



Department of Pesticide Regulation



Brian R. Leahy
Director

MEMORANDUM

Edmund G. Brown Jr.
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TO: Saturnino Yanga
Environmental Program Manager I
Worker Health and Safety Branch

HSM-14004

FROM: Harvard R. Fong, CIH
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(original signed by H. Fong)

DATE: March 4, 2014

SUBJECT: RESULTS FROM CONSULTATION WITH STANISLAUS CAC CONCERNING
PROPOSED CONVERSION OF A WAREHOUSE INTO A FUMIGATION
CHAMBER

On February 22, 2014, Associate Industrial Hygienist Parissa Tehrani and I traveled to the Growers Direct Nut Company in Hughson, Stanislaus County to provide a consultation for Stanislaus County Agricultural Commissioner's (CAC) staff concerning a proposed warehouse site to be converted into a fumigation chamber. The operator of the site, Dave Meyer, was present, as well as inspectors from the CAC.

The structure in question, identified as Building G, is a metal-sided structure presently used as storage for bins of nut product. It is approximately 50 feet north of a fumigation chamber that the operation currently uses. An inspection of the building does not disclose any apparent structural conditions that prevent conversion. There are two conduits that should either be removed or internally sealed with appropriate filler, suitable for electrical conduit and wiring. The penetration holes these conduits pass through (both in Building G and the adjoining Building E) appear to be adequately sealed with foam. Electrical panels presently within the structure should be relocated to the outside of the structure, in case emergency access to these panels is required while the facility is under fumigation.

There is a location issue involving the minimum buffer-zone requirements. Building G is within 5 feet of an adjoining metal-sided structure (Building E) housing processing and storage operations. The buffer extends to a roll-up cargo door and is also close to an entry door (Photo One). This is a potential non-compliance with the Department of Pesticide Regulation's Reference Manual/Methyl Bromide Commodity Fumigation (August 8, 1994): Definition R, Condition 19: Treatment Zone Access & Duration ("Condition 19"). I advised the CACs that a potential alternative condition would be to require that the cargo door entry (both the rapid roll-up screen and the steel roll-up door behind it) be locked in the closed position during fumigation and that the entry door be equipped with a panic bar/alarm system (see Photo Two). Employees should be trained that exit through this door during fumigation is prohibited except during emergency situations. Management may use a sign system informing employees when use of the door is prohibited and when it is allowed. The alarm could be turned off when fumigations are not occurring. The activation/deactivation procedures of the alarm must be incorporated into the



fumigation management plan for this facility. Under no circumstances shall the door be rendered inoperable or otherwise locked, preventing emergency egress when necessary.



Photo One: Cargo and entry door adjoining proposed fumigation structure.

The breezeway between Buildings G and E should be tested (first three fumigations, then periodically after that, at least seasonally) for any methyl bromide leaking from the chamber. A chain or other entry-prevention measure should be installed at both ends of the breezeway, along with warning signs, prohibiting entry during fumigation.



Photo Two: Alarm-equipped emergency exit bar

Finally, two rainwater drains were noted very close to one corner of Building G (Photo Three). It is advised, though not necessarily to be made a requirement that sandbags be placed over these drains during fumigation, to preclude any leaking methyl bromide from accumulating in the drainage system fed by these drains.

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Photo Three: Drain adjacent to Building G corner

All appropriate structural and procedural requirements as specified in the 1994 Reference Manual: Methyl Bromide Commodity Fumigation should be followed.

cc: Claudia Parrish, Agricultural Inspector, Stanislaus County Department of Agriculture
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Pamela Wofford, Senior Environmental Scientist, Environmental Monitoring Branch, DPR