

## Handout # 2

### 2008 Inspection Procedures Manual Training Additional Tips For Inspection Prioritizing - Use Monitoring Inspections

DPR emphasizes “inspection prioritizing” in the Inspection Procedures Manual because there are some key principles to keep in mind when you are preparing to go out and do inspections. Your time is usually limited and most counties don’t have the resources to inspect every company every year/season. So how do you choose companies to inspect? If they are not at a single permanent location, how do you even find them?

#### I. Prioritization Considerations: “Hazards, Handlers, & History”

The following bullets are excerpts from DPR’s 2008 Inspection Procedures Manual, with some added information for training purposes:

Prioritization of pesticide use **hazards** should include the following factors:

- Pesticide toxicity and formulation (Danger vs Caution; liquid vs water soluble packet)
- Proximity to environmentally sensitive areas (lakes, endangered species habitat, etc.)
- Proximity to residences, schools, or other sensitive sites (hospital, nursing home, etc.)
- Proximity to surrounding areas where workers or the public may be present
- The number of employees engaged in pesticide related activities
- The type of application method (e.g. fumigation vs. backpack sprayer vs. bait block)

Prioritization of businesses to inspect should also take into consideration:

- The **number** of handler and/or “crew” employees (higher priority than an “owner only” company, unless there’s a history of violations or complaints with that person).
- The **frequency** with which employees handle pesticides and/or work in treated areas.
- The **level** of exposure hazards the company’s operations create for workers, the public, and the environment (**what** they apply, **how** they apply it, **when & where**).
- The **company’s history** of violations, episodes and complaints.

Another item to think about, especially for companies with compliance problems:

- **Time & Location of specific applications:** Are they working at a specific site, or in an area where they know they will get inspected regularly, or is it a time/place where they wouldn’t expect to see you? Occasionally there are handlers that might always wear their PPE when they are in highly visible residential areas, or growing grounds near CAC/government offices...but on weekdays before 7:00 am or after 4:00pm, or weekend applications, it may not be a “given”!

Talk to your supervisor to see if there is a policy regarding unmarked county vehicle surveillance. Otherwise look for a less conspicuous “hiding place” for situations

described above, since companies with compliance problems will sometimes do just fine if they know you are watching that site.

### **Inspection Prioritizing: Use Monitoring Inspections**

Being as inconspicuous as possible can also help you find unlicensed/unregistered companies. If you can at least write down the vehicle license number, someone from your office can research it later.

## **II. Timing Is Everything – Best time of day/places to find inspections**

Some days you may have all day to drive around and do surveillance in the field, other days you may only have an hour or two to try and get a Use Monitoring inspection. How do you increase your chances of finding applications when your time is limited?

### **A. “NOI required” strategies:**

Having that NOI is very helpful, but how do you maximize the potential for finding inspections? First off, if you have a program “veteran” in the office, ask them about the companies or applications you’re trying to find! Also try some of these tips:

1. Knowing the Company HQ/Local Branch location in relation to your office, or their NOI address(es) for that day.

Remember, it’s poor time management for a company to have a licensee or other handler going back multiple times to the same site, unless it’s absolutely necessary (simultaneous applications to multiple large fields, or mix-load offsite). **NOTE:** If you happen to see the property owner leaving before the handler/crew has arrived, ask when the company said they would arrive! If you explain that your agency prefers to do “unannounced” inspections to determine compliance, the property owner usually will not disclose that you’ve been there earlier.

2. “Plot” addresses for each day’s NOIs. On Tue-Fri, include the previous day.

When your time is limited, one of the easiest strategies is to start with NOIs for larger jobs (e.g.  $\geq 40$  acre field, “1112-1132 Main St.”). These jobs naturally will take more time so you will be more likely to run into the handler(s) while they are working onsite.

