

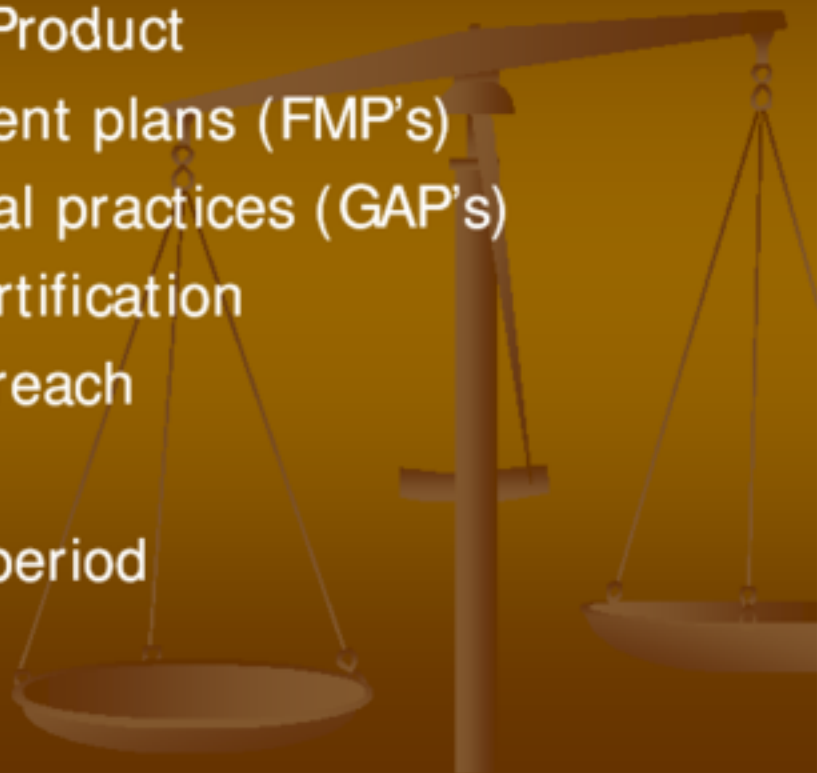
Metam RED

Re-registration Eligibility Document



What Will Be Implemented in 2010

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




Restricted Use Product

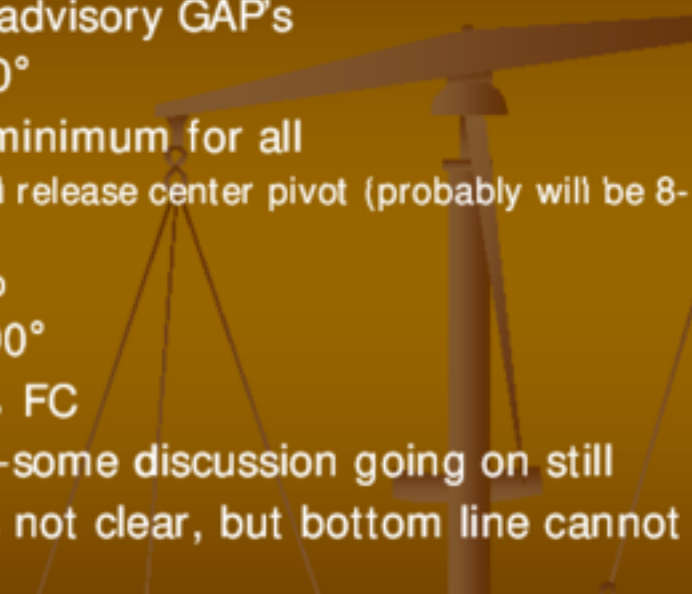
- Other fumigants are already RUP's
- Doesn't mean a lot to growers, except license required for purchase
- Probably a good idea



