

Structural Fumigation Use Monitoring Inspection Training Module

Application Phase

- Module 1.5: Observing the Application

WHO SHOULD TAKE THIS TRAINING?

This series of training modules is intended for County Agricultural Commissioner (CAC) staff who perform structural fumigation inspections.

The procedures described in this presentation are intended solely for the guidance of employees of DPR and CACs. They do not constitute rulemaking by DPR. DPR and CACs may deviate from the procedures and guidance contained in the modules provided deviations do not conflict with law, regulation or policy.

This guidance was developed in May 2015 after consultation with the Structural Pest Control Board. If you have any questions, please contact the Department of Pesticide Regulation, Enforcement Branch Liaison serving your county.

GUIDANCE AND REFERENCES

Before starting this module,
have these three manuals available to consult:

- **Inspection Procedures Manual**
(Vol. 4 of DPR's "PUE Program Standards Compendium")
http://www.cdpr.ca.gov/docs/enforce/compend/vol_4/inspect_procedures.htm
- **Laws and Regulations**
(Vol. 2 of DPR's "PUE Program Standards Compendium")
http://www.cdpr.ca.gov/docs/enforce/compend/vol_2/lawsregs.htm
- **Laws and Regulations Relating to the Practice of Structural Pest Control** (including Business and Professions Code; a convenient booklet format published by Structural Pest Control Board)
<http://www.pestboard.ca.gov/pestlaw/act.shtml>

PHASES OF A STRUCTURAL FUMIGATION

The three phases of a structural fumigation include:

- Application Phase
- Aeration Phase
- Certification Phase

APPLICATION PHASE

The five main tasks the CAC inspector has when inspecting the application phase of a structural fumigation:

- Document review
- Truck contents
- Exterior of structure walk-around
- Interior of structure walkthrough
- Observing the actual application

OBSERVING THE APPLICATION

This module covers 16* inspection requirements from the application phase of Structural Fumigation Form:

#	REQUIERMENT	#	REQUIREMENT
9	Label – PPE	21	Accurate Measurement
10	Regulation – PPE	22	Protection of Persons/Animals/Property
11	Respiratory Protection	23	Structure Vacated/Secure Against Reentry
12	Handler(s) Trained	24	Equipment in Good Repair and Safe
15	SCBA Worn/Cont. Monitoring/CAP Used	28	Direct Supervision
17	2 Trained Employees – Application/ Aeration	32	Warning Agent Used
18	Fume of Enclosed Spaces/Proper Entry	36	Pesticide Handling/Use/Storage
19	Proper Management of Treated Areas	39	MB – Warning Agents/Fans/Aeration

* In total, there are 40 inspection requirements on the Structural Fumigation Use Monitoring Inspection Report form (PR-ENF-107, revised 01/2010)

Requirement #9: Regulation— Personal Protective Equipment

What and how to inspect:

- All persons handling registered pesticides.
- Review the label.
- Is the applicator wearing appropriate labeling PPE.
- Check labeling for any prohibited PPE.

For more information:

- Pesticide labeling including associated documents.
- *Inspection Procedures Manual* .
- When one person applying chloropicrin to more than two introduction points to a single fumigated structure an air supplied/SCBA must be used.

Requirement #9: Labeling – Personal Protective Equipment

Is this in compliance (yes or no) ?



Requirement #9: Labeling – Personal Protective Equipment

Is this in compliance (yes or no) ?



Answer: Yes.

Requirement #10: Labeling – Personal Protective Equipment

What and how to inspect:

- Review the regulation and the application activity for all employees handling pesticides.
 - Is PPE provided and available?
 - Is the PPE clean and maintained?

For more information:

- 3CCR § 6738.
- Inspection Procedures Manual entry and appendix 1 personal protective equipment for this requirement

Requirement #10: Labeling – Personal Protective Equipment

Is this in compliance (yes or no) ?



Follow up with your supervisor:

- Based on the criteria in 3CCR 6128 & 6130 (ACP) or 16CCR 1922 (SCP), what action (if any) should you take in response to this violation?

Requirement #10: Labeling – Personal Protective Equipment

Is this in compliance (yes or no) ?

Answer: Not now.

Continue to observe, make sure the employee rolls down his sleeves and label required eye protection is used. If the applicator does not, it is a non-compliance.



