

Structural Fumigation Use Monitoring Inspection Training Module

Application Phase

Module 1.4: Interior Walk through

(1)



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

INTERIOR OF STRUCTURE WALK-THROUGH

This Interior Walkthrough module covers 6* inspection requirements from the application phase on the Structural Fumigation Form:

#	REQUIERMENT
6	Labeling – Site/Rate/Concentration/Other
8	Labeling – Food Bagging, Pets Removed, Etc.
15	SCBA Worn / Continuous Monitoring / CAP Used
22	Protection of Persons/Animals/Property
23	Structure vacated / secured against reentry
24	Equipment in Good Repair and Safe

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

Requirement #6: Labeling – Site/Rate/Other

SF labeling, particularly the associated structural fumigation manual, has many pages of detailed information covering many items.

The next series of 11 slides cover some important miscellaneous compliance items for this criteria item.

Requirement #6: Labeling – Site/Rate/Other

What and how to inspect:

- Verifying sulfuryl fluoride (SF) labeling compliance for various items and equipment inside the structure.

For more information:

- FAC § 12973
- Sulfuryl product labeling
- *Inspection Procedures Manual*

Requirement #6: Labeling – Site/Rate/Other

- Electric fans are used for rapid dispersion of gas and to facilitate in the aeration process.
- Labeling requires a larger fan be used for the shooting fan with “pic pan” in its air stream for proper dispersal.
- Fans used elsewhere for air circulation are not required to be any particular size.



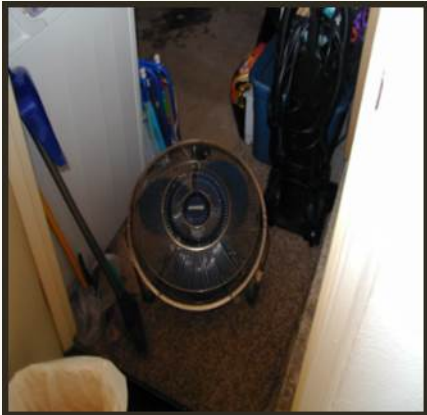
Requirement #6: Labeling – Site/Rate/Other *Heat Source and Electricity Concerns*

- “Extinguish all flames, [heat sources], including pilot lights...unplug/turn off all automatic lighting and appliance controls...”
- “Turn off burglar alarm”
-because they are triggered by air motion of fans
- “Turn off all central heat/air conditioning systems...”

Note: Primary Door Lock(s) not being locked is a label violation!

Requirement #6: Labeling – Site/Rate/Other

Use of circulation fans to establish air flow



Requirement #6: Labeling – Site/Rate/Other

Setup & use of chloropicrin warning agent



Labeling requires the pic pan be positioned next to the shooting fan so that the warning agent is more quickly distributed throughout the structure along with the fumigant. Labeling may state either place in airstream of a fan only, or may state whether a pic pan must be in front of, or behind, the fan.

Requirement #6: Labeling – Site/Rate/Other *Cabinets, Drawers, & Appliance Doors Opened*

To ensure adequate circulation of SF and warning agent, all operable drawers, cabinet doors, and appliance doors other than refrigerators and freezers must remain open.



Requirement #6: Labeling – Site/Rate/Other

Operable Internal Doors Opened

- To ensure adequate circulation of SF and warning agent, all operable internal doors must also remain open.
 - B1 use various methods to keep them open



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) ?



No for left photo.



Yes for right photo.

Follow-up with your supervisor:

- What additional action (if any) should you take in response to this violation?

Requirement #6: Labeling – Site/Rate/Other

Operable windows opened (at least 3 inches)



Exterior walls with operable windows; at least 1 window per room must be opened at least 3 inches.

But if windows nailed/painted shut or no access because of storage etc. they are not required to be opened.



For security reasons, B1 will utilize existing window locking devices to ensure windows can't fully open.

If none present or they are broken, B1 may install a temporary window lock or barricading device.

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) ?



Room windows closed; inside there are boxes stacked in front of windows up to the ceiling.



Room with multiple windows, but only 1 is open because the others are painted shut.

Answer: Yes for both.

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) ?



Sliding door open 3 inches; inside there is a temporary lock inside the door track.



Inside the sliding door track, This lock is what you see.

Answer: Yes for both.

Requirement #8: Labeling - Bagging, Pets Removed, etc.

- SF labeling, particularly the associated structural fumigation manual, has many pages of detailed information covering many items.
- The next series of 10 slides cover some important miscellaneous compliance items for this criteria item.

Requirement #8: Labeling - Bagging, Pets Removed, etc.

What and how to inspect:

- Verifying compliance with labeling for which items have to be bagged or removed, and that domestic/non-target animals and desirable plants are removed.