Fumigant Management Plans

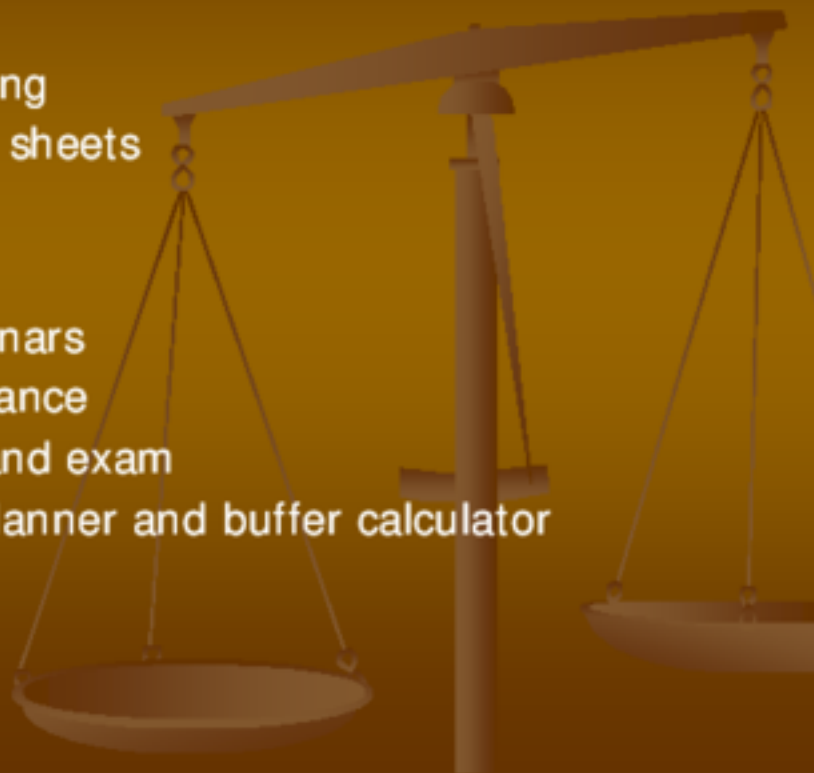
- Will be site specific
 - Plan all aspects of a safe & effective fumigation
 - Prevent accidents & identify procedures for accidents
 - Demonstrate compliance with the label and a tool for verification
 - These will be extensive and contain everything from application location, rates, and products to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

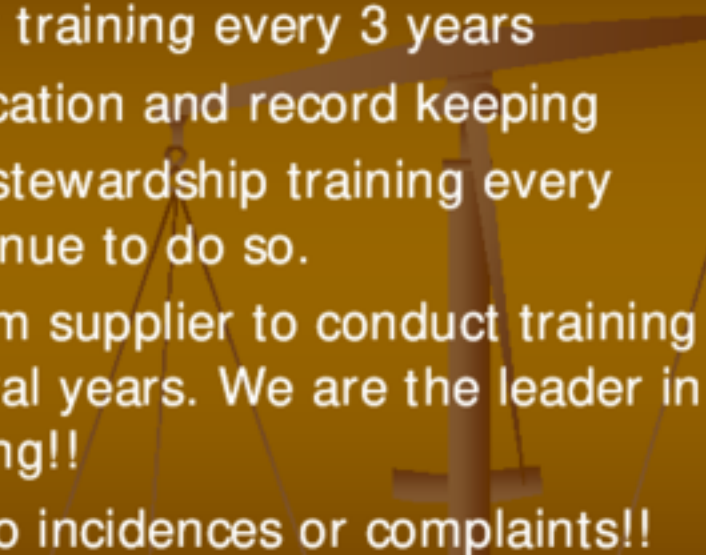
- Both mandatory and advisory GAP's
 - Maximum air temp-90°
 - Wind speeds-2 mph minimum for all
 - 8 mph max for normal release center pivot (probably will be 8-10 after next RED)
 - 25 mph for SmartDrop
 - Maximum soil temp-90°
 - Soil moisture-60-80% FC
 - Field stubble or trash-some discussion going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

- Registrant
 - Stewardship training
 - Materials and fact sheets
 - Posting signs
- States and EPA
 - Training and seminars
 - Compliance assistance
 - Training manual and exam
 - Web based IPM planner and buffer calculator
 - Templates.

