Appendix G

Commodity Fumigation

Overview

Introduction
This section provides information on Commodity Fumigation.

Information on Soil Fumigation may be found in Appendix I.

In this section
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<th>Topic</th>
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</tbody>
</table>
Section G.1

Recommended Permit Conditions for Methyl Bromide and Sulfuryl Fluoride Commodity Fumigation

Introduction

This document describes the recommended permit conditions for commodity fumigations at facilities. The permit conditions are designed to prevent the risk of acute exposures from the off-site movement of the fumigant to persons living near fumigation facilities. The following topics are included:

- Work site plan;
- Recommended permit conditions;
- Final permit conditions.

NOTE: Most permit conditions apply to both fumigants, however, be aware that some apply to only one fumigant or the other.

Permit issuance

Title 3, CCR (3 CCR) section 6420 allows non-agricultural use permits to be issued to the facility operator, the pest control business, or both parties. DPR's position is that the option of who is required to obtain the permit rests with the CAC.

It is DPR’s determination that when there is a fumigation of a commodity during storage or processing (industrial use) and the application is performed by a pest control business, both the facility operator and the pest control business have different duties with respect to the permit conditions. To be held responsible for their respective duties, both must be issued written permit conditions through the permitting process. Issue the primary permit to the facility operator.

If the facility does not have a certified applicator (qualified applicator certificate) on staff or chooses to hire a licensed pest control business to make the application, condition the permit to require all applications be conducted by a licensed agricultural pest control business. Require the pest control business to obtain a separate permit. As an alternative, the CAC may require that the business be specifically named in the facility permit and that a copy of the permit conditions be provided to that business.

Continued on next page
Recommended Permit Conditions for Methyl Bromide and Sulfuryl Fluoride Commodity Fumigation, Continued

**Permit process**

The following steps are required to obtain the restricted materials permit for methyl bromide or sulfuryl fluoride commodity fumigations:

1. The facility that will conduct the fumigation prepares a work site plan. The work site plan documents the characteristics and procedures for a specific site.
2. Upon completion, the work site plan is forwarded to the county agricultural commissioner for review.
3. The CAC reviews the work site plan.
4. After the CAC reviews the work site plan, any modifications to the original work site plan are discussed with the applicator. Evaluation of individual work site plans may reveal one or more of the permit conditions as inappropriate for a specific site. In this case, a proposed alternative should be developed. DPR is available to assist the CAC in the evaluation of alternative mitigations.
5. Once the work site plan is approved, the CAC issues the restricted materials permit using the final work site plan, which details the equipment and procedural requirements that must be followed in order to use methyl bromide or sulfuryl fluoride, as conditions of the permit. The permit should be conditioned upon compliance with the approved final work site plan.

**Intent of the permit conditions**

Permit conditions are meant to be guidelines for typical fumigations. Because of the wide variety of fumigation types, some of the permit conditions may be inappropriate for certain applications. In such cases, the CAC may issue site-specific permit conditions. The site-specific permit conditions will consist of the requirements given here and/or alternative conditions based on information in the individual work site plan. Methyl bromide and sulfuryl fluoride users are encouraged to suggest alternatives in the work site plan which will mitigate exposure. The CAC will evaluate requests for alternative conditions and consult with DPR to determine if the request will mitigate the exposure.

*Continued on next page*
Recommended Permit Conditions for Methyl Bromide and Sulfuryl Fluoride Commodity Fumigation, Continued

Major concepts

The permit conditions are based on four concepts which methyl bromide and sulfuryl fluoride users should keep in mind: containment, dilution, distance, and time.

- First, high concentrations of the fumigants should be contained. This means fumigation equipment and the fumigation structure or enclosure should not leak.
- Second, when the fumigants are not contained, dilute it with fresh air.
- Third, keep as much distance as possible between the fumigants and people.
- Fourth, minimize the time people are exposed to the fumigants. The permit conditions use the interaction of these four concepts to minimize exposure. For example, when one is not achieved, the other three are used to compensate.

While mitigation measures based on these concepts can decrease the methyl bromide and sulfuryl fluoride exposure to the desired levels, the best way to decrease exposure is to use as little of the fumigant as possible. Particularly, when better containment is provided, it may be possible to decrease the amount of the fumigants and still achieve efficacy. Users will find that as less methyl bromide and sulfuryl fluoride is used, the permit conditions become less obstructive and alternative conditions are easier to implement.

The permit conditions also require various approved test procedures to be used.

Continued on next page
Recommended Permit Conditions for Methyl Bromide and Sulfuryl Fluoride Commodity Fumigation, Continued

### Definitions

The following definitions are categorized.

#### General terms

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
</table>
| A: Enclosure              | A single fumigated space.  
  *Examples:* a single chamber, single silo, single sea/land container, or a single group of bins under one tarpaulin. |
| B: Enclosed Area          | A gas-confining area surrounded by non-porous walls and a roof.                                                                                                                                              |
| C: Control Room           | A small enclosed room adjoining some fumigation enclosures (e.g., primarily chambers) used exclusively for introducing fumigant into an enclosure and/or monitoring its concentration.                                      |
| D: Fumiscope              | A monitoring instrument which reads the concentration of fumigant in ounces per 1000 cubic feet inside an enclosure.                                                                                           |
| E: Loss Ratio             | The proportion of fumigant per hour which leaks from the enclosure during the treatment period. This ratio is determined by a DPR-approved retention test.                                                      |
| F: Mechanical Ventilation | The use of fans or any mechanical device to ventilate a fumigation enclosure, or an enclosed area where fumigated commodities are stored.                                                                  |
| G: Mitigation Measures    | Modified work practices or engineering controls to comply with the stated permit conditions or alternative permit conditions.                                                                               |
| H: Non-Residential Facility | Facilities where commodities are stored or processed. They do not include any structures where people live.                                                                                       |
| I: Passive Ventilation    | Non-mechanical ventilation (e.g., opening doors and removing tarpaulin cover) of a fumigation enclosure.                                                                                                   |
| J: Secondary Enclosed Area | An **enclosed area** surrounding a fumigation enclosure. This is usually a structure (e.g., warehouse, production facility, etc.) that houses the fumigation enclosure. This does not include mesh screen or other porous barriers. |
| K: Work Site              | A location where one or more enclosures are fumigated.  
  *Example:* several chambers or sea/land containers at one address.                                                                               |
## Recommended Permit Conditions for Methyl Bromide and Sulfuryl Fluoride Commodity Fumigation, Continued

### Retention categories, Aeration categories

<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>L: Pressure Tested</td>
<td>Either a vacuum chamber or an enclosure which has been pressure tested following the procedures stated in the U.S. Department of Agriculture Plant Protection and Quarantine Treatment Manual.</td>
</tr>
<tr>
<td>M: Retention Tested</td>
<td>An enclosure that has been measured for loss of fumigant over time according to a DPR-approved procedure.</td>
</tr>
<tr>
<td>N: Untested</td>
<td>An enclosure that has not been pressure or retention tested.</td>
</tr>
<tr>
<td>O: Standard Height Exhaust Stack</td>
<td>An exhaust stack that is at least 10 feet above the enclosure's highest point, and at least 10 feet above any major obstruction within 200 feet of the stack, and at least as tall as the appropriate value in Table 1. <em>Examples of major obstructions: houses, mature orchards, silos</em></td>
</tr>
<tr>
<td>P: Exit Velocity</td>
<td>The air speed through the exhaust stack during aeration. The exit velocity is determined by dividing the rated fan capacity (cubic feet per minute) by the stack cross-sectional area (square feet).</td>
</tr>
<tr>
<td>Q: Minimum Exhaust Stack</td>
<td>An exhaust stack that does not meet the conditions for a standard height exhaust stack, but is at least 15 feet above the ground and has an exit velocity of at least 600 feet per minute.</td>
</tr>
<tr>
<td>R: No Stack</td>
<td>An enclosure whose stack does not meet either the standard height or minimum qualifications, or which does not use a stack for aeration.</td>
</tr>
</tbody>
</table>

### Buffer zones

<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>S: Treatment Zone</td>
<td>A buffer zone that is maintained around an enclosure during the fumigation treatment period (exposure or holding period). Only persons supervising and performing fumigation activities are permitted in the treatment zone. All other people, including residents and workers, must be excluded from this zone.</td>
</tr>
<tr>
<td>T: Aeration Zone</td>
<td>A buffer zone that is maintained around an enclosure during the first portion of the aeration period (four hours or less, depending on the emission concentration). Only persons supervising and performing fumigation activities are permitted in the aeration zone. All other people, including residents and workers, must be excluded from this zone.</td>
</tr>
</tbody>
</table>
Section G.2

Recommended Permit Conditions for Tarped Potting Soil Fumigation

I. Definitions

A. Application includes treatment and aeration; it is complete when the tarped potting soil has been aerated.

B. Application rate, in pounds per cubic yard, is equal to the amount of methyl bromide in the formulated product.

C. Application site means the location where the fumigations take place. A property operator may have more than one location where potting soil fumigations take place. If these locations are not contiguous, then there would be two application sites. The application site designation may also be used in the restricted materials permit and for pesticide use reporting purposes.

D. Buffer zone is the area that must be maintained between the treated potting soil and those places where people conduct certain activities or practices. These activities and practices may not occur in the buffer zone for prescribed periods of time. For potting soil fumigations there are three types of buffer zones to be considered:

1. Resident Buffer Zone is the area surrounding the treated potting soil, during fumigation and aeration, outside of which people may “dwell.” The Resident Buffer Zone is in effect until aeration is complete. See the definition: dwell.

2. Worker Buffer Zone is the area surrounding the treated potting soil, during fumigation and aeration, outside of which people may “work or occupy.” The Worker Buffer Zone is in effect until aeration is complete, except for the first four hours of aeration (see Aeration Buffer Zone). See the definition: work or occupy.

3. Aeration Buffer Zone is the area surrounding the treated potting soil that begins when the tarps are cut or removed and lasts for the first four hours of aeration. This buffer zone is the same size as the Resident Buffer Zone and applies to all activities.

E. Dwell means that a person is able to or will occupy a structure for any or all parts of a 24-hour period. This includes, but is not limited to: homes, hospitals, convalescent homes, boarding schools, hotels, and apartment complexes.

F. Frequency of applications refers to the interval of time elapsed from the beginning of the application of methyl bromide to one potting soil pile to the beginning of the application of methyl bromide to another potting soil pile.
RECOMMENDED PERMIT CONDITIONS FOR TARPED POTTING SOIL FUMIGATION

I. DEFINITIONS (Continued)

G. **Gas confining** means a structure that has a non-porous roof and walls and all doors, side panels, and vents remain closed.

H. **Pesticide Handler** includes employees involved in fumigation, aeration activities, tarp repair, and tarp removal **prior** to the completion of aeration.

I. **Potting soil** is any combination of soil and/or soil-less media that is used for growing plants.

J. **Work or occupy** means that a person is able to or will be at a place for eight hours or less. This includes, but is not limited to: fields, offices, warehouses, stores, malls, factories, greenhouses, packing sheds, workshops, and recreational parks.

II. WORKER SAFETY REQUIREMENTS

A. **Restricted Entry and Warning Sign Posting Requirements**

1. The restricted entry interval begins with the introduction of the fumigant and ends 48 hours after the tarp is removed and measurements show 5 ppm (parts per million) or less methyl bromide in the air at the surface of the treated potting soil pile. The duration of the restricted entry interval depends upon whether the tarp is removed or cut prior to removal.

2. As a condition of the permit, warning signs shall be posted on/near the treated pile for the duration of the restricted entry interval.
II. WORKER SAFETY REQUIREMENTS (Continued)

B. Pesticide Handler and Field Worker Requirements

1. The employer must maintain use records for all employees involved in application, aeration, tarp repair, and tarp removal activities. The record shall identify the person, work activity(ies), date(s), duration of handling, U.S. Environmental Protection Agency Registration Number, and brand name of the methyl bromide product handled.