For more information:

- FAC § 12973
- Sulfuryl product labeling
- *Inspection Procedures Manual*

Requirement #8: Labeling - Bagging, Pets Removed, etc. *Bag or Remove Designated Food & Medicine Items*

- SF labeling from registrant may vary in whether certain food, beverage, and/or medicinal items must be bagged or removed.
- Certain food and medicinal items are NOT required to be bagged or removed. Examples listed in SF labeling include:
 - Food, feed, drugs, tobacco product, and medicinals (including those in refrigerators and freezers) can remain unbagged in the structure, if they are in unopened plastic, glass or metal bottles, cans or jars with the original manufacturer's air-tight seal intact.

NOTE:

Cosmetic or topical lotions and others that are not "ingested" are exempt from the bag or remove requirement.

Requirement #8: Labeling - Bagging, Pets Removed, etc.

Bag or Remove Designated Food & Medicine Items



Requirement #8: Labeling - Bagging, Pets Removed, etc *Bag or Remove Designated Food & Medicine Items*

- For all items that must be bagged, check labeling to verify which brand of bag(s) can be used with that SF product:
 - Nylofume (Vikane), Fumiguard (Zythor), and/or Master Fume bags.
 - Some SF labels also allow other registrant brand bags to be used.
- Photo on the right depicts properly double bagged sealed food items. Photo below is a closeup of the Nylofume brand bag, which can be used by all 3 SF products per their registered labeling.



Requirement #8: Labeling - Bagging, Pets Removed, etc.

Bag or Remove Designated Food & Medicine Items



Requirement #8: Labeling - Bagging, Pets Removed, etc.

Bag or Remove Designated Food & Medicine Items

Are these in compliance (yes or no) ?



Left photo:
Cat food dish
found in bathroom.

Right photo:
Dog biscuit box that's been
opened on pantry shelf
next to canned pet food.



Requirement #8: Labeling - Bagging, Pets Removed, etc. *Bag or Remove Designated Food & Medicine Items*

Are these in compliance (yes or no) ?



Left photo:
Cat food dish
found in bathroom.

Right photo:
Dog biscuit box that's been
opened on pantry shelf
next to canned pet food.



Answer: No for both.

Follow-up with your supervisor:

- What additional action (if any) should you take in response to this violation?

Requirement #8: Labeling - Bagging, Pets Removed, etc.

Removing Pets

- SF labeling may vary in how they describe requirements or options for large fish tanks. Otherwise all people and non-target/domestic animals must be removed.



Requirement #8: Labeling - Bagging, Pets Removed, etc.

Removing Fish

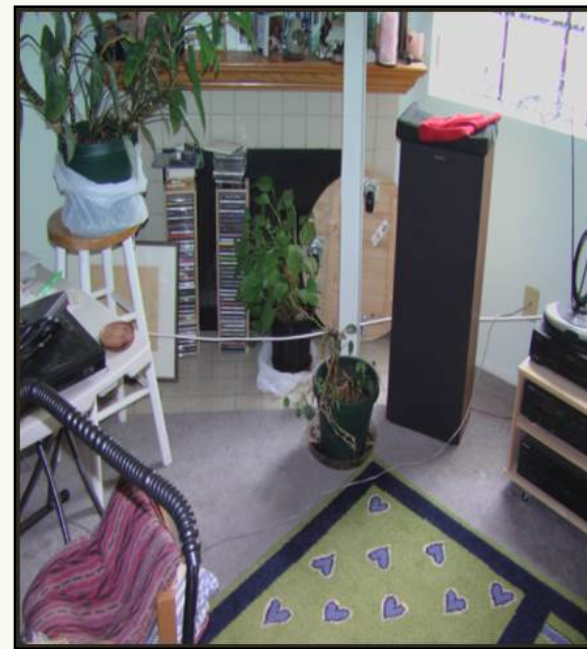
SF labeling states fish should be removed, or in some cases where large tanks with “sensitive” fish the label may allow providing outside fresh air line into the tank and “seal” off the tank from the rest of the fumigated space.



Requirement #8: Labeling - Bagging, Pets Removed, etc.

Remove plants

When you are doing the walk-through, prior to licensee introducing the chloropicrin warning agent and the fumigant, look around every room to see that no small potted plants were left inside...unless of course they are plastic (“fake”) plants!



Requirement #8: Labeling - Bagging, Pets Removed, etc.

Are these in compliance (yes or no) ?



Requirement #8: Labeling - Bagging, Pets Removed, etc.

Are these in compliance (yes or no) ?



Answer: No for both.

Follow-up with your supervisor:

- What additional action (if any) should you take in response to this violation?

Requirement #15: CAP Equipment / Placement*

What and how to inspect:

- Verifying compliance for California Aeration Plan (CAP) equipment located inside the tarps.
- SCBA worn/continuous monitoring are normally N/A for application phase inspections; see speaker notes for additional scenario examples.