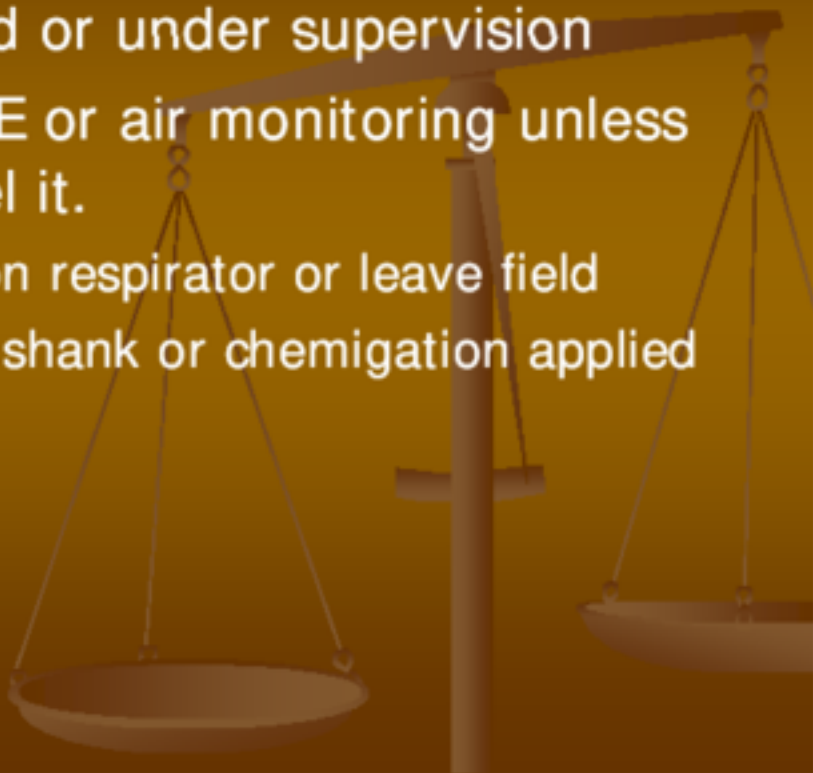


Training and Certification

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

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



Site Monitoring

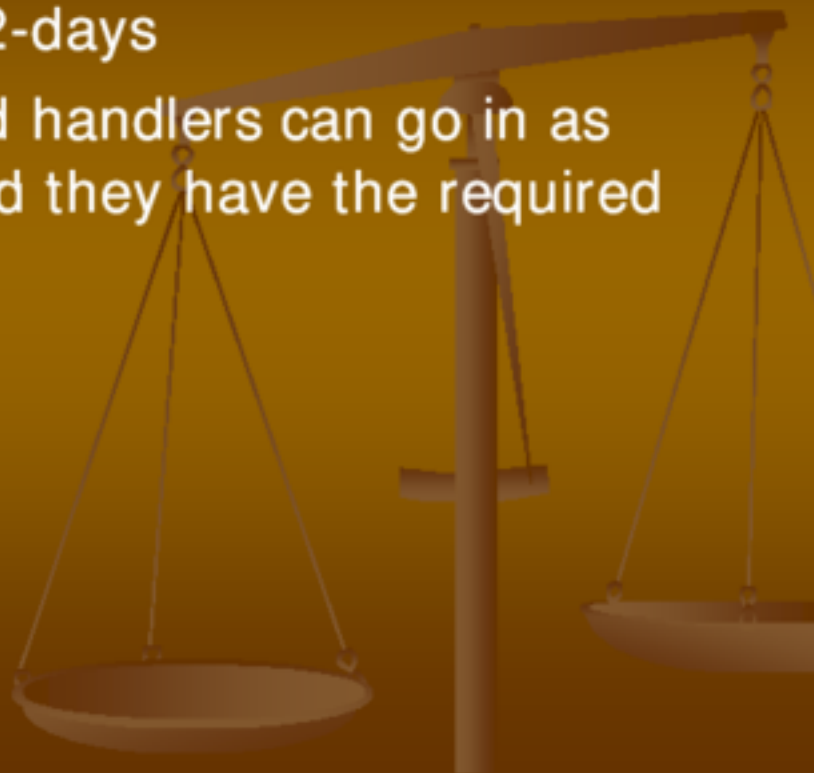


- Shank applications
 - Cert. applicator must be on site at all times and supervise others
- Chemigation
 - Cert. applicator must be on site and supervise others
 - Can leave but must return at least every 2-hours

