

Branch 1 Fumigations: Inspection Report 107

Structural Regulatory Training

Ahmed Elhawary

DPR Enforcement

Southern Regional Office

Structural fumigation
 have three distinct phases:
 1- Application
 2- Aeration
 3- Certification

STATE OF CALIFORNIA
 DEPARTMENT OF PESTICIDE REGULATION
**STRUCTURAL FUMIGATION USE
 MONITORING INSPECTION REPORT**

COMPLETE
 PARTIAL
 FOLLOWUP INSPECTION

107-00-16-WD00-002

ORIGINAL INSP. # _____ UNKNOWN COUNTY
 INSPECTING COUNTY

| | | | |
|-----------------------------------|--|------------------------------|------------------|
| FIRM INSPECTED | | BUSINESS REGISTRATION NUMBER | |
| FIRM MAILING ADDRESS | | INDIVIDUAL LICENSE NUMBER | |
| PERSON INSPECTED | | VEHICLE LICENSE NUMBER | TELEPHONE NUMBER |
| APPLICATION SITE ADDRESS | | REQUIRED DISTANCE MAINTAINED | WIND |
| | | PEST | TREATMENT SITE |
| HANDLER'S NAME / # INTERVIEWED: 0 | | ACTIVITY | |
| PESTICIDE NAME / MANUFACTURER | | LABEL REGISTRATION NUMBER | SIGNAL WORD |
| | | FORMULATION | RATE |

Application/Aeration/Certification

| REQUIREMENTS | SECTION | COMPLIANCE | | |
|---|------------|------------|----|-----|
| | | YES | NO | N/A |
| 1. Registered in County | 15204.5(a) | | | |
| 2. County Notified 24 Hours Prior | 15204.5(d) | | | |
| 3. Written Notice to Occupant | 8538 | | | |
| 4. Pesticide Disclosure Signed / Available | 1970.4 | | | |
| 5. Registered Label Available at Use Site | 6602 | | | |
| 6. Labeling - Site / Rate / Concentration / Other | 12973 | | | |
| 7. Labeling - Aeration / Certification | 12973 | | | |
| 8. Labeling - Bagging, Pets Removed, Etc. | 12973 | | | |
| 9. Labeling - PPE | 12973 | | | |
| 10. Regulations - PPE | 6738 | | | |
| 11. Respiratory Protection | 6739 | | | |
| 12. Handler(s) Trained | 6724 | | | |
| 13. Emergency Medical Care, Posting | 6726 | | | |
| 14. Decont. Facility, Site "Warning/Danger" | 6734 | | | |
| 15. SCBA Worn / Cont. Monitoring / CAP Used | 6780(b) | | | |
| 16. Accident Response Plan at Worksite | 6780(d) | | | |
| 17. 2 Trained Employees - Application & Aeration | 6782(a) | | | |
| 18. Fume of Enclosed Spaces/Proper Entry | 6782(d) | | | |
| 19. Proper Management of Treated Area | 6782(f) | | | |
| 20. Connection Structures | 1970.6 | | | |
| 21. Accurate Measurement | 6604 | | | |
| 22. Protection of Persons / Animals / Property | 6614 | | | |
| 23. Structure Vacated / Secured Against Reentry | 8505.7 | | | |
| 24. Equipment in Good Repair and Safe | 6742 | | | |
| 25. 2 SCBA / CPR Chart / Mfg. Instructions | 1971(a)(1) | | | |
| 26. Test Equipment | 1971(a)(2) | | | |
| 27. Re-entry Requirements | 1973 | | | |
| 28. Direct Supervision | 8505.2 | | | |
| 29. Warning Signs on All Sides of Structure | 1974 | | | |
| 30. Required Information on Warning Signs | 8505.1 | | | |
| 31. Signs - Attic / Under-area | 8505.11 | | | |
| 32. Warning Agent Used | 8505.12 | | | |
| 33. Equipment Properly Identified | 6630 | | | |
| 34. Containers Labeled / Closures | 6676 | | | |
| 35. Proper Pesticide Transport | 6682 | | | |
| 36. Pesticide Handling / Use / Storage | 1983 | | | |
| 37. Methyl Bromide Requirements | 6454(a) | | | |
| 38. MB - Tarps Accept. / Condition / Ret. Method | 6454(b-e) | | | |