Follow up with your supervisor:

- Based on the criteria in 3CCR 6128 & 6130 (ACP) or 16CCR 1922 (SCP), what action (if any) should you take in response to this violation?

Requirement #11: Respiratory Protection

What and how to inspect:

- For employees when required by labeling, restricted material permit condition, regulation, or employer.
 - Is the employee being exposed above an exposure standard to the fumigant for which only air-supplied respirator equipment is approved when entering?
 - CAP being used

For more information:

- 3CCR § 6739, 6780 (b) and (c)
- Inspection Procedures Manual entry and appendix 1 personal protective equipment for this requirement
- Inspection Procedures Manual appendix 6 California Aeration Plan (CAP)
- Be familiar with the respiratory protection exemptions

Requirement #11: Respiratory Protection

Is this in compliance (yes or no) ?



Requirement #11: Respiratory Protection

Is this in compliance (yes or no) ?



Answer: Yes.

When the employee is being exposed to a fumigant above the exposure standard for which only air-supplied respirator equipment is approved.

Requirement #12: Handler(s) Trained

What and how to inspect:

- Ask each handler to see their license.
- A person holding a pest control operator or field representative license are certified commercial applicators.
- Certified applicators are considered trained.
- Ask questions and observe work practiced to determine if handlers have been trained.

For more information:

- 3 CCR § 6724(d)
- 3 CCR § 6000, definitions of “certified commercial applicator” and “handle”

Requirement #12: Handler(s) Trained

Is this in compliance (yes or no) ?



Requirement #12: Handler(s) Trained

Is this in compliance (yes or no) ?



Answer: Yes.

The operator or field representative are certified applicators are considered trained. Employees removing tarps are handlers and need to be trained.

Requirement #15: SCBA Worn/Cont. Monitoring/CAP Used

What and how to inspect:

- Verify the CAP procedures are followed.
- Is the alarm bell ringing on the SCBA the wearer must exit the structure?
- Do the inlets, fans, and ducting comply with size and location requirements?
- Is the certified applicator present as required by the CAP?

For more information:

- 3CCR § 6780
- Inspection Procedures Manual entry and appendix 6.

Requirement #15: SCBA Worn/Cont. Monitoring/CAP Used

Is this in compliance (yes or no) ?



Requirement #15: SCBA Worn/Cont. Monitoring/CAP Used

Is this in compliance (yes or no) ?



Answer: Yes.

Employees entering an unknown atmosphere or above PEL must wear SCBA

Requirement #17: Two Trained Employees – Application & Aeration

What and how to inspect:

Whenever a fumigant is used in an enclosed space and employees are present.

- Two trained persons must be present.
 - When the fumigant is introduced
 - The enclosed space is entered – aeration.
 - Certification of enclosed space.
- Are employees trained in the use of SCBA equipment and CPR.
- PPE needs to be accessible to other employee.

For more information:

- FAC § 12973
- 3CCR § 6782(a)
- Inspection Procedures Manual entry for this requirement.

Requirement #17: Two Trained Employees – Application & Aeration

Is this in compliance (yes or no) ?



- Is there a licensee?
- Is there at least one other employee assisting?

Requirement #17: Two Trained Employees – Application & Aeration

Is this in compliance (yes or no) ?



- Is there a licensee?
- Is there at least one other employee assisting?

Answer: Yes.

as long as the others are certified applicator or have received handler training.

Requirement #18: Fumigation of Enclosed Spaces/Proper Entry

What and how to inspect:

- Employees are prohibited from entering fumigated enclosed space unless the concentration is known to be at or below the permissible exposure level (PEL).
 - Ask how the fumigant concentration level was determined.
 - Ask to see the monitoring of testing equipment.
 - If you have questions if the structure is safe to enter ask for another test in your presence.

For more information:

- 3CCR § 6782(d)
- Inspection Procedures Manual
- Appendix 6 (CAP) of the Inspection Procedures Manual, Aeration and Reentry.

Requirement #18: Fumigation of Enclosed Spaces/Proper Entry

Is this in compliance (yes or no) ?

- CAP was followed, the minimum aeration time was met, the enclosed structure was monitored and the level was below 1 ppm



Requirement #18: Fumigation of Enclosed Spaces/Proper Entry

Is this in compliance (yes or no) ?