2. The employer must maintain records of the air monitoring used to determine completeness of aeration. These records must include sampling method, date, time, sample location(s), and the level, in parts per million (ppm).

3. The employer must maintain these records at a central location for two years and make them available to the county agricultural commissioner upon request for review.

4. Employers shall ensure that all employees who are pesticide handlers are trained and protected. **Pesticide handlers** include all persons whose work activities involve application, tarp repair, and tarp removal.

C. Tarpaulin Repair

1. The tarpaulin is considered “application equipment” covered by 3 CCR section 6742(a) and is required to be kept in good repair by the **applicator** for the duration of the fumigation. For the purpose of this section, fumigation ends when the tarps are removed or cut for aeration. **The person or business performing methyl bromide fumigations is responsible for making any necessary repairs.**

2. Tarpaulin repair must be evaluated on a job-by-job basis. The decision should be based on hazard to the public or workers, size of the damaged area, timing of damage, and ease of repair.

3. The methyl bromide label requires **all persons wear a Self-Contained Breathing Apparatus** if entering an area where the concentration of methyl bromide is unknown or exceeds 5 ppm. This includes making repairs to the tarp that covers a potting soil pile under fumigation.
RECOMMENDED PERMIT CONDITIONS FOR TARPED POTTING SOIL FUMIGATION

II. WORKER SAFETY REQUIREMENTS (Continued)

D. Workers in Adjacent Sites

1. The property operator and/or pest control operator must be aware of adjacent sites where worker activity is likely until aeration is complete. They must ensure that the adjacent property operators are advised, prior to the fumigation, on how to comply with the Worker Buffer Zone and the Aeration Buffer Zone.

2. The property operator and/or pest control operator may give notice to adjoining property operators orally or in writing.

3. If entry occurs as the result of a failure to be aware of worker activity and subsequent failure to advise adjacent property operators to keep workers out, the operator of the property fumigated and the person performing pest control are in violation of the methyl bromide permit conditions.

III. APPLICATION REQUIREMENTS

A. All potting soil fumigations shall be conducted outdoors or in an enclosure that is not gas-confining.

A. A maximum of 400 cubic yards of potting soil, in one or more tarped piles, will be allowed to be fumigated and aerated at one location. All treated potting soil must be completely aerated before another potting soil fumigation may begin at the same location.

C. Maximum pile height is two feet tall. Potting soil may be fumigated in containers or raised structures as long as the depth of the potting soil does not exceed two feet.

D. For multiple potting soil fumigation:

1. Piles can be considered “isolated” when they are separated by at least 1,300 feet.

2. Piles can also be considered isolated when they are separated by at least 48 hours from the introduction and tarpaulin cutting of one pile to the introduction and tarpaulin cutting of another pile. For example, multiple piles can be considered isolated:
RECOMMENDED PERMIT CONDITIONS FOR TARPED POTTING SOIL FUMIGATION

III. APPLICATION REQUIREMENTS (Continued)

i. When introduction takes place at 48-hour intervals (e.g., introduction of Pile 1 on October 1 and introduction of Pile 2 on October 3).

ii. When tarpaulin cutting takes place at 48-hour intervals (e.g., tarpaulin cutting of Pile 1 on October 1 and tarpaulin cutting of Pile 2 on October 3).

iii. When introduction and tarpaulin cutting occur alternately at 48-hour intervals (e.g., tarpaulin cutting of Pile 1 on October 1 and introduction of Pile 2 on October 3).

3. For isolated piles, calculate buffer zones independently for each pile.

E. For non-isolated piles, calculate buffer zones by aggregating the volume of the piles. This is the same procedure for calculating buffer zones for isolated and non-isolated field fumigations.

F. A maximum of 0.6 pounds of methyl bromide (active ingredient) per cubic yard is allowed.

G. The methyl bromide must be injected through perforated tubing that is anchored in place within the tarped potting soil piles. Follow the pesticide registrant's recommendation for the type of application tubing to be used.

H. The tarp shall be sealed to the ground with sand or water snakes.

I. All fittings, connections, and valves between the supply tank and the tarpaulin must be checked for methyl bromide leaks prior to fumigation. If cylinders are replaced during the fumigation process, the connections and valves must be checked for leaks prior to continuing the job.

J. Only the tarpaulins listed on the approved manufacturers list are to be used. The tarp used during the fumigation must meet or exceed the following standards for a “high barrier” tarp: a permeability factor of less than eight milliliters methyl bromide per hour per square meter per 1,000 ppm of methyl bromide under the tarp at 30 degrees Celsius. See the list of high barrier tarp suppliers. Polyethylene tarp of six-mil thickness or greater meets these criteria.

K. No other types of methyl bromide applications may be conducted at the same application site for 48 hours before, or 24 hours following, a tarped potting soil fumigation.
RECOMMENDED PERMIT CONDITIONS FOR TARPED POTTING SOIL FUMIGATION

IV. BUFFER ZONE DETERMINATION

A. A buffer zone is the area surrounding a fumigated potting soil pile outside of which certain activities or practices are allowed. The buffer zones are in effect until the potting soil is completely aerated. The size of the buffer zone will be determined by the proposed size of the potting soil pile, in cubic yards, and the application rate. The buffer zone distance may have to be modified for each pile due to the proximity to occupied structures, distance to adjacent workers, and proximity to other potting soil fumigations.

B. The buffer zone is partitioned into the Resident Buffer Zone, the Worker Buffer Zone, and the Aeration Buffer Zone. The size of the Resident Buffer Zone is based on the assumption that a person may “dwell” at a place for 24 hours. The size of the Worker Buffer Zone is based on the assumption that people work or recreate at a place for eight hours or less. The Aeration Buffer Zone becomes effective at the time the tarp is removed or cut and lasts for four hours. It is the same size as the Resident Buffer Zone and is required due to the high levels of methyl bromide released when the tarp is removed or cut.

C. Transit through the Worker Buffer Zone by the permittee's employees is limited to infrequent and unavoidable trips. Routine or repeated transit through this buffer zone is prohibited.

D. Transit through (except on a public road), working in, or dwelling in the Aeration Buffer Zone is prohibited for the entire four hours. No one is allowed in this area until aeration is complete unless they are trained pesticide handlers facilitating aeration.

E. The buffer zones begin at the edges of the treated piles and extend in all directions regardless of buildings or property boundaries.

F. Procedures:

1. Determine the application rate. Use the highest application rate if more than one pile will be fumigated. If the application rate is not identical to the values listed in Table 1, then round up to the next highest value.

2. Determine the volume. If there will be more than one pile, use the total volume of all piles fumigated at the same time as at the same application site. If the volume is not identical to the values listed in Table 1, then round up to the next highest value.

3. Determine the Resident Buffer Zone by applying the highest application rate and total volume to Table 1.
IV. BUFFER ZONE DETERMINATION (Continued)

4. Determine the Worker Buffer Zone by dividing the application rate by three. Apply the adjusted application rate and total volume to Table 1. If the adjusted application rate is not identical to the values listed in Table 1, then round up to the next highest value.

5. The Aeration Buffer Zone is the same size as the Resident Buffer Zone and must be vacated by all people for the first four hours of aeration, starting when the tarp is first cut or removed.

G. Resident Buffer Zone Duration

1. To determine if the proposed Resident Buffer Zone includes places where people are living or staying, measure the distance between the edge of the tarped pile and the physical structure, not the property line associated with that structure.

2. People are not allowed to “dwell” within the Resident Buffer Zone. Residences within the buffer zone must be vacated while the buffer zone is in effect. This time period starts when the fumigation begins and ends when aeration is complete, at least 48 hours after tarp removal.

3. If the resident(s) are unable to vacate the building(s), then the property operator must decrease either the cubic yards to be treated or the rate of methyl bromide to be used to reduce the size of the buffer zone.

4. This requirement applies to all persons, including the property operator.

H. Worker Buffer Zone Duration

1. People will not be allowed to work in or occupy the Worker Buffer Zone. This time period starts when the fumigation begins and ends when aeration is complete, at least 48 hours after tarp removal. The beginning point of measurement shall be the tarped edge of the fumigated pile.

2. If there are occupied commercial buildings or workers within the proposed Worker Buffer Zone and the work sites cannot be vacated, then the application must either be rescheduled to coincide with the worker's day-off or the cubic yards to be treated and/or application rate must be decreased to reduce the size of the buffer zone.
IV. BUFFER ZONE DETERMINATION (Continued)

I. Aeration Buffer Zone Size and Duration

1. The Aeration Buffer Zone is the same size as the Resident Buffer Zone.

2. The Aeration Buffer Zone is in effect for the first four hours of aeration, which begins when the tarp is removed or cut. No one is allowed to work in, reside in, or transit this area for any length of time. This is required due to the large amounts of methyl bromide that can be released when the tarp is first disturbed.
V. NOTICE OF INTENT MODIFICATION

A. The county agricultural commissioner must receive a Notice of Intent at least 24 hours prior to commencement of a methyl bromide fumigation of tarped potting soil piles. The Notice of Intent must indicate the day and hour the application is to commence.

B. Unless a waiver is granted by the county agricultural commissioner, fumigation of a tarped potting soil pile must not commence sooner than the starting time on the Notice of Intent. Nor must the fumigation commence later than 12 hours after the intended starting time submitted on the Notice of Intent. If the potting soil fumigation does not commence within this time frame, a new Notice of Intent must be submitted, but no 24-hour waiting period is required unless notified by the county agricultural commissioner.

C. For multiple potting soil piles to be fumigated sequentially, the county agricultural commissioner may allow one Notice of Intent with a “schedule” to be submitted in lieu of one Notice of Intent for each potting soil pile to be fumigated. The schedule must include a map and must specify the date and time each potting soil pile is intended to be fumigated.

D. The 24-hour Notice of Intent waiting period may be waived if the county agricultural commissioner determines:

1. Effective pest control cannot be attained otherwise, or
2. Approaching climatic conditions require the application to take place sooner, or
3. Twenty-four hours are not necessary to adequately evaluate the intended application.

E. The reasons for granting each waiver must be documented and a record maintained by the county agricultural commissioner.

F. The operator of the property to be treated and the person performing pest control (if they are different) must be aware of adjacent sites where there is a reasonable possibility of work activity occurring while the Worker Buffer Zone and Aeration Buffer Zone are in effect, and must ensure that operators of those adjacent properties are advised to keep workers out of those areas during that period of time.
VI. TARPAULIN REMOVAL

A. Aeration shall be commenced during daylight hours, not at night.

B. A Self-Contained Breathing Apparatus shall be used to commence aeration, which includes removing or cutting the tarp, unless this activity can be performed from outside of the aeration zone.

C. The tarp may be removed no sooner than three days (72 hours) after the potting soil pile was fumigated.

D. If the tarps are cut, rather than removed completely, they must be allowed to aerate for a minimum of 24 hours following cutting. Workers may then be allowed to remove the cut tarps without using a Self-Contained Breathing Apparatus.

E. After the tarps have been removed, regardless of method, the soil pile must be allowed to aerate for an additional two days (48 hours) before workers may disturb the pile. At that time, if spot measurement shows less than 5 ppm, the soil can be handled by the workers. If the measurement is above 5 ppm, aeration shall continue until the level of methyl bromide is below 5 ppm.

   The measurement(s) should be taken as close as possible to the surface of the treated potting soil pile.

