

Structural Fumigation Use Monitoring Inspection Training Module

Application Phase

- Module 1.3: Exterior Walk Around

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>

GUIDANCE AND REFERENCES

You will also need:
Inspection form
PR-ENF-107
(revised 1/2010)

STATE OF CALIFORNIA
DEPARTMENT OF PESTICIDE REGULATION
STRUCTURAL FUMIGATION USE
MONITORING INSPECTION REPORT
PR-ENF-107 (REV. 01/10) Page 1 of 1

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COMPLETE
 PARTIAL
 FOLLOW-UP INSPECTION

ORIGINAL INSP. # _____

INSPECTING COUNTY

FIRM INSPECTED _____ BUSINESS REGISTRATION NUMBER BR UNL VEHICLE LICENSE PLATE _____
 FIRM ADDRESS _____ TELEPHONE NUMBER PR _____ WIND VELOCITY _____
 PERSON INSPECTED _____ INDIVIDUAL LICENSE NUMBER DPR FR UNL DIRECTION _____ to _____
 APPLICATION SITE ADDRESS _____ REQ. DISTANCE MAINTAINED _____
 PEST YES NO NA
 TREATMENT SITE _____

HANDLER'S NAME _____ ACTIVITY _____ PERSONAL PROTECTIVE EQUIPMENT WORN _____

PESTICIDE NAME / MANUFACTURER	LABEL REGISTRATION NUMBER	SIGNAL WORD	FORMULATION	RATE

STRUCTURAL FUMIGATION	APPLICATION	AERATION	CERTIFICATION
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

REQUIREMENTS		Section	COMPLIANCE	REQUIREMENTS, (Continued)		Section	COMPLIANCE
YES	NO	YES	NO	YES	NO	YES	NO
1. Registered in County	16204.6(x)			26. Test Equipment	1871(a)(2)		
2. County Notified 24 Hours Prior	16204.6(e)			27. Re-entry Requirements	1973		
3. Written Notice to Occupant	8538			28. Direct Supervision	8505.2		
4. Pesticide Disclosure Signed / Available	1970.4			29. Warning Signs on All Sides of Structure	1974		
5. Registered Label Available at Use Site	6602			30. Required Information on Warning Signs	8505.10		
6. Labeling - Site / Rate / Concentration / Other	12973			31. Signs - Atic / Under-area	8505.11		
7. Labeling - Aeration / Certification	12973			32. Warning Agent Used	8505.12		
8. Labeling - Bagging, Pets Removed, Etc.	12973			33. Equipment Properly Identified	6830		
9. Labeling - PPE	12973			34. Containers Labeled / Closures	6878		
10. Regulations - PPE	6738			35. Proper Pesticide Transport	6882		
11. Respiratory Protection	6739			36. Pesticide Handling / Use / Storage	1983		
12. Handler(s) Trained	6724			37. Methyl Bromide Requirements	8454(a)		
13. Emergency Medical Care, Posting	6726			38. MB - Tarps Accept. / Condition / Ret. Method	8454(b-e)		
14. Decant Facility, Site "Warning/Cancel"	6754			39. MB - Warning Agents / Fans / Aeration	8454(f-n)		
15. SCBA Worn / Cont. Monitoring / TRAP Used	6780(b)			40. MB - Measuring Concentration	8454(n)		
16. Accident Response Plan at Work Site	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(i)						
20. Connecting Structures	1970.6						
21. Accurate Measurement	6804						
22. Protection of Persons / Animals / Property	6814						
23. Structure Vacated / Secured Against Reentry	8505.7						
24. Equipment in Good Repair and Safe	6742						
25. 2 SCBA / CPR Chart / Mfg. Instructions	1871(a)(1)						
COMPLIANCE ACTIONS				TOTAL			
Cease and Desist Order 11897 / 13102 <input type="checkbox"/> YES <input type="checkbox"/> NO							
Follow-up Required <input type="checkbox"/> YES <input type="checkbox"/> NO							
Correct Noncompliances By: _____				TOTAL			

Remarks - Include a detailed description of noncompliances. When additional space is required, continue on inspection report / VN Supplement, PR-ENF-111.

