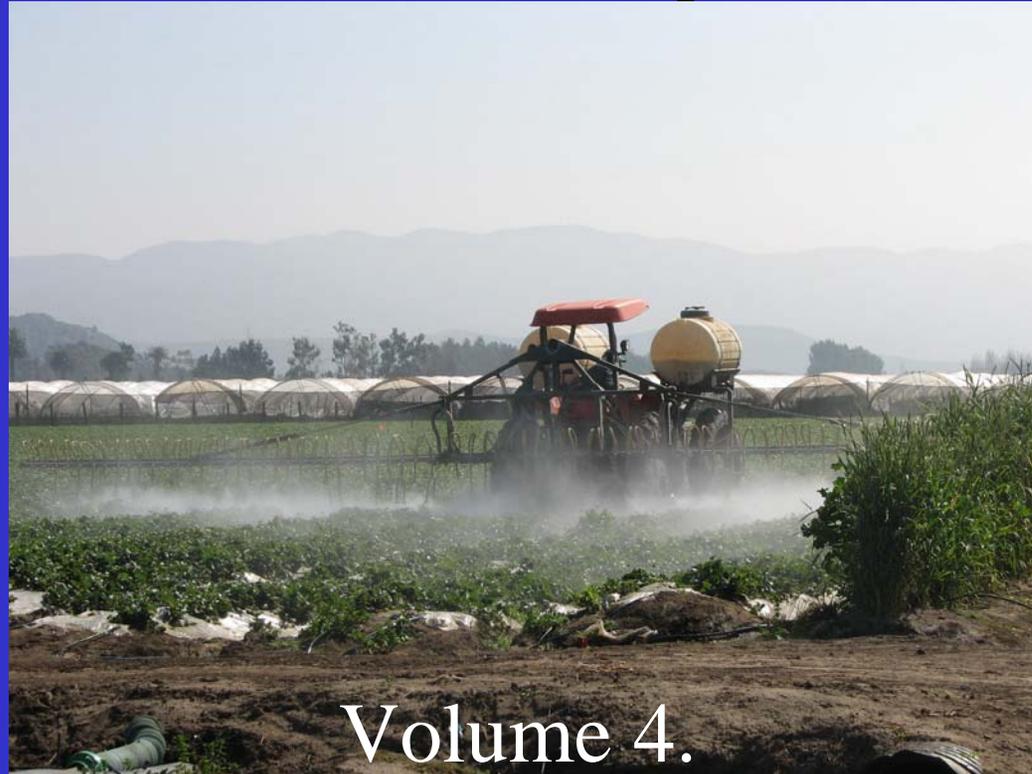
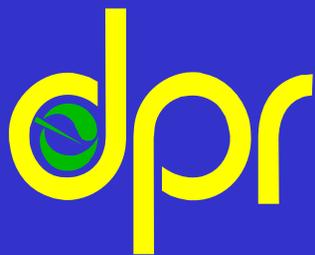


Pesticide Use Enforcement Standards Compendium



Volume 4.

Inspection Procedures



Photos courtesy of Andrew Calderwood Ventura CAC

Why Are We Here

- To improve the quality and consistency of inspections
- To provide guidance on:
 - Use of the new Inspection Procedures
 - Changes in the Inspection Procedures
 - Heightened standards for inspections
- To address questions and comments on performing inspections



Pesticide Use Enforcement Standards Compendium

- DPR authority to direct CACs
- Compendium Supersedes ENF Letters
- Deviations
- Updates
- Suggested changes



How to Use This Manual

- Scope
 - All pesticides vs. registered pesticides
 - Use of N/A
- Directions
- Exemptions →
- references
- Appendices

5. Pilot(s) Registered in County. FAC §11920

Scope: Persons acting as a pest control aircraft pilot.

☞ Pilots must be registered in each county in which they are operating. Are apprentice certificate holders supervised by a Journeyman Pilot named on the apprentice pilot's county registration must be registered in that county.

Exemptions: None.

6. Recommendations Retained / One Year. FAC §11920

Scope: Agricultural pest control businesses applying pesticides. Written recommendations must be written.

☞ When applied by an agricultural PCB, a written record of agricultural use of a pesticide that requires a permit. See §11920.1(1)(b).

☞ Has the pest control business retained a copy of each written recommendation available for each agricultural use? Match a sample of use records containing Restricted Material recommendations. If deficiencies are observed, expand on the use records.

