575	625	675	713	750	813	875	938	1000
alen	211	25	25	25	25	25	34	42	50	59	67	139	185	237	267	303	339	391	437	514	591	643	694	733	771	836	900	964	1029
u iv	217	25	25	25	25	25	35	43	52	60	69	143	190	243	275	312	349	402	449	529	608	661	714	753	793	859	925	991	1057
	223	25	25	25	25	25	36	45	53	62	71	147	195	250	282	320	358	413	461	543	624	679	733	774	814	882	950	1018	1086
cas	229	25	25	25	25	30	37	46	55	64	72	150	201	256	290	329	368	423	474	557	641	696	752	794	836	905	975	1045	1114
B ro ad cast	234	25	25	25	25	30	38	47	56	65	74	154	206	263	297	337	377	434	486	571	657	714	771	814	857	929	1000		1143
В	240	25	25	25	30	30	39	48	57	67	76	158	211	269	305	346	387	445	498	586	674	732	791	835	879	952	1025	1098	1171
	246	25	25	25	30	30	40	49	59	68	78	162	216	276	312	354	396	456	510	600	690	750	810	855	900	975	1050	-	1200
	252	25	25	25	30	30	41	50	60	70	80	166	221	283	319	362	405	467	522	614	706	768	829	875	921	998		1152	1229
	258	25	25	25	30	30	41	52	62	72	82	170	226	289	327	371	415	478	534	629	723	786	849	896	943			1179	
	264	25	25	25	30	35	42	53	63	73	84	174	231	296	334		424	489	546	643	739	804	868	916				1205	
	270	25	25	25	30	35	43	54	64	75	85	177	237	302	342	388	434	499	559	657	756	821	887	936				1232	
	275	25	25	25	30	35	44	55	66	77	87	181	242	309	349	396	443	510	571	671	772	839	906	957	1007		1175		
	281	25	25	25	30	35	45	56	67	78	89	185	247	315	357	405	453	521	583	686	789	857	926	977	1029		1200		_
	287	25	25	25	30	35	46	57	69	80	91	189	252	322	364	413	462	532	595	700	805	875	945	998	-	1138	1225		
	293	25	25	30	30	35	47	59	70	81	93	193	257	329	371	421	471	543	607	714	821	893	964		1071			1339	
	299	25	25	30	35	40	48	60	71	83	95	197	262	335	379	430	481	554	619	729	838	911	984		1093		1275	-	1457
	305	25	25	30	35	40	49	61	73	85	97	201	267	342	386	438	490	565	631	743	854	929	1003			1207	1300		
	310	25	25	30	35	40	50	62	74	86	98	204	273	348	394	447	500	575	644	757	871	946	1022	1079	1136	1230	1325	1420	1514

Table 4. Bed Untarp (both preformed beds and beds listed/disk hilled at the time of application) Buffer Zone Distances in Feet