INSPECTOR (Print Name) _____ Signature _____ TIME AND DATE INSPECTED _____
 INSPECTION ACKNOWLEDGED BY (Print Name) _____ Signature _____ DATE ACKNOWLEDGED _____

VIOLATION NOTICE YES NO # _____ **VIOLATION NOTICE** YES NO # _____
 (BUSINESS) (LICENSEE)

Distribution: White - County, Canary - DPR, Pink - Inspector, Goldenrod - Firm / Person Inspected

Page _____ of _____



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

EXTERIOR WALK-AROUND

This EXTERIOR WALK AROUND module covers 12* inspection requirements from the Structural Fumigation Inspection Form:

#	REQUIERMENT	#	REQUIREMENT
6	Labeling – site/rate/concentration/other	24	Equipment in good repair and safe
14	Decontamination facility, site “Warning /Danger”	29	Warning signs on all sides of structure
15	SCBA worn/continuous monitoring/ CAP used	30	Required information on warning signs
20	Connecting structures	37	Methyl bromide requirements
22	Protection of persons/animals/property	38	MB- tarps accept./condition/ret. method
23	Structure vacated /secured against reentry	39	MB-warning agents/fans/aeration

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

Requirement #6: Labeling – Site/Rate/Other

What and how to inspect:

- Suitable climatic conditions used to determine rate (taking into account factors such as heat and wind at the site using weather condition equipment);
- Proper application methods (site conditions, tarp condition & seal, and soil moisture) in compliance with use directions on labeling (for CAP, see requirement #15);

Requirement #6: Labeling – Site/Rate/Other

What and how to inspect:

- Natural gas shut off at main service valve (labeling requires following *procedures set by local gas company*)



For more information:

- Product labeling, including associated manuals
- Enforcement letter ENF 11-30 (natural gas shut-off)
- *Inspection Procedures Manual*

Requirement #6: Labeling – Site/Rate/Other

Are these in compliance (yes or no) ?



Requirement #6: Labeling – Site/Rate/Other

Are these in compliance (yes or no) ?



Answers:

- **No** (1st photo, left side), there are no snakes on the step and no soil seals on the corners to assure a seal for the fumigant.
- **No** (2nd photo, right side), one snake is sticking out of the tarp creating a conduit for gas to escape. Also, soil is dry, not damp as required.

Follow up with your supervisor:

- What should you do in response to this violation?

Requirement #14: Decontamination Facilities

What and how to inspect:

Are these supplies available within 100 feet of the “mixing/loading site” (fumigant cylinder)?

- “Sufficient” water, soap, and single-use towels
 - EPA recommends at least 3 gallons per handler.
 - Spigot / hose bib on a structure is acceptable, if it will be accessible when fumigant is introduced.
 - Waterless hand cleaners may be substituted for soap, but water must still be provided and used for decon. Hand sanitizer products are not acceptable.
- One clean change of coveralls



For more information:

- 3CCR § 6734(a) and (d) - - structural is non-ag use
- *Inspection Procedures Manual*

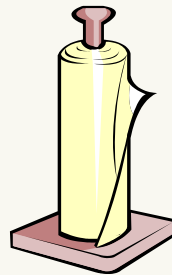
Requirement #14: Decontamination Facilities

Is this in compliance (yes or no) ?

All of the following are stored on the truck



Hand Soap



roll of
paper towels



one set of
clean coveralls



hose bib is on
nearby structure

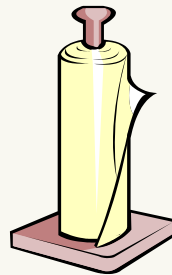
Requirement #14: Decontamination Facilities

Is this in compliance (yes or no) ?

All of the following are stored on the truck



Hand Soap



roll of
paper towels



one set of
clean coveralls



hose bib is on
nearby structure

Answer: Yes.

Provided that the hose is accessible (will not be covered by tarp), and is functioning, it is an acceptable source of water.