For more information:

- California Aeration Plan (CAP) & 3CCR § 6780(c)
- Inspection Procedures Manual

Requirement #15: CAP Equipment / Placement*

Interior view of CAP ducted Aeration Fan



- Most of the CAP equipment inspection compliance is determined from the outside of the structure.
- During an application phase inspection it is still important to see how the Ducted Aeration Fan is placed inside.
- Verify ducting is securely attached to fan and it is clipped into and threaded through the tarp so there is no bunching or blockage on the inside that would inhibit Aeration phase use of this equipment to exhaust the fumigant and warning agent

Requirement #15: CAP Equipment / Placement

Interior view of CAP ducted Aeration Fan

Is this in compliance (yes or no) ?



Requirement #15: CAP Equipment / Placement

Interior view of CAP ducted Aeration Fan

Is this in compliance (yes or no) ?



Answer: Yes.

CAP ducting needs to be attached (securely) to the fan, as well as fitting snugly to function properly, or else the initial force of fan activation could cause ducting to partially or completely detach from the fan.

Requirement #22: Protection of Persons/Animals/Property

What and how to inspect:

- Verifying compliance for miscellaneous items that ensure people, non-target animals, and the property under fumigation are protected from damage or other harm related to exposure.
- This requires your judgment - not limited only to the exact wording of labeling or CAP

For more information:

- FAC § 12973, and sulfuryl product labeling
- 3CCR § 6614
- *Inspection Procedures Manual*

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.

Follow-up with your supervisor:

- What additional action (if any) should you take in response to this violation?

Requirement #23: Structure Vacated/Secured Against Re-entry

- SF labeling, particularly the associated structural fumigation manual, has many pages of detailed information covering many items.
- The next series of 6 slides cover some important compliance items for this requirement item.

Requirement #23: Structure Vacated/Secured Against Re-entry

What and how to inspect:

- Verifying compliance for occupants all having vacated the structure and that primary and “secondary” locks/barricades (when required) are in place for entrances until fumigation is completed and the structure is certified safe for occupants to re-enter.

For more information:

- FAC § 12973, and sulfuryl product labeling
- *Inspection Procedures Manual* BPC § 8505.7 & 16CCR § 1970.3

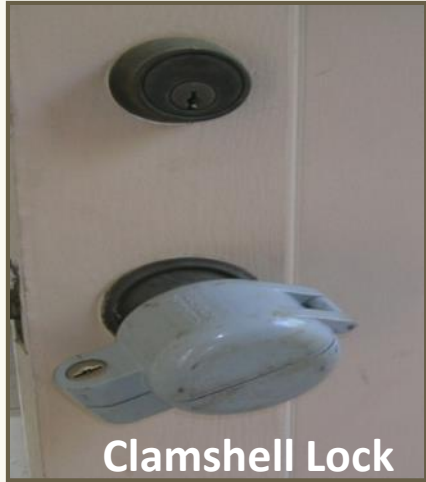
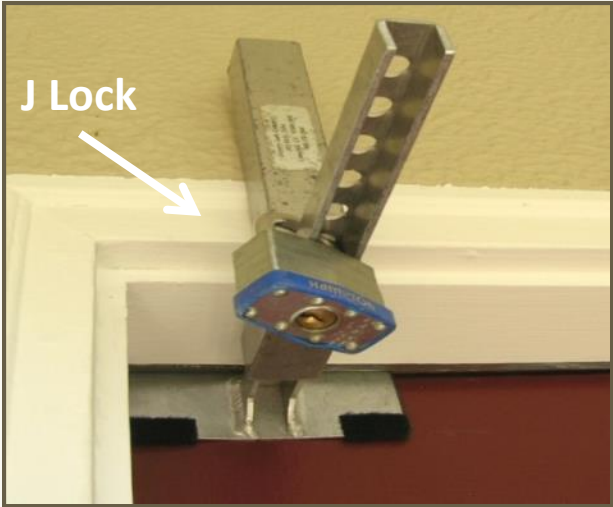
Requirement #23: Structure Vacated/Secured Against Re-entry *Primary Door Locks*



Not engaging the primary lock on a door is a label (FAC 12973) violation, NOT a BPC 8505.7 “Secondary Lock” violation.