- CAP was followed, the minimum aeration time was met, the enclosed structure was monitored and the level was below 1 ppm

Answer: Yes.



Requirement #19: Proper Management of Treated Areas

What and how to inspect:

- Management of treated area to prevent employee exposure.
- How is the licensee preventing entry into the structure prior to certification?
- What precautions are being taken?

For more information:

- Pesticide labeling including associated documents.
- 3CCR § 6782 (f)

Requirement #21: Accurate Measure

What and how to inspect:

- Weighing or measuring any concentrate pesticide.
 - Is the pesticide being measured or weighed accurately?
 - Does the measuring device measure to the smallest unit in which the fumigant is being used?
 - Is the warning agent measured accurately, if the warning agent is not a pesticide, is the pesticide labeling.

For more information:

- Pesticide labeling including associated documents.
- 3CCR § 6604.
- Inspection Procedures Manual

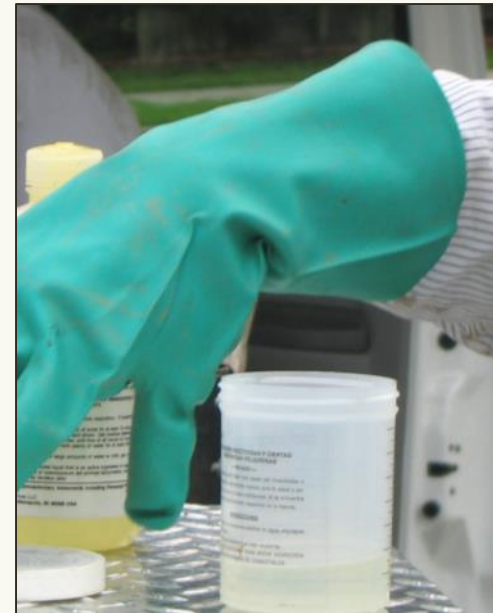
Requirement #21: Accurate Measure

Are these in compliance (yes or no) ?



Requirement #21: Accurate Measure

Are these in compliance (yes or no) ?



Answer: Probably.

The weight of the cylinder must be known when using a spring scale (left) and the digital scale set at zero (middle) before the fumigant is released.

Requirement #22: Protection of Persons/Animals/Property

What and how to inspect:

- Is the applicator evaluating conditions at the site to prevent harm or damage?
 - Is there any food or medication that has not been bagged?
 - Are there any pet items or pet food?
 - Ask the applicator where the pets are, all spaces within the tarps have been checked for pets.
 - Verify all requirements are met prior to the introduction of the fumigant.

For more information:

- Pesticide labeling including associated documents.
- 3CCR § 6614
- Inspection Procedures Manual entry for this requirement.

Requirement #22: Protection of Persons/Animals/Property

Is this in compliance (yes or no) ?



Requirement #22: Protection of Persons/Animals/Property

Is this in compliance (yes or no) ?



Answer: No.

There are food items and medication left on the table.

Follow up with your supervisor:

- What should you do in response to this violation? Based on the criteria in 3CCR 6128 & 6130 (ACP) or 16CCR 1922 (SCP), what action (if any) should you take in response to this violation? Check with your supervisor at what stage of the fumigation is it called a non-compliance?

Requirement #23: Structure Vacated/Secured Against Reentry

What and how to inspect:

Verify the occupants have left the structure and is secured against entry until the end of the exposure period.

- Walk through the structure:
 - Make sure the structure is.
 - Are all entrances secured and locked.
 - Focus on last seal and on entry.
 - If there is a garage door or a pet door larger enough for a person, is it secure.

For more information:

- Pesticide labeling including associated documents.
- B & P Code § 8505.7
- Inspection Procedures Manual entry for this requirement.

Requirement #23: Structure Vacated/Secured Against Reentry

Is this in compliance (yes or no) ?



Requirement #23: Structure Vacated/Secured Against Reentry

Is this in compliance (yes or no) ?



Answer: No.

Someone can enter the structure through these entrances.

Follow up with your supervisor:

- What should you do in response to this violation? Based on the criteria in 16CCR 1922 (SCP), what action (if any) should you take in response to this violation?