I- Application Phase: Criteria Covered

| # | Code | # | Code | # | Code |
|-----|---------------|-------|------------|------|---------|
| 1&2 | 15204.5 (a&d) | 13 | 6726 | 28 | 8505.2 |
| 3 | 8538 | 14 | 6734 | 29 | 1974 |
| 4 | 1970.4 | 15&16 | 6780 (b&d) | 30 | 8505.10 |
| 5 | 6602 | 20 | 1970.6 | 32 | 8505.12 |
| 6 | 12973 | 21 | 6604 | 33 | 6630 |
| 8 | 12973 | 22 | 6614 | 34 | 6676 |
| 9 | 12973 | 23 | 8505.7 | 35 | 6682 |
| 10 | 6738 | 24 | 6742 | 36 | 1983 |
| 12 | 6724 | 25 | 1971(a)(1) | (41) | 6600 |

County Notified 24 Hours Prior FAC 15204.5(d) & BPC 8505.5

STRUCTURAL - NOTICE OF INTENT

AGRICULTURAL COMMISSIONER PESTICIDE AND PEST MANAGEMENT DIVISION

FROM

[REDACTED]

DATE: 11/17/12

ADDRESS:

[REDACTED]

CITY: FONTANA CA 92335

SUBMITTED BY:

PHONE NUMBER:

[REDACTED]

FAX NUMBER:

[REDACTED]

TOTAL PAGES (INCLUDING THIS SHEET): _____

Date of

Street Address

Application

include ST, AVE, PL, BLVD, UNIT, ETC.

city

zip code

11/19/12

[REDACTED]

[REDACTED]

Written Notice to Occupant 8538

B1 Notice must be given to the tenant & owner of a property 48 hours before a fume, unless inspection was < 48 hours prior.

Notice must be given in at least 1 of these ways:

- First class OR electronic mail, IF an electronic mailing address has been provided.**
- Posting in a conspicuous place
- Personal delivery

**Added as part of AB 1685, effective 1/1/2015.

Written Notice to Occupant 8538

B1 Notice for 8538 compliance must include:

- Name of pest to be controlled
- Pesticide name; Active ingredient(s)
- Health Precautionary Statement
- Phone #s for: County Health, County Ag & Pest Control

Business doing the application

- Phone # & address of the SPCB

Pesticide Disclosure

Signed/ Available 1970.4

Occupants Fumigation Notice (OFN)

- Must be signed by the occupants or designated agent of a structure prior to the fumigation. B3 “prime” usually handles this.
- B1 must have onsite when SF is released
- This notice requires all info listed in 8538(a), plus statements specific to B1 about the company using a lethal gas in the structure & that it’s unsafe to return until cleared

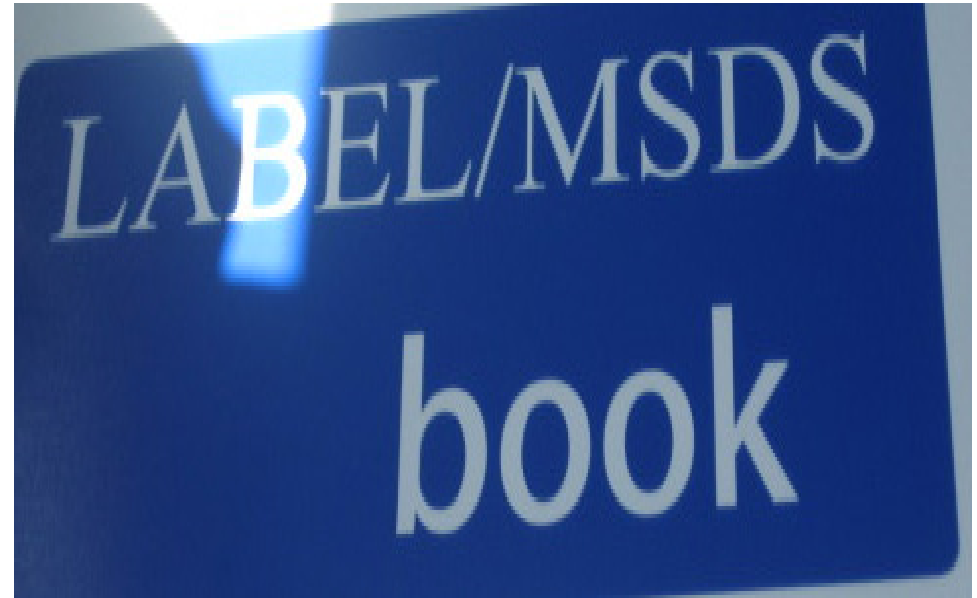
New in 2016: 1970.4(a) Regulation Change