VII. LIST OF MANUFACTURERS OF HIGH BARRIER TARPAULINS

The current list of approved tarps is available at DPR’s web site at:
## RECOMMENDED PERMIT CONDITIONS FOR TARPED POTTING SOIL FUMIGATION

### TABLE 1. Buffer Zones (feet) for Potting Soil Fumigations

<table>
<thead>
<tr>
<th>Volume cubic yards</th>
<th>Application Rate* lbs/100 ft³</th>
<th>Application Rate* lbs/1000 ft³</th>
</tr>
</thead>
<tbody>
<tr>
<td>20</td>
<td>30</td>
<td>30</td>
</tr>
<tr>
<td>30</td>
<td>30</td>
<td>30</td>
</tr>
<tr>
<td>40</td>
<td>30</td>
<td>30</td>
</tr>
<tr>
<td>60</td>
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<td>30</td>
</tr>
<tr>
<td>80</td>
<td>30</td>
<td>35</td>
</tr>
<tr>
<td>100</td>
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</tr>
<tr>
<td>150</td>
<td>30</td>
<td>75</td>
</tr>
<tr>
<td>200</td>
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<td>100</td>
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<td>250</td>
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<td>120</td>
</tr>
<tr>
<td>300</td>
<td>30</td>
<td>140</td>
</tr>
<tr>
<td>350</td>
<td>35</td>
<td>155</td>
</tr>
<tr>
<td>400</td>
<td>40</td>
<td>175</td>
</tr>
</tbody>
</table>

* Application Rate Units:
  
  - lbs/yd³ = pounds per cubic yard
  - lbs/100 ft³ = pounds per 100 cubic feet
  - lbs/1000 ft³ = pounds per 1000 cubic feet

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Commodity Fumigation Facility Work Site Plan

This Work Site Plan has five sections:
1. **Section A** records general information about the work site.
2. **Section B** records compliance with general permit conditions.
3. **Section C** is used to determine the size of the buffer zones.
4. **Section D** records compliance with other specific conditions.
5. **Section E** records information for alternate conditions.

The Work Site Plan must be completed and submitted to the CAC. Restricted Materials Permits must be obtained by both the facility operator and pest control business, if applicable.

**A Restricted Materials Permit cannot be issued unless all questions in the appropriate sections are answered correctly. Incorrect information on the Work Site Plan will result in denial of the permit.**

Fumigation Site:

Address: ______________________   City: _____________________   Zip: ______________

Contact Person: ________________________________  Phone: _________________________
(Facility Operator, Grower, QAC, QAL, etc.)

Pest Control Business: ______________________  Permit Number:

Address: ______________________   City: _____________________   Zip: ______________

Contact Person: ________________________________  Phone: _________________________
(QAL with the appropriate category)

I VERIFY THE FOLLOWING INFORMATION IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.

Signature: _____________________________________  Date: ______________
(Facility Operator)

Title: __________________________________________
Consult with the County Agricultural Commissioner for suggestions on alternative conditions.

<table>
<thead>
<tr>
<th>Condition</th>
<th>Question</th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>B.1: Maximum Application Rate</td>
<td><em>(Condition 1)</em>: Will your application rate be eight pounds per 1000 cubic feet or less?</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>If question B.1 is answered NO, you must complete Section E.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>B.2: Total Fumigant</td>
<td><em>(Condition 2)</em>: Will you be using 1000 pounds or less of sulfuryl fluoride or methyl bromide at the work site during a 24-hour period?</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>If question B.2 is answered NO, you must complete Section E.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>B.3: Other Types of Applications</td>
<td>This permit condition does not apply to sulfuryl fluoride applications.</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>B.4: Enclosed Areas</td>
<td><em>(Condition 4)</em>: Is the fumigation enclosure outside of other buildings (i.e., not within a secondary enclosed area)?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>B.5: Common Walls</td>
<td><em>(Condition 4)</em>: Is the fumigation enclosure physically separated from all other structures (i.e., the fumigation enclosure does not share a common wall with another building)?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>B.6: Outside Introduction</td>
<td><em>(Condition 5)</em>: Is the fumigant introduced from outside the enclosure?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>B.7: Gas-tight Fumigant Lines</td>
<td><em>(Condition 6)</em>: Are fumigant lines and connections checked for leaks during each fumigation?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
If concentrations within the enclosure are monitored with a Fumiscope or other instrument, are the following precautions taken?

<table>
<thead>
<tr>
<th>Question</th>
<th>Description</th>
<th>YES</th>
<th>NO</th>
<th>does not apply</th>
</tr>
</thead>
<tbody>
<tr>
<td>B.8: Test Equipment Seals</td>
<td>(Condition 7). Is the enclosure sealed where instrument sampling lines pass through enclosure walls?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B.9: Test Equipment Exhaust</td>
<td>(Condition 8). Is the exhaust from the monitoring instrument vented out of the control room or back into the enclosure?</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If fumigant is introduced from within an enclosed control room, are the following precautions taken?

<table>
<thead>
<tr>
<th>Question</th>
<th>Description</th>
<th>YES</th>
<th>NO</th>
<th>does not apply</th>
</tr>
</thead>
<tbody>
<tr>
<td>B.10: Fumigant Line Purge</td>
<td>(Condition 9). Is nitrogen gas or compressed air used to purge fumigant lines prior to changing cylinders?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B.11: Control Room Ventilation</td>
<td>(Condition 10). Is the control room mechanically ventilated when people are present?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B.12: Control Room Storage</td>
<td>(Condition 11). Are fumigant cylinders stored outside the control room?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B.13: Aeration Initiation</td>
<td>(Condition 12). Is a Self Contained Breathing Apparatus worn when initiating aeration?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B.14: Minimum Aeration Time</td>
<td>(Condition 14). If the enclosure is aerated with mechanical ventilation, is the aeration period at least four hours?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B.15: Minimum Aeration Time</td>
<td>(Condition 14). If the enclosure is aerated passively, is the aeration period at least 12 hours?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B.16: Testing Aeration Completeness</td>
<td>(Condition 15). Is the air concentration checked according to approved procedures before moving the commodity from the enclosure?</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
If the treated commodity is stored in an enclosed area, are the following precautions taken?

<table>
<thead>
<tr>
<th>B.17: Storage Area Testing</th>
<th>(Condition 16). Is the air concentration within the enclosed area checked according to DPR approved procedures before people enter?</th>
<th>YES</th>
<th>NO</th>
<th>does not apply</th>
</tr>
</thead>
<tbody>
<tr>
<td>B.18: Storage Area Work Schedule</td>
<td>(Condition 16). Do workers spend less than one hour in a 24-hour period inside the enclosed storage area?</td>
<td>YES</td>
<td>NO</td>
<td>does not apply</td>
</tr>
<tr>
<td>B.19: Document Requirements</td>
<td>(Condition 18). Are all test results kept for 2 years?</td>
<td>YES</td>
<td>NO</td>
<td>does not apply</td>
</tr>
</tbody>
</table>

**Alternate Conditions** - Describe alternatives if any of the questions in Section B were answered NO.
The information in this section is used by the County Agricultural Commissioner to determine the size of the buffer zones for each enclosure at the work site. Complete this section for each enclosure, unless the answers to all of the questions for all enclosures are the same.

<table>
<thead>
<tr>
<th>Retention Category</th>
<th>Determination</th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>C.1. Is the enclosure a vacuum chamber?</td>
<td></td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>C.2. Does the enclosure pass the USDA pressure test?</td>
<td>YES</td>
<td>NO</td>
<td></td>
</tr>
<tr>
<td>C.3. Has the enclosure been retention tested according to DPR-approved procedures?</td>
<td>YES</td>
<td>NO</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Aeration Category</th>
<th>Determination</th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>C.4. Does the enclosure use an exhaust stack for aeration?</td>
<td>If C.4 is answered NO, skip C.5 – C.11 and go to question C.12.</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>C.5. What is the exhaust stack's height above ground level? Use lowest stack if more than 1.</td>
<td></td>
<td>feet</td>
<td></td>
</tr>
<tr>
<td>C.6. Is the top of the exhaust stack at least 10 feet above the enclosure's highest point?</td>
<td>YES</td>
<td>NO</td>
<td></td>
</tr>
<tr>
<td>C.7. Is the top of the exhaust stack at least 10 feet above all major obstructions (building, silo, orchard) within 200 feet of the stack?</td>
<td>YES</td>
<td>NO</td>
<td></td>
</tr>
<tr>
<td>C.8. What is the rated fan capacity or air flow rate of the exhaust fan for this enclosure (combine all fans if more than one)?</td>
<td>cubic feet per minute</td>
<td></td>
<td></td>
</tr>
<tr>
<td>C.9. What is the stack cross-sectional area for this enclosure (combine all stacks)?</td>
<td>square feet</td>
<td>Area of circle = 3.14 x radius²</td>
<td></td>
</tr>
<tr>
<td>C.10. Divide the value from question C.8 by the value from question C.9. This is the exit velocity.</td>
<td>feet per minute</td>
<td></td>
<td></td>
</tr>
<tr>
<td>C.11. What is the largest amount of fumigant that will be used for the entire work site in a 24-hour period?</td>
<td>pounds</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Fumigation Information</strong></td>
<td>C.12. What is the highest application rate that will be used for this enclosure?</td>
<td>________ pounds per 1000 cubic feet</td>
<td></td>
</tr>
<tr>
<td>C.13. What is the maximum number of fumigations in a 24-hour period for this enclosure?</td>
<td>________</td>
<td></td>
<td></td>
</tr>
<tr>
<td>C.14. What is the fumigated volume for this enclosure?</td>
<td>________ cubic feet</td>
<td></td>
<td></td>
</tr>
<tr>
<td>C.15. What is the maximum amount of fumigant used in a 24-hour period for this enclosure?</td>
<td>________ pounds</td>
<td></td>
<td></td>
</tr>
<tr>
<td>C.16. What is the duration of the longest treatment period?</td>
<td>________ hours</td>
<td></td>
<td></td>
</tr>
<tr>
<td>C.17. If this enclosure has been retention tested according to a DPR approved test, what is the loss ratio (proportion of fumigant leaked from the enclosure per hour)?</td>
<td>________</td>
<td>does not apply</td>
<td></td>
</tr>
</tbody>
</table>

| **Other Enclosures** | C.18. Give the name, identification or designation for this enclosure: | ______________________ |
| C.19. List any other enclosures that have the same answers to all of the questions in Section C. | ______________________ |
| C.20. List any other enclosures that may be fumigated or aerated within the same 24-hour period and how many times they may be used. | ______________________ |
Complete this section for each enclosure, unless all of the answers are the same.

<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
<th>Condition</th>
<th>Question</th>
<th>YES</th>
<th>NO</th>
<th>does not apply</th>
</tr>
</thead>
<tbody>
<tr>
<td>D.1: Vertical Stack Exhaust</td>
<td>(Condition 21). If one or more stacks are used to aerate, are they vented vertically to the outside air?</td>
<td></td>
<td></td>
<td>YES</td>
<td>NO</td>
<td>does not apply</td>
</tr>
<tr>
<td>D.2: Unobstructed Exhaust</td>
<td>(Condition 21). If one or more stacks are used to aerate, are the tops of the stacks free of overhead obstructions during aeration?</td>
<td></td>
<td></td>
<td>YES</td>
<td>NO</td>
<td>does not apply</td>
</tr>
<tr>
<td>D.3: Daylight Aeration</td>
<td>(Conditions 13 and 22). Do you always initiate aeration during daylight hours?</td>
<td></td>
<td></td>
<td>YES</td>
<td>NO</td>
<td></td>
</tr>
</tbody>
</table>

Alternate Conditions - Describe alternatives if any of the questions in Section D were answered NO. Attach additional pages if necessary.
Complete this section only if alternate conditions need to be evaluated by the Department of Pesticide Regulation. Consult with the County Agricultural Commissioner before filling out this section. This section must be completed for each enclosure for which alternate conditions are being requested.