A little unclear- but may be able to be in phone or radio contact

5-Day Reentry Prohibition

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

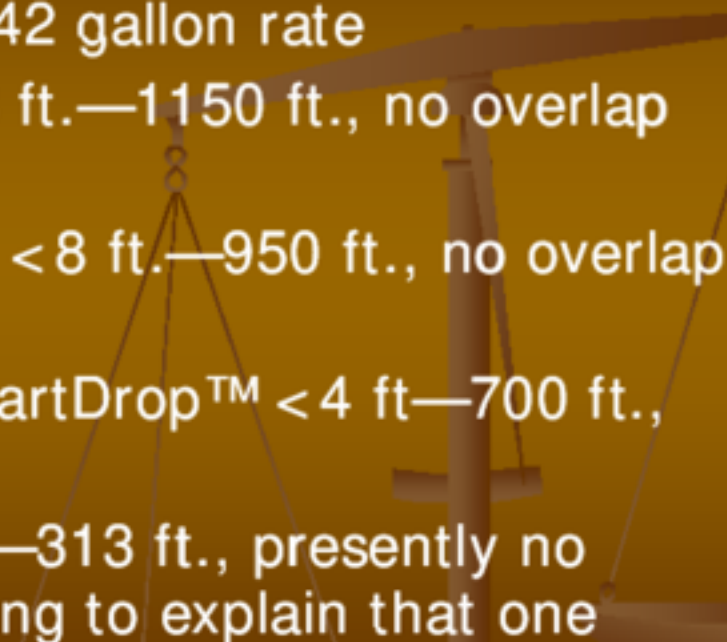


What Will Be Implemented in 2011

- Buffer zones
 - Posting
- Monitoring
 - Applicators
 - Buffer zone



Buffer Zone Requirements

- 120 acre pivot, 42 gallon rate
 - High release > 8 ft.—1150 ft., no overlap for 12 hrs.
 - Medium release < 8 ft.—950 ft., no overlap for 12 hrs.
 - Low release/SmartDrop™ < 4 ft—700 ft., can overlap
 - Shank injection—313 ft., presently no overlap-EPA trying to explain that one
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Conventional Application



SmartDrop™ Application

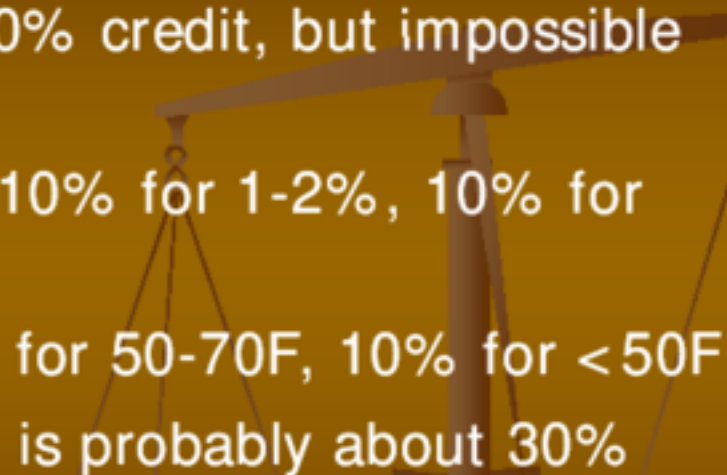




EPA SmartDrop Comment

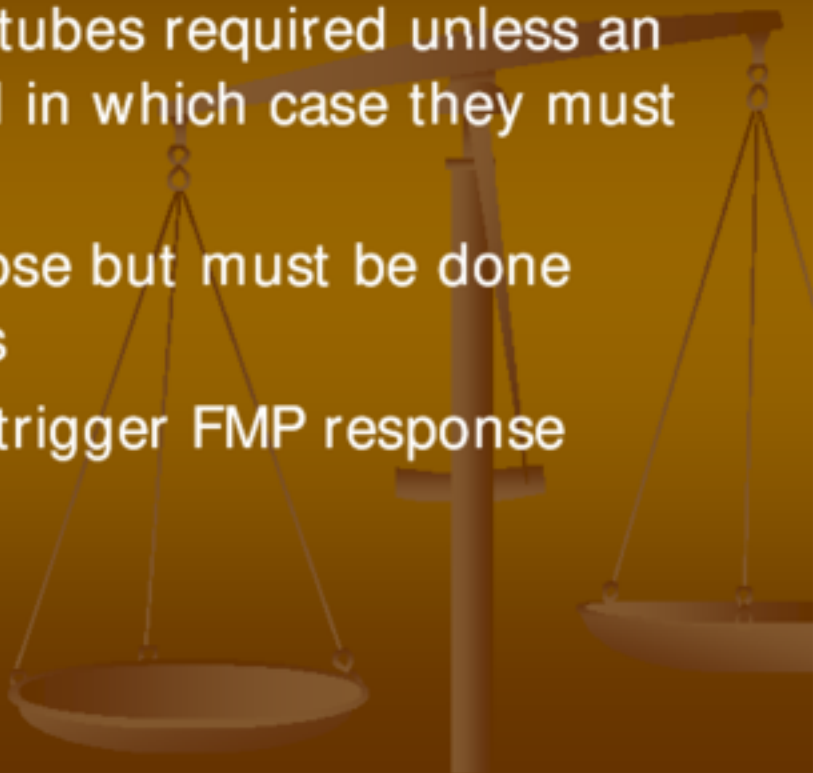
Would like to see every pivot
fumigation application made with
this system.

