

Structural Fumigation Use Monitoring Inspection Training Module

Application Phase

- Module 1.2: Truck Contents

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

TRUCK CONTENTS

This Truck Contents module covers 10* inspection requirements from the application phase on the Structural Fumigation Use Monitoring Inspection Report form:

#	REQUIERMENT	#	REQUIREMENT
5	Registered label available at use site	26	Test equipment
13	Emergency medical care, posting	33	Equipment properly identified
14	Decont. facility, site "Warning/Danger"	34	Containers labeled/ closures
16	Accident response plan at work site	35	Proper pesticide transport
25	2 SCBA/ CPR chart/ mfg. instructions	36	Pesticide handling / use/ storage

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

Requirement # 5 Registered Label Available

What and how to inspect:

- Review labeling present on site.
- Photocopies or even digital formats are okay, if they are not materially different from labeling registered with DPR.
- Be sure to check label affixed to fumigant cylinder.

For more information:

- California Code of Regulations, title 3, § 6602
- Compendium Volume 8 (Interpretation),
 - pages 1-29 and 1-30 (“Labeling at use site”)
 - http://www.cdpr.ca.gov/docs/enforce/compend/vol_8/chapter1.pdf

Requirement # 5 Registered Label Available

Details for structural fumigations:

- “Manual for Structural Fumigation” or “Applicator’s Manual” is part of the registered labeling for all sulfuryl fluoride products registered for structural fumigation (since 2010).
 - Both the cylinder label and the Manual must be on site (both are registered labeling).
- Chloropicrin (“pic”) used as warning agent is not a pesticide.
 - So, 3CCR § 6602 does not apply to the chloropicrin product being used as a warning agent.



Requirement # 5 Registered Label Available

Is this in compliance (yes or no) ?



Product label, per se, is only glued onto the cylinder on back of the truck



“Our label book is on the truck seat”

Product “Applicator Manual” is present only as a black-and-white photocopy

Requirement # 5 Registered Label Available

Is this in compliance (yes or no) ?



Product label, per se, is only glued onto the cylinder on back of the truck



“Our label book is on the truck seat”

Product “Applicator Manual” is present only as a black-and-white photocopy

Answer: Yes, if cylinder label is intact and legible.

Both parts of the “registered labeling” are present on site (the label, and the Manual). Photocopies are acceptable as long as the photocopy is not materially different from labeling that is registered with DPR.

Requirement # 13 Emergency Medical Care

What and how to inspect:

Is information about emergency medical facility posted in a prominent place (at work site or in truck)?

- Must include name, address, and phone number
- “Call 911” is not sufficient

For more information:

- 3 CCR§6726
- Inspection Procedures Manual entry for this requirement

Requirement # 13 Emergency Medical Care

Is this posting in compliance (yes or no) ?



Sticker posted onto sun visor inside the cab of the truck

Requirement # 13 Emergency Medical Care

Is this posting in compliance (yes or no) ?



Sticker posted onto sun visor inside the cab of the truck

Answer: Yes (if visor is down).

Information is complete, and posted in a prominent place (a bystander could see it if needed in case of emergency).

If this sticker was stored inside the glove box rather than posted, that would not be in compliance.

“Emergency Medical Care Posting” was one of the most common violation categories in structural inspections (2009-11).

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



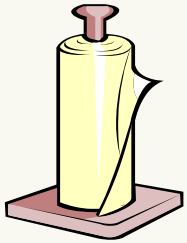
For more information:

- 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 or in the truck:



roll of
paper towels



Hand soap



two gallons of
cold water

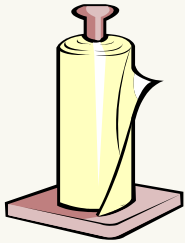


one set of
clean coveralls

Requirement # 14: Decontamination Facilities

Is this in compliance (yes or no) ?

All of the following are stored on or in the truck:



roll of
paper towels



Hand soap



two gallons of
cold water



one set of
clean coveralls

Answer: Not enough information yet.

Two gallons of water probably is not sufficient

(because there should be at least two handlers on site).

Besides, decontaminated water must be separate from drinking water.



BUT: perhaps the crew has access to a hose bib.

Ask the crew, and check during the “exterior walk-around”.

Requirement #16: Accident Response Plan

What and how to inspect:

- Is there a written plan at the worksite?
- Check for completeness
 - How fumigation crew should manage various accidents such as spills, fires, and leaks (“follow label” is okay)
 - Whom to contact (such as fire department), with emergency phone numbers
- Does the crew know the plan?
 - Ask them what they would do if there was a spill, etc.