Effective July 1, 2016:

16 CCR 1970.4(a) related to the Branch 1 OFN signed disclosure notice will add the option of it being in ELECTRONIC form...

“...The properly signed form or a copy, written or electronic, thereof shall be in the possession of the licensed fumigator when the fumigant is released...”

Registered Labeling at Use Site 6602



*California Code of Regulations 6602:
"A copy of the registered labeling that allows the manner in which
the pesticide is being used shall be available at each site."*



MASTER FUME®
Specialty Gas Fumigant

Registered Labeling at Use Site 6602

As of 2010, all Branch 1 SF labels now include their product-specific **Structural Fumigation (Applicator's) Manual** as their registered labeling

So to be in compliance with 6602 they must have onsite either:

- Product Manual + Cylinder label
- OR
- Product Manual + Specimen label



A Few Words About Tape & Seal...



Labeling describes what types of structures need this method rather than tarpaulin fumigation.

Plastic similar to that used to bag food & medicinals may cover windows/doors etc. if the tape seal alone is insufficient.

Labeling – Site / Rate / Concentration / Other 12973



Labeling – Site / Rate / Concentration / Other 12973



Labeling – Site / Rate / Concentration / Other 12973



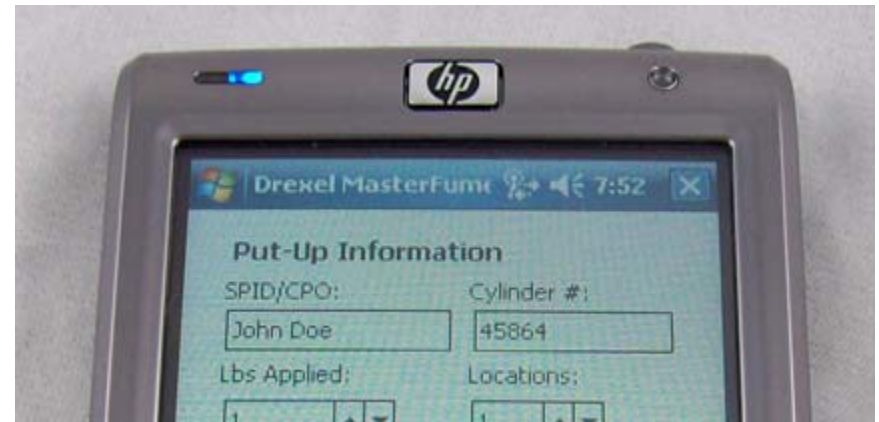
Chloropicrin* must be released
w/in structure at least 5-10
minutes prior to introduction of
fumigant.

No more than 3 fluid ounces per
“pic pan”