Buffer Zone Credits

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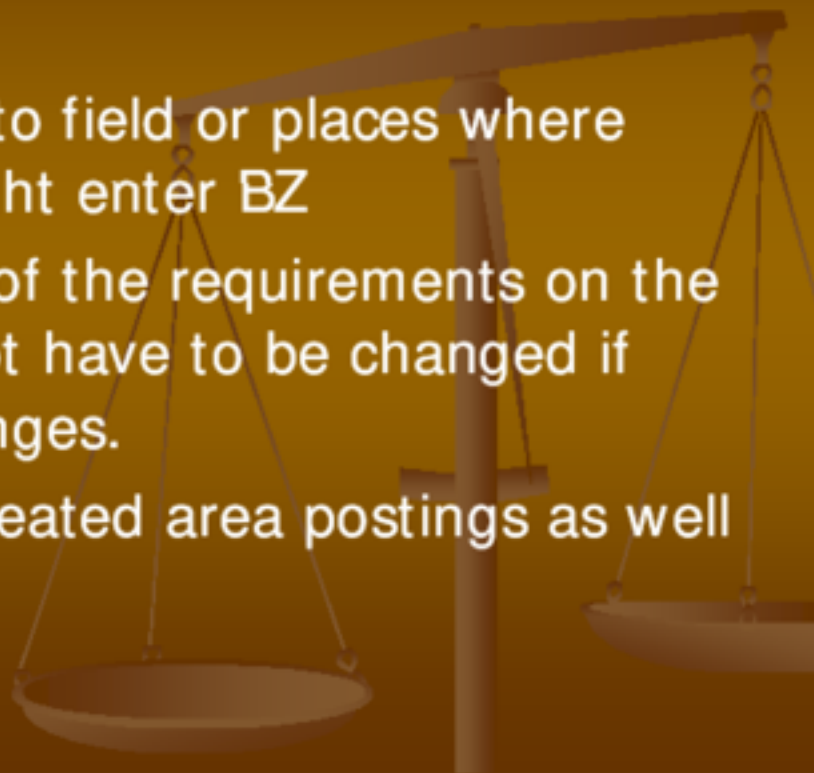
Air Monitoring

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



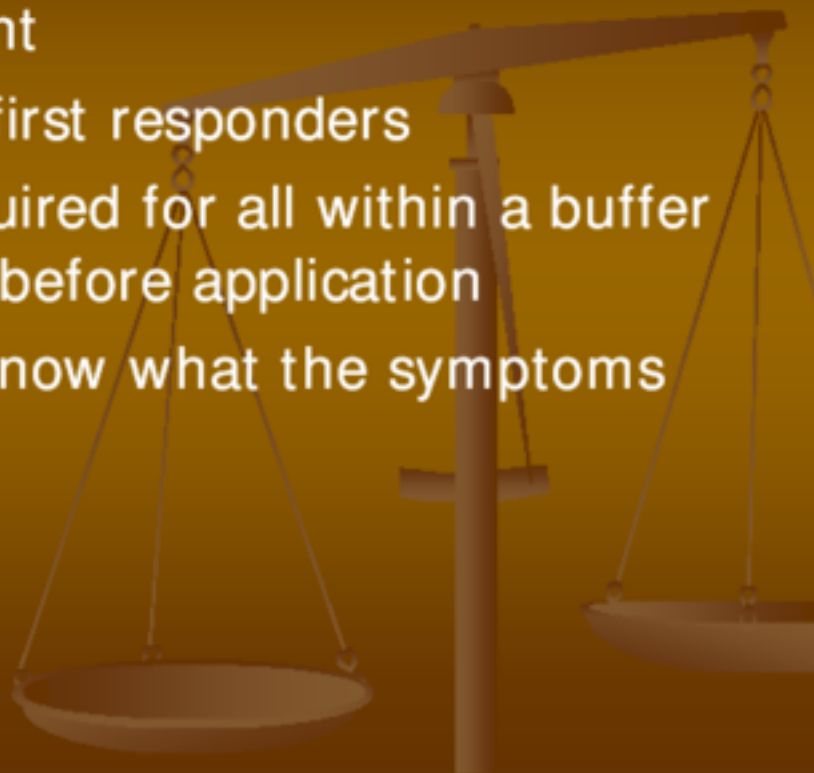
Buffer Zone Posting

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



Community Outreach

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



Timelines



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

2009 Idaho Vapam/K-Pam Stewardship Training

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

