

INSPECTION PROCEDURES – Revisions

Inspection Procedures, Volume 4 of the Pesticide Use Enforcement Program Standards Compendium, contains the following revisions to the previous manuals.

There will be a significant delay before DPR will be able to distribute the revised inspection forms. The Volume 4 revisions related to the revised inspection forms are in *italics*.

General Revisions

1. Added “How to Use This Manual” section, page 1.
2. Changed all sources cited from ENF letters to Compendium references.
3. Identified each regulation as applicable to all pesticides or only registered pesticides.
4. Revised and clarified the “Scope” and “Exemptions” for each regulation.
5. Provided code section references for each exemption.
6. Clarified use of “N/A” column, page 25.
7. Editing for clarity and accuracy.
8. *Renamed inspections.*
9. *Added Respiratory Protection requirements [Title 3, California Code of Regulations (3CCR section 6739)] to all use and headquarter inspections.*
10. *Suitable Method/Manner removed from all inspections except the Structural Use Monitoring Inspection Report (PR-ENF-108).*
11. *Added a treatment area map to most use monitoring inspections.*
12. *The detailed Decontamination section has been removed.*
13. Added Personal Protective Equipment (PPE) appendix, page 233.
14. Added Backflow/Chemigation and Groundwater appendices, pages 283 and 307.
15. Incorporated Bag Disposal/Burning appendix, page 321.
16. Enhanced the Inspection Interviews appendix – strengthened interview requirements, page 265.
17. Incorporated policy standards where appropriate.
18. Updated the Label on Site policy (3CCR section 6602).
19. Clarified Proper Containers (3CCR section 6680).
20. *Reordered Requirement items so all Pesticide Worker Safety regulations (3CCR section 6700 series) are grouped consecutively.*
21. *Modified the shaded “N/A” boxes.*
22. Incorporated Title 3, CCR regulation changes for Respiratory Protection and Groundwater Protection requirements.
23. Updated the Glove Liners policy, page 237.

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Specific Revisions

Note: Each change listed for a regulation in a specific inspection is duplicated for that regulation in all other appropriate inspections.

Chapter 1. General Inspection Procedures

1. Added section on the Interpretation of Standards Consistent with the Worker Protection Standard (WPS) (3CCR section 6701) and the General Application of Standards (3CCR section 6601), page 6.
2. Change in procedure for filling out “Violation Notice” box, now check “YES” whenever a noncompliance is noted, page 29.
3. Directs inspectors to provide more comprehensive narrative information in the Remarks section, page 30.

Chapter 2. Pesticide Pre-Application Site Evaluation (PR-ENF-102) - Name change

1. *Removed header information items, Written Recommendation Reviewed, and Written Recommendation Complete.*
2. *Added header information item, Basis for Application Evaluated [3CCR section 6426(a)].*
3. *Added Requirement item number 4, Proposed Application Consistent with Restricted Material Regulations (3CCR sections 6443 – 6487.5).*
4. *Added a line to document Applicator Notification (when Applications is Denied).*

Chapter 3. Field Worker Safety Inspection Report (PR-ENF-103)

1. Labeling registration number is now required, page 47.
2. *Added a “N/A” box to the Early Entry PPE Worn section and revised the list of PPE Worn.*
3. New procedures for 3CCR sections 6618 (Notice of Applications), page 49 and 6761.1 (Application Specific Information Display), page 53. Evaluation of the display is no longer required when inspecting a farm labor contractor.
4. Expanded and improved Entry-Restricted Areas table, page 60.

Chapter 4. Pesticide Use Monitoring Inspection Report (PR-ENF-104)

1. Updated Labeling Available at Use Site (3CCR section 6602) policy. Policy extends to all inspections, page 63.
2. Laundry of PPE by Employees, page 69.
3. Policy on keeping decontamination supplies together, page 69.
4. Waterless soap policy, page 72.
5. Changed procedure for documenting field posting violations when inspecting PCB applications, page 73.
6. Policy on backflow device for containers of 5 gallons or less, page 78.