*@ SF Calculator amount
or @ 1oz / 10-15k cubic ft

Labeling – Site / Rate / Concentration / Other 12973

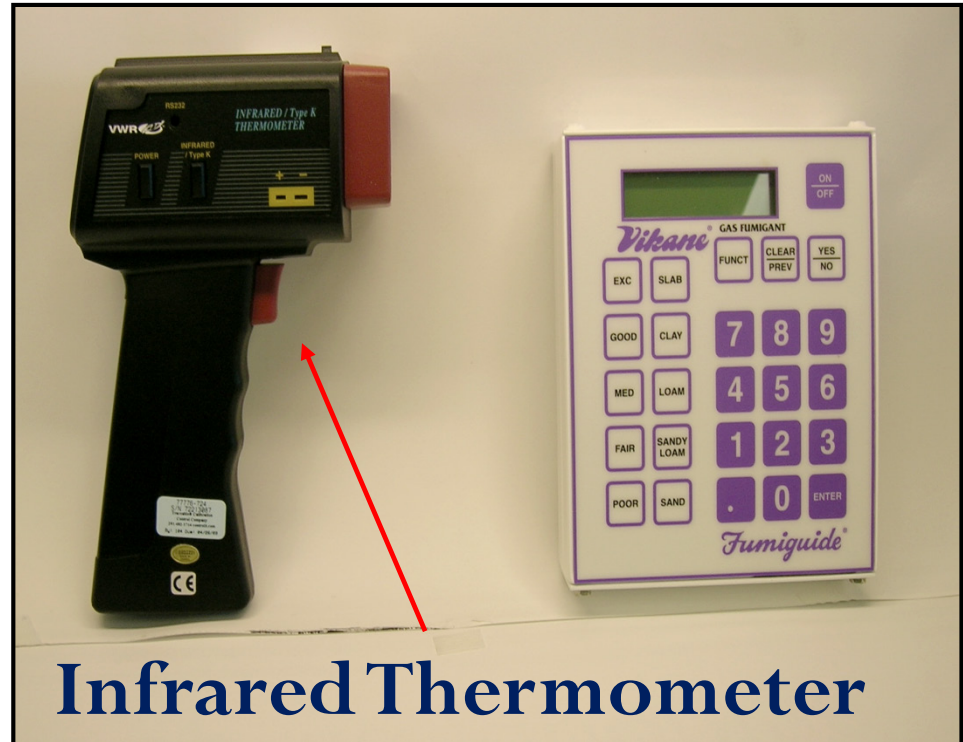
Chloropicrin & SF rates are usually calculated by that registrant's product-specific calculator.



Labeling – Site / Rate / Concentration / Other 12973

Thermometer in the sub-
area of a home

The Vikane Fumiguide* calculator is to be used
for the coordination of fumigant rates with soil
or slab temperature....



Labeling – Site / Rate / Concentration / Other 12973



- Open cabinets, drawers, attics, appliances.
Turn off pilot lights etc.
- Electric fans used for rapid dispersion of gas & to facilitate in the aeration process.

Labeling – Food/Medicine Removal or Bagging 12973

Must bag or remove from the structure all food, beverages & medicinals as required in SF Manual



Labeling –Plants & Pets Removed, 12973

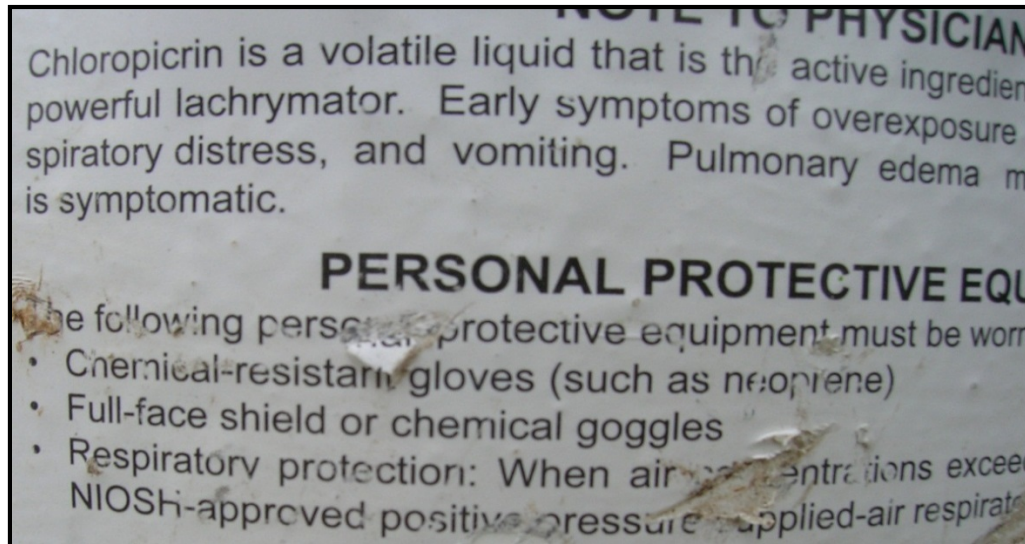
Remove from the structure all persons, domestic animals, pets, & desirable growing plants



Labeling: Personal Protective Equipt 12973

SF labeling states applicators must follow specific PPE listed for pic use which is different than for SF PPE.