140	IC 4. I	Bea (Intarp	o (bot	n pre	Iorme	ea be	as an	a bea	s liste	a/ais					applic			ter Zo	one D	istanc	es in	Feet						
													Appli			Size (Acres)											
		1	2	3	4	5	6	7	8	9	10	15	20	25	30	35	40	50	60	70	80	90	100	110	120	130	140	150	160
	41	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	40	50	60	75
	47	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	75	81	88	94	100
	53	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	40	65	90	93	95	121	148	160	172	184	197
	59	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	55	105	155	160	165	193	220	238	257	275	293
	65	25	25	25	25	25	25	25	25	25	25	25	25	25	25	43	55	88	108	148	188	198	208	229	250	271	292	313	333
	71	25	25	25	25	25	25	25	25	25	25	25	25	25	25	60	85	150	160	190	220	235	250	265	280	303	327	350	373
	77	25	25	25	25	25	25	25	25	25	25	25	25	53	63	100	120	183	193	223	253	285	318	349	380	412	443	475	507
	82	25	25	25	25	25	25	25	25	25	25	25	25	80	100	140	155	215	225	255	285	335	385	433	480	520	560	600	640
	88	25	25	25	25	25	25	25	25	25	25	45	95	125	150	200	215	240	275	325	375	425	475	520	565	612	659	706	753
	94	25	25	25	25	25	25	25	25	25	25	68	123	155	183	225	240	278	330	378	425	475	525	566	608	658	709	759	810
	100	25	25	25	25	25	25	25	25	25	25	90	150	185	215	250	265	315	385	430	475	525	575	613	650	704	758	813	867
	106	25	25	25	25	25	25	32	39	46	53	115	168	203	233	268	293	350	433	481	530	576	623	668	713	772	831	891	950
	112	25	25	25	25	25	25	39	53	66	80	140	185	220	250	285	320	385	480	533	585	628	670	723	775	840	904	969	1033
	117	25	25	25	25	25	25	43	61	79	98	153	200	238	280	318	350	418	510	570	630	679	728	776	825	894	963	1031	1100
1 🙃	123	25	25	25	25	25	25	48	70	93	115	165	215	255	310	350	380	450	540	608	675	730	785	830	875	948	1021	1094	1167
Acre	129	25	25	25	25	25	25	51	78	104	130	200	250	310	350	400	435	490	575	650	725	778	830	898	965	1045	1126	1206	1287
ct/,	135	25	30	32	36	39	43	68	94	119	145	213	268	330	365	418	455	533	608	679	750	799	848	928	1008	1091	1175	1259	1343
Broadcast Equivalent Application Rate (lbs Product/Acre)	141	25	32	39	46	53	60	85	110	135	160	225	285	350	380	435	475	575	640	708	775	820	865	958	1050	1138	1225	1313	1400
s Pı	147	30	40	49	59	68	78	101	125	149	173	243	303	368	415	460	513	613	660	743	825	873	920	1000	1080	1170	1260	1350	1440
(B)	153	30	43	56	69	82	95	118	140	163	185	260	320	385	450	485	550	650	680	778	875	925	975	1043	1110	1203	1295	1388	1480
?ate	158	30	45	59	74	88	103	126	150	174	198	273	335	405	468	510	565	668	730	815	900	969	1038	_	1143	1238	1333	1428	1523
on]	164	35	50	65	80	95	110	135	160	185	210	285	350	425	485	535	580	685	780	853	925	1013	1100	1138		1273	1371	1469	1567
cati	170	40	56	72	88	104	120	146	173	199	225	315	385	440	540	575	625	775	870	915	960	1068	1175	1250	-	1435	1546	1656	1767
ilde	176	45	63	80	98	115	133	159	185	211	238	328	393	463	553	600	650	805	893	974	1055	1149	1243	1340		1557	1677	1797	1917
t A _J	182	50	69	88	107	126	145	171	198	224	250	340	400	485	565	625	675	835	915	1033	1150	1230	1310	1430		1679	1808	1938	2067
alen	188	55	75	94	114	133	153	181	210	239	268	358	418	508	578	645	720	855	948	1055	1165	1255	1345	1479	1613	1747	1881	2016	2150
uiv	193	60	80	100	120	140	160	191	223	254	285	375	435	530	590	665	765	875	980	1080	1180	1280	1380	1528	1675	1815	1954	2094	2233
Eq	199	65	88	111	134	157	180	211	243	274	305	418	460	555	633	708	778	925		1164	1253	1363	1473	1586		1842	1983	2125	2267
cast	205	75	100	125	150	175	200	231	263	294	325	460	485	580	675	750	790	975	1170	1248	1325	1445	1565	1645		1869	2013	-	2300
oad	211	77	103	129	154	180	206	238	270	302	334	473	499	597	694	771	813	1003	1203	1283	1363	1486	1610	1692	1774	1922	2070		2366
Br	217	79	105	132	159	185	211	244	278	311	344	486	513	613	714	793	835	1003		1319	1401	1528		1739		_	-	2279	2431
	223	81	100	136	163	190	217	251	285	319	353	499	527	630	733	814	858	1051	1270	1354	1439	1569	1699	1786	-	2029	2128	2341	2497
	229	-	-	-		-		-		327			540						-	-								2403	2563
1	234	84	111	139	167	195	223	258	293		362	513		646	752	836	880	1086	1304 1337	1390	1476	1610	1744	1833	1922	2082 2136	2243	2403	2629
1	-	86	114	143	171	200	229	264	300	336	371	526	554	663	771	857	903	1114	-	1426	1514	1651	1789	1880	1971	2136	2300	-	-
1	240	88	117	146	176	205	234	271 278	308	344	381	539	568 582	679 696	791	879	925	1142	1371	1461	1552	1693	1833	1927	2021	_	2358	2526	2694
1	246	90	120	150	180	210	240		315	353	390	552			810	900	948	1170	1404	1497	1590	1734	1878	1974	2070	2243	2415	2588	2760
1	252 258	92 94	123 126	154 157	184	215 220	246	284 291	323 330	361	399 409	565 578	596 610	713	829 849	921 943	971 993	1198		1533	1628	1775			2119			2649 2711	2826
		-		-																								-	
1	264	96	129	161	193	225	257	297	338	378	418	591	624	746	868	964	1016	1254		1604			-		-		2588		2957
1	270	99	131	164	197	230	263	304	345	386	427	605	637	762	887	986	1038	1281		1640	1741	1899			2267		2645	2834	3023
1	275	101	134	168	201	235	269	311	353	394	436	618	651	779	906	1007	1061	1309		1675	1779				2316			-	
	281	103	137	171	206	240	274	317	360	403	446	631	665	795	926	1029	1083	1337		1711						_	_	2957	
1	287	105	140	175	210	245	280	324	368	411	455	644	679	812	945		1106	1365	1638		1855						2818		3220
	293	107	143	179	214	250	286	330	375	420	464	657	693	829	964	1071	1129	1393	1671	1782	1893	2064			2464		-	3080	3286
	299	109	146	182	219	255	291	337	383	428	474	670	707	845	984		1151	1421	-	1818	_	2106	2280		2514	2723		3142	3351
1	305	111	149	186	223	260	297	344	390	436	483	683	721	862	1003	1114	1174	1449		1853	1969		2325			2776		3204	3417
	310	114	151	189	227	265	303	350	398	445	492	697	734	878	1022	1136	1196	1476	1772	1889	2006	2188	2370	2491	2612	2830	3048	3265	3483

If after applying applicable credits, the buffer zone distances are still greater than $\frac{1}{2}$ mile (2,640 feet), then the application is prohibited.

Buffer for Compacted Untarped Beds (beds listed/disk hilled and compacted at the time of application in one pass) is 25 feet.