For more information:

- CA Code of Regulations, title 3, § 6780 (d)
- *Inspection Procedures Manual*

Requirement #16: Accident Response Plan

Is this in compliance (yes or no) ?

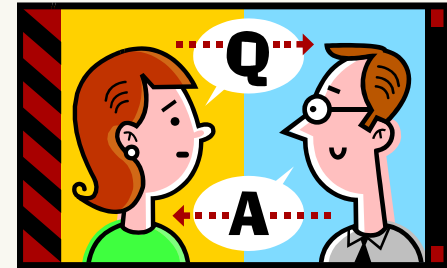
You ask a crewmember:

What would you do if the cylinder started leaking?

Crew member answers:

Get everybody away from the cylinder!

And then go get the crew chief, because he needs to wear the SCBA if the cylinder is leaking. I know there are details on the label, I think it's in the "cylinder" section . . . Anyway, our emergency plan tells what part of the label deals with leaks. It's on the front seat.



Requirement #16: Accident Response Plan

Is this in compliance (yes or no) ?

You ask a crewmember:

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Crew member answers:

Get everybody away from the cylinder!

And then go get the crew chief, because he needs to wear the SCBA if the cylinder is leaking. I know there are details on the label, I think it's in the "cylinder" section . . . Anyway, our emergency plan tells what part of the label deals with leaks. It's on the front seat.



Answer: Yes, the crew member seems well trained about the Accident Plan.

Double-check that the Plan includes emergency phone numbers.

Requirement #25: Safety Kit/ SCBA

What and how to inspect:

1) Does the crew have a safety kit that includes:

- Instructions for first aid methods ?
- Two “effective” Self Contained Breathing Apparatus (SCBA) ?

2) Do the SCBA’s have enough air?

Check the pressure gauges:

- One cylinder must be at 100% of capacity
- Second cylinder must have enough air so that warning bell does not ring (licensee must not enter a structure if bell is ringing)



3) Does the crew know how to do first aid?

For more information:

- CA Code of Regulations, title 16, § 1971 and title 3, § 6739(j)
- *Inspection Procedures Manual*
- Video on inspecting pressure gauges

<http://www.firerescue1.com/fire-products/fire-breathing-apparatus/clip/452947-SCBA-pressure-gauges/>

Requirement #25: Safety Kit/ SCBA

Is this in compliance (yes or no) ?

One cylinder at about 80%
“we charged it first thing
this morning, and haven’t
touched it since.”



One cylinder at
about 65%
“because we used
it this morning at
another job”

Licensee tells you, “At the beginning of the workday, we charge both SCBA’s to at least 80%, just like the regulations say.”

Requirement #25: Safety Kit/ SCBA

Is this in compliance (yes or no) ?

One cylinder at about 80%
“we charged it first thing
this morning, and haven’t
touched it since.”



One cylinder at
about 65%
“because we used
it this morning at
another job”

Licensee tells you, “At the beginning of the workday, we charge both SCBA’s to at least 80%, just like the regulations say.”

Answer: No. The cylinder of at least one SCBA must be at 100% of capacity, to meet the requirement for “emergency use”

3CCR 6739(j)(1)(B)4

Note: the general category “Respiratory Protection” was the most common type of violation in structural inspections (2009-11)

Follow up with your supervisor:

- What should you do in response to this violation?

Requirement #26: Test Equipment

What and how to inspect:

1) Does labeling require test equipment ?

Might not be required during application phase, if:

- No one enters the enclosed space when the fumigant is introduced, *or*
- Anyone who enters wears SCBA

2) If required, does equipment meet specifications?

- for sulfuryl fluoride, test equipment must be able to detect down to 1 ppm

For more information:

- CA Code of Regulations, title 16, § 1971(a)(2)
- Product labeling
- *Inspection Procedures Manual*

Requirement #26: Test Equipment

Is this in compliance (yes or no) ?

Fumigant that will be used is Vikane (a sulfuryl fluoride product).

Crew has an Interscan Model GF1900 with a portable battery pack.