Requirement #24: Equipment in Good Repair and Safe

What and how to inspect:

- Inspect the condition and operation of the equipment.
 - Is the equipment in good repair and is it safe to operate?
 - Is application equipment, valves, hoses, couplings in good condition?
 - Observe the licensee making the application.

For more information:

- 3CCR § 6742
- Inspection Procedures Manual entry for this requirement.

Requirement #24: Equipment in Good Repair and Safe

Is this in compliance (yes or no) ?



Requirement #24: Equipment in Good Repair and Safe

Is this in compliance (yes or no) ?



Answer: Yes.

While the equipment is in operation the valve, coupling, and hoses appear to be in good condition and is not leaking.

Requirement #28: Direct Supervision

What and how to inspect:

- Structural fumigations are to be performed under the direct and personal supervision of the operator or field representative.
- During the release of the fumigant, ventilation, and at the time the property is released for occupancy.

For more information:

- B & P Code 8505.2, and 8505.3
- Inspection Procedures Manual.

Requirement #28: Direct Supervision

Is this in compliance (yes or no) ?

- The biologist in this slide has asked the applicator for his license.



Requirement #28: Direct Supervision

Is this in compliance (yes or no) ?

- The biologist in this slide has asked the applicator for his license.



Answer: Yes.

The applicator has a valid license issued by the Structural Pest Control Board.

Requirement #32: Warning Agent Used

What and how to inspect:

- Warning agents are used when the fumigant has no warning agent properties.
- Ask the application for the cubic footage of the structure (one or more chloropicrin sites for each 45,000 cu. ft. of space).
- No more than 3 fl. oz. of chloropicrin per evaporative container.
- Verify a warning agent is used prior to the introduction of the fumigant.

For more information:

- Pesticide labeling including associated documents.
- B & P Code § 8505.7
- Inspection Procedures Manual

Requirement #32: Warning Agent Used

Is this in compliance (yes or no) ?

The applicator placed the chloropicrin in the evaporative container less than 10 minutes prior to the introduction of the fumigant.



Requirement #32: Warning Agent Used

Is this in compliance (yes or no) ?

The applicator placed the chloropicrin in the evaporative container less than 10 minutes prior to the introduction of the fumigant.



Answer: Yes.

Requirement #36: Pesticide Handling/Use/Storage

What and how to inspect:

- Determine if the pest control business has control of the pesticide containers and containers are stored properly.
 - Pesticide containers (including empty containers) are stored in a manner that will prevent a hazard.
 - Pesticide containers are locked or attended (responsible person in the area where they can maintain control of the pesticide container).
 - If there are no pesticide check N/A.

For more information:

- Pesticide labeling including associated documents.
- 16CCR § 1983.
- Inspection Procedures Manual.

Requirement #36: Pesticide Handling/Use/Storage

Is this in compliance (yes or no) ?



Requirement #36: Pesticide Handling/Use/Storage

Is this in compliance (yes or no) ?



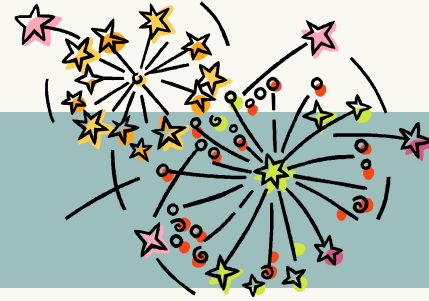
Answer: Yes

Left, the cylinders are in a holder that prevents the containers from sliding, a metal band with a lock that holds the containers in place. Right, there are split doors that lock to keep containers secure.

Requirement #39: Methyl Bromide - Warning Agents/Fans/Aeration

- The use of Methyl Bromide (MB) is a rare occurrence.
- Not applicable would be checked on the inspection form if MB is not used.
- If MB is used, consult with your supervisor.

- For more information:
 - 3CCR 6454
 - *Inspection Procedures Manual*



CONGRATULATIONS!

You have completed the Observing the application module, which included 16* requirements from the Structural Fumigation Use Monitoring Inspection form:

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Please complete the remaining modules before conducting an actual inspection of the application phase of a structural fumigation:

- ✓ Document review
- ✓ Truck contents
- ✓ Exterior of structure walk-around
- ✓ Interior of structure walk-through
- ✓ Observing the actual application

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