Table 5. Broadcast Tarp Buffer Zone Distances in Feet

No.		T	Divac		-u-p		1 201			U 11.1				A 1°		D1 1	a: /													
Part					_									- î)											
No. Part			1	2	3	4	5	6	7	8	9	10	15	20	25	30	35	40	50	60	70	80	90	100	110	120	130	140	150	160
Fig. Part		82	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	30	30	35	40	45	50	55
Fig. Part		94	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	30	32	37	40	43	45	45	50	55	60	64	69	73
14 15 15 15 15 15 15 15		106	-															30		49				-				-	88	93
14		\vdash	-		_	_											-				-		_	-		-		-	-	127
Part		-	-		_												-									-			-	_
No. Part		117	25			25	25	25				25				25	30		53	7/3	85	97	110	115	120	125		146	156	167
14 15 15 15 15 15 15 15		123	25	25	25	25	25	25	25	25	25	25	25	25	25	25	30	35	60	85	100	115	130	145	160	170	184	198	213	227
		129	25	25	25	25	25	25	25	25	25	25	30	34	36	38	45	51	78	104	120	136	150	165	180	190	206	222	238	253
		135	25	25	25	25	25	25	25	25	25	25	34	42	46	51	59	68	95	122	140	158	170	185	200	210	228	245	263	280
		141	25				25				25		38	51	57	64	-	84		141						-			300	320
Fig. 1.5 1.5 2.5		-	-														-									-				_
Fig. 18 18 18 18 18 18 18 1		-										-					-													367
		\vdash	-											_			103		148		_			-				-	371	396
Part		158	25	25	25	25	25	25	25	25	25	25	51	76	89	102	118	134	165	196	220	244	268	290	310	330	358	385	413	440
Part		164	25	25	25	25	25	25	25	25	25	25	55	85	100	115	133	150	183	215	240	265	290	315	335	355	385	414	444	473
Part		170	25	25	25	25	25	30	30	30	32	34	64	94	112	129	147	164	198	231	259	286	311	335	360	380	412	443	475	507
No column		-	-														-				-								519	553
Fig.		-	-		_	_	_							_			-				_			-					550	_
Part		\vdash	-														-				_			-		-	_	-	-	587
Part		\vdash	-														-				-			-		-			600	640
Part		193	25	25		25	25	34	42	51	59	68	100	131	159	186	204	221			333	369		439	474	504		588	630	672
Part		199	25	25	25	25	25	35	46	56	66	76	109	141	171	201	218	236	275	314	351	389	427	465	503	536	581	625	670	715
287		205	25	25	25	25	25	37	49	61	73	85	118	150	183	215	233	250	290	330	370	410	450	490	530	565	612	659	706	753
287	re)	211	25	30	30	30	32	45	58	70	83	96	129	161	194	226	249	271	312	353	394	434	474	514	554	589	638	687	736	785
287	Ac		-																		-								768	819
287	ıct/	\vdash																												
287	ıpο	\vdash				_											-			_				-		-		-	798	851
287	s Pr	229		32			54	68		98	113	128			228		297			421	464	507		587	627	662			828	883
287	(lb	234	25	34	43	52	61	76	92	107	123	139	173	207	240	272	313	354	399	444	488	531	571	611	651	686	744	801	858	915
287	ate	240	25	36	46	57	68	84	100	117	133	149	184	219	251	284	329	374	421	467	511	556	596	636	676	711	770	829	888	948
287	J.R.	246	25	38	50	63	75	92	109	126	143	160	195	230	263	295	345	395	443	490	535	580	620	660	700	735	796	858	919	980
287	tioi	\vdash	-														-									-			937	999
287 25 50 75 100 125 140 155 170 185 200 248 295 345 395 443 490 540 590 635 680 720 760 800 835 905 974 10 293 25 51 77 103 129 144 159 174 189 204 254 303 355 407 453 499 551 604 656 708 748 788 828 863 935 1007 10 299 25 52 79 105 132 147 163 178 193 209 260 311 365 419 463 507 563 619 677 736 776 816 856 891 965 1039 11 305 25 53 80 108 136 151 167 182 197 213 266 319 375 431 474 516 574 633 698 764 804 844 884 919 995 1072 11 310 25 54 82 111 139 155 170 186 202 217 272 326 385 444 484 524 586 647 719 791 831 871 911 946 1025 1104 11 316 25 54 84 113 143 159 174 190 206 221 278 334 395 456 494 533 597 661 740 819 859 899 939 974 1055 1137 12 322 25 55 86 116 146 162 178 194 210 226 284 342 405 468 505 541 609 676 761 847 887 927 967 1002 1086 1169 12 3340 25 57 89 122 154 171 188 205 222 239 300 361 423 484 526 569 642 715 798 881 921 961 1001 1036 1123 1209 12 340 25 58 91 124 158 176 194 212 230 248 310 373 430 488 538 588 664 740 814 888 928 968 1008 1043 1129 1216 13 346 25 59 93 127 161 180 199 218 237 256 320 384 438 491 549 606 686 765 829 894 934 974 1014 1049 1136 1224 13 351 25 60 95 130 165 185 205 225 245 265 330 395 445 498 554 608 661 752 843 900 940 980 1020 1065 1143 1231 357 30 64 100 136 172 192 212 233 253 273 341 408 406 512 573 633 718 803 862 920 960 1000 1040 1075 1165 1254 13 369 35 73 110 148 185 206 227 248 269 290 363 435 490 545 598 650 740 830 895 960 1000 1040 1075 1165 1254 13 369 35 73 110 148 185 206 227 248 269 290 363 435 490 545 598 650 740 830 895 960 1000 1040 1075 1165 1254 13 369 35 73 110 148 185 206 227 248 269 290 363 435 490 545 598 650 740 830 895 960 1000 1040 1075 1165 1254 13 360 35 73 110 148 185 206 227 248 269 290 363 435 490 545 598 660 740 830 895 960 1000 1040 1075 1165 1258 138 360 44 81 120 159 198 218 239 260 280 301 376 452 513 573 628 682 775 869 927 986 1036 1086 1126 1166 1263 1360 14 392 44 83 123 163 202 123 243 263 284 304 381 458 520 582 638 693 877 881 938 994 1044 1094 1139 1179 1277 1376 14	ica	\vdash	-		-												-									-			954	1018
