



April 15, 2011

Mr. Henry Gonzales
Ventura County Agricultural Commissioner
815 East Santa Barbara Street
Santa Paula, California 93060

Dear Mr. Gonzales:

As you know, volatile organic compounds (VOCs) contribute to the formation of ozone, a major air pollutant. Under the federal Clean Air Act, the Department of Pesticide Regulation (DPR) tracks and reduces VOC emissions from pesticides. Title 3, California Code of Regulations (3 CCR) section 6452.2(a) and (b) requires DPR to establish a field fumigant VOC emission limit for the Ventura nonattainment area during the May–October 2011 period by subtracting the nonfumigant emissions from the benchmark (fumigant + nonfumigant emissions) of 3.3 average tons/day. DPR has established a fumigant limit of 2.86 average tons/day (1,047,000 pounds) based on the estimate of subtracting the forecasted 2011 nonfumigant emissions of 0.429 average tons/day.

For the May–October period, you should establish a system to maintain a running total of VOC emissions for every fumigation as they occur. As specified in 3 CCR section 6452.2(c), one or more of the following methods may be used to ensure that the fumigant limit will not be exceeded:

- Condition the permit to include fumigant emission allowances.
- Deny any permit or notice of intent that would cause the fumigant limit to be exceeded.
- Condition permit to prohibit or require any of the low emission methods allowed by 3 CCR sections 6447.3(a), 6448(c), 6449.1(b), 6450.1(d), or 6452.

We would like a reply describing which option(s) you plan to implement to ensure that the fumigant limit is not exceeded.



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If you have any questions, please contact Mr. Randy Segawa, Environmental Program Manager, at 916-324-4137, or <rsegawa@cdpr.ca.gov>.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Reardon". The signature is fluid and cursive, with the first letter of each word being capitalized and prominent.

Chris Reardon
Chief Deputy Director
916-445-4000

cc: Mr. Randy Segawa
Ms. Polly Frenkel, DPR Chief Counsel
Mr. Thomas Babb, DPR Agricultural Commissioner Liaison

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bcc: Wofford Surname File