E.1. Enclosure Identification:

E.2. Description of Enclosure:
(chamber, tarped bins)

E.3. Enclosure Material (plastic tarp, wood):

E.4. Enclosure Dimensions:

E.5. Description of Secondary Enclosed Space (if any):


E.7. Commodity/Site Fumigated:

E.8. Months Fumigations Conducted (e.g., Jan-Dec):

E.9. Months of Peak Season (e.g., Jan-Dec):

E.10. Number of Fumigations Per Week During Peak Season:

E.11. Aeration Duration (hours or days):

E.12. Treated Commodity Storage Area Description:

E.13. Treated Commodity Storage Area Dimensions:

E.14. Description of Work Activities in Storage Area (if any):

________________________________________________________________
________________________________________________________________
________________________________________________________________
________________________________________________________________

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E.15. Identify permit condition(s) for which alternate conditions are being requested:

____________________________________________________________________
____________________________________________________________________
____________________________________________________________________
____________________________________________________________________
____________________________________________________________________

E.16. Describe suggested alternate conditions. If no specific alternate conditions can be suggested, identify which of the following general mitigation measures are possible:
- Containment (better containment of fumigant within the enclosure)
- Dilution (dilute the released fumigant with fresh air)
- Distance (increase the distance between the fumigant and people)
- Time (decrease the time people are exposed)

____________________________________________________________________
____________________________________________________________________
____________________________________________________________________
____________________________________________________________________
1: Maximum Application Rate
A maximum application rate of 8 pounds per 1000 cubic feet or the rate specified by the label may be used, whichever is less.

2: Total Methyl Bromide
The total amount of methyl bromide per work site must not exceed 1000 pounds in a 24-hour period.

3: Other Types of Applications
No other types of methyl bromide applications (e.g., field, greenhouse, potting soil, structural) can occur at the work site for the preceding 48 hours or the following 24 hours of a commodity application. Other commodity fumigations can be conducted.

4: Enclosed Area and Common Walls
The following types of fumigations are prohibited unless mitigation options are identified in the Work Site Plan:
- those inside an enclosed area with people present
- enclosures which share a common wall with another enclosed area with people present

Examples: A tarpaulin fumigation inside a warehouse is prohibited. Using a chamber which shares a common wall with an office is prohibited.
### 5: Outside Introduction
Application from outside the enclosure through a closed system is required. Releasing methyl bromide from inside the enclosure is prohibited unless mitigation options are identified in the Work Site Plan.

### 6: Gas-tight Fumigant Lines
All fumigant lines must be gas-tight. Fumigant lines, valves, fittings, etc. which are routinely adjusted or changed must be checked for leaks after each adjustment.

*Examples:* When changing methyl bromide cylinders, the connection between the introduction line and the cylinder must be checked for leaks. The cylinder valve must be checked for leaks after opening.

### 7: Test Equipment Seals
The enclosure must be sealed where instrument sampling lines pass through enclosure walls.

*Example:* Fumiscope leads must be placed and the hole at the chamber or enclosure wall sealed prior to the fumigation.

### 8: Test Equipment Exhaust
Exhaust from sampling equipment must be vented away from people and to outside air or back into the enclosure.

### 9: Fumigant Line Purge
When introducing methyl bromide from an enclosed control room, applicators must use nitrogen gas or compressed air to purge fumigant lines prior to changing cylinders.

### 10: Control Room Ventilation
Enclosed control rooms must be mechanically ventilated during fumigation if workers are present.

### 11: Control Room Storage
Methyl bromide cylinders must not be stored inside enclosed control rooms.
### RECOMMENDED PERMIT CONDITIONS

**Methyl Bromide**  
**Commodity Fumigation**

<table>
<thead>
<tr>
<th>NOTE: The following conditions pertain to aeration of the fumigation enclosure, not aeration of areas where commodities are stored, except when they are the same.</th>
</tr>
</thead>
</table>

12: **Aeration Initiation**  
Persons who initiate aeration by manually breaking a seal must wear a self-contained breathing apparatus (SCBA). **Exception:** enclosures for which aeration is initiated remotely, such as chambers.  

*Examples: breaking seals on tarpaulin fumigations, opening sea/land container doors*

13: **Aeration During Daylight**  
Aeration must be initiated during daylight hours. **Exception:** Enclosures which aerate using an exhaust stack meeting the standard height requirements may exhaust at any time.

14: **Minimum Aeration Times**  
Enclosures must be aerated for the following minimum duration:  
- a. Four hours if mechanically ventilated using fans, or  
- b. 12 hours if passively ventilated  
**Note:** The duration of the aeration period should not be confused with the time the aeration zone is in place. The aeration zone is in place for only the first portion of the aeration: four hours at most.

15: **Testing Aeration Completeness**  
The concentration of methyl bromide in the air spaces between the stacked commodity must be less than 5 ppm before the commodity can be moved from the enclosure. Testing of this air space must be done according to approved procedures.
16: Enclosed Storage Areas

Methyl bromide concentrations in enclosed areas (e.g., buildings, warehouses, silos, etc.) where fumigated commodities are stored must be less than 5 ppm before persons may enter. Testing of the air concentration must be done according to approved procedures. No individual may be inside the enclosed area for more than one hour in a 24-hour period.

NIOSH-certified half- or full-facepiece air purifying respirator with cartridges (such as the 3M Model 60928 Organic Vapor/Acid Gas/P100 which is specifically recommended by the manufacturer for use against methyl bromide, subject to manufacturer’s restrictions) will be allowed and will provide protection in atmospheres containing less than 5 parts per million of methyl bromide. These respirators can be used in place of the work hour restrictions.

Note: This condition pertains to areas where commodities are stored, not the fumigation enclosure, except when they are the same.

17: Work Site Plan

The enclosure operator and/or pest control business must complete or revise a Work Site Plan before receiving a permit. A completed Work Site Plan must be submitted to the CAC for evaluation before a Restricted Materials Permit will be issued.

18: Test Results Documentation

The enclosure operator must keep records of all test results for two years and make them available to the CAC and workers (pursuant to Labor Code section 6408 and Cal-OSHA regulations Title 8, section 3204) upon request.
Fumigation Enclosure Types

There are specific conditions for each of six different types of fumigation enclosures. The enclosures are classified by the combination of two factors: the amount of methyl bromide the enclosure retains and the method used to aerate. There are two retention categories: pressure tested and retention tested/untested; and three aeration methods: standard height stack, minimum stack, and no stack. These two retention categories and three aeration categories give the six possible combinations of fumigation enclosures listed below:

- **A1** - Pressure Tested/Standard Height Stack (e.g., quarantine or vacuum chamber)
- **A2** - Pressure Tested/Minimum Stack (e.g., quarantine or vacuum chamber)
- **A3** - Pressure Tested/No Stack (e.g., quarantine chamber without a stack)
- **B1** - Retention Tested or Untested/Standard Height Stack (e.g., typical chamber)
- **B2** - Retention Tested or Untested/Minimum Stack (e.g., "Butler" with short stack)
- **B3** - Retention Tested or Untested/No Stack (e.g., tarp fumigation)

Buffer Zones

The amount of time a person spends in areas around commodity fumigations must be limited in order to minimize exposure. Exposure is limited by restricting a person's access to or time spent in areas near enclosures being fumigated or aerated. The size of the buffer zones depends on which of the six types of enclosures is being used. For certain types of enclosures, the amount of methyl bromide used and retained in the enclosure also influences the size of the buffer zone. There are two types of buffer zones: treatment zone and aeration zone. There can be different sizes of treatment zones because of differences in exposure duration. For example, nearby workers would have a smaller treatment zone if they worked for 12 hours, compared to nearby residents who would have a treatment zone based on a 24-hour exposure. A summary of the treatment zones and aeration zones for the various types of fumigations appears in Chart 1.
### Enclosure Description

A pressure tested/standard height enclosure is a vacuum chamber or has passed the USDA pressure test. The exhaust stack is at least 10 feet above the enclosure's highest point, at least 10 feet above any major obstruction within 200 feet of the stack and at least as tall as the appropriate value listed in Table 1.

*Examples: a quarantine chamber with a tall stack; a vacuum chamber with a tall stack.*

### 19: Treatment Zone

A treatment zone of 10 feet must be established around the enclosure during the fumigation treatment period. Only persons supervising and performing fumigation activities are permitted in the treatment zone during the treatment period. **Exception:** Limited transit is allowed if unavoidable.

### 20: Aeration Zone

An aeration zone of 10 feet must be maintained around an enclosure during the first portion of the aeration period. Only persons supervising and performing fumigation activities are permitted in the aeration zone. **Exception:** Transit along public thoroughfares is allowed. The aeration zone must remain in place for the first four hours of aeration or until the exhaust concentration is less than 5 ppm. The aeration period itself may be of longer duration. Testing must be done according to approved procedures.

### 21: Vertical Stack Exhaust

The stack must be vented vertically to the outside air. When exhausting, the top of the stack must be free of overhead obstructions.

### 22: Aeration During Daylight

Does not apply. Aeration may occur at any time.
RECOMMENDED PERMIT CONDITIONS
Methyl Bromide
Commodity Fumigation

Enclosure Description
A pressure tested/minimum stack enclosure is a vacuum chamber or has passed the USDA pressure test. The exhaust stack is at least 15 feet above ground and the exhaust exit velocity is at least 600 feet per minute.

Examples: a quarantine chamber with a short stack; a vacuum chamber with a short stack.

19: Treatment Zone
A treatment zone of 10 feet must be established around the enclosure during the fumigation treatment period. Only persons supervising and performing fumigation activities are permitted in the treatment zone during the treatment period. Exception: Limited transit is allowed if unavoidable.

20: Aeration Zone
An aeration zone as specified in Table 3, page G-42, must be maintained around an enclosure during the first portion of the aeration period. Only persons supervising and performing fumigation activities are permitted in the aeration zone. Exception: Transit along public thoroughfares is allowed. The aeration zone must remain in place for the first four hours of aeration or until the exhaust concentration is less than 5 ppm. The aeration period itself may be of longer duration. Testing must be done according to approved procedures.

21: Vertical Stack Exhaust
The stack must be vented vertically to the outside air. When exhausting, the top of the stack must be free of overhead obstructions.

22: Aeration During Daylight
Aeration must be initiated during daylight hours (see permit condition 13).
Enclosure Description

A pressure tested/no stack enclosure is a vacuum chamber or has passed the USDA pressure test, and either has no stack or the exhaust stack is less than 15 feet above ground or the exhaust exit velocity is less than 600 feet per minute.

Example: a quarantine chamber with no stack.

19: Treatment Zone

A treatment zone of 10 feet must be established around the enclosure during the fumigation treatment period. Only persons supervising and performing fumigation activities are permitted in the treatment zone during the treatment period. **Exception:** Limited transit is allowed if unavoidable.

20: Aeration Zone

An aeration zone as specified in Table 4, page G-43, must be maintained around an enclosure during the first portion of the aeration period. Only persons supervising and performing fumigation activities are permitted in the aeration zone. **Exception:** Transit along public thoroughfares is allowed. The aeration zone must remain in place for the first four hours of aeration or until the exhaust concentration is less than 5 ppm. The aeration period itself may be of longer duration. Testing must be done according to approved procedures.

21: Vertical Stack Exhaust

Does not apply.

22: Aeration During Daylight

Aeration must be initiated during daylight hours (see permit condition 13).
# Enclosure Description

A retention tested or untested/standard height stack enclosure may retain a large or small proportion of the methyl bromide and the exhaust stack is at least 10 feet above the enclosure's highest point, at least 10 feet above any building within 200 feet of the stack and at least as tall as the appropriate value listed in Table 1.

Note: The size of the treatment zone may be minimized by measuring how well the enclosure retains methyl bromide and determining its loss ratio. This is done by performing a DPR-approved test procedure.

*Examples:* a typical chamber with a tall stack; a "Butler" tank with a tall stack; a building with a tall stack.