SF Manuals say each person placing > 2 pic pans in a structure means that person also must wear SCBA .



Labeling: PPE-12973 / Regs: PPE 6738



Protective Clothing

Wear goggles or full face shield for eye protection during introduction of the fumigant. Do not wear gloves or rubber boots. Do not reuse clothing or shoes that have become contaminated with liquid Vikane until thoroughly aerated and cleaned.

SF labels prohibit some PPE normally required for other pesticides, due to potential for trapping fumigant close to skin if cylinder valve malfunctions.

Handler(s) Trained 3CCR 6724

- Certified applicators are considered trained
- Employees who are licensed by the SPCB as operators or field representatives are considered trained for the purpose of regulation

Emergency Medical Care, Posting 3CCR 6726

All employees handling any pesticides

- Planned in advance
 - Inform employees
 - Post name of facility, address, telephone number
 - When facility is not reasonably accessible to have procedures to be followed to obtain medical care
- Displaying 911 is inadequate

Decontamination Facility / Site “Warning / Danger” 6734

Mix & Load site: Water, soap, single use towels, and coveralls must be within 100 feet



SCBA Worn/Cont. Monitoring / ~~TRAP~~ Used CAP

6780(b): Whenever an employee may be exposed above an exposure standard to ...sulfuryl fluoride, or any other fumigant for which only air-supplied respirator equipment is approved the employer shall either:

- (1) Require the use of a SCBA
- (2) Use a continuous monitoring device, or
- (3) Operate under a fumigation safety plan approved by the Director (like CAP)

Accident Response Plan At Work Site 6780(d)

6780(d): “The employer shall have an accident response plan at the worksite.

The plan shall provide instructions to protect employees during situations such as spills, fire, and leaks.

Employees shall be trained in accident management procedures based on the plan.”

Connecting Structures

1970.6

- (a) Prior to the process of fumigation...
- (b) B3 prime shall...inquire/inspect/document
- (c) Prior to intro of fumigant, the licensee in charge of the fumigation shall:
 - (1) conduct a thorough search for...
construction elements, conduits,
drains or vacuum systems that could
allow passage of the fumigant from the structure to
any adjacent or adjoining structure...

Accurate Measurement 6604



Measuring
device must be
calibrated to
smallest unit of
use

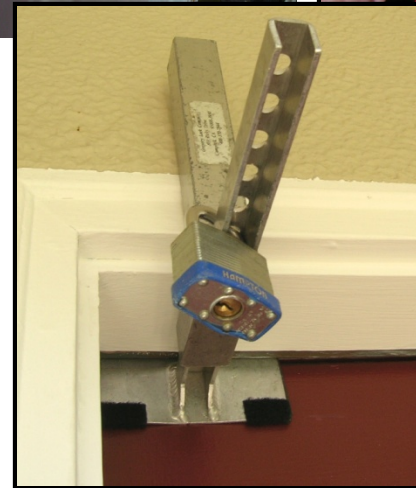
Protection of Persons/Animals/Property

3 CCR 6614

- Verify that all spaces within the tarp have been inspected for pets and the main gas line to the structure has been shut off.

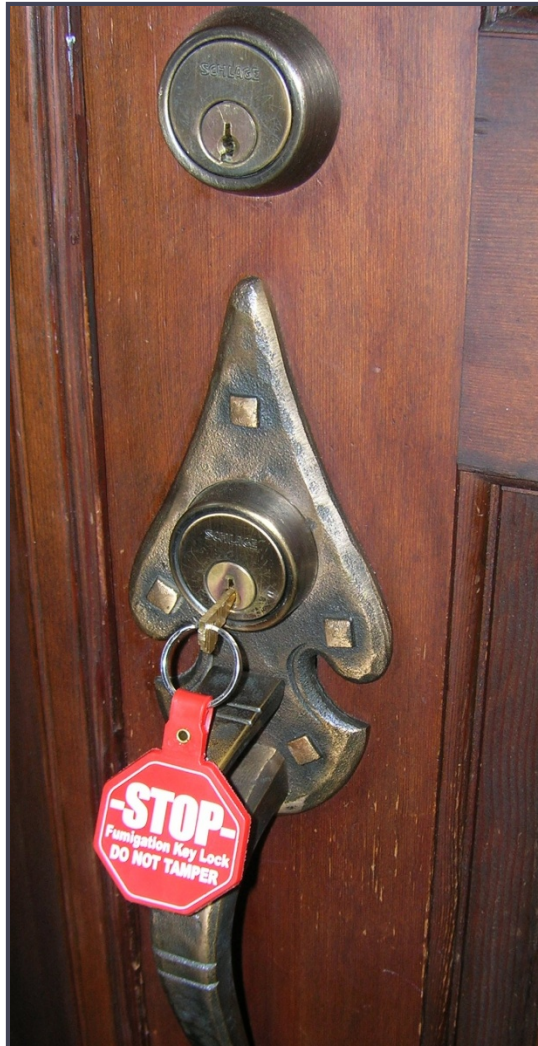
Structure Vacated/Secured Against Reentry 1970.3

