Department of Pesticide Regulation

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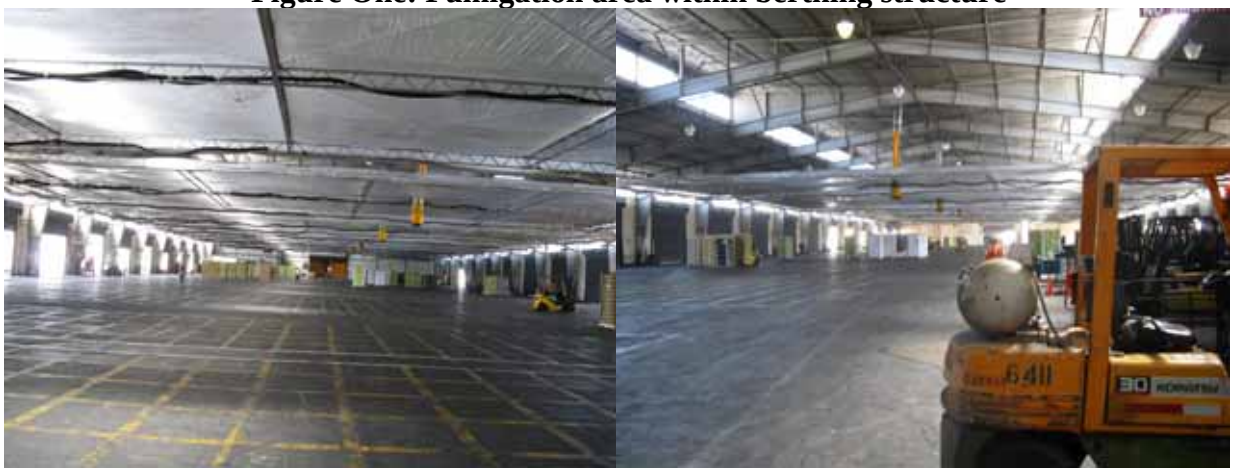
DATE: November 4, 2009

SUBJECT: OBSERVATIONS AND RECOMMENDATIONS FROM AN EVALUATION OF A TARPED COMMODITY FUMIGATION FACILITY IN THE LONG BEACH AREA, LOS ANGELES COUNTY ON SEPTEMBER 30, 2009

On September 30th, 2009, I traveled to Los Angeles County to conduct an evaluation of a tarpaulin pile fumigation facility at the San Pedro harbors. These consultations were requested by the Los Angeles County Agricultural Commissioner's (CAC) Office. CAC staff were present during the consultations. Additionally, the manager of the facility was also present.

The purpose of the visit was to assess the walls of the harbor berth structure as to their gas penetration resistance. Methyl bromide fumigation is performed within the cavernous structure (Figure One), either by covering the smaller commodity piles with plastic tarpaulin and shooting methyl bromide under the tarpaulin, or, for larger amounts, by lowering a plastic shroud, suspended from the ceiling, over the commodity and injecting fumigant. This shroud can be seen in the Figure One photos. The yellow tubes hanging down through the shroud top are exhaust ventilation tubes.

Figure One: Fumigation area within berthing structure



The exterior walls of this section of the berthing facility are riddled with roll-up loading dock doors, many of which were opened during this facility inspection. The two interior walls appear to be thick concrete/masonry and fairly impervious to permeation.

Figure Two: Penetrations of interior walls

These interior walls did have penetrations. One type of penetration were the doors and roll-ups that allowed transit through the walls. These can be sealed sufficiently using sand-snakes or other comparable, temporary methods. This would allow sealing during fumigation and aerations. The other type of penetration is shown in Figure Two. These are penetrations from pipes passing through the walls. These should be sealed via expanded foam packing or other permanent method to prevent fumigant intrusion into the adjoining work areas.

With the large number of loading dock doors in the fumigation section of the berthing facility, when there are as many open as when I visited the facility, the structure may be considered partially enclosed. For future reference for this specific facility, if at least 50% of the loading dock doors, on each side, are open, the structure could be considered unenclosed. If less than 50% but more than 25% are open (on both sides), then this structure could be considered partially enclosed. If less than 25% of the doors are open, it should be considered an enclosed space. A roll-up door would be considered open if it is at least half-way open.

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