## 19: Treatment Zone

A treatment zone as specified in Table 2, page G-41, must be established around the enclosure during the fumigation treatment period. Only persons supervising and performing fumigation activities are permitted in the treatment zone during the treatment period. **Exception:** Limited transit is allowed if unavoidable.

Different size zones may be calculated based on the duration of exposure and/or duration of the treatment period. For example, a treatment zone may be calculated for nearby workers based on a 12-hour work shift and a separate treatment zone may be calculated for nearby residents based on 24-hour occupancy.

## 20: Aeration Zone

An aeration zone of **10 feet** must be maintained around an enclosure during the first portion of the aeration period. Only persons supervising and performing fumigation activities are permitted in the aeration zone. **Exception:** Transit along public thoroughfares is allowed. The aeration zone must remain in place for the first four hours of aeration or until the exhaust concentration is less than 5 ppm. The aeration period itself may be of longer duration. Testing must be done according to approved procedures.

## 21: Vertical Stack Exhaust

The stack must be vented vertically to the outside air. When exhausting, the top of the stack must be free of overhead obstructions.

## 22: Aeration During Daylight

Does not apply. Aeration may occur at any time.
Enclosure Description
A retention tested or untested/minimum stack enclosure may retain a large or small proportion of the methyl bromide. The exhaust stack is at least 15 feet above ground and the exhaust exit velocity is at least 600 feet per minute.

**Note:** The size of the treatment zone may be minimized by measuring how well the enclosure retains methyl bromide and determining its loss ratio. This is done by performing a DPR-approved test procedure.

*Examples: a chamber with a short stack; a building exhausted through the roof.*

19: Treatment Zone
A treatment zone as specified in Table 2, page G-41, must be established around the enclosure during the fumigation treatment period. Only persons supervising and performing fumigation activities are permitted in the treatment zone during the treatment period. **Exception:** Limited transit is allowed if unavoidable.

Different size zones may be calculated based on the duration of exposure and/or duration of the treatment period. For example, a treatment zone may be calculated for nearby workers based on a 12-hour work shift and a separate treatment zone may be calculated for nearby residents based on 24-hour occupancy.

20: Aeration Zone
An aeration zone as specified in Table 3, page G-42, must be maintained around an enclosure during the first portion of the aeration period. Only persons supervising and performing fumigation activities are permitted in the aeration zone. **Exception:** Transit along public thoroughfares is allowed. The aeration zone must remain in place for the first four hours of aeration or until the exhaust concentration is less than 5 ppm. The aeration period itself may be of longer duration. Testing must be done according to approved procedures.

21: Vertical Stack Exhaust
The stack must be vented vertically to the outside air. When exhausting, the top of the stack must be free of overhead obstructions.

22: Aeration During Daylight
Aeration must be initiated during daylight hours (see permit condition 13).
Enclosure Description

A retention tested or untested/no stack enclosure may retain a large or small proportion of the methyl bromide and either has no stack or the exhaust stack is less than 15 feet above ground or the exhaust exit velocity is less than 600 feet per minute.

Note: The size of the buffer zones may be minimized by measuring how well the enclosure retains methyl bromide and determining its loss ratio. This is done by performing a DPR-approved test procedure.

Examples: a typical sea/land container; a building exhausted through open doors and windows; a typical tarpaulin fumigation.

19: Treatment Zone

A treatment zone as specified in Table 2, page G-41, must be established around the enclosure during the fumigation treatment period. Only persons supervising and performing fumigation activities are permitted in the treatment zone during the treatment period. Exception: Limited transit is allowed if unavoidable.

Different size zones may be calculated based on the duration of exposure and/or duration of the treatment period. For example, a treatment zone may be calculated for nearby workers based on a 12-hour work shift, and a separate treatment zone may be calculated for nearby residents based on 24-hour occupancy.

20: Aeration Zone

An aeration zone as specified in Table 4, page G-43, must be maintained around an enclosure during the first portion of the aeration period. Only persons supervising and performing fumigation activities are permitted in the aeration zone. Exception: Transit along public thoroughfares is allowed. The aeration zone must remain in place for the first four hours of aeration or until the exhaust concentration is less than 5 ppm. The aeration period itself may be of longer duration. Testing must be done according to approved procedures.

21: Vertical Stack Exhaust

Does not apply.

22: Aeration During Daylight

Aeration must be initiated during daylight hours (see permit condition 13).
**RECOMMENDED PERMIT CONDITIONS**

**Methyl Bromide**
**Commodity Fumigation**

### CHART 1
**Summary of Buffer Zone Sizes**

<table>
<thead>
<tr>
<th>Retention Category</th>
<th>Aeration Method</th>
<th>Class</th>
<th>Treatment Zone Size</th>
<th>Aeration Zone Size</th>
<th>Aerate Daylight Hours Only</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pressure Tested (USDA pressure test)</td>
<td>Standard Height Stack <em>(Table 1 requirements)</em></td>
<td>A1</td>
<td>10 feet</td>
<td>10 feet</td>
<td>NO</td>
</tr>
<tr>
<td>Retention Tested or Untested (DPR-approved test or no test)</td>
<td>Minimum Stack <em>(stack 15 ft above ground &amp; exit velocity &gt;600 ft/min)</em></td>
<td>A2</td>
<td>10 feet</td>
<td>Table 3</td>
<td>YES</td>
</tr>
<tr>
<td></td>
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<td>Retention Tested or Untested (DPR-approved test or no test)</td>
<td>Standard Height Stack <em>(Table 1 requirements)</em></td>
<td>B1</td>
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<td>Minimum Stack <em>(stack 15 ft above ground &amp; exit velocity &gt;600 ft/min)</em></td>
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* The stack must be at least 10 feet above the enclosure's highest point and at least 10 feet above any major obstruction within 200 feet of the stack and at least as tall as the appropriate value listed in Table 1.
This table is used to determine the "standard height" (feet) of a stack. A "standard height" exhaust stack is one which is:

1. at least 10 feet above the enclosure's highest point, and
2. at least 10 feet above any major obstruction within 200 feet of the stack, and
3. at least as tall (above ground level) as the appropriate value in the table below.

### Total Amount of Methyl Bromide Applied (pounds) at the Work Site in a 24-hour Period ROUND UP

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*Exit Velocity =

\[
\text{Stack Cross-Sectional Area (square feet)} = \pi \times \text{radius}^2
\]

\[
\text{Rated Fan Capacity (cubic feet per minute)}
\]
This table is used to determine the treatment zone size (feet) surrounding enclosures which are retention tested or untested. Consult with the County Agricultural Commissioner to determine the sizes for multiple fumigations in a 24-hour period.

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<td>220</td>
<td>240</td>
<td>255</td>
<td>275</td>
<td>285</td>
</tr>
</tbody>
</table>

* The Concentration Lost is calculated from the application rate, exposure duration and loss ratio (proportion of methyl bromide leaked from the enclosure), according to the formula below. The exposure duration for workers is 12 hours or the treatment duration, whichever is less. The exposure duration for residents is the duration of treatment (24 hours maximum). The loss ratio is determined from a DPR-approved test; for untested enclosures use 0.030.

Concentration Lost = [Application Rate (pounds per 1000 cubic feet)] × [Exposure Duration (hours)] × [Loss Ratio]
This table is used to determine the aeration zone size (feet) required during the aeration of enclosures with exhaust stacks having the following characteristics:

1. The top of the exhaust stack is at least 15 feet above ground level, and
2. The exit velocity is at least 600 feet per minute

\[
\text{Exit Velocity} = \frac{\text{Rated Fan Capacity (cubic feet per minute)}}{\text{Stack Cross-Sectional Area (square feet)}}
\]

<table>
<thead>
<tr>
<th>Total Retained in a 24-hour Period (pounds)*</th>
<th>Aeration Zone (feet)</th>
</tr>
</thead>
<tbody>
<tr>
<td>50</td>
<td>10</td>
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<tr>
<td>51</td>
<td>220</td>
</tr>
<tr>
<td>ROUND UP 100</td>
<td>220</td>
</tr>
<tr>
<td>150</td>
<td>360</td>
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<td>1730</td>
</tr>
<tr>
<td>1000</td>
<td>1790</td>
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</tbody>
</table>

* The Total Retained is calculated from the amount of methyl bromide, treatment duration and loss ratio (proportion of methyl bromide leaked from the enclosure), according to the formulas below. The loss ratio is determined from a DPR-approved test.

Proportion Retained** = 1 – [Treatment Duration (hours) × Loss Ratio]

**For untested enclosures, use 0.90 for the Proportion Retained

Total Retained = [Amount of Methyl Bromide Applied in a 24-hour Period (pounds)] × [Proportion Retained]
This table is used to determine the aeration zone size (feet) of enclosures that have no stack. Consult with the county agricultural commissioner to determine the aeration zone size when aerating multiple enclosures in a 24-hour period.

<table>
<thead>
<tr>
<th>Volume Aerated in a 24-hour Period (cubic feet)</th>
<th>Concentration Retained (pounds per 1000 cubic feet)* ROUND UP</th>
</tr>
</thead>
<tbody>
<tr>
<td>1000</td>
<td>0.4 0.8 1.2 1.6 2.0 2.4 2.8 3.2 3.6 4.0 4.4 4.8 5.2 5.6 6.0</td>
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<tr>
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<td>3000</td>
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</tr>
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<td>8000</td>
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</tr>
</tbody>
</table>

* The Concentration Retained is calculated from the rate, treatment duration and loss ratio (proportion of methyl bromide leaked from the enclosure), according to the formulas below. The loss ratio is determined from a DPR-approved test.

Proportion Retained** = 1 − [Treatment Duration (hours) × Loss Ratio]

**For untested enclosures, use 0.90 for the Proportion Retained

Concentration Retained = [Application Rate (pounds per 1000 cubic feet)] × [Proportion Retained]
FINAL PERMIT CONDITIONS
Methyl Bromide
Commodity Fumigation

Fumigation Site: ______________________________ Permit Number: ________________
Address: _____________________ City: ___________________ Zip: __________________
Contact Person: ______________________________ Phone: ________________________
(Facility Operator, Grower, QAC, QAL, etc.)

Pest Control Business: __________________________ Permit Number: ________________
Address: _____________________ City: ___________________ Zip: __________________
Contact Person: ______________________________ Phone: ________________________
(QAL with the appropriate category)

I VERIFY THAT THE ATTACHED PERMIT CONDITIONS WILL BE FOLLOWED

Permit Applicant: ______________________________ Date: ________________
(Facility Operator)
1: Maximum Application Rate

A maximum application rate of 8 pounds per 1000 cubic feet or the rate specified by the label may be used, whichever is less.

Work Site Plan B.1

☐ Complies
☐ Does Not Apply
☐ Alternative: ________________________________

See page G-32 for possible additional restrictions to comply with the buffer zones.

2: Total Methyl Bromide

The total amount of methyl bromide per work site must not exceed 1000 pounds in a 24-hour period.

Work Site Plan B.2

☐ Complies
☐ Does Not Apply
☐ Alternative: ________________________________

See page G-32 for possible additional restrictions to comply with the buffer zones.

3: Other Types of Applications

No other types of methyl bromide applications (e.g., field, greenhouse, potting soil, structural) can occur at the work site for the preceding 48 hours or the following 24 hours of a commodity application.

Work Site Plan B.3

☐ Complies
☐ Does Not Apply
☐ Alternative: ________________________________

4: Enclosed Area and Common Walls

The following types of fumigations are prohibited:
- those inside an enclosed area with people present
- enclosures which share a common wall with another enclosed area with people present

Work Site Plan B.4 & 5

☐ Complies
☐ Does Not Apply
☐ Alternative: ________________________________
5: Outside Introduction
Application from outside the enclosure through a closed system is required. Releasing methyl bromide from inside the enclosure is prohibited.