Requirement #23: Structure Vacated/Secured Against Re-entry

Secondary Locks



Requirement #23: Structure Vacated/Secured Against Re-entry

Secondary Locks



Clamshell lock interior & side views

Padlock with chain

Secondary Lock display provided by Mike Watkins of Cardinal Professional Products



Criterion #23: Structure Vacated/Secured Against Re-entry

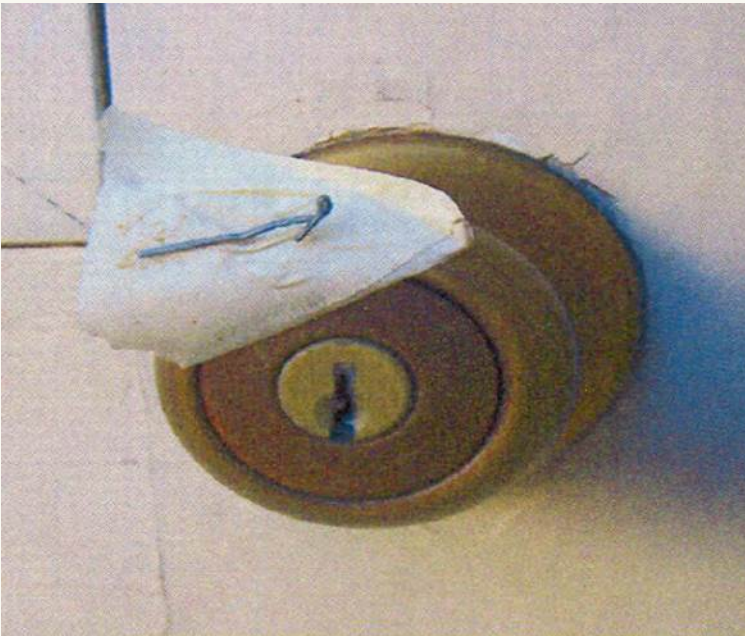
More Scenario Examples



Licensee is disconnecting the electrical power cord to disable the automatic garage door opener.

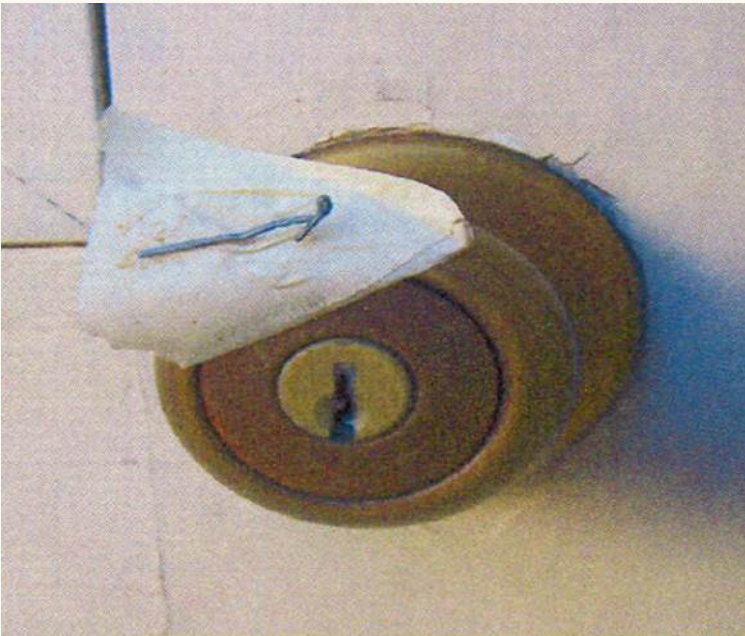
Criterion #23: Structure Vacated/Secured Against Re-entry

Is this in compliance (yes or no) ?



Criterion #23: Structure Vacated/Secured Against Re-entry

Is this in compliance (yes or no) ?



Answer: No.

Follow-up with your supervisor:

- What additional action (if any) should you take in response to this violation?

Requirement #24: Equipment in Good Repair/Safe

What and how to inspect:

- Verifying compliance for equipment functioning while applying the fumigant. (Most of this is done while outside the tarps.)

For more information:

- FAC § 12973, 3CCR 6742, and sulfuryl product labeling
- *Inspection Procedures Manual* entry for this requirement

Criterion #24: Equipment in Good Repair/Safe

Is this in compliance (yes or no) ?

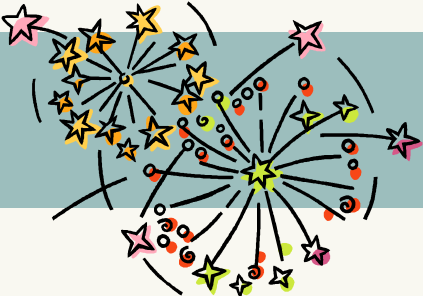


Criterion #24: Equipment in Good Repair/Safe

Is this in compliance (yes or no) ?



Answer: YES.



CONGRATULATIONS!

You have completed the Interior Walk-Through module, which included six* requirements from the Structural Fumigation Use Monitoring Inspection form:

#	REQUIERMENT
6	Labeling – Site/Rate/Concentration/Other
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* In total, there are 40 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 of structure walk-around
- ✓ Interior of structure walk-through
 - Observing the actual application

FOR MORE INFORMATION, CONTACT:

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