



# Department of Pesticide Regulation



Mary-Ann Warmerdam  
Director

Arnold Schwarzenegger  
Governor

April 29, 2010

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(c) requires DPR to establish a field fumigant VOC emission limit for the Ventura nonattainment area during the May–October 2010 period by subtracting the nonfumigant emissions from the benchmark (fumigant + nonfumigant emissions) of 3.600 average tons/day. DPR has established a fumigant limit of 3.107 average tons/day (1,143,000 pounds for May–October 2010) based on the estimate of subtracting the forecasted 2010 nonfumigant emissions of 0.493 average tons/day. As specified in 3 CCR section 6452.3, the fumigant limit is enforced through emission allowances issued to growers. The county agricultural commissioners enforce the emission allowances as conditions included on restricted materials permits.

For the May–October 2010 period, DPR received field fumigant emission allowance requests for 2,353,714 pounds of VOCs for the Ventura nonattainment area. The requests exceed the field fumigant emission limit of 1,143,000 pounds by 206.2 percent. The field fumigant emission allowances must not exceed 48.4997 percent of the requested amounts to comply with the field fumigant emission limit. The enclosures includes a listing of each permittee and his/her specific field fumigant emission allowance. As specified in 3 CCR section 6452.3(d), you must include the emission allowance as a condition of the restricted materials permit for each permittee listed.

For the May–October period, you should establish a system to maintain a running total of VOC emissions for every fumigation as they occur. DPR staff has developed an Excel file to assist you with tracking the VOC emissions as well as tracking revoked/returned allowances and any supplemental allowances that may be issued. As specified in 3 CCR section 6452.3(e), you must deny any notice of intent that does not comply with the fumigant emission allowance.



Mr. Henry Gonzales  
April 29, 2010  
Page 2

Thank you for your assistance. If you have any questions, please feel free to contact Mr. Jahan Motakef, Environmental Program Manager, at 714-279-7011 or <jmotakef@cdpr.ca.gov>.

Sincerely,

*Original signed by  
Charles M. Andrews  
for*

Christopher W. Reardon  
Chief Deputy Director  
916-445-4000

Enclosures

cc: Ms. Mary-Ann Warmerdam, DPR Director (w/o Enclosures)  
Ms. Polly Frenkel, DPR Chief Counsel (w/o Enclosures)  
Dr. Nan Gorder, DPR Chief (w/o Enclosures)  
Mr. Jahan Motakef, DPR Environmental Program Manager (w/o Enclosures)