Effective Secondary Locks 8505.7



Effective Secondary Locks

8505.7



Make sure primary lock has been engaged!



Not engaging the primary lock on a door is a label
(12973) violation

Re: sliding glass doors...check the label; some not as clear about requiring secondary locks
IF there's no "exterior" lock access



Equipment in Good Repair & Safe 6742

(a) The employer shall assure that equipment used for mixing, loading, transferring, or applying pesticides is inspected before each day of use and any safety defect is repaired or altered to remove the hazard before further use...



2 SCBA / CPR / Mfg Instructions 1971(a)(1)

- Statement of instructions published by the manufacturer of the fumigant being used (label/labeling)
- A chart of instructions for artificial resuscitation
- 2 or more effective gas masks* or other NIOSH approved safety equipment

(*Reference: B&P Code Section 8505.16)

Two SCBA Available 1971(a)(1)



Direct Supervision

8505.2

- A fumigation shall be performed under the direct and personal supervision of a qualified licensee.

- 8505.3 (Definition of “Direct Supervision”)

Means the licensee shall be present:

- During the release of the fumigant
- During the commencement of aeration
(CAP Steps, or when using label aeration = 1970.5)
- When property is released for occupancy

Warning Signs on All Sides of Structure 1974

Prior to sealing, warning signs shall be posted at or near all entrances/sides

Windows are not entrances

Signs shall be visible on all sides of the structure & all seams



Required Information on Warning Signs 8505.10



SB 1244
changes

Other
info
still must
be in **red**

“Legible ink
of any color”

Warning Agent Used 8505.12

A registered company performing a fumigation shall use* an adequate warning agent with all fumigants which lack such properties

Defined in Section 8505.1(b):

“Warning Agent” shall be any agent used in combination with any fumigant that lacks warning properties

*SB 1244 “pic waiver” exception added



Equipment Properly Identified 6630

Identification must include either:

- The business name or
- PCO license number statement, such as “License pest control operator”, “Fumigation Division”, “Licensed Fumigator”, or similar wording
- And readable at a distance of 25 feet.

(N/A for certification trucks
that are not used for applications)

Containers Labeled/Closures

6676



Any container that holds
or has held any pesticide
shall carry the
registrant's label

Proper Pesticide Transport

Pesticide Handling/Use/Storage

6682
1983



Suitable Methods / Manner / Climate 6600*

Non-compliance examples: Take Photos!

- Cracked hose
- Improper placement of snakes, clips
- Not using enough chloropicrin
- Large holes in the tarp, etc.

*Record violation(s) as #41 on Form 107
& describe details of the violation(s)
in the “Remarks” section.

II- Aeration Phase: 2 Options

SF Label

“Aeration Procedures”

1 or 2

California

Aeration Plan

(CAP)

“Non – CAP”

- SCBA required to enter
- Continuous Monitoring or SCBA when entering to clear/certify
- “Tape & Seal” jobs
- ≤ 9 additional criteria

SCBA: Not required

(Unless entering before aeration period ends for emergencies, etc.)

- Aeration “period” is much longer

II- Aeration Phase:

“SF Label” Aeration Procedure 1/2

Criteria Covered:

| # | Code | # | Code |
|----|-----------------|---|------|
| 9 | 12973 | | |
| 11 | 6739 | | |
| 18 | 6782(e) | | |
| 19 | 6782(g) | | |
| 28 | 8505.2/(1970.5) | | |

Aeration Using “Label” (Non-CAP Fumes)

Some structures requiring fumigation are not able to use the standard “CAP” method.