Requirement #15: SCBA/ Continuous Monitoring / CAP

What and how to inspect

Inlet Device Placement:

- Placed ≥ 4 feet above exterior grade.
- Should be placed opposite from where discharge (aeration ducting) is located.
- Where inlet opening air flow is not blocked.
- When using smaller than 254 sq. inch size inlets, more inlets are needed to achieve total required surface area.



Single Story Ducting:

Must extend from fan end (inside) to roofline, or at least 10 feet above ground for higher rooflines.

For more information:

- 3CCR § 6780(b)
- *Inspection Procedures Manual*

Requirement #15: SCBA/ Continuous Monitoring / CAP

Are these in compliance (yes or no) ?

1



2



Requirement #15: SCBA/ Continuous Monitoring / CAP

Are these in compliance (yes or no) ?

1



2



- **Yes**, photo 1, shows the CAP exterior ducting placement extends to the roofline.
- **No**, photo 2, the top of the exterior ducting does not extend to the roofline and is well below that point.

Follow up with your supervisor:

- What should you do in response to this violation?

Requirement #15: SCBA/ Continuous Monitoring / CAP

Are these in compliance (yes or no) ?

1



2



Requirement #15: SCBA/ Continuous Monitoring / CAP

Are these in compliance (yes or no) ?

1



2



- **No**, photo 1, there is a brick wall behind the inlet device and the air cannot enter without obstruction.
- **No**, photo 2, the CAP inlet device window is blocked by the hedge and will not allow proper ventilation.

Follow up with your supervisor:

- What should you do in response to this violation?

Requirement #20: Connecting Structures

What and how to inspect:

- Visually check the site for drains, conduits and pipes etc... to ensure that the licensee has identified the potential for off-site movement of the fumigant to a connecting structure.
- Ensure the prime contractor has verified with the property owner/designated agent or licensee about any construction elements (e.g. conduits, drains or vacuum systems) that could allow fumigant to pass to adjacent structures or out to the street from a drainage system.
- Ensure that the licensee has a fumigation log on site and that it is filled out and that any problems are recorded in the log.

Requirement #20: Connecting Structures

What and how to inspect:

- Check the Fumigation Log (if present) to verify that a thorough search for drains, conduits or vacuum systems etc... was conducted by the licensee and discuss this with them.
- Verify that any discovered connection has been closed or the structure vacated and managed as a fumigated structure.
- If there were any conduits, how were they handled and determine if their closure is adequate to keep the fumigant from going past the connection.

For more information:

- FAC § 12973 and 16CCR 1970.6
- *Inspection Procedures Manual*

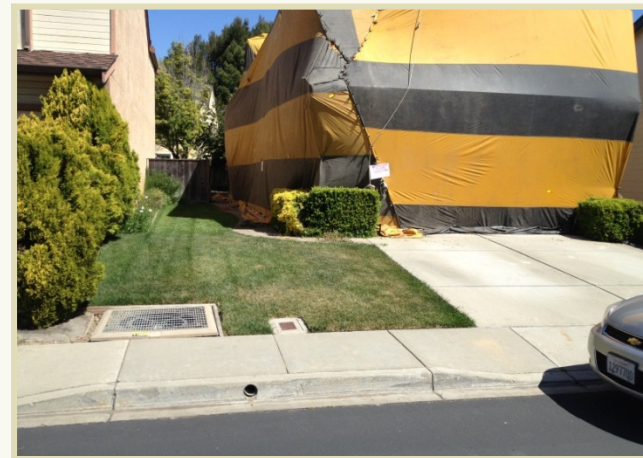
Requirement #20: Connecting Structures

Are these in compliance (yes or no) ?



Requirement #20: Connecting Structures

Are these in compliance (yes or no) ?



Has the garage unit adjacent to the house in photo 1 (left) been documented in the fumigation log (conduits identified etc....)?

Has it been determined in photo 2 (right) that the drain at the gutter is not connected to the fumigated home?

Follow up with your supervisor:

- What should you do in response to this violation?

