



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

June 18, 2024

**VIA EMAIL**

Roger T. Cox  
Production Manager, Co-Owner  
InSeason Ag Innovations LLC  
7425 W. Sunnyview Ave.  
Visalia, CA 93291

Re: Buffer Zone Reduction Request for the "InSeason Mulch TIF,  $\geq 1$  mil" tarp

Dear Roger T. Cox:

This letter serves as the response to your request for EPA approval of soil fumigant buffer zone reduction credits for the " **InSeason Mulch TIF,  $\geq 1$  mil** " tarp.


The EPA has reviewed the laboratory tarp permeability testing data for this tarp, which was submitted on your behalf by Dr. Husein Ajwa, of the University of California, on March 25<sup>th</sup>, 2024. Based on the calculated mass transfer coefficients (MTCs) and the corresponding cut points determined by EPA as a basis for assigning buffer zone credits (*DP Barcode 385314. Dawson, Smith and Shelat. "Second Update to Health Effects Division Recommendations for Good Agricultural Practices and Associated Buffer Credits." January 11, 2011*), the tarp qualifies for the following buffer zone reduction credits: 60% for methyl bromide and chloropicrin applications, 60% for chloropicrin applications, 60% for 1,3-dichloropropene and chloropicrin applications, as well as 30% for methyl isothiocyanate applications. The tarp is also approved for use on dimethyl disulfide (DMDS) applications.

The tarp name will be added to the appropriate category on the EPA soil fumigant tarp webpage: <http://www.epa.gov/pesticides/tarpcredits/>

The tarp will also be listed on the webpage for approved DMDS tarps: <http://www2.epa.gov/soil-fumigants/tarps-approved-use-dimethyl-disulfide-dmnds-products>

Please contact me at (202) 566-2224 or at [green.tiffany@epa.gov](mailto:green.tiffany@epa.gov) if you have any questions.

Sincerely,



Tiffany Green, Chemical Review Manager  
Risk Management & Implementation Branch II  
Pesticide Re-evaluation Division  
Office of Pesticide Programs

Enclosure:

DP 468415; Review of the permeability test data of a tarp material for various fumigants:  
InSeason Mulch TIF, InSeason Ag Innovations LLC. ACB Project # B24-12.