287	þþ	-																											-	_
287	t A	-	-				_														-								972	1037
287	lca	270	25	45	64	84	104	119	135	151	167	183	225	267	310	352	401	449	498	547	592	637	677	717	757	792	858	924	990	1056
287	.0ac	275	25	46	68	89	111	126	142	157	173	189	233	276	321	366	415	463	512	561	606	651	691	731	771	806	874	941	1008	1075
293	Ē	281	25	48	71	95	118	133	148	164	179	194	240	286	333	381	429	476	526	576	621	666	706	746	786	821	889	958	1026	1094
299		287	25	50	75	100	125	140	155	170	185	200	248	295	345	395	443	490	540	590	635	680	720	760	800	835	905	974	1044	1113
299		293	25	51	77	103	129	144	159	174	189	204	254	303	355	407	453	499	551	604	656	708	748	788	828	863	935	1007	1079	1150
305 25 53 80 108 136 151 167 182 197 213 266 319 375 431 474 516 574 633 698 764 804 844 884 919 995 1072 11 310 25 54 82 111 139 155 170 186 202 217 272 326 385 444 484 524 586 647 719 791 831 871 911 946 1025 1104 11 316 25 54 84 113 143 159 174 190 206 221 278 334 395 456 494 533 597 661 740 819 859 899 939 974 1055 1137 12 322 25 55 86 116 146 162 178 194 210 226 284 342 405 468 505 541 609 676 761 847 887 927 967 1002 1086 1169 12 328 25 56 88 119 150 166 182 198 214 230 290 350 415 480 515 550 620 690 783 875 915 955 995 1030 1116 1202 12 334 25 57 89 122 154 171 188 205 222 239 300 361 423 484 526 569 642 715 798 881 921 961 1001 1036 1123 1209 12 340 25 58 91 124 158 176 194 212 230 248 310 373 430 488 538 588 664 740 814 888 928 968 1008 1043 1129 1216 13 346 25 59 93 127 161 180 199 218 237 256 320 384 438 491 549 606 686 765 829 894 934 974 1014 1049 1136 1224 13 351 25 60 95 130 165 185 205 225 245 265 330 395 445 495 560 625 708 790 845 900 940 980 1020 1055 1143 1231 13 357 30 64 100 136 172 192 212 233 253 273 341 408 460 512 573 633 718 803 862 920 960 1000 1040 1075 1165 1254 13 363 32 68 105 142 178 199 220 240 261 282 352 422 475 528 585 642 729 817 878 940 980 1020 1060 1095 1186 1278 13 369 35 73 110 148 185 206 227 248 269 290 363 435 490 545 598 650 740 830 895 960 1000 1040 1075 1165 1254 13 375 37 75 113 151 189 210 231 252 273 294 367 441 498 554 608 661 752 843 906 969 1012 1052 1092 1127 1221 1315 14 386 41 81 120 159 198 218 239 260 280 301 376 452 513 573 628 682 775 869 927 986 1036 1086 1126 1166 1263 1360 14 392 44 83 123 163 202 223 243 263 284 304 381 458 520 582 688 693 787 881 938 994 1044 1094 1139 1179 1277 1376 14		\vdash	-																											<u> </u>
310		-	-		_	-											-				_	-		-		-		-	-	1188
316		\vdash			_	_																				-			1148	1225
322		310	25	54	82	111	139	155			202	217		326		444	_	524		647	-						1025		1183	1262
328		316	25	54	84	113	143	159	174	190	206	221	278	334	395	456	494	533	597	661	740	819	859	899	939	974	1055	1137	1218	1299
344		322	25	55	86	116	146	162	178	194	210	226	284	342	405	468	505	541	609	676	761	847	887	927	967	1002	1086	1169	1253	1336
344		328	25	56	88	119	150	166	182	198	214	230	290	350	415	480	515	550	620	690	783	875	915	955	995	1030	1116	1202	1288	1373
340			25																	715				961					-	_
346		-			_																			-		-				
351		-																								-				<u> </u>
357 30 64 100 136 172 192 212 233 253 273 341 408 460 512 573 633 718 803 862 920 960 1000 1040 1075 1165 1254 13 363 32 68 105 142 178 199 220 240 261 282 352 422 475 528 585 642 729 817 878 940 980 1020 1060 1095 1186 1278 13 369 35 73 110 148 185 206 227 248 269 290 363 435 490 545 598 650 740 830 895 960 1000 1040 1080 1115 1208 130 13 375 37 75 113 151 189 210 231 252 273 294 367 441 498 554 608 661 752 843 906 969 1012 1052 1092 1127 1221 1315 14 381 39 78 116 155 194 214 235 256 276 297 372 446 505 564 618 671 764 856 916 977 1027 1077 1117 1155 1251 1348 14 386 41 81 120 159 198 218 239 260 280 301 376 452 513 573 628 682 775 869 927 986 1036 1086 1126 1166 1263 1360 14 392 44 83 123 163 202 223 243 263 284 304 381 458 520 582 638 693 787 881 938 994 1044 1094 1139 1179 1277 1376 14		\vdash	-		_		_										-				_		_			-		-	1311	1398