Requirement #22: Protection of Persons/Animals/Property

What and how to inspect:

- Has the licensee evaluated the equipment, weather conditions, and surrounding properties?
- Do you see reasonable possibility* of:
 - Pesticide contamination of bystanders or nearby residents?
 - Contamination of property (including plants or animals) ?
 - For example, has the licensee verified that all spaces within the tarp have been inspected for pets?

*This requires your judgment -
not limited to exact wording of the label or the CAP

For more information:

- 3CCR 6614
- *Inspection Procedures Manual*

Requirement #22: Protection of Persons/Animals/Property

Are these in compliance (Yes or No) ?



Requirement #24: Equipment in Good Repair and Safe

What and how to inspect:

- Look at all equipment used as part of the fumigation (tarps, clamps, snakes, hoses, SCBAs, CAP equipment);
- Pest control equipment should be inspected while in use.
- Equipment is kept in good repair and is safe to operate (such as valves, couplings and hoses to make sure they are not leaking).

For more information:

- 3CCR 6742 (a)
- *Inspection Procedures Manual*

Requirement #24: Equipment in Good Repair and Safe

Are these in compliance (yes or no) ?

1



2



3



Requirement #24: Equipment in Good Repair and Safe

Are these in compliance (yes or no) ?

1



2



3



No, photo 1, air control valve handle appears to be bent on SCBA.

No, photo 2, tarp is clearly torn and has compromised the fumigation.

No, photo 3, SCBA mask is filthy and has clearly not been kept in good repair as required (see 3CCR, section 6600 for assessment).

Follow up with your supervisor:

- What should you do in response to this violation?

Requirement #29: Warning Sign on All Sides of Structure

What and how to inspect:

- Look at the label to see what it says about warning sign location.
- Are warning signs posted on the structure itself (even though it will be covered by the tarp):
 - on each side of the structure; and
 - at or near all entrances (usually entrance = door).
- Are warning signs posted on the outside of the tarp:
 - on all accessible sides, visible from any direction; and
 - at all joint seams of the tarp at the first floor level.

For more information:

- 16CCR 1974
- *Inspection Procedures Manual*

Requirement #29: Warning Sign on All Sides of Structure

Are these in compliance (yes or no) ?



Requirement #29: Warning Sign on All Sides of Structure

Are these in compliance (yes or no) ?



Yes, for all three photos.

All joint seams are marked with a warning sign and the entrance to the structure in photo #1, left, is also marked. Don't forget to inspect all sides of the tarp on the structure, and the structure inside the tarp).

For more information:

- 16CCR 1974
- *Inspection Procedures Manual*

Requirement #30: Required Information on Warning Signs

What and how to inspect:

- Printed in red on white background;
- The statement “DANGER-FUMIGATION” in letters two inches in height or larger;
- Skull & crossbones one inch in height or larger; and
- Shall state, in letters not less than one half-inch in height:
 - The product name; the name of fumigant; and the active ingredient;
 - date and time fumigant introduced to structure (except signs inside the tarp only need the date); and
 - the name, address, and phone number of the registered business performing the fumigation.

For more information:

- Business and Professions Code 8505.10
- *Inspection Procedures Manual*

Requirement #30: Required Information on Warning Signs

Is this sign in compliance or non-compliance?



Requirement #30: Required Information on Warning Signs

Was the sign on the previous slide in compliance ?

Yes & No, this posting or Warning Sign contains: The date that the fumigant was introduced into the structure; the word “danger” and the skull/cross-bones; the PCB name/address/phone number; and, the name of the fumigant.

The sign has the date that the fumigant was introduced into the structure, but it does not contain the time that the fumigant was introduced into the structure and this is a violation. This information is necessary for knowing when the fumigation is complete.

Requirements #37-39: Methyl Bromide

- 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 EXTERIOR WALK AROUND training module that covers 12* requirements on the Structural Fumigation Use Monitoring Inspection Report form:

#	REQUIERMENT	#	REQUIREMENT
6	Labeling – site/rate/concentration/other	24	Equipment in good repair and safe
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* In total, there are 40 inspection requirements on the Structural Fumigation Use Monitoring Inspection Report form (PR-ENF-107, revised 01/2010)

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

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

FOR MORE INFORMATION, CONTACT:

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