For these applications consult the sulfuryl fluoride registered label and associated registered applicator’s manual (labeling):

AERATION STEPS 1 and 2 must be followed.

One Example:

Brick, stucco and certain other buildings are more impermeable to SF than wood framed; the Tape & Seal method is sometimes used.

Labeling: Aeration Steps 1 and 2

Other Common Violations

“Short-Timing”:

- Failure to complete 1 hour active aeration
- OR
- Failure to complete 6 hours passive aeration



| | |
|--|---------|
| Labeling – Personal Protective Equipment (PPE) | 12973 |
| Fume of Enclosed Spaces/Proper Entry | 6782(e) |
| Proper Management of Treated Area | 6782(g) |
| Respiratory Protection | 6739 |

Aeration and Reentry

- No one should be in treated area if level of $SF > 1$ ppm unless provided with NIOSH or MSHA approved SCBA
- If employee wears proper respiratory protection he/she is allowed to enter



Labeling – Aeration / Reentry 12973

Common Violations - Aeration Step (1)

- Employees entering the structure during the 1 hour aeration without wearing an SCBA



B1 Fumigators only have 2 aeration options:

Follow all applicable labeling steps

OR follow CAP Steps 1-6.

Recently a few counties have seen what has been nicknamed a “hybrid” of label and CAP aeration methods, using CAP installed equipment but short-timing total hours.

Labeling – Aeration / Reentry 12973 re: Violations - Aeration Method Used

When CAC staff find this at a fume site, the licensee claims they changed their mind to do a “label” aeration instead.

Be aware the B1 cannot “substitute” 1 hour of CAP method for the label “1 hour active aeration” and meet 3CCR 6780(b-c) or label.

No testing has been done on “hybrid” methods. USEPA & DPR have never approved this practice.

Labeling – Aeration / Reentry 12973
re: Violations - Aeration Method Used

If tarps were dropped*, document this type of mixed method as a **FAC 12973 aeration violation**. The fumigator needs to follow labeling aeration steps discussed in earlier slides. Document in Remarks section key details regarding the short timing, etc.

*If tarps still up, they can choose to follow CAP for the remaining time, to equal the total 12 hours.

Direct Supervision

8505.2

1970.5 “Commencing Aeration” (For Non-CAP Fumigations)

Period of time beginning when the seal is broken, and ending when all seals/tarps are removed.

A branch 1 licensee is required to be present during this entire period of time.

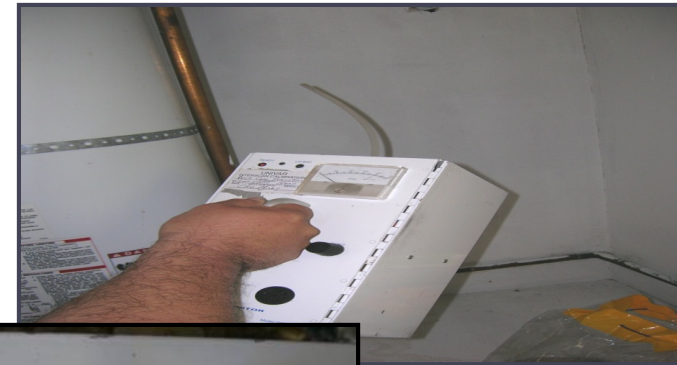
III-Certification Phase

Criteria Covered

| # | Code |
|----|----------------------------|
| 7 | 12973 – SF Label: 6 hr min |
| 26 | 1971(a)(2) |
| 27 | 1973 |
| 31 | 8505.11 |

Labeling – Aeration/ Certification 12973

Label Step (3): After the minimum [6] hour waiting period, measure the concentration of sulfuryl fluoride in breathing zones... Structure may be reoccupied when concentration ≤ 1 ppm.



