

October 29, 2008

Industry Relations Report

By Todd Cornelison

Fumigant Comments Deadline Fast Approaching

The EPA's deadline for comments on the new regulations for fumigant usage is **October 30**. If you have not submitted your comments yet, now is the time.

Since it is too late to mail comments, you must now submit your comments on-line. To do this: go to www.regulations.gov, in the search field enter the docket ID number: EPA-HQ-OPP-2005-0125-0300. This will take you to the document that extended the comment period to October 30. From there you will see a little yellow balloon that states "send a comment or submission." Click on that balloon and enter your farm's information. You now have a choice; you can type your comments right in the field provided or you can prepare your comments from another source, such as Microsoft Word, and add them as an attachment. To do this you select the browse button which will allow you to find the file on your computer and then select the "add attachment" button to add it. If you need help or are unsure of how the process works, please do not hesitate to call me, and I can walk you through it. Todd Cornelison 208-559-4792 or tcornelison@potato.idaho.gov

If you are having trouble deciding what to include in your comments, I have listed below some ideas with their coinciding RED page numbers. The highlighted items may be of special interest to growers. I also have more in depth information on the size of the required buffer zones for various types of applications, i.e. chemigation verses shank. If you think this information would be beneficial, I would be happy to send it to you. I also have various form letters that can help with other thoughts and ideas.

METAM RED POINTS

- *p 38. Buffer zone for shank application too large; needs to be no more than fifty feet to be practical. All buffer zones are too large; very impractical for chemigation methods.
- *p43. Buffer credits for soil conditions cite studies from Dow for Telone products and other references to Methyl Bromide; not relevant to MITC.
- *p44. Buffer credits-crop rotations in the Idaho never allow for organic in excess of 3%; maybe 1-1.5% is more common.
- *p44. Clay content: how do we measure clay content on all the fields practically?
- *p44. Soil temp: we are below 70 degrees for most of the fumigation seasons in Idaho and need more credits at lower temps.
- *p44. An additional credit should be listed for increased depth of application. 10-12 inches would get more credit than 4 inches.
- p.52. RED requires two WPS trained handlers be on site for all post fumigation handling activities. Does this include tractor drivers who also transfer product? If so, it will be difficult to find enough operators and may cause more people to be exposed.
- p.54. Continuous air monitoring for tasks over a long duration too costly.
- p.56. Respirator or air monitoring for tractor drivers in enclosed filtered cabs?
- p.58. 5 days after application for reentry too long.
- p.62. Do not apply if ground level winds are less than 2 mph.
- p.62. Forecasting inversions is impossible and will be very limiting to application progress.
- p.62. Do not apply with clear skies and stars visible at night.
- p.66. Stainless impellers must be used: what's wrong with polypropylene?
- p.66. Can tractor drawn applicators carry the product in polypropylene tanks?
- p.66. Must pressurize the system with nitrogen prior to application. This can't be done before every field and water should be acceptable to check the machine, not nitrogen.

- p.68. FMP too detailed.
- p.68. FMP should be handled by the retailers since they are the source of the product and can more feasibly implement protocols of the FMP.
- p.72. Air monitoring 30 minutes before each hour during the application.
- p.72. Provide response information to neighbors 48 hours before application.
- p.75. Notice to state lead agencies will inhibit application progress and seems redundant if applicators are already state certified.
- p.112. The pressure rating of all components of the rig must be at least 500 psi. (This is a metam rig, not a methyl bromide rig) application pressures are usually between 30 and 80 psi.
- p.112. Brass or stainless fittings must be used throughout and all tubing must be Teflon or Teflon-lined steel braid. This contradicts p.66. What's wrong with poly propylene fittings and hoses?

Calendar

November

- 4-6 US Canada meeting, Washington, DC
- 11-13 Whistlestop Tour (Please rsvp for meals to Alyse at 514-4214)
- 11 Pocatello - Red Lion: Noon (lunch served)
- 12 Idaho Falls - Hilton Garden Inn: 6:00 pm (dinner served)
- 13 Burley - Fairfield Inn: Noon (lunch served)
- Boise - Ameritel Inn - Boise Spectrum: 6:00 pm (dinner served)

December

- 6 IGSA meeting, Salt Lake City, UT
- 16-17 Idaho Potato Commission Meeting, Boise, ID

January

- 7-8 NPC Potato Expo, San Antonio, TX
- 9-10 NPC Annual meeting/USPB Winter meeting, San Antonio, TX
- 20 Potato Seed seminar, Pocatello, Idaho
- 21-22 41st Annual Idaho Potato Conference and Eastern Idaho Ag Show, Pocatello, ID
- 28-29 Idaho Potato Commission Meeting, Boise, ID

February

- 19-26 Potato Industry Leadership Institute