363 32 68 105 142 178 199 220 240 261 282 352 422 475 528 585 642 729 817 878 940 980 1020 1060 1095 1186 1278 133 369 35 73 110 148 185 206 227 248 269 290 363 435 490 545 598 650 740 830 895 960 1000 1040 1080 1115 1208 1301 133 375 37 75 113 151 189 210 231 252 273 294 367 441 498 554 608 661 752 843 906 969 1012 1052 1092 1127 1221 1315 144 381 39 78 116 155 194 214 235 256 276 297 372 446 505 564 618 671 764 856 916 977 1027 1077 1117 1155 1251 1348 144 386 41 81 120 159 198 218 239 260 280 301 376 452 513 573 628 682 775 869 927 986 1036 1086 1126 1166 1263 1360 144 392 44 83 123 163 202 223 243 263 284 304 381 458 520 582 638 693 787 881 938 994 1044 1094 1139 1179 1277 1376 145		351	25	60	95	130	165	185	205	225	245	265	330	395	445	495	560	625	708	790	845	900	940	980	1020	1055	1143	1231	1319	1407
369 35 73 110 148 185 206 227 248 269 290 363 435 490 545 598 650 740 830 895 960 1000 1040 1080 1115 1208 1301 13 375 37 75 113 151 189 210 231 252 273 294 367 441 498 554 608 661 752 843 906 969 1012 1052 1092 1127 1221 1315 14 381 39 78 116 155 194 214 235 256 276 297 372 446 505 564 618 671 764 856 916 977 1027 1077 1117 1155 1251 1348 14 386 41 81 120 159 198 218 239 260 280 301 376 452 513 573 628 682 775 869 927 986 1036 1086 1126 1166 1263 1360 14 392 44 83 123 163 202 223 243 263 284 304 381 458 520 582 638 693 787 881 938 994 1044 1094 1139 1179 1277 1376 14		357	30	64	100	136	172	192	212	233	253	273	341	408	460	512	573	633	718	803	862	920	960	1000	1040	1075	1165	1254	1344	1433
369 35 73 110 148 185 206 227 248 269 290 363 435 490 545 598 650 740 830 895 960 1000 1040 1080 1115 1208 1301 13 375 37 75 113 151 189 210 231 252 273 294 367 441 498 554 608 661 752 843 906 969 1012 1052 1092 1127 1221 1315 14 381 39 78 116 155 194 214 235 256 276 297 372 446 505 564 618 671 764 856 916 977 1027 1077 1117 1155 1251 1348 14 386 41 81 120 159 198 218 239 260 280 301 376 452 513 573 628 682 775 869 927 986 1036 1086 1126 1166 1263 1360 14 392 44 83 123 163 202 223 243 263 284 304 381 458 520 582 638 693 787 881 938 994 1044 1094 1139 1179 1277 1376 14		363	32	68	105	142	178	199	220	240	261	282	352	422	475	528	585	642	729	817	878	940	980	1020	1060	1095	1186	1278	1369	1460
375 37 75 113 151 189 210 231 252 273 294 367 441 498 554 608 661 752 843 906 969 1012 1052 1092 1127 1221 1315 14 381 39 78 116 155 194 214 235 256 276 297 372 446 505 564 618 671 764 856 916 977 1027 1077 1117 1155 1251 1348 14 386 41 81 120 159 198 218 239 260 280 301 376 452 513 573 628 682 775 869 927 986 1036 1086 1126 1166 1263 1360 14 392 44 83 123 163 202 223 243 263 284 304 381 458 520 582 638 693 787 881 938 994 1044 1094 1139 1179 1277 1376 14			35	73					227		269							650		830						-				<u> </u>
381 39 78 116 155 194 214 235 256 276 297 372 446 505 564 618 671 764 856 916 977 1027 1077 1117 1155 1251 1348 14 386 41 81 120 159 198 218 239 260 280 301 376 452 513 573 628 682 775 869 927 986 1036 1086 1126 1166 1263 1360 14 392 44 83 123 163 202 223 243 263 284 304 381 458 520 582 638 693 787 881 938 994 1044 1094 1139 1179 1277 1376 14		\vdash	-														-				_			-		-				_
386 41 81 120 159 198 218 239 260 280 301 376 452 513 573 628 682 775 869 927 986 1036 1086 1126 1166 1263 1360 14 392 44 83 123 163 202 223 243 263 284 304 381 458 520 582 638 693 787 881 938 994 1044 1094 1139 1179 1277 1376 14		-																								-			-	_
392 44 83 123 163 202 223 243 263 284 304 381 458 520 582 638 693 787 881 938 994 1044 1094 1139 1179 1277 1376 14		-			_		_																			-			1444	
		\vdash	41	81		159	_					301					628			869						-			1458	
398 46 86 126 166 206 227 247 267 288 308 386 464 528 591 648 704 799 894 949 1003 1053 1053 1148 1188 1287 1386 14		392	44	83	123	163	202	223	243	263	284	304	381	458	520	582	638	693	787	881	938	994	1044	1094	1139	1179	1277	1376	1474	1572
		398	46	86	126	166	206	227	247	267	288	308	386	464	528	591	648	704	799	894	949	1003	1053	1053	1148	1188	1287	1386	1485	1584
404 48 89 129 170 211 231 251 271 291 311 390 469 535 601 658 714 811 907 959 1011 1061 1111 1156 1196 1296 1395 14	ì	404	48	89	129	170	211	231	251	271	291	311	390	469	535	601	658	714	811	907	959	1011	1061	1111	1156	1196	1296	1395	1495	1595
	1																				-								1506	_
1 . 1 1 1 1 1 1 1 1			23	, 1	100	***	2.0	200	200	2,0		2.2	270	.,,5	2.5	5.0	500	. 20	525	220	2,0	- 520	-0,0	- 120	- 1 00	-200	-233	50	-230	-007