Exemptions: None.

How to Use This Manual

Appendices

- PPE – Appendix 1
 - 3CCR § 6738
- Inspection Interviews – Appendix 2
 - All inspections except Pre-Application
 - Management and employees
 - Headquarter and Employee Safety
 - Spanish Translations

Inspection Procedures

- Inspections vs. Investigations
 - Inquisitive approach
- Reports vs. checklists
 - Interviews
 - Narrative remarks



General Procedures

- General Application of Standards
- 3CCR § 6601
 - PPE and other Labeling Requirements
- WPS Consistent Standard 3CCR § 6701 Page 6
 - 6700 regulations > Federal WPS
- Determining Compliance Status Page 25
- Violation Notice Status of Inspections Page 29

General Revisions

- Respirator Regulation 3CCR § 6739
 - All inspections except Pre-App, FWS
 - Use monitoring requirements
 - Headquarter requirements
- ENF references deleted



Pre-Application Site Evaluation

- Application consistent with R.M. regulations 3CCR § 6443 – 6487.5
- Basis for application evaluated. 3CCR § 6436/6426(a)
- New forms omit recommendation reviewed/complete
- List all pesticides in proposed application

Fieldworker Safety Inspection

- Labeling registration number
- Notification 3CCR § 6618
 - Interview employer and worker(s)
 - Who provides notification?
 - What notifications received?



Fieldworker Safety Inspection

- Application Specific Information Display
 - Must verify or provide an explanation
 - Citing operator on FLC FWS inspection
- Greenhouse/ nursery entry table



WPS Elements

STATE OF CALIFORNIA
DEPARTMENT OF PESTICIDE REGULATION
FIELD WORKER SAFETY INSPECTION
PR-ENF-103 (EST. 3/03)

IS THIS A FOLLOW-UP INSPECTION? YES NO
Check one below & list serial # of original inspection
 COMPLETE
 PARTIAL - Do not count on PRAMR (Report 5)
SERIAL # _____

INSPECTING COUNTY _____

FIRM / PERSON INSPECTED (Check one) FLC GROWER OTHER TELEPHONE NUMBER _____ SITE ID NUMBER _____

FIRM MAILING ADDRESS _____ PERMIT / OPERATOR ID NUMBER _____ COMMODITY / SITE _____

PROPERTY OPERATOR _____ ADJACENT ENVIRONMENT (N) _____ (S) _____

PROPERTY LOCATION _____ (E) _____ (W) _____

SUPERVISOR INTERVIEWED YES NO

WORKER PROTECTION STANDARD ELEMENTS

Notice of Application within 1/4 Mile YES NO N/A NOT INSPECTED App. Specific Info. (Prop Operator) YES NO N/A NOT INSPECTED

Date of Application: _____ REI Expired: YES NO

Approximate Number of Fieldworkers: _____ Approximate Field Size: _____

Number of Fieldworkers Interviewed: _____ Fieldworkers Activity: _____

PESTICIDE NAME / MANUFACTURER	LABEL REGISTRATION NUMBER	SIGNAL WORD	REI

Early Entry Personal Protective Equipment Worn

HANDS <input type="checkbox"/> Cloth/Leather Gloves <input type="checkbox"/> Chemical Resistant Gloves <input type="checkbox"/> Other _____ <input type="checkbox"/> None	EYES <input type="checkbox"/> Safety Glasses <input type="checkbox"/> Goggles <input type="checkbox"/> Faceshield <input type="checkbox"/> Eye/Sun Glasses <input type="checkbox"/> None	INHALATION <input type="checkbox"/> Dust Mask <input type="checkbox"/> 1/2 Face Respirator <input type="checkbox"/> Full Face Respirator <input type="checkbox"/> SCBA <input type="checkbox"/> None	OTHER <input type="checkbox"/> Work Clothes <input type="checkbox"/> Chemical Resistant Clothes <input type="checkbox"/> Chemical Resistant Boots <input type="checkbox"/> Head Covering <input type="checkbox"/> Shoes and Socks <input type="checkbox"/> Other _____
--	--	--	---