Work Site Plan B.6
☐ Complies
☐ Does Not Apply
☐ Alternative: ________________________________

6: Gas-tight Fumigant Lines
All fumigant lines must be gas-tight. Fumigant lines, valves, fittings, etc. which are routinely adjusted or changed must be checked for leaks after each adjustment.

Work Site Plan B.7
☐ Complies
☐ Does Not Apply
☐ Alternative: ________________________________

7: Test Equipment Seals
The enclosure must be sealed where instrument sampling lines pass through enclosure walls.

Work Site Plan B.8
☐ Complies
☐ Does Not Apply
☐ Alternative: ________________________________

8: Test Equipment Exhaust
Exhaust from sampling equipment must be vented away from people and to outside air or back into the enclosure.

Work Site Plan B.9
☐ Complies
☐ Does Not Apply
☐ Alternative: ________________________________
9: Fumigant Line Purge
When introducing methyl bromide from an enclosed control room, applicators must use nitrogen gas or compressed air to purge fumigant lines prior to changing cylinders.

Work Site Plan B.10
- □ Complies
- □ Does Not Apply
- □ Alternative: __________________________________________

10: Control Room Ventilation
Enclosed control rooms must be mechanically ventilated during fumigation if workers are present.

Work Site Plan B.11
- □ Complies
- □ Does Not Apply
- □ Alternative: __________________________________________

11: Control Room Storage
Methyl bromide cylinders must not be stored inside enclosed control rooms.

Work Site Plan B.12
- □ Complies
- □ Does Not Apply
12: Aeration Initiation

Persons who initiate aeration by manually breaking a seal must wear a self-contained breathing apparatus (SCBA). Exception: enclosures for which aeration is initiated remotely, such as chambers.

Work Site Plan B.13

☐ Complies
☐ Does Not Apply
☐ Alternative: ________________________________

13: Aeration During Daylight

Aeration must be initiated during daylight hours. Exception: Enclosures which aerate using an exhaust stack meeting the standard height requirements may exhaust at any time.

Work Site Plan D.3

☐ Complies
☐ Does Not Apply
☐ Alternative: ________________________________

14: Minimum Aeration Times

Enclosures must be aerated for the following minimum duration:

a. 4 hours if mechanically ventilated using fans, or
b. 12 hours if passively ventilated

Work Site Plan B.14 & B.15

☐ Complies
☐ Does Not Apply
☐ Alternative: ________________________________

15: Testing Aeration Completeness

The concentration of methyl bromide in the air spaces between the stacked commodity must be less than 5 ppm before the commodity can be moved from the enclosure. Testing of this air space must be done according to approved procedures.

Work Site Plan B.16

☐ Complies
☐ Does Not Apply
☐ Alternative: ________________________________
16: Enclosed Storage Areas

Methyl bromide concentrations in enclosed areas (i.e., buildings, warehouses, silos, etc.) where fumigated commodities are stored must be less than 5 ppm before persons may enter. Testing of the air concentration must be done according to approved procedures. No individual may be inside the enclosed area for more than one hour in a 24-hour period.

☐ Complies
☐ Does Not Apply
☐ Alternative: __________________________________________

17: Work Site Plan

The enclosure operator and/or pest control business must complete or revise a Work Site Plan before receiving a permit.

☐ Complies
☐ Does Not Apply
☐ Alternative: __________________________________________

18: Test Results Documentation

The enclosure operator must keep records of all test results for 2 years and make them available to the County Agricultural Commissioner and workers upon request.

Work Site Plan B.19

☐ Complies
☐ Does Not Apply
☐ Alternative: __________________________________________
This part needs to be completed for each enclosure.

Enclosure Identification/Description: ____________________________________________
(check one)

- □ A1 - Pressure Tested/Standard Height Stack
- □ A2 - Pressure Tested/Minimum Stack
- □ A3 - Pressure Tested/No Stack
- □ B1 - Retention Tested or Untested/Standard Height Stack
- □ B2 - Retention Tested or Untested/Minimum Stack
- □ B3 - Retention Tested or Untested/No Stack

Ancillary Buffer Zone Requirements:

| Maximum Application Rate: __________________ | Maximum Fumigated Volume: __________________ |
| Other Enclosures Which May Be Used Within 24 hrs: __________________ |
| Treatment Duration: __________________ | Used Within 24 hrs: __________________ |

19: Treatment Zone

A treatment zone of ________ feet must be established around the enclosure during the fumigation treatment period. Only persons supervising and performing fumigation activities are permitted in the treatment zone during the treatment period. A separate treatment zone of ________ feet for workers may be used.

20: Aeration Zone

An aeration zone of ________ feet must be maintained around an enclosure during the first portion of the aeration period. Only persons supervising and performing fumigation activities are permitted in the aeration zone. The aeration zone must remain in place for the first four hours of aeration or until the exhaust concentration is less than 5 ppm.

21: Vertical Stack Exhaust

The stack must be vented vertically to the outside air. When exhausting, the top of the stack must be free of overhead obstructions.

- □ Complies
- □ Does Not Apply
- □ Alternative: ____________________________________________

Work Site Plan D.1, D.2
SULFURYL FLUORIDE PERMIT CONDITIONS -- DECISION TABLE.................................G-52

RECOMMENDED PERMIT CONDITIONS NON-RESIDENTIAL FACILITIES (<4500 LBS)

General Conditions..............................................................................................................G-53

RECOMMENDED PERMIT CONDITIONS FOR COMMODITY FUMIGATIONS &
NON-RESIDENTIAL FACILITIES (>4500 LBS)

General Conditions..............................................................................................................G-54

Specific Conditions..............................................................................................................G-58

Charts and Tables ...............................................................................................................G-65

FINAL PERMIT CONDITIONS ...............................................................................................G-70
### SULFURYL FLUORIDE PERMIT CONDITIONS -- DECISION TABLE

<table>
<thead>
<tr>
<th>If the fumigation type is:</th>
<th>And the total amount used will be:</th>
<th>Your permit conditions start on:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-Residential Processing &amp; Storage Facilities</td>
<td>&lt; 4500 lbs</td>
<td>Page G-53</td>
</tr>
<tr>
<td>Non-Residential Processing &amp; Storage Facilities</td>
<td>&gt; 4500 lbs</td>
<td>The CAC will refer your information to DPR. DPR will prepare a custom site plan for your fumigation.</td>
</tr>
<tr>
<td>Commodity</td>
<td>Any amount</td>
<td>Page G-1</td>
</tr>
</tbody>
</table>
Sulfuryl Fluoride Permit Conditions for Non-Residential (Enclosed Areas), Less than or equal to 4500 lbs

1) **General Requirement for Use of ProFume®**: Restricted material permits for the use of ProFume® shall not be issued to a facility operator and/or pest control operator who has not received a Dow AgroSciences certification showing they have attended a ProFume® stewardship training meeting.

2) **Restricted Material Permit Conditions for Sulfuryl Fluoride Use in Nonresidential Facilities (Enclosed areas)**
   For fumigations where less than or equal to 4500 lbs of sulfuryl fluoride will be applied within a 24 hour period, the following permit conditions apply:
   
   i) **Buffer zone requirements**:
      1. **Duration**: A buffer zone must be maintained during fumigation and through the completion of aeration.
      2. **Distance**: Use Table 1 to determine buffer zone distance based on the target fumigation concentration that will be maintained (oz SF/1000 ft3).
      3. **Occupation**: The buffer zone extends from the edge of the fumigated building. There may not be any occupied structures within the buffer zone. Only persons supervising and performing fumigation activities are permitted in the buffer zone. Exception: Transit along public thoroughfares is allowed.
   
   ii) **Aeration Requirements**:
      1. Minimum fumigant release height above ground level: 50 feet.
      2. Aeration must be initiated during daylight hours:
         a. Not later than one hour prior to sunset, and
         b. Not earlier than one hour following sunrise.

Table 1 – Use table to determine the buffer zone distance from edge of the fumigation facility to the nearest occupied structure.

<table>
<thead>
<tr>
<th>Targeted Fumigation Conc. (oz/1000ft3)</th>
<th>Buffer Zone Distance (ft)</th>
</tr>
</thead>
<tbody>
<tr>
<td>16</td>
<td>30</td>
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<tr>
<td>32</td>
<td>60</td>
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<td>96</td>
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<tr>
<td>112</td>
<td>260</td>
</tr>
<tr>
<td>128</td>
<td>300</td>
</tr>
</tbody>
</table>
### 1: Maximum Application Rate

A maximum application rate of 8 pounds per 1000 cubic feet or the rate specified by the label may be used, whichever is less.

### 2: Total Sulfuryl Fluoride

The total amount of sulfuryl fluoride per work site must not exceed 1000 pounds in a 24-hour period.

### 3: Other Types of Applications

This permit condition does not apply to sulfuryl fluoride applications.

### 4: Enclosed Area and Common Walls

The following types of fumigations are prohibited unless mitigation options are identified in the Work Site Plan:

- those inside an enclosed area with people present
- enclosures which share a common wall with another enclosed area with people present

*Examples: A tarpaulin fumigation inside a warehouse is prohibited. Using a chamber which shares a common wall with an office is prohibited.*
5: Outside Introduction

Application from outside the enclosure through a closed system is required. Releasing fumigant from inside the enclosure is prohibited unless mitigation options are identified in the Work Site Plan.

6: Gas-tight Fumigant Lines

All fumigant lines must be gas-tight. Fumigant lines, valves, fittings, etc. which are routinely adjusted or changed must be checked for leaks after each adjustment.

Examples: When changing sulfuryl fluoride cylinders, the connection between the introduction line and the cylinder must be checked for leaks. The cylinder valve must be checked for leaks after opening.

7: Test Equipment Seals

The enclosure must be sealed where instrument sampling lines pass through enclosure walls.

Example: Fumiscope leads must be placed and the hole at the chamber or enclosure wall sealed prior to the fumigation.

8: Test Equipment Exhaust

Exhaust from sampling equipment must be vented away from people and to outside air or back into the enclosure.

9: Fumigant Line Purge

When introducing fumigant from an enclosed control room, applicators must use nitrogen gas or compressed air to purge fumigant lines prior to changing cylinders.

10: Control Room Ventilation

Enclosed control rooms must be mechanically ventilated during fumigation if workers are present.

11: Control Room Storage

Sulfuryl fluoride cylinders must not be stored inside enclosed control rooms.
NOTE: The following conditions pertain to aeration of the fumigation enclosure, not aeration of areas where commodities are stored, except when they are the same.

12: Aeration Initiation  Persons who initiate aeration by manually breaking a seal must wear a self-contained breathing apparatus (SCBA). Exception: enclosures for which aeration is initiated remotely, such as chambers.

   Examples requiring SCBA: breaking seals on tarpaulin fumigations, opening sea/land container doors

13: Aeration During Daylight  Aeration must be initiated during daylight hours. Exception: Enclosures which aerate using an exhaust stack meeting the standard height requirements may exhaust at any time.

14: Minimum Aeration Times  Enclosures must be aerated for the following minimum duration:
   a. Four hours if mechanically ventilated using fans, or
   b. 12 hours if passively ventilated

   Note: The duration of the aeration period should not be confused with the time the aeration zone is in place. The aeration zone is in place for only the first portion of the aeration: four hours at most.

15: Testing Aeration Completeness  The concentration of sulfuryl fluoride in the air spaces between the stacked commodity must be less than 1 ppm before the commodity can be moved from the enclosure. Testing of this air space must be done according to approved procedures.

---

1 Daylight hours = Not later than one hour prior to sunset and not earlier than one hour following sunrise.
16: Enclosed Storage Areas
Sulfuryl fluoride concentrations in enclosed areas (i.e., buildings, warehouses, silos, etc.) where fumigated commodities are stored must be less than 1 ppm before persons may enter. Testing of the air concentration must be done according to approved procedures. No individual may be inside the enclosed area for more than one hour in a 24-hour period. **Note:** This condition pertains to areas where commodities are stored, not the fumigation enclosure, except when they are the same.