Table 6. Broadcast Untarp Buffer Distances in Feet

					<u> </u>		БШПС						Appli	cation	Block	Size (Acres)											
		1	2	3	4	5	6	7	8	9	10	15	20	25	30	35	40	50	60	70	80	90	100	110	120	130	140	150	160
	36	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	35	40	45	50	55	60	65	70
	41	25	25	25	25	25	25	25	25	25	25	25	25	25	25	30	35	43	50	63	75	85	95	105	115	125	134	144	153
	47	25	25	25	25	25	25	25	25	25	25	25	25	25	25	38	50	80	110	138	165	175	185	200	210	228	245	263	280
	53	25	25	25	25	25	25	25	25	25	25	25	25	41	58	76	95	133	170	201	233	253	283	310	330	358	385	413	440
	59	25	25	25	25	25	25	25	25	25	25	25	25	58	90	115	140	185	230	265	300	335	370	405	440	477	513	550	587
	65	25	25	25	25	25	25	25	25	25	25	46	68	100	133	161	190	238	285	325	365	405	445	485	520	563	607	650	693
	71	25	25	25	25	25	25	25	25	25	25	68	110	143	175	208	240	290	340	385	430	470	510	550	585	634	683	731	780
	77	25	25	25	25	25	30	33	37	41	45	95	145	183	220	253	285	343	400	448	495	540	585	630	670	726	782	838	893
Product/Acre	82	25	25	25	25	25	33	41	49	57	65	123	180	223	265	298	330	395	460	510	560	610	660	710	755	818	881	944	1007
ı ct/	88	25	25	30	30	30	42	56	70	84	98	158	218	263	307	343	380	452	523	578	633	688	743	798	848	919	989	1060	1131
ro d 1	94	25	30	30	30	32	52	72	92	112	132	194	257	303	348	389	430	508	587	647	707	767	827	887	942	1021	1099	1178	1256
S	100	25	30	30	33	35	61	87	113	139	165	230	295	343	390	435	480	565	650	715	780	845	910	975	1035	1121	1208	1294	1380
e (1b	106	25	34	43	52	61	86	111	136	161	186	248	309	366	423	473	523	616	709	794	879	949	1019	1089	1154	1250	1346	1443	1539
Rate	112	25	41	56	72	88	112	136	160	184	208	265	323	389	455	510	565	666	768	873	978	1053	1128	1203	1273	1379	1485	1591	1697
i 0 n	117	25	47	69	92	114	137	160	183	206	229	283	336	412	488	548	608	717	826	951	1076	1156	1236	1316	1391	1507	1623	1739	1855
ic a t	123 25 54 83 111 140 162 184 206 228 250 300 350 435 520 585 650 768 885 1030 1175 1260 1345 1430 1510 1636 1762 1888													2013															
Application	129 25 56 88 119 150 173 196 218 241 264 325 386 473 559 628 696 817 938 1079 1220 1310 1400 1490 1575 1706 1838 1969 2													2100															
st	135	25	59	93	126	160	184	207	231	254	278	350	422	510	598	670	742	867	991	1128	1265	1360	1455	1550	1640	1777	1913	2050	2187
adca	141	25	61	98	134	170	194	219	243	268	292	375	458	548	637	713	788	916	1044	1177	1310	1410	1510	1610	1705	1847	1989	2131	2273
B ro	147	25	64	103	141	180	205	230	256	281	306	400	494	585	676	755	834	966	1097	1226	1355	1460	1565	1670	1770	1918	2065	2213	2360
	153	25	66	108	149	190	216	242	268	294	320	425	530	623	715	798	880	1015	1150	1275	1400	1510	1620	1730	1825	1977	2129	2281	2433
	158	25	71	118	164	210	238	265	293	320	348	450	553	651	750	833	915	1040	1165	1314	1463	1578	1695	1810	1925	2085	2246	2406	2567
	164	25	76	128	179	230	259	288	317	346	375	475	575	680	785	868	950	1065	1180	1353	1525	1645	1765	1885	2005	2172	2339	2506	2673
	170	25	78	130	183	235	268	301	334	367	400	500	600	706	811	903	994	1108	1223	1402	1581	1706	1831	1956	2080	2253	2427	2600	2773
	176	25	79	133	186	240	277	314	351	388	425	525	625	731	838	938	1038	1151	1265	1451	1638			2030		2340	2520	2700	2880
	182	25	80	135	190	245	286		368	409	450	550													-			2831	
	188 25 81 138 194 250 295 340 385 430 475 575 675 783 890 1008 1125 1238 1350 1550 1750 1910 2070 2230 2380 2578 2777 2975 3																												
	193 25 85 146 206 267 310 353 397 440 483 595 707 817 927 1038 1150 1283 1417 1600 1783 1943 2103 2263 2400 2600 2800 3000 32																												
	199	25	90	154	_	283			408	450	492	-		851		_										_		3031	
	205	25	94		231						500			_														3063	3267
			If a	fter a	pplyin	ıg app	licabl	e cre	dits th	e buf	fer zo	ne dis	stance	es are	still g	greate	r thar	1½ m	ile (2,	640 fe	eet), t	hen th	ne app	olicati	on is p	prohib	ited.		

STRIKE 85CP Fumigant, EPA Reg. No. 87994-6, Draft Specimen Labeling, 2016 April 5, p. 27