REQUIREMENTS	Section	COMPLIANCE			REQUIREMENTS (Continued)	Section	COMPLIANCE		
		YES	NO	N/A			YES	NO	N/A
1. FLC Registered # _____	(LC) 1695				Items Specific to Property Operators				
2. Labeling - Personal Protective Equipment	12973				10. Posting Compliance	6776			
3. Hazard Communication A-9	8781				11. Greenhouse Ventilation Criteria	6769			
4. Field Work during Pesticide Application	8782								
5. Field Worker Training	8764								
6. Emergency Medical Care Knowledge	8766								
7. Decontamination Facility	8768								
8. Field Entry after Pesticide Application	8770								
9. Early Entry Requirements	8771				TOTAL	TOTAL			

COMPLIANCE ACTIONS:

Follow-up Required YES NO

Cease and Desist Order 11897/13102 YES NO

Hazardous Area 6706 YES NO

Correct Noncompliances By: _____

DECONTAMINATION FACILITY: (Item 7 or 9)

Decontamination Facility within 1/4 Mile YES NO

Sufficient Water Available YES NO

Sufficient Soap Available YES NO

Sufficient Single Use Towels or Clean Towels (6771) YES NO

Eyewash, 1 Pint each (Early Entry) (6771) YES NO N/A

VIOLATION NOTICE # _____ YES NO

Remarks: include a detailed description of noncompliances.

INSPECTOR _____ TIME AND DATE INSPECTED _____

Use Monitoring Inspection

- Labeling on site 3CCR § 6602
- Labeling – site, rate, other
- Respiratory protection
- Field Posting –
 - violations for PCB applications
 - Activity based REIs



Use Monitoring Inspection

- Safe equipment
 - Cover/shut off/sight gauge scope, exemp.s
- Backflow device exemption
- Proper/rinsed containers 3CCR § 6680/84
- Time of use definition
- Ground water/Wellhead protection
- Dormant insecticides





Can you spot

Any violations in this picture?