17: Work Site Plan
The enclosure operator and/or pest control business must complete or revise a Work Site Plan before receiving a permit. A completed Work Site Plan must be submitted to the CAC for evaluation before a Restricted Materials Permit will be issued.

18: Test Results Documentation
The enclosure operator must keep records of all test results for two years and make them available to the CAC and workers (pursuant to Labor Code section 6408 and Cal-OSHA regulations Title 8, section 3204) upon request.
Fumigation

Enclosure Types

There are specific conditions for each of six different types of fumigation enclosures. The enclosures are classified by the combination of two factors: the amount of fumigant the enclosure retains and the method used to aerate. There are two retention categories: pressure tested and retention tested/untested; and three aeration methods: standard height stack, minimum stack, and no stack. These two retention categories and three aeration categories give the six possible combinations of fumigation enclosures listed below:

A1 - Pressure Tested/Standard Height Stack (e.g., quarantine or vacuum chamber)

A2 - Pressure Tested/Minimum Stack (e.g., quarantine or vacuum chamber)

A3 - Pressure Tested/No Stack (e.g., quarantine chamber without a stack)

B1 - Retention Tested or Untested/Standard Height Stack (e.g., typical chamber)

B2 - Retention Tested or Untested/Minimum Stack (e.g., "Butler" with short stack)

B3 - Retention Tested or Untested/No Stack (e.g., tarp fumigation)

Buffer Zones

The amount of time a person spends in areas around commodity fumigations must be limited in order to minimize exposure. Exposure is limited by restricting a person's access to or time spent in areas near enclosures being fumigated or aerated. The size of the buffer zones depends on which of the six types of enclosures is being used. For certain types of enclosures, the amount of sulfuryl fluoride used and retained in the enclosure also influences the size of the buffer zone. There are two types of buffer zones: treatment zone and aeration zone. There can be different sizes of treatment zones because of differences in exposure duration. For example, nearby workers would have a smaller treatment zone if they worked for 12 hours, compared to nearby residents who would have a treatment zone based on a 24-hour exposure. A summary of the treatment zones and aeration zones for the various types of fumigations appears in Chart 1.
Enclosure Description

A pressure tested/standard height enclosure is a vacuum chamber or has passed the USDA pressure test. The exhaust stack is at least 10 feet above the enclosure's highest point, at least 10 feet above any major obstruction within 200 feet of the stack and at least as tall as the appropriate value listed in Table 1.

*Examples:* a quarantine chamber with a tall stack; a vacuum chamber with a tall stack.

19: Treatment Zone

A treatment zone of 10 feet must be established around the enclosure during the fumigation treatment period. Only persons supervising and performing fumigation activities are permitted in the treatment zone during the treatment period. **Exception:** Limited transit is allowed if unavoidable.

20: Aeration Zone

An aeration zone of 10 feet must be maintained around an enclosure during the first portion of the aeration period. Only persons supervising and performing fumigation activities are permitted in the aeration zone. **Exception:** Transit along public thoroughfares is allowed. The aeration zone must remain in place for the first four hours of aeration or until the exhaust concentration is less than 1 ppm. The aeration period itself may be of longer duration. Testing must be done according to approved procedures.

21: Vertical Stack Exhaust

The stack must be vented vertically to the outside air. When exhausting, the top of the stack must be free of overhead obstructions.

22: Aeration During Daylight

Does not apply. Aeration may occur at any time.
RECOMMENDED PERMIT CONDITIONS
Sulfuryl Fluoride
Commodity Fumigation

Enclosure Description
A pressure tested/minimum stack enclosure is a vacuum chamber or has passed the USDA pressure test. The exhaust stack is at least 15 feet above ground and the exhaust exit velocity is at least 600 feet per minute.

Examples: a quarantine chamber with a short stack; a vacuum chamber with a short stack.

19: Treatment Zone
A treatment zone of 10 feet must be established around the enclosure during the fumigation treatment period. Only persons supervising and performing fumigation activities are permitted in the treatment zone during the treatment period. Exception: Limited transit is allowed if unavoidable.

20: Aeration Zone
An aeration zone as specified in Table 3, page G-68, must be maintained around an enclosure during the first portion of the aeration period. Only persons supervising and performing fumigation activities are permitted in the aeration zone. Exception: Transit along public thoroughfares is allowed. The aeration zone must remain in place for the first four hours of aeration or until the exhaust concentration of sulfuryl fluoride is less than 1 ppm. The aeration period itself may be of longer duration. Testing must be done according to approved procedures.

21: Vertical Stack Exhaust
The stack must be vented vertically to the outside air. When exhausting, the top of the stack must be free of overhead obstructions.

22: Aeration During Daylight
Aeration must be initiated during daylight hours (see permit condition 13).
A pressure tested/no stack enclosure is a vacuum chamber or has passed the USDA pressure test, and either has no stack or the exhaust stack is less than 15 feet above ground or the exhaust exit velocity is less than 600 feet per minute.

*Example: a quarantine chamber with no stack.*

**19: Treatment Zone**

A treatment zone of 10 feet must be established around the enclosure during the fumigation treatment period. Only persons supervising and performing fumigation activities are permitted in the treatment zone during the treatment period. **Exception:** Limited transit is allowed if unavoidable.

**20: Aeration Zone**

An aeration zone as specified in Table 4, page G-69, must be maintained around an enclosure during the first portion of the aeration period. Only persons supervising and performing fumigation activities are permitted in the aeration zone. **Exception:** Transit along public thoroughfares is allowed. The aeration zone must remain in place for the first four hours of aeration or until the exhaust concentration of sulfuryl fluoride is less than 1 ppm. The aeration period itself may be of longer duration. Testing must be done according to approved procedures.

**21: Vertical Stack Exhaust**

Does not apply.

**22: Aeration During Daylight**

Aeration must be initiated during daylight hours (see permit condition 13).
**Enclosure Description**

A retention tested or untested/standard height stack enclosure may retain a large or small proportion of the Sulfuryl Fluoride and the exhaust stack is at least 10 feet above the enclosure's highest point, at least 10 feet above any building within 200 feet of the stack and at least as tall as the appropriate value listed in Table 1.  

**Note:** The size of the treatment zone may be minimized by measuring how well the enclosure fumigant and determining its loss ratio. This is done by performing a DPR-approved test procedure.

*Examples: a typical chamber with a tall stack, a "Butler" tank with a tall stack, a building with a tall stack.*

<table>
<thead>
<tr>
<th>Number</th>
<th>Condition</th>
</tr>
</thead>
<tbody>
<tr>
<td>19: Treatment Zone</td>
<td>A treatment zone as specified in Table 2, page G-67, must be established around the enclosure during the fumigation treatment period. Only persons supervising and performing fumigation activities are permitted in the treatment zone during the treatment period. <strong>Exception:</strong> Limited transit is allowed if unavoidable. Different size zones may be calculated based on the duration of exposure and/or duration of the treatment period. For example, a treatment zone may be calculated for nearby workers based on a 12-hour work shift, and a separate treatment zone may be calculated for nearby residents based on 24-hour occupancy.</td>
</tr>
<tr>
<td>20: Aeration Zone</td>
<td>An aeration zone of <strong>10 feet</strong> must be maintained around an enclosure during the first portion of the aeration period. Only persons supervising and performing fumigation activities are permitted in the aeration zone. <strong>Exception:</strong> Transit along public thoroughfares is allowed. The aeration zone must remain in place for the first four hours of aeration or until the exhaust concentration is less than 1 ppm. The aeration period itself may be of longer duration. Testing must be done according to approved procedures.</td>
</tr>
<tr>
<td>21: Vertical Stack Exhaust</td>
<td>The stack must be vented vertically to the outside air. When exhausting, the top of the stack must be free of overhead obstructions.</td>
</tr>
<tr>
<td>22: Aeration During Daylight</td>
<td>Does not apply. Aeration may occur at any time.</td>
</tr>
</tbody>
</table>
Enclosure Description

A retention tested or untested/minimum stack enclosure may retain a large or small proportion of the fumigant. The exhaust stack is at least 15 feet above ground and the exhaust exit velocity is at least 600 feet per minute.

Note: The size of the treatment zone may be minimized by measuring how well the enclosure retains fumigant and determining its loss ratio. This is done by performing a DPR-approved test procedure.

Examples: a chamber with a short stack, a building exhausted through the roof.

19: Treatment Zone

A treatment zone as specified in Table 2, page G-67, must be established around the enclosure during the fumigation treatment period. Only persons supervising and performing fumigation activities are permitted in the treatment zone during the treatment period. Exception: Limited transit is allowed if unavoidable.

Different size zones may be calculated based on the duration of exposure and/or duration of the treatment period. For example, a treatment zone may be calculated for nearby workers based on a 12-hour work shift, and a separate treatment zone may be calculated for nearby residents based on 24-hour occupancy.

20: Aeration Zone

An aeration zone as specified in Table 3, page G-68, must be maintained around an enclosure during the first portion of the aeration period. Only persons supervising and performing fumigation activities are permitted in the aeration zone. Exception: Transit along public thoroughfares is allowed. The aeration zone must remain in place for the first four hours of aeration or until the exhaust concentration of sulfuryl fluoride is less than 1 ppm. The aeration period itself may be of longer duration. Testing must be done according to approved procedures.

21: Vertical Stack Exhaust

The stack must be vented vertically to the outside air. When exhausting, the top of the stack must be free of overhead obstructions.

22: Aeration During Daylight

Aeration must be initiated during daylight hours (see permit condition 13).
Enclosure Description

A retention tested or untested/no stack enclosure may retain a large or small proportion of the fumigant and either has no stack or the exhaust stack is less than 15 feet above ground or the exhaust exit velocity is less than 600 feet per minute.

Note: The size of the buffer zones may be minimized by measuring how well the enclosure retains fumigant and determining its loss ratio. This is done by performing a DPR-approved test procedure.

Examples: a typical sea/land container, a building exhausted through open doors and windows, a typical tarpaulin fumigation.

19: Treatment Zone

A treatment zone as specified in Table 2, page G-67, must be established around the enclosure during the fumigation treatment period. Only persons supervising and performing fumigation activities are permitted in the treatment zone during the treatment period. Exception: Limited transit is allowed if unavoidable.

Different size zones may be calculated based on the duration of exposure and/or duration of the treatment period. For example, a treatment zone may be calculated for nearby workers based on a 12-hour work shift, and a separate treatment zone may be calculated for nearby residents based on 24-hour occupancy.

20: Aeration Zone

An aeration zone as specified in Table 4, page G-69, must be maintained around an enclosure during the first portion of the aeration period. Only persons supervising and performing fumigation activities are permitted in the aeration zone. Exception: Transit along public thoroughfares is allowed. The aeration zone must remain in place for the first four hours of aeration or until the exhaust concentration of sulfuryl fluoride is less than 1 ppm. The aeration period itself may be of longer duration. Testing must be done according to approved procedures.

21: Vertical Stack Exhaust

Does not apply.

