

2008 Inspection Procedures Manual Training

Tips For Prioritizing & Preparing For HQ/Employee Safety & Records Inspections

HQ Records Inspections, whether it's a structural business or "ag" farming enterprise, are the exception to the rule because you almost always have to make appointments in advance to conduct them. If you do some planning and preparation up front, you can maximize your efficiency while finding out everything you need to know to determine compliance with all the requirements. Remember the goal is not just to determine compliance "yes or no", but to understand how the business is run and records are kept in case you need to work with them to help them correct problems.

I. HQ Inspections - Prioritization Considerations:

- a) Under normal circumstances, you only perform an HQ Records inspection if that company has an office in your county. Talk to your supervisor about what your county work plan goals are concerning HQ inspections (e.g. is there an inspection frequency statement included in the plan). For example, if your county has so much industry that you cannot perform an annual HQ Records inspection on every PCB, then you must take into consideration the criteria for properly prioritizing inspections.
- b) Companies that should be a higher priority for an annual or more frequent HQ records inspection include, but are not limited to:
 - Any company with a history of complaints, WH&S illness episodes, or other problems with compliance in the field (including unlicensed)
 - Handle higher toxicity pesticides (ex: fumigants, "Warning" products) and/or higher risk of exposure applications (ex: regular applications at or near schools or other very sensitive sites)
 - Have employee handlers/applicators
 - Do a significant amount of applications in your county
 - Have a history of "paperwork" compliance problems
 - Do both structural and agricultural work in your county
 - Have a history of non-compliance in neighboring counties, even if they do not have a poor compliance history in your county (especially if their office is near the "border" between two counties)

Inspection Prioritizing Tips: HQ/Employee Safety & Records Inspections

II. Preparing For HQ Records Inspections

- a) HQ Inspections need advance preparation in order for you to maximize your time and effort. Making an appointment helps ensure that a responsible person who can access all the files and/or company computer information that you need will be there during the inspection. It's best to remind the clerk or owner/Branch Manager of the list of items you will need to review when you make the appointment. If it's been a couple of weeks since you made the appointment, you might want to call and remind their office the day before. Remember, you may do this kind of inspection regularly, but this is only a very small part of the company's work! Don't rely on their "memory" each year.
- b) Do your own preparation, by checking the following at the CAC office:
 - Verify the company has their registration document(s) on file
 - Verify whether or not the company has pesticide use reports on file, and whether there are any "problems" with their use reporting (ex: EPA registration numbers that are "wrong" may be just a "typo", or they may actually be using a pesticide not registered in California). See if any of the pesticides listed on PURs have specific respirator requirements per 3CCR 6739.
 - Verify company's address and other Inspection Form header information (ex: how many branches of work they do, PR or Branch License #). Some company names are similar, and a company may have moved or the OPR licensee changed since the last inspection. If you're not familiar with this company, make sure you are going the right location!
 - Whenever possible, fill out as much of your "header" information on the HQ Inspection Form as you can prior to starting the inspection. This saves the company those extra minutes, and you may be less likely to make mistakes or omit information.
 - Unless you've been there before, check the directions to their office and ask where to park, so you don't lose time. Company managers are usually very busy. Starting the inspection on time will increase their appreciation of your courtesy and "professionalism".

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III. Conducting HQ Records Inspections

- a) After introducing yourself, ask the owner/manager if they have any appointments or need to leave at a certain time. If so, then make sure you do the most important items that involve the manager first. For example, if you have questions about the information on their “service tickets”, how they conduct training, etc. ask the manager whenever possible since the QAL/PCO or Branch Manager is the “responsible person”.

You can also ask what criteria items the manager thinks can be handled by the company’s clerical staff if it appears s/he will have to leave before the inspection will be completed (ex: use reports, training records).

- b) If you see there are company vehicles on site that have a posted pesticide storage sign, ask whether they will be leaving soon or will be remaining onsite for the next hour or two. If the manager says they will be leaving in awhile, ask if you can inspect at least a couple of the vehicles first so you are not unduly detaining them from their route. If trucks are parked out front, you can at least check for backflow devices on application vehicles as you walk in or as they are on their way out. (You might even catch a PCB mix-load before they leave for their first site.)
- c) Whether or not the manager needs to leave early, work through your HQ inspection as systematically as possible. For example, don’t look at some of the use reports, then go out and inspect the storage, then go back in to look at more paperwork, then go back out and look at vehicles. You can either do all the “outside” inspection items first (especially if there are weather concerns) or do all the “indoor” paperwork inspection items first and then finish with the storage area and/or onsite vehicle inspections. There are advantages to doing the storage site inspection first, especially if vehicles are not present.
- d) During the storage site inspection, check to see if their inventory matches recent PURs. Protect yourself and put on gloves before you touch any containers or application equipment! Watch for any pesticides that have specific storage requirements on their labels (such as fumigants). In addition to confirming containers are properly labeled, etc. check for any stored pesticides that don’t fit their license category (such as a Branch 2 company with “ag use only” pesticides or vice versa). If you know what pesticides they’ve been reporting you will also find it easier to spot possible unregistered products in the storage area.
- e) For PCBs: while reviewing service records, copy some addresses and schedule times (“2nd Tuesday”) so you can observe applications later!