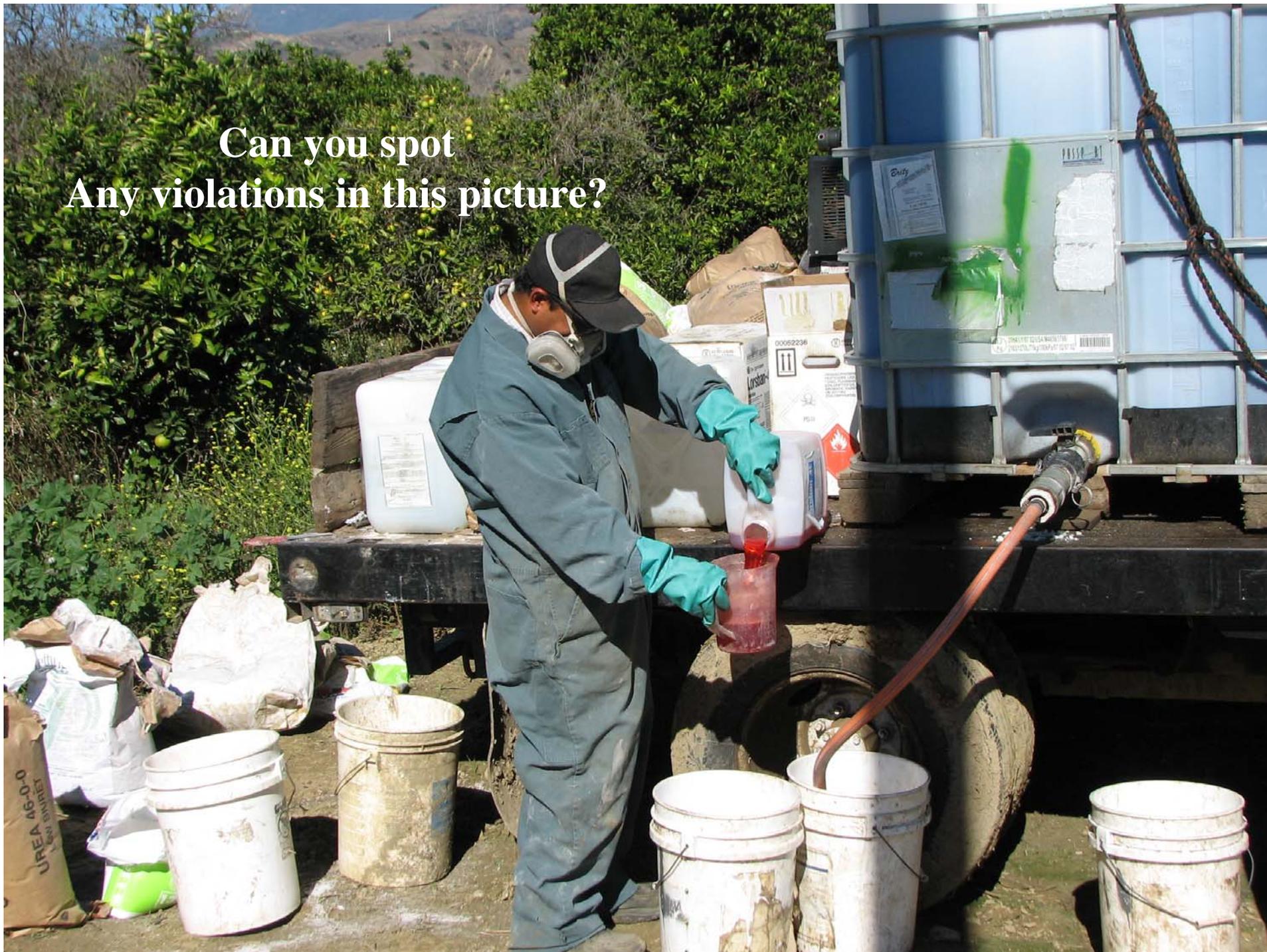
Can you spot

Any violations in this picture?

**Can you spot
Any violations in this picture?**



Can you spot
Any violations in this picture?



Commodity Fumigations

- Added PCB licensed FAC § 11701 to new forms
- NOIs
- Physical/visual presence of certified applicator

Field Fumigation Inspections

- Method codes
 - License category
 - NAA emission allowance
 - Fumigation methods
 - Buffer Zones (update)
-
- Note: Page 106 “labeling prohibits rubber gloves..” Labeling actually prohibits all gloves.



Headquarter Inspections

- Handler & worker interviews
 - Exemptions/explanations
- Respirator regulations 3CCR § 6739
- Medical records HPPA
- Medical Supervision - 30 day interval

Headquarter Inspections

- Training requirements
- SPCB use records B&PC § 8505.17/
16CCR § 1970(b)
- Qualified Branch supervisor 16CCR 8611

Headquarter Inspections

- Dealer
 - GW statement 3CCR § 6570 deleted
 - Out of County Sales added 3CCR § 6568(d)
 - Specialized records added 3CCR § 6674/6676
- Adviser
 - GW statement 3CCR § 6570 deleted

Appendix 1 PPE

- 3CCR § 6738 vs. labeling
- Safety glasses
 - Two step verification
- Gloves
 - Labeling/table/key
 - Liners

Appendix 1 Respiratory PPE

- Respiratory PPE
- Use limitations
- Medical evaluation
- Voluntary Use
- NRP key
- Certification numbers/labeling substitutions
- Maintenance/inspection

Appendix 1 Engineering Controls

- Closed systems
 - Dry formulation/application systems
 - Liquid systems/Directors criteria
 - PPE substitutions
- Enclosed cabs
 - Criteria
 - Use requirements
 - Maintenance requirements



Appendix 2 Inspection Interviews

- When/who/why
- Technique
- General questions
- Retaliation issues
- Inspection specific questions
- When you can't interview
- Spanish translations

Appendix 3 & 4

- Backflow prevention
- Chemigation
- Groundwater protection

Appendices 5 - 7

- Bag burning
- TRAP
- Fumigation Methods



**Can you spot
Any violations in this picture?**

Pages 284 - 353

31



**Can you spot
Any violations in this picture?**

Seguridad

AG 4

Las se adhieren a trabajo y después de trabajo...

NO LESION

erren a su piel y ropa cuando toca las plantas...

de su ropa a su piel...

eden atravesar fácilmente su piel y pueden...

o si está enfermo o se ha lesionado en el trabajo...

on es a causa del trabajo, su empleador pagará...

lacionada con el trabajo, a usted le podrían...

lo lleve al doctor si usted está...

nado

RECUERDE SIEMPRE

Nunca ponga pesticidas en...

them the opportunity to participate in scheduled hearings at which the operator is to appeal alleged violations or questions of abatement, as required by OSHA regulations.

ANY QUESTIONS?
If you have any questions about this notice or want more information about labor camps, or if you want to report a violation of the law, please contact:

Person: _____
Agency: _____
Address: _____
Telephone No.: _____

operaciones a personas... el campamento tenga que testificar violaciones declaradas o preguntas de revocación, como es requisito de las regulaciones de OSHA.