22: Aeration During Daylight

Aeration must be initiated during daylight hours (see permit condition 13).
## RECOMMENDED PERMIT CONDITIONS

**Sulfuryl Fluoride**  
**Commodity Fumigation**

### CHART 1

**Summary of Buffer Zone Sizes**

<table>
<thead>
<tr>
<th>Retention Category</th>
<th>Aeration Method</th>
<th>Class</th>
<th>Treatment Zone Size</th>
<th>Aeration Zone Size</th>
<th>Aerate Daylight Hours Only</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pressure Tested (USDA pressure test)</td>
<td>Standard Height Stack</td>
<td>A1</td>
<td>10 feet</td>
<td>10 feet</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td><em>(Table 1 requirements)</em></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
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<td></td>
<td>Minimum Stack</td>
<td>A2</td>
<td>10 feet</td>
<td>Table 3</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td><em>(stack 15 ft above ground &amp; exit velocity &gt;600 ft/min)</em></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>No Stack</td>
<td>A3</td>
<td>10 feet</td>
<td>Table 4</td>
<td>YES</td>
</tr>
<tr>
<td>Retention Tested or Untested (DPR-approved test or no test)</td>
<td>Standard Height Stack</td>
<td>B1</td>
<td>Table 2</td>
<td>10 feet</td>
<td>NO</td>
</tr>
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<td><em>(Table 1 requirements)</em></td>
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<td>Minimum Stack</td>
<td>B2</td>
<td>Table 2</td>
<td>Table 3</td>
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</tr>
<tr>
<td></td>
<td><em>(stack 15 ft above ground &amp; exit velocity &gt;600 ft/min)</em></td>
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<tr>
<td></td>
<td>No Stack</td>
<td>B3</td>
<td>Table 2</td>
<td>Table 4</td>
<td>YES</td>
</tr>
</tbody>
</table>

*The stack must be at least 10 feet above the enclosure's highest point and at least 10 feet above any major obstruction within 200 feet of the stack and at least as tall as the appropriate value listed in Table 1.*

G-65
This table is used to determine the "standard height" (feet) of a stack. A "standard height" exhaust stack is one which is:
1. at least 10 feet above the enclosure's highest point, and
2. at least 10 feet above any major obstruction within 200 feet of the stack, and
3. at least as tall (above ground level) as the appropriate value in the table below

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<th>Total Amount of Sulfuryl Fluoride Applied (pounds) at the Work Site in a 24-hour Period</th>
<th>50</th>
<th>100</th>
<th>150</th>
<th>200</th>
<th>250</th>
<th>300</th>
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</table>

*Exit Velocity = \[
\text{Stack Cross-Sectional Area (square feet)} \times 3.14 \times \text{radius}^2
\]
This table is used to determine the treatment zone size (feet) surrounding enclosures which are retention tested or untested. Consult with the CAC to determine the sizes for multiple fumigations in a 24-hour period.

### Concentration Lost (pounds per 1000 cubic feet)* ROUND UP

<table>
<thead>
<tr>
<th>Volume Fumigated in a 24-hour Period (cubic feet)</th>
<th>0.2</th>
<th>0.4</th>
<th>0.6</th>
<th>0.8</th>
<th>1.0</th>
<th>1.2</th>
<th>1.4</th>
<th>1.6</th>
<th>2.0</th>
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<th>2.4</th>
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</table>

* The Concentration Lost is calculated from the application rate, exposure duration, and loss ratio (proportion of fumigant leaked from the enclosure), according to the formula below. The exposure duration for workers is 12 hours or the treatment duration, whichever is less. The exposure duration for residents is the duration of treatment (24 hours maximum). The loss ratio is determined from a DPR approved test; for untested enclosures use 0.030.

\[
\text{Concentration Lost} = \left[ \text{Application Rate (pounds per 1000 cubic feet)} \right] \times \left[ \text{Exposure Duration (hours)} \right] \times [\text{Loss Ratio}]
\]

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This table is used to determine the aeration zone size (feet) required during the aeration of enclosures with exhaust stacks having the following characteristics:
1. The top of the exhaust stack is at least 15 feet above ground level, and
2. The exit velocity is at least 600 feet per minute

\[
\text{Exit Velocity} = \frac{\text{Rated Fan Capacity (cubic feet per minute)}}{\text{Stack Cross-Sectional Area (square feet)}}
\]

<table>
<thead>
<tr>
<th>Total Retained in a 24-hour Period (pounds)</th>
<th>Aeration Zone (feet)</th>
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<tr>
<td>50</td>
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</table>

* The Total Retained is calculated from the amount of fumigant, treatment duration and loss ratio (proportion of fumigant leaked from the enclosure), according to the formulas below. The loss ratio is determined from a DPR-approved test.

Proportion Retained** = 1 – [Treatment Duration (hours) × Loss Ratio]

**For untested enclosures, use 0.90 for the Proportion Retained

Total Retained = [Amount of fumigant Applied in a 24 hour Period (pounds)] × [Proportion Retained]
This table is used to determine the aeration zone size (feet) of enclosures that have no stack. Consult with the CAC to determine the aeration zone size when aerating multiple enclosures in a 24-hour period.

### Table 4
Aeration Zone Sizes for No Stacks

<table>
<thead>
<tr>
<th>Concentration Retained (pounds per 1000 cubic feet)*</th>
<th>ROUND UP</th>
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</thead>
<tbody>
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</tr>
<tr>
<td>15000</td>
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</tbody>
</table>

* The Concentration Retained is calculated from the rate, treatment duration, and loss ratio (proportion of fumigant leaked from the enclosure), according to the formulas below. The loss ratio is determined from a DPR-approved test.

Proportion Retained** = 1 - [Treatment Duration (hours) × Loss Ratio]

**For untested enclosures, use 0.90 for the Proportion Retained

Concentration Retained = [Application Rate (pounds per 1000 cubic feet)] × [Proportion Retained]
Fumigation Site: __________________________ Permit Number: ________________
Address: __________________________ City: __________________ Zip: ________________
Contact Person: __________________________ Phone: __________________________
(Facility Operator, Grower, QAC, QAL, etc.)

Pest Control Business: __________________________ Permit Number: ________________
Address: __________________________ City: __________________ Zip: ________________
Contact Person: __________________________ Phone: __________________________
(QAL with the appropriate category)

I VERIFY THAT THE ATTACHED PERMIT CONDITIONS WILL BE FOLLOWED

Permit Applicant: __________________________ Date: ________________
(Facility Operator)
1: Maximum Application Rate

A maximum application rate of 8 pounds per 1000 cubic feet or the rate specified by the label may be used, whichever is less.

Work Site Plan B.1

☐ Complies
☐ Does Not Apply
☐ Alternative: ____________________________

*See page G-58 for possible additional restrictions to comply with the buffer zones.*

2: Total Sulfuryl Fluoride

The total amount of sulfuryl fluoride per work site must not exceed 1000 pounds in a 24-hour period.

Work Site Plan B.2

☐ Complies
☐ Does Not Apply
☐ Alternative: ____________________________

*See page G-58 for possible additional restrictions to comply with the buffer zones.*

3: Other Types of Applications

This permit condition does not apply to sulfuryl fluoride fumigations.

Work Site Plan B.3

4: Enclosed Area and Common Walls

The following types of fumigations are prohibited:
- those inside an enclosed area with people present
- enclosures which share a common wall with another enclosed area with people present

Work Site Plan B.4 & 5

☐ Complies
☐ Does Not Apply
☐ Alternative: ____________________________
### 5: Outside

**Introduction**

Application from outside the enclosure through a closed system is required. Releasing sulfuryl fluoride from inside the enclosure is prohibited.

- Work Site Plan B.6
  - □ Complies
  - □ Does Not Apply
  - □ Alternative: ________________________________

### 6: Gas-tight

**Fumigant Lines**

All fumigant lines must be gas-tight. Fumigant lines, valves, fittings, etc. which are routinely adjusted or changed must be checked for leaks after each adjustment.

- Work Site Plan B.7
  - □ Complies
  - □ Does Not Apply
  - □ Alternative: ________________________________

### 7: Test Equipment

**Seals**

The enclosure must be sealed where instrument sampling lines pass through enclosure walls.

- Work Site Plan B.8
  - □ Complies
  - □ Does Not Apply
  - □ Alternative: ________________________________

### 8: Test Equipment

**Exhaust**

Exhaust from sampling equipment must be vented away from people and to outside air or back into the enclosure.

- Work Site Plan B.9
  - □ Complies
  - □ Does Not Apply
  - □ Alternative: ________________________________
9: Fumigant Line Purge

When introducing sulfuryl fluoride from an enclosed control room, applicators must use nitrogen gas or compressed air to purge fumigant lines prior to changing cylinders.

Work Site Plan B.10

☐ Complies
☐ Does Not Apply
☐ Alternative: __________________________

10: Control Room Ventilation

Enclosed control rooms must be mechanically ventilated during fumigation if workers are present.

Work Site Plan B.11

☐ Complies
☐ Does Not Apply
☐ Alternative: __________________________

11: Control Room Storage

Sulfuryl fluoride cylinders must not be stored inside enclosed control rooms.

Work Site Plan B.12

☐ Complies
☐ Does Not Apply
☐ Alternative: __________________________
12: Aeration Initiation

Persons who initiate aeration by manually breaking a seal must wear a self-contained breathing apparatus (SCBA).

Exception: Enclosures for which aeration is initiated remotely, such as chambers.

Work Site Plan B.13

□ Complies
□ Does Not Apply
□ Alternative: ________________________________

13: Aeration During Daylight

Aeration must be initiated during daylight hours.

Exception: Enclosures which aerate using an exhaust stack meeting the standard height requirements may exhaust at any time.

Work Site Plan D.3

□ Complies
□ Does Not Apply
□ Alternative: ________________________________

14: Minimum Aeration Times

Enclosures must be aerated for the following minimum duration:

a. 4 hours if mechanically ventilated using fans, or
b. 12 hours if passively ventilated

Work Site Plan B.14 & B.15

□ Complies
□ Does Not Apply
□ Alternative: ________________________________

15: Testing Aeration Completeness

The concentration of sulfuryl fluoride in the air spaces between the stacked commodity must be less than 1 ppm before the commodity can be moved from the enclosure. Testing of this air space must be done according to approved procedures.

Work Site Plan B.16

□ Complies
□ Does Not Apply
□ Alternative: ________________________________
16: Enclosed Storage Areas
Sulfuryl fluoride concentrations in enclosed areas (i.e., buildings, warehouses, silos, etc.) where fumigated commodities are stored must be less than 1 ppm before persons may enter. Testing of the air concentration must be done according to approved procedures. No individual may be inside the enclosed area for more than one hour in a 24-hour period.

□ Complies
□ Does Not Apply
□ Alternative: ________________________________

17: Work Site Plan
The enclosure operator and/or pest control business must complete or revise a Work Site Plan before receiving a permit.

□ Complies
□ Does Not Apply
□ Alternative: ________________________________

18: Test Results Documentation
The enclosure operator must keep records of all test results for 2 years and make them available to the County Agricultural Commissioner and workers upon request.

□ Complies
□ Does Not Apply
□ Alternative: ________________________________
This part needs to be completed for each enclosure.

Enclosure Identification/Description: ________________________________
(check one)

□ A1 - Pressure Tested/Standard Height Stack
□ A2 - Pressure Tested/Minimum Stack
□ A3 - Pressure Tested/No Stack
□ B1 - Retention Tested or Untested/Standard Height Stack
□ B2 - Retention Tested or Untested/Minimum Stack
□ B3 - Retention Tested or Untested/No Stack

Ancillary Buffer Zone Requirements:

Maximum
Application Rate: ________________
Fumigated Volume: __________________

Other Enclosures
Treatment Duration: __________________
Which May Be Used Within 24 hrs: __________________

19: Treatment Zone
A treatment zone of ________ feet must be established around the enclosure during the fumigation treatment period. Only persons supervising and performing fumigation activities are permitted in the treatment zone during the treatment period. A separate treatment zone of ________ feet for workers may be used.

20: Aeration Zone
An aeration zone of ________ feet must be maintained around an enclosure during the first portion of the aeration period. Only persons supervising and performing fumigation activities are permitted in the aeration zone. The aeration zone must remain in place for the first four hours of aeration or until the exhaust concentration is less than 1 ppm.

21: Vertical Stack Exhaust
The stack must be vented vertically to the outside air. When exhausting, the top of the stack must be free of overhead obstructions.