“Ready” indicator lights up when on

Meter reads zero in open air (no SF)

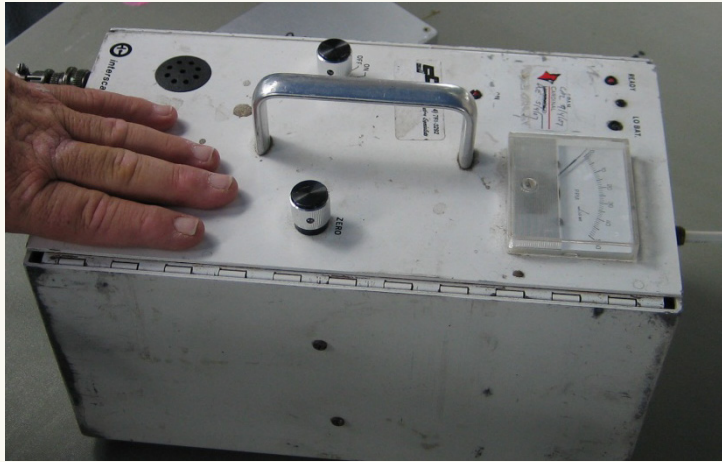
Gas inlet hose (open at end)

Requirement #26: Test Equipment

Is this in compliance (yes or no) ?

Fumigant that will be used is Vikane (a sulfuryl fluoride product).

Crew has an Interscan Model GF1900 with a portable battery pack.



“Ready” indicator lights up when on

Meter reads zero in open air (no SF)

Gas inlet hose (open at end)

Answer: Yes.

This Interscan model meets the specifications on sulfuryl fluoride labeling (please check the labeling to verify for yourself).

Requirement #33: Equipment Identified

What and how to inspect:

Is the truck marked (readable from 25 feet):

1. Operator license number or Company registration number;

-and-

2. Company name, “Licensed Pest Control Operator”, “Fumigation Division”, or substantially similar wording

For more information:

- CA Code of Regulations, title 3, § 6630
- *Inspection Procedures Manual* entry for this criterion

Requirement #33: Equipment Identified

Is this in compliance (yes or no) ?



AGRICULTURAL COMMISSIONER OF BESTEST COUNTY	
REGISTRATION FOR BRANCH 1 - STRUCTURAL FUMIGATION	
Date Submitted: 02/03/2012	
For Year: 2012	
COMPANY INFORMATION:	
Company Name: Kilzall Brothers Pest Control	
Registration No. PR-6666	
Mailing Address: 8739 Main Street, Bestest City CA 92234	
Telephone: (999) 222-0000	
E-mail: joe@kilzall.com	
Fax: (999) 222-0001	
Physical Address: Same as mailing address	
Operator Name: Joe Kilzall	
License: OPR-9999	Expiration: June 30, 2013

Registration form on file at CAC

Requirement #33: Equipment Identified

Is this in compliance (yes or no) ?



AGRICULTURAL COMMISSIONER OF BESTEST COUNTY	
REGISTRATION FOR BRANCH 1 - STRUCTURAL FUMIGATION	
Date Submitted: 02/03/2012	
For Year: 2012	
COMPANY INFORMATION:	
Company Name: Kilzall Brothers Pest Control	
Registration No. PR-6666	
Mailing Address: 8739 Main Street, Bestest City CA 92234	
Telephone: (999) 222-0000	
E-mail: joe@kilzall.com	
Fax: (999) 222-0001	
Physical Address: Same as mailing address	
Operator Name: Joe Kilzall	
License: OPR-9999	Expiration: June 30, 2013

Registration form on file at CAC

Answer: Yes.

- “PR-6666” is the Principal Office registration of the company, registered by the Structural Pest Control Board (SPCB).
- “Kilzall Brothers” is the company name (the complete DBA name should be used, and that appears to be “Kilzall Brothers Pest Control” – you could check with SPCB).
- The “CA122999” is not relevant to your inspection (probably it’s the license from Contractors’ State License Board; it’s okay if the contractor chooses to show it).

Requirement #34: Containers Labeled/ Closures

What and how to inspect:

- Do all pesticide containers carry the original label?
- Are all lids or closures securely tightened?
 - If in doubt, ask licensee to check, while you watch.

Reminder: fumigant labeling prohibits gloves (because they can trap gas)



For more information:

- CA Code of Regulations, title 3, § 6676
- *Inspection Procedures Manual*

Requirement #34: Containers Labeled/ Closures

Is this in compliance (yes or no) ?



Cylinders on back of truck has no label



“Our label book is on the truck seat”

Photocopy of complete Vikane label is available in the truck

Requirement #34: Containers Labeled/ Closures

Is this in compliance (yes or no) ?



Cylinders on back of truck has no label



“Our label book is on the truck seat”

Photocopy of complete Vikane label is available in the truck

Answer: No.

3CCR § 6676 requires the registrant’s label on the container. A label somewhere else (such as in their “label book”) is not relevant.

Follow up with your supervisor:

- What should you do in response to this violation?

Requirement #35: Pesticide Transport

What and how to inspect:

- Are pesticides separated from people and food during transport?
- Are pesticide containers securely attached to vehicle during transport?