For counties that have more than a few companies registered, use the tips below to figure out what addresses are “clustered” in a certain area. Driving the “loop” between those few addresses increases the chance of your getting an inspection that day. For example, if you have two companies with scheduled fumigations close to one another you can “stake out” one location. Then every hour or so, drive back to the other NOI location(s) to see if the company has arrived.

Another strategy could be to group all the NOIs for a particular company and focus on just one company that day. If they have several fumigations taking place in your county, you can start with driving by the fumigation address furthest from their office and work your way back, or vice versa.

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You can plot NOIs by checking your local map book/Thomas Guide, or go to the Internet for websites that give driving directions between address locations.

#### 3. Commodity Treatments – NOI vs. Where to Next & When?

If you don't do the district phytos or other Exclusion Program export documents, check with those who do to see what day/time they are scheduled to go to that location and write phytos for those fumigated commodities. They can also help you determine when nurseries are most likely to be treating plants (incoming or outgoing).

#### 4. Informal Conversation w/Handlers:

When you do meet licensees or other handlers,, during the course of inspection you often have a few minutes of “down time”.

Maximize your time by asking a couple of informal, friendly questions about how much “business” they have that time of year. If it's a new company or a licensee unfamiliar to you, ask how many trucks the company runs, or how many counties he/she works in...for future reference.

#### 5. Weather Isn't Good or Bad...unless you're in pest control:

Branch 1 crew members need to be on rooftops and ladders, so most companies avoid working on days that are forecasted for heavy rain, especially with lightning. Crew members risk being electrocuted on rooftops (or near power lines) in very wet weather. Companies also try to avoid extremely windy conditions, since a “blown” tarp usually means the company has to re-shoot and could have an exposure complaint or other hazardous situation develop.

#### 6. Holidays Aren't For Everyone:

Most pest control work tends to slow down a lot during the Nov-Dec-Jan holiday season. This can be the best time to do your PCB HQ/Business Records inspections, if you don't have a lot of Restricted Material Permit issuance.

### **B. When No NOI Is Required - strategies to find applications:**

#### 1. Since you don't have an NOI...know where to go & when

Many Ag and Branch 2 PCBs do general pest control. Knowing your area's general climate patterns can help you anticipate peak seasons for the more common weeds and insect pests to help you find applications.

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If there have been weather problems earlier in the week or month, often handlers will have to “catch up” with their regular service contracts, especially around the end of the month.

If your district has some “upscale” neighborhoods, they are often where monthly service stops can be found for various companies. On the other side, neighborhoods less affluent may have frequent service calls for chronic insect pest problems.

Know where the strip malls with fast food restaurants are in your district and cruise by the “restaurant row” between 11:30 – 12:30 p.m. If you see a PCB vehicle, position your vehicle where you can see the driver get in and which direction he's going, so you can follow him at a discreet distance.

Sometimes inspectors try cruising around freeway exit/entrances, but usually if they see you getting on the freeway behind them they “take off”. As with the Branch 1 vehicles, knowing where their office is can help you find them early in the morning as they start out to their first stop.

#### **2. During your HQ Records Inspection, Note Where They Go & When!**

If you are doing a records inspection, note what areas they have most of their service calls. If you can discreetly note a few addresses and “3<sup>rd</sup> Thursday monthly” etc., you can then look for handlers servicing that area later.

Another item to make note of during your HQ inspection is to ask how many trucks they have that are doing applications. If you want to target a particular company, knowing what their vehicle color/logo looks like can help you find them driving down the road. Some PCBs may have some “specialty” handlers while others have all their handlers doing various types of pest control.

[Note: company “manager” vehicles may look different than employee handler vehicles. Counties occasionally find “manager” vehicles may carry pesticides but not be in compliance with container or pesticide transport regulations.]

If the PCB isn't based in your county, but you have networked at this training... Maybe someone sitting near you is in the neighboring county where that company is located, and they can tip you off to what cities the PCB has a lot of work in?

### 3. Pesticide Use Reports...Can Also Be Useful

PURs show what pesticides they use most and least each month. PUR file you can see what months they tend to do more work in your county, and what type of work (herbicides versus rodenticides, etc).