Table 7. Broadcast Deep (18 inches) Untarp Buffer Zone Distances in Feet

No. Process	Tab	Application Block Size (Acres)																												
Part																			_									1		
2			1	_	_				_	_	_							40				-						-		-
Part		36	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	35	45	55	65	70	76	81	87
Part		41	25	25	25	25	25	25	25	25	25	25	30	30	33	35	38	41	44	48	51	55	67	80	92	105	113	122	131	139
No. Process		47	25	25	25	25	25	25	25	25	25	25	30	35	40	46	51	57	63	70	77	84	99	114	129	144	156	168	180	192
No. Process		53	25	25	25	25	25	25	25	25	25	25	33	40	48	56	64	73	83	93	103	114	134	154	174	194	210	226	242	258
Part		-												-												-				_
Part		-			_	_								-		-		_		_						-		-		_
Fig. Process		-			_	_	_			_				-	-	-						_			_		_	-	_	_
No. Process		-				_							-					_					-							_
Fig.		77	25	25	25	25	25	25	25	25	25	25	50	75	102	129	156	183	217	250	285	321	351	381	411	446	483	520	558	595
Part		82	25	25	25	25	25	25	25	25	25	25	55	85	118	150	183	215	255	295	338	380	410	440	470	510	553	595	638	680
Part		88	25	25	25	25	25	30	32	35	38	40	77	114	148	183	216	249	294	340	384	429	459	489	519	554	600	646	693	739
Part		94	25	25	25	25	25	33	39	45	51	55	99	143	179	215	249	283	334	385	431	478	508	538	568	598	648	698	748	797
Fig.		-																_										-		_
Fig. Part		-	_	_			_					-	-		-							_					_	_	_	-
Part		-											-			-		_					-							_
Part		-	_	_					60				-									_			_		_	_	_	_
Part		117	25	25	30	30	30	50	67	84	102	118	179	240	285	330	368	405	478	550	608	665	695	725	755	785	850	916	981	1047
Fig. Part		123	25	30	30	33	35	58	81	104	127	150	215	280	330	380	420	460	543	625	690	755	785	815	845	875	948	1021	1094	1167
Part		129	25	32	38	45	51	74	97	120	143	166	234	301	355	408	450	493	579	665	735	804	839	874	909	944	1023	1101	1180	1259
Part		135	25	36	46	57	68	91	114	137	160	183	253	323	379	436	481	526	615	705	779	854	889	924	959	994	1077	1160	1243	1325
Part		-										-	-													_		-		_
No. Part		-			_		-									-										-		-		_
Part		-						_		_			-			-									_		_	_		+
Part		-																												1
Part		-			_					-			-													-		-		1615
Part		164	25	56	88	119	150	173	196	219	242	265	348	430	503	575	633	690	798	905	1003	1100	1140	1180	1220	1260	1365	1470	1575	1680
Part		170	25	59	92	126	159	183	207	231	255	279	365	451	527	603	664	725	841	956	1061	1166	1206	1246	1286	1326	1437	1547	1658	1768
Part		176	25	61	97	133	169	193	218	243	267	292	382	471	551	631	695	760	884	1008	1120	1231	1271	1311	1351	1391	1507	1623	1739	1855
258 39 109 179 249 319 358 366 435 473 511 668 825 934 1043 1135 1228 1444 1659 1755 1850 1900 1950 200 2050 2221 2929 2563 273: 264 46 118 189 260 331 371 410 449 488 827 686 845 955 1064 1159 1254 1478 1701 1788 1875 1925 1975 2025 2075 2248 2421 2292 2563 273: 275 61 134 208 282 356 396 437 477 518 559 722 885 996 1107 1207 131 1341 1815 1828 1859 1925 1975 2025 2075 2125 2302 2479 2656 283: 281 68 143 218 293 368 409 450 402 533 574 740 905 1017 1129 1231 1334 1581 828 1889 1950 2000 2050 2100 2250 2105 2275 2450 2625 280 287 75 151 228 304 380 422 464 506 548 590 758 90 758 905 1077 1129 1231 1334 1581 828 1889 1950 2000 2050 2102 125 2302 2479 2656 283: 281 68 143 218 293 368 409 450 402 533 574 740 905 1017 1129 1231 1334 1581 828 1889 1950 2000 2050 2100 2150 2236 2268 2868 266 287 75 151 228 304 380 422 464 506 548 590 758 90 758 90 758 905 1007 1179 1283 1334 1581 828 1889 1950 2000 2050 2102 125 2175 2356 2538 2719 2000 293 88 2 159 235 312 389 431 474 516 559 601 769 936 1057 1179 1283 1334 1581 828 1889 1950 2000 2050 2100 2150 2329 2082 2088 2867 2075 2048 2048 2048 2048 2048 2048 2048 2048	(e)	182	25	63	101	140	178	203	229	255	280	306	399	492	575	659	727	795	927	1059	1178	1297	1337	1377	1417	1457	1578	1700	1821	1943
258 39 109 179 249 319 358 366 435 473 511 668 825 934 1043 1135 1228 1444 1659 1755 1850 1900 1950 200 2050 2221 2929 2563 273: 264 46 118 189 260 331 371 410 449 488 827 686 845 955 1064 1159 1254 1478 1701 1788 1875 1925 1975 2025 2075 2248 2421 2292 2563 273: 275 61 134 208 282 356 396 437 477 518 559 722 885 996 1107 1207 131 1341 1815 1828 1859 1925 1975 2025 2075 2125 2302 2479 2656 283: 281 68 143 218 293 368 409 450 402 533 574 740 905 1017 1129 1231 1334 1581 828 1889 1950 2000 2050 2100 2250 2105 2275 2450 2625 280 287 75 151 228 304 380 422 464 506 548 590 758 90 758 905 1077 1129 1231 1334 1581 828 1889 1950 2000 2050 2102 125 2302 2479 2656 283: 281 68 143 218 293 368 409 450 402 533 574 740 905 1017 1129 1231 1334 1581 828 1889 1950 2000 2050 2100 2150 2236 2268 2868 266 287 75 151 228 304 380 422 464 506 548 590 758 90 758 90 758 905 1007 1179 1283 1334 1581 828 1889 1950 2000 2050 2102 125 2175 2356 2538 2719 2000 293 88 2 159 235 312 389 431 474 516 559 601 769 936 1057 1179 1283 1334 1581 828 1889 1950 2000 2050 2100 2150 2329 2082 2088 2867 2075 2048 2048 2048 2048 2048 2048 2048 2048	Ac	-	_																		_					_		-		1
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Buffer Zone Credits

The buffer zone distances for STRIKE 85CP FUMIGANT 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 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 SymmetryTM application system is used with a tarp that qualifies for a credit and the application rate is ≤ 100 pounds a.i./treated acre. The 10% credit for the SymmetryTM application system is added to the buffer zone credit for the tarp. For example if the SymmetryTM application system is used with a tarp that qualifies for a 40% credit the total credit for the tarp and the application system would be 50%.
- 15% reduction in buffer zone distance, IF potassium thiosulfate (KTS) is applied at a minimum rate of 300 pounds per acre.
- 15% reduction in buffer zone distance, IF ½ to ½ inch of water is applied.
- 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 $\geq 2\%$ 3%; and a 30% reduction in the buffer zone distance, IF the organic content of the soil in the application block is $\geq 3\%$.
- 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 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.
 - o Some examples of points of entry include, but are not limited to, roadways, sidewalks, paths, and bike trails.
 - O 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.
 - o 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:
 - o 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).
 - o 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.
 - o 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_fumigants/index.htm
 - o The Buffer Zone signs must contain the following information:
 - The 'Do Not Walk' symbol
 - DO NOT ENTER/NO ENTRE,
 - STRIKE 85CP FUMIGANT (Chloropicrin) 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 the 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:

- o The location of the application block.
- o Fumigant(s) applied including the active ingredient, name of the fumigant product(s), and the EPA Registration number.
- o 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).
- o 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).
- o 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 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:

- o there is an incident,
- o sensory irritation is experienced outside of the buffer zone, and/or
- o 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 supervising the application 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
 - o Name,
 - o Phone number.
 - o Pesticide applicator license and/or certificate number,
 - o Specify if commercial or private applicator,
 - o Employer name,
 - o Employer address, and
 - o Date and location of completing EPA approved soil fumigant training program.
- General site information
 - o Application block location (e.g., county, township-range-section quadrant), address, or global positioning system (GPS) coordinates
 - o Name, address, and phone number of application block owner
 - o 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
 - o Target application date/window,
 - o Fumigant Product Name, and
 - o EPA registration number.
- Tarp Plan (if tarp is used)
 - o Schedule for checking tarps for damage, tears, and other problems,