Proper Test Equipment Re-entry Requirements

1971(a)(2)
1973

Licensee must personally:

- Clear a structure using proper testing equipment as required by label & regs
- Release the property for occupancy by posting a Notice of Re-Entry form



Re-entry Requirements 1973



Structural Pest Control Board
Control de Pestes Estructurales


NOTICE/AVISO

This building is safe for re-entry on:
Se puede entrar a este edificio despues de:

Date/Fecha: 4/10/7 Time/Hora: 10:30 AM

Fumigant Used: [REDACTED]
Fumigante utilizado: [REDACTED]

Warning Agent: [REDACTED]
Odorizante de Noticia de Peligro: [REDACTED]

 **PLEASE KEEP POSTED FOR PG&E**

Branch 1 Licensee Name: [REDACTED]
Nombre de la Licencia de Categoria 1: _____

License No. / Numero de Licencia: [REDACTED]

Company Name: [REDACTED]
Nombre de la Compania: _____

Company Registration NO:
Numero de Registro de la Compania: [REDACTED]

Company Address: [REDACTED]
Direccion de la Compania: _____

Company Telephone: [REDACTED]
Telefono de la Compania: _____

13M-43 (Rev. 8/92)
Trademark of Terra Plaster

Signs in Attic/Under-area

Upon Completion 8505.11

Completion signs have to be posted near the entrances of the attic or sub area* at the completion of the fumigation with the following information per 16 CCR 1996.1(b):

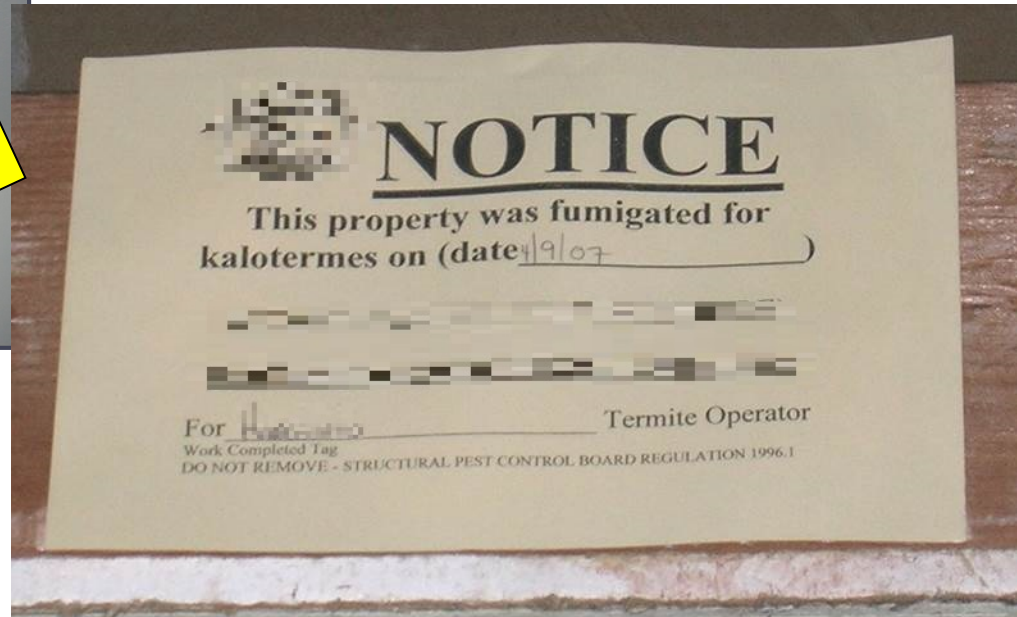
- Company name
- Date of fumigation
- Name of fumigant
(Brand Name + Active Ingredient)

*If a house has both an attic and sub-area,

Both places need to be posted

Signs in Attic/Under-area Upon Completion 8505.11

**Completion Signs have to
be at least 5" x 7"**



Violations – Certification Day

If you arrive at the site prior to the company on the day they will certify safe for re-entry, here are some common violations to watch for during your certification inspection:

- (1) Secondary locks
- (2) Warning signs (missing info, or incorrect info)
- (3) Continuous Monitoring Equipment not calibrated, or used incorrectly

Violations – Certification Day

- (4) Unbagged food/medicinals (verify by labeling)
- (5) Pre-posting the Notice of Re-entry Sign
- (6) Notice of Re-entry incomplete or incorrect
- (7) Attic/Subarea Completion Signs not posted, or incorrect (or older form used)

???

ANY QUESTIONS

???



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