



# Department of Pesticide Regulation



Edmund G. Brown Jr.  
Governor

May 9, 2011

ENF 11-16

TO: County Agricultural Commissioners

SUBJECT: CALIFORNIA AERATION PLAN-FREQUENTLY ASKED QUESTIONS

The California Aeration Plan (CAP) is currently the only Fumigation Safety Program accepted for use under section 6780(c) of Title 3, California Code of Regulations. As a reminder, the CAP method and revised inspection procedures were distributed as CAC letter ENF 10-20 on October 26, 2010.

The following are frequently asked questions and answers about implementation of the CAP.

*Q: When there is a storage shed attached on the outside of the structure, or a storage room under a staircase, is a fan required to aid aeration?*

A: No fan is required. If the shed has an operable window it should be opened a minimum of three inches. If there is no window, the door may be used to provide the fresh air exchange. The door should be open a minimum of three inches and secured against unauthorized entry.

*Q: Is there a minimum size required for circulation fans?*

A: There is no minimum size requirement for circulation fans in the CAP. Aeration fans must be at least 18" in diameter.

*Q: Is there a minimum size for a room without windows which requires a fan to aid aeration, such as internal bathrooms, walk-in closets and pantries?*

A: There is no minimum size, however the fumigator must provide for aeration of the entire fumigated space using inlets, aeration fans with ducting, and circulation fans.

*Q: Does one attic with multiple attic accesses require a fan for each access?*

A: No, all operable attic openings must be open and one fan directed into each attic.

*Q: What is the interpretation of "use a fan to aid aeration of that room" for a room without an operable window?*



A: There is no requirement to place a fan in every room without an operable window, however the fumigator must provide for aeration of the entire fumigated space using inlet devices, aeration fans and circulation fans. For example, a circulation fan in the hall could be used to aid aeration of bedrooms and bathrooms.

*Q. Inlet devices are often used in pairs. If the job is 61MCF and three inlet devices are required, can four inlet devices be used?*

A: CAP Table 1 in the Inspection Procedures, Compendium Volume 4 at [http://www.cdpr.ca.gov/docs/enforce/compend/vol\\_4/append6.pdf](http://www.cdpr.ca.gov/docs/enforce/compend/vol_4/append6.pdf), describes the minimum number of inlets and ducts based on structure volume. The language does not prevent using an extra inlet. However, the number of inlets does eventually have an influence on creating the negative pressure which helps pull fresh air through the structure.

*Q. Is CAP required to fumigate boats, sheds, carports and gazebos?*

A: CAP is an option. Title 3, California Code of Regulations (3CCR) section 6780 requires the use of air supplied respirator (SCBA) or continuous monitoring to warn employees before the Permissible Exposure Level is reached or an approved Fumigation Safety Program, such as CAP, to protect workers during the tarp removal process. If SCBA or continuous monitoring is used for tarp removal, refer to labels for Aeration Procedure 1 and Aeration Procedure 2.

While the use of an SCBA is legally acceptable under DPR regulations for removing tarps from any structure, the CAP plan minimizes the potential risk to workers by providing the option to remove tarps without the use of an SCBA.

*Q. Can CAP be used for "Tape and Seal" fumigations?*

A: Yes, CAP is an option, provided its requirements are met. The other option is to use SCBA or continuous monitoring for interior opening; refer to the labels for Aeration Procedure 1 and Aeration Procedure 2.

*Q. How do fumigators comply with section 6780 when a fumigation "blows open"?*

A: Respiratory protection (SCBA) or continuous monitoring can be used when determining fumigant level in the exterior workspace. Determine the interior fumigant level to assess if the job is finished.

If the job is finished, it can be resealed and aerated using CAP. If the job is finished and cannot be resealed, tarps can be removed using SCBA or employ continuous monitoring; aeration must be completed using Aeration Procedure 1 or Aeration Procedure 2 from the product label.

County Agricultural Commissioners

May 9, 2011

Page 3

If the job is not finished, it can be resealed, more fumigant added if necessary, and CAP used for aeration. If the fumigation cannot be resealed and is to be rescheduled for a later date, tarps can be removed using SCBA or continuous monitoring. Aeration must be completed using Aeration Procedure 1 or Aeration Procedure 2 from the product label.

*Q: When CAP is used, are two people required for tarp removal?*

A: No. A licensee is required to commence ventilation and to be present when the tarps are removed. Since no respiratory equipment is required for tarp removal, additional employees are optional.

*Q: Does a Fumiscope meet the requirement for continuous monitoring under 3CCR section 6780?*

A: No, a Fumiscope is not sensitive enough (1 ppm is required). If a fumigator attempts to comply with section 6780 using continuous monitoring, they would need to monitor each employee removing clips, tarps and snakes with an Interscan or ExplorIR.

*Q: Do employees who remove tarps require training?*

A: Yes. Training is required for pesticide handlers. Employees removing tarps from a fumigated structure are handlers by definition (3CCR section 6000).

If you have any questions about implementation of CAP, please contact the Enforcement Branch Liaison assigned to your county.

Sincerely,

*Original Signature by:*

Nan Gorder, Ph.D.  
Chief, Enforcement Branch  
916-324-4100

cc: Mr. Tom Babb, DPR Agricultural Commissioner Liaison  
Enforcement Branch Liaisons