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7. Provided “time of use” definition for 3CCR section 6684 (Container Rinsing), page 81.
8. Reformatted instructions for 3CCR section 6742 (Cover/Shut Off/Sight Gauge) to delineate differences in the three requirements, page 74.
9. *Added the following code sections to Requirements:*
 - *Pest Control Business (PCB) Licensed [California Food and Agricultural Code (FAC section 11701)].*
 - *Ground Water Protection (3CCR sections 6487.1 – 6487.5).*
 - *Wellhead Protection (3CCR section 6609).*
 - *Dormant Insecticides (3CCR section 6960), page 82.*

Chapter 5. Commodity Fumigation Use Monitoring Inspection Report (PR-ENF-105)

1. *Added PCB Licensed (FAC section 11701), page 86.*
2. Added directions about Aeration requirements to FAC section 12973 (Complies with Permit Conditions), page 88.

Chapter 6. Field Fumigation Use Monitoring Inspection Report (PR-ENF-106)

1. *Added the following code sections to Requirements:*
 - *PCB Licensed (FAC section 11701), page 102.*
 - *Licensed in Proper Category (3CCR section 6536), page 103.*
 - *NAA Emission Allowance (3CCR section 6452.3), page 103.*
 - *1,3-D, Chloropicrin, Metam, Dazomet, Sodium tetrathiocarbonate fumigation methods (3CCR sections 6448.1-6451.1), page 118.*
 - *Wellhead Protection (3CCR section 6609), page 121.*
2. Changed procedure for documenting field posting violations when inspecting PCB applications, page 111.
3. Updated buffer zone directions for 3CCR section 6447.2. (Methyl Bromide Field Fumigation Buffer Zone Requirements), page 116.
4. Corrected listing for 3CCR section 6784(a) [Field Fumigation] posting – this section applies to all fumigants, page 111.

Chapter 7. Structural Fumigation Use Monitoring Inspection Report (PR-ENF-107)

1. *Added the following code sections to Requirements:*
 - *Registered in County (FAC section 15204), page 130.*
 - *County Notified (Business and Professions Code (BPC) section 8505.5), page 130.*
 - *Connecting Structures (Title 16, California Code of Regulations (16CCR) section 1970.6), page 140.*
2. Provided additional guidance on SCBA Worn/Continuous Monitoring/TRAP Used [3CCR section 6780(b)], page 137.
3. Clarified Test Equipment requirement (16CCR section 1971), page 142.
4. Clarified policy on the time ventilation is commenced for BPC section 8505.2, page 143.

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Chapter 8. Structural Use Monitoring Inspection Report (PR-ENF-108)

Added the following code sections to Requirements:

- *Registered in County (FAC section 15204), page 153.*
- *Certified Applicator Supervision-Restricted Materials (3CCR section 6406), page 161.*
- *Wellhead Protection (3CCR section 6609), page 167.*

Chapter 9. Pest Control Headquarter Inspections Report (PR-ENF-109)

A./B. Headquarter and Employee Safety Inspection

1. Employee Safety Headquarter Inspections require interviews of the employer and, if available, at least one handler and one worker, page 170.
2. New respiratory protection regulations (3CCR section 6739), page 182.
3. Updated the policy on medical supervision records (3CCR section 6728), page 187.
4. Clarified policy on 30-day determination for medical supervision, page 186.

C. Dealer Records / Storage Inspection:

1. 3CCR section 6570 has been repealed (Groundwater Protection Statement / 2 Years).
2. Removed container rinsing (3CCR section 6684).
3. *Added the following code sections to Requirements:*
 - *Out of County Sales Reporting [3CCR section 6568(d)], page 197.*
 - *Specialized Records Clopyralid, Tributyltin [3CCR section 6574/6576], page 197.*

D. Pest Control Adviser Records Inspection

3CCR section 6557 has been repealed (Groundwater Protection Advisories).

Chapter 10. Pest Control Business Headquarter Inspections Report (PR-ENF-110)

A./B. Headquarter and Employee Safety Inspection

1. Employee Safety Headquarter Inspections require interviews of the employer and, if available, at least one handler and one worker, page 206.
2. New respiratory protection regulations (3CCR section 6739), page 211.
3. Updated the policy on medical supervision records (3CCR section 6728), page 216.
4. Clarified policy on 30-day determination for medical supervision, page 215.