¿HAY PREGUNTAS?
Para cualquier pregunta en cuanto a esta noticia se refiere o para más información sobre los campamentos de trabajadores, o si usted quiere reportar una violación de ley, sírvase comunicarse con:

Persona: _____
Agencia: _____
Dirección: _____
Teléfono No.: _____

NOTE: This notice shall be posted in a conspicuous space within a labor camp at all times the camp is occupied.
HCD 206 (Revised 8/77)

Emergency Numbers for Pesticide Handlers
Números de Emergencia para Manejadores de Pesticidas:

Medical/Medical: _____

Doctor/Doctor: _____

Hospital/Hospital: _____

Clinic/Clinica: _____

Ambulance/Ambulancia: _____

Report all injuries/Reporte todas las lesiones!
(CCR, Title 3 § 6726)



• Taking a pregnancy disability leave date. If you want more information leave on your seniority and benefits

DFEH-100-20 (01/00)

***NOTE:** This pregnancy leave
***NOTA:** Este aviso de permiso p

STATE OF CALIFORNIA-State and Consumer S
DEPARTMENT OF FAIR EMPLOY
2014 T Street, Suite 210
Sacramento, CA 95814-5212

- FAMILY CARE AND M AND PREGNAN**
- Under the California Family Rig than 12 months of service with the 12-month period before the have a right to an unpaid family leave may be up to 12 workwee adoption, or foster care placem health condition or that of your
 - Even if you are not eligible for C childbirth or related medical cor disability leave of up to four mo disability. If you are CFRA-eligit pregnancy disability leave and a child. Both leaves contain a gua comparable position at the end under the law.
 - If possible, you must provide at events (such as the expected b for yourself or of a family memb need you to notify us, at least v the leave.
 - Failure to comply with these no deferral of the requested leave
 - We may require certification fro you a leave for pregnancy or yo certification from the health car who has a serious health condit of that family member. When m intermittent or a reduced work s
 - If you are taking a leave for the child, the basic minimum durati conclude the leave within one y foster care.
 - Taking a family care or pregno

**Can you spot
Any violations in this picture?**



**Can you spot
Any violations in this picture?**



**Can you spot
Any violations in this picture?**

EXERCISES



QUIZ

For each question:

Step 1

Find the correct answer in the manual.

Step 2

Tell the class the answer and where you found it in the manual.

- a) Chapter and Page number
- b) Scope, direction or exemptions
- c) Referent – code section or guidance

QUIZ Question 1

- 1.) You are inspecting a crew of lemon harvesters on Knowles Farm. The foreman tells you they work for Sunshine Packing company. You determine that Sunshine Packing is not registered as a farm labor contractor.
 - Is Sunshine Packing in violation of labor Code ' 1695?

Answer Question 1

- No
 - Chapter 3 Page 49
 - Requirement 1 Exemptions
 - Labor Code section 1682.4

QUIZ Question 2

2.) You are inspecting a backpack application of pyrethrins to a flower field in a nursery setting. You note that the 4-gallon backpack sprayer is not equipped with a backflow device.

Is this a violation of 3CCR § 6610?

Answer Question 2

- No
 - Chapter 4 Page 78
 - Requirement 23 Exemptions
 - Guidance

QUIZ Question 3

3.) You are inspecting an employee using methyl bromide to perform tree hole fumigations. There is only one trained employee at the site.

Is this a violation of 3CCR § 6784(b)?

Answer Question 3

- No
 - Chapter 6 Page 115
 - Requirement 23 Exemptions
 - 3CCR section 6784(b)/6450.3

QUIZ Question 4

- You observe an application of Termin-8 to a crawl space under a residence. The labeling states this product is “For Exterior Use Only”.
- Is this a violation of FAC § 12973?

Answer Question 4

- Yes
 - Chapter 8 Page 155
 - Requirement 5 Directions
 - Guidance

QUIZ Question 5

- How do you handle NOI denials?

Answer Question 5

- Contact responsible person
- Document the contact
- Document the status of application
- Deliver a Notice of Proposed Action per direction in Restricted Material Permitting (Volume # 3, Page 10-4)

Quiz Question 6

- When performing a use monitoring inspection on a PCB, do you need to fill in the permit number on the inspection report form?