- o Minimum size of damage that will be repaired,
- o Factors used to determine when tarp repair will be conducted,
- o Equipment/methods used to perforate tarps,
- o Target dates for perforating tarps, and
- o Target dates for removing tarps.
- Soil conditions
 - o Description of soil texture and moisture in application block,
 - o Method used to determine soil moisture, and
 - o Soil temperature measurement if air temperatures were above 100 °F in any of the 3 days prior to the application.
- Buffer zones
 - o Application method,
 - o Injection depth,
 - o Application rate from lookup table on label,
 - o Application block size from lookup table on label,
 - o Credits applied and measurements taken (if applicable),
 - Tarp brand name, lot number, thickness, manufacturer, batch number, and part number
 - SymmetryTM application system
 - Potassium thiosulfate
 - Water seal
 - Organic matter content
 - Clay content
 - Soil temperature
 - o 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
 - o Location of Buffer Zone signs.
- Emergency Preparedness and Response Measures (if applicable)
 - o Fumigant site monitoring (if applicable):
 - When and where it will be conducted
 - o 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).

- o Name and phone number of persons contacted by the certified applicator, and
- o Date contacted.
- Handler (including Certified Applicators) Information and PPE
 - o Names, addresses and phone numbers of handlers
 - o Names, addresses, and phone numbers for employers of handlers
 - o Tasks that each handler is authorized and trained to perform
 - o Date of PPE training for each handler
 - o Applicable handler PPE including:
 - Long-sleeved shirts/long pants, shoes, socks
 - Chemical-resistant apron
 - Chemical-resistant footwear
 - Protective eyewear (not goggles)
 - Chemical-resistant gloves
 - Air-purifying respirators
 - Respirator make, model, type, style, size, and cartridge/canister type
 - SCBAs
 - Respirator make, model, type, style, size
 - Other PPE
 - o 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 www.epa.gov/fumiganttraining for the active ingredient(s) in this product.
 - o For handlers designated to wear respirators (air-purifying respirator or SCBA):
 - date of medical qualification to wear a respirator,
 - date of respirator training, and
 - date of fit-testing for the respirator.
 - o Unless exempted in the *Protection of Handlers* section, verify that:
 - at minimum 2 handlers have 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
 - o If sensory irritation is experienced, indicate whether operations will cease or operations will continue with use of an air-purifying respirator
 - o 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)
 - o Identify (e.g., list, attach applicable label section) applicable mandatory GAPs.
- Pesticide Product Labels and Material Safety Data Sheets (MSDS)
 - o 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 application. 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
 - o 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).
 - o 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):
 - o Date of tarp damage discovery,
 - o Location and size of tarp damage,
 - o Description of tarp/tarp seal/tarp equipment failure, and
 - o Date and time of tarp repair completion.
- Tarp perforation/removal details (if applicable):
 - o Date and time tarps were perforated,
 - o Date and time tarps were removed, and
 - o Record if tarps were perforated and/or removed early. Describe the conditions that caused early tarp perforation and/or removal.
- Complaint details (if applicable):
 - o Person filing complaint (e.g., on-site handler, person off-site),

- o If off-site person, name, address, and phone number of person filing complaint, and
- o Description of control measures or emergency procedures followed after complaint.
- Description of incidents, equipment failure, or other emergency and emergency procedures followed (if applicable).
- Air monitoring results:
 - o 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).
 - o 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).
- Fumigant Treated Area and Buffer Zone Signs:
 - o 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.

Spill and Leak Procedures

Evacuate everyone from the immediate area of the spill or leak. For entry into affected area to correct problems, wear the personal protective equipment specified in the *Personal Protective Equipment (PPE)* section of this labeling. Move leaking or damaged containers outdoors or to an isolated location. Observe strict safety precautions. Work upwind, if possible. Allow spilled fumigant to evaporate or to absorb onto vermiculite, dry sand, earth, or similar absorbent material. Dispose of contaminated material on site or at an approved disposal facility. Only correctly trained and PPE-equipped handlers are permitted to perform such cleanup. Do not permit entry into the spill or leak area by any other person until the concentration of chloropicrin is measured to be 0.15 ppm or less.

Storage and Disposal

DO NOT CONTAMINATE WATER, FOOD, OR FEED BY STORAGE OR DISPOSAL.

Pesticide Storage: Store in a dry, cool, well-ventilated area under lock and key. Post as a pesticide storage area.

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 Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. When a cylinder is partially full, and there is no further requirement for the product, return the cylinder to the registrant or distributor. Replace safety cap and valve protection bonnet before shipping container.

Container Handling: Store cylinders upright, secured to a rack or wall to prevent tipping. Do not subject cylinders to rough handling or mechanical shock such as dropping, bumping, dragging, or sliding. Do not use rope slings, hooks, tongs or similar devices to unload cylinders. Transport cylinders using hand truck, fork truck or other device to which the cylinder can be firmly secured. Do not remove valve protection bonnet and safety cap until immediately before use. Replace safety cap and valve protection bonnet when cylinder is not in use.

Return of Containers: Cylinders are the property of the registrant or distributor and must be returned promptly after use. Do not ship cylinders without safety caps or valve protection bonnets.

Refillable Container: Only the registrant or distributor is allowed to refill this container. This container can be refilled with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

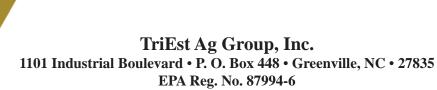
Container Disposal: To clean the container before final disposal, remove any remaining liquid from the container, using dry air pressure if necessary. Allow container to aerate for at least 5 days. After aeration, wash container using hot water; then offer container to qualified reconditioner or dispose of as directed by State or local regulations.

WARRANTY

Seller warrants that this product conforms to the chemical description on its label and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use. To the extent consistent with applicable law, neither this warranty nor any other warranty of MERCHANTABILITY or FITNESS FOR A PARTICULAR PURPOSE, express or implied, extends to the use of this product in a manner contrary to its label.

STRIKE 85CP Fumigant

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EPA Est. 87994-GA-1, 87994-FL-2, 87994-NC-3

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