For more information:

- CA Code of Regulations, title 3, § 6682
- *Inspection Procedures Manual*
- Page 1-44 of Volume 8, *Guidelines for Interpreting Pesticide Laws, Regulations, and Labeling*

Requirement #35: Pesticide Transport

Is this in compliance (yes or no) ?



Requirement #35: Pesticide Transport

Is this in compliance (yes or no) ?



Answer: Yes.

Fumigant cylinders are securely attached, and are isolated from the cab of the truck.

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.

Why no requirement for the fumigation log?

- Although fumigation crews often have their Fumigation Log in the truck,
- CA Code of Regulations, title 16, § 1970 does not require that the Fume Log be in the truck (or even at the work site).

For more information:

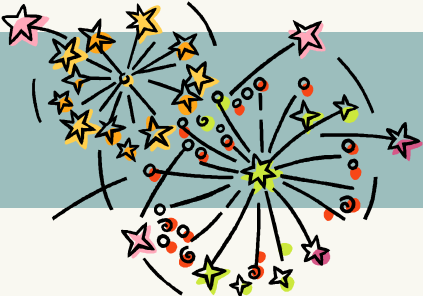
- CA Code of Regulations, title 16, § 1970
- Form PR-ENF-110, *Pest Control Business Headquarter Inspections Report*. During future headquarters inspections, verify that the business is compiling and retaining the fume logs.

Fumigation Log Standard Format

(from CA Code of Regulations, title 16, § 1970)

Not required to be at work site
(though you may encounter it):

ADDRESS OF PROPERTY		CITY		DATE OF FUMIGATION	
BRANCH CO. AND ADDRESS OF CONTRACTOR			PRIME CONTRACTOR NAME AND ADDRESS		
CO. REG. A.			CO. REG. F.		
OWNER/AGENT NAME AND ADDRESS			FIRE DEPT. NOTIFIED (DATE/HOUR)		
PROPERTY DESCRIPTION			C.A.C. NOTIFIED (METHODS/DATE/HOUR)		
NOTES OR COMMENTS					
SECTION 1		TARGET FEET	WARRANTY AGENT	CUBIC FEET	GENERA USED
FUMIGANT RELEASED					
FUMIGANT / E.P.A. REGISTRATION NO.		SEALING METHOD	DATE/TIME GAS INTRODUCED		
		CYLINDER SERIAL NO.	WT. BEFORE INTRO.	POUNDS APPLIED	
WIND M.P.H.	AIR TEMP	CYLINDER SERIAL NO.	WT. BEFORE INTRO.	POUNDS APPLIED	
		CYLINDER SERIAL NO.	WT. BEFORE INTRO.	POUNDS APPLIED	
EQUIPMENT ONLY PRECAUTIONS					TOTAL POUNDS
<input type="checkbox"/> FUMIGUIDE B		<input type="checkbox"/> FUMIGUIDE Y	<input type="checkbox"/> VIKANE CALCULATOR	<input type="checkbox"/> FUMICALC CALCULATOR	<input type="checkbox"/> OTHER
DOSAGE FACTOR		UNDER SEAL			
TARP CONDITION		TEMPERATURE			
SEAL CONDITION		HOURS EXPOSURE			
WIND (MPH)		MONITOR JOB (YES / NO)			
VOLUME					
CREW MEMBERS NAMES					
WAS REQUIRED SAFETY EQUIP. PROVIDED?		LICENSEE RELEASING FUMIGANT		LICENSE NO.	
YES () NO ()		SIGNATURE			
SECTION 2		AERATION COMMENCED:		TARP / SEAL CONDITION	
VENTILATION COMMENCED		DATE	TIME		
CREW MEMBERS NAMES					
WAS REQUIRED SAFETY EQUIP. PROVIDED?		LICENSEE CONDUCTING VENTILATION		LICENSE NO.	
YES () NO ()		SIGNATURE			
SECTION 3		RESTORED DEVIEN USED		PROPERTY CERTIFIED SAFE FOR OCCUPANCY	
RELEASED FOR OCCUPANCY		DATE	TIME		
CREW MEMBERS NAMES					
WAS REQUIRED SAFETY EQUIP. PROVIDED?		LICENSEE RELEASING PROPERTY FOR OCCUPANCY		LICENSE NO.	
YES () NO ()		SIGNATURE			



CONGRATULATIONS!

You have completed the TRUCK CONTENTS module, which included ten* requirements from the Structural Fumigation Use Monitoring Inspection Report form:

#	REQUIERMENT	#	REQUIREMENT
5	Registered label available at use site	26	Test equipment
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* In total, there are 40 inspection criteria 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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