Answer Question 6

- Yes, all heading and information blocks must be completed unless there are specific instructions to leave blank.
- Chapter 1 Page 13

Quiz Question 7

- While performing a FWS inspection on a farm labor contractor you find a violation of the grower's application specific information display. How is this handled?

Answer Question 7

- 5 step procedure
- Chapter 3 page 45



**Can you spot
Any violations in this picture?**



**Can you spot
Any violations in this picture?**

Ground Application Equipments:





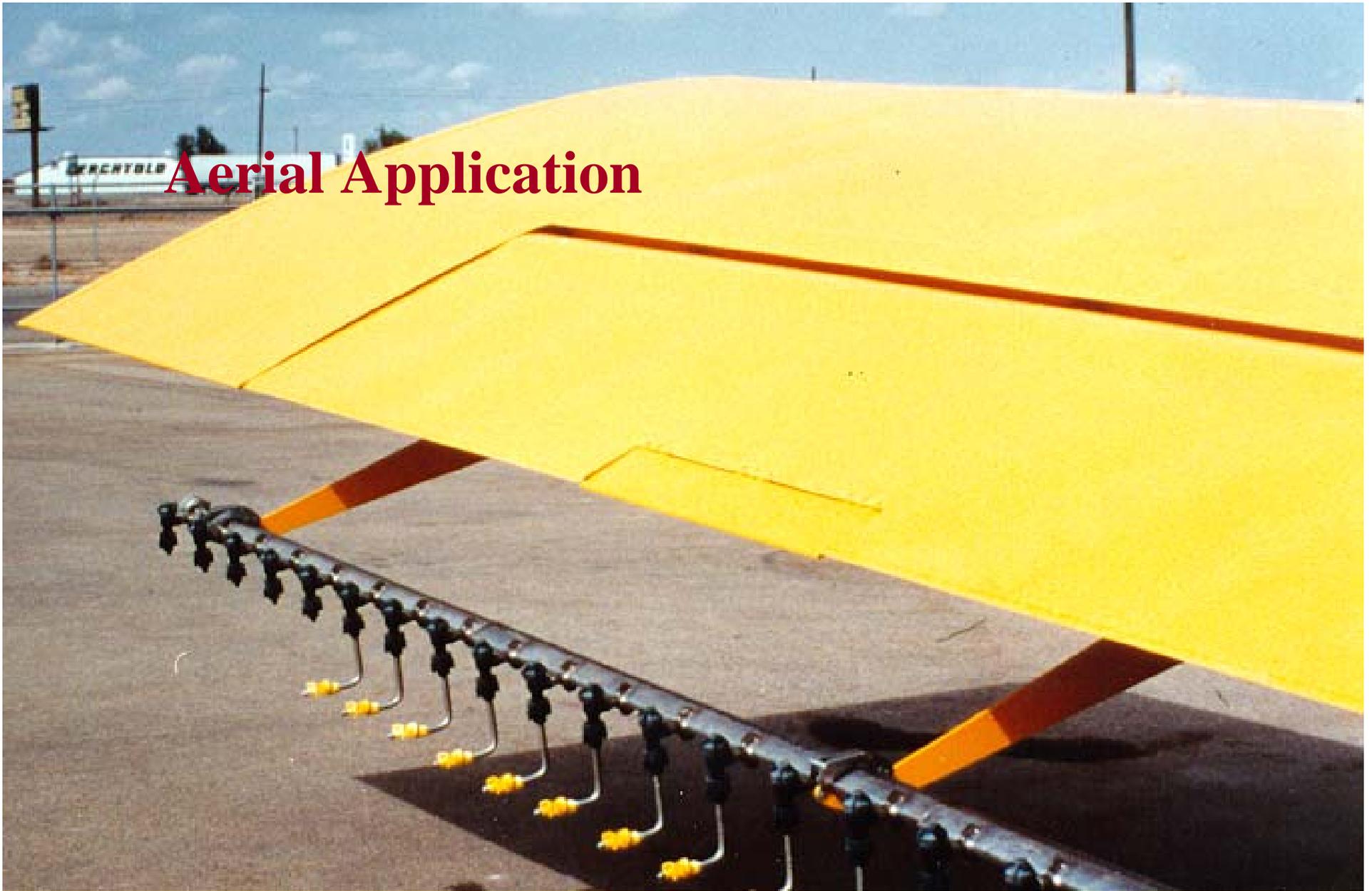


Methods of application

- Ground - lock and load



Aerial Application





END