**2008 Inspection Procedures Manual Training**  
**Tips For Prioritizing & Preparing For HQ/Employee Safety & Records Inspections**

HQ Records Inspections, whether it's a structural business or "ag" farming enterprise, are the exception to the rule because you almost always have to make appointments in advance to conduct them. If you do some planning and preparation up front, you can maximize your efficiency while finding out everything you need to know to determine compliance with all the requirements. Remember the goal is not just to determine compliance "yes or no", but to understand how the business is run and records are kept in case you need to work with them to help them correct problems.

I. HQ Inspections - Prioritization Considerations:

- a) Under normal circumstances, you only perform an HQ Records inspection if that company has an office in your county. Talk to your supervisor about what your county work plan goals are concerning HQ inspections (e.g. is there an inspection frequency statement included in the plan). For example, if your county has so much industry that you cannot perform an annual HQ Records inspection on every PCB, then you must take into consideration the criteria for properly prioritizing inspections.
- b) Companies that should be a higher priority for an annual or more frequent HQ records inspection include, but are not limited to:
  - Any company with a history of complaints, WH&S illness episodes, or other problems with compliance in the field (including unlicensed)
  - Handle higher toxicity pesticides (ex: fumigants, "Warning" products) and/or higher risk of exposure applications (ex: regular applications at or near schools or other very sensitive sites)
  - Have employee handlers/applicators
  - Do a significant amount of applications in your county
  - Have a history of "paperwork" compliance problems
  - Do both structural and agricultural work in your county
  - Have a history of non-compliance in neighboring counties, even if they do not have a poor compliance history in your county (especially if their office is near the "border" between two counties)

## Inspection Prioritizing Tips: HQ/Employee Safety & Records Inspections

### II. Preparing For HQ Records Inspections

- a) HQ Inspections need advance preparation in order for you to maximize your time and effort. Making an appointment helps ensure that a responsible person who can access all the files and/or company computer information that you need will be there during the inspection. It's best to remind the clerk or owner/Branch Manager of the list of items you will need to review when you make the appointment. If it's been a couple of weeks since you made the appointment, you might want to call and remind their office the day before. Remember, you may do this kind of inspection regularly, but this is only a very small part of the company's work! Don't rely on their "memory" each year.
- b) Do your own preparation, by checking the following at the CAC office:
  - Verify the company has their registration document(s) on file
  - Verify whether or not the company has pesticide use reports on file, and whether there are any "problems" with their use reporting (ex: EPA registration numbers that are "wrong" may be just a "typo", or they may actually be using a pesticide not registered in California). See if any of the pesticides listed on PURs have specific respirator requirements per 3CCR 6739.
  - Verify company's address and other Inspection Form header information (ex: how many branches of work they do, PR or Branch License #). Some company names are similar, and a company may have moved or the OPR licensee changed since the last inspection. If you're not familiar with this company, make sure you are going the right location!
  - Whenever possible, fill out as much of your "header" information on the HQ Inspection Form as you can prior to starting the inspection. This saves the company those extra minutes, and you may be less likely to make mistakes or omit information.
  - Unless you've been there before, check the directions to their office and ask where to park, so you don't lose time. Company managers are usually very busy. Starting the inspection on time will increase their appreciation of your courtesy and "professionalism".

## Inspection Prioritizing Tips: HQ/Employee Safety & Records Inspections

### III. Conducting HQ Records Inspections

- a) After introducing yourself, ask the owner/manager if they have any appointments or need to leave at a certain time. If so, then make sure you do the most important items that involve the manager first. For example, if you have questions about the information on their “service tickets”, how they conduct training, etc. ask the manager whenever possible since the QAL/PCO or Branch Manager is the “responsible person”.

You can also ask what criteria items the manager thinks can be handled by the company’s clerical staff if it appears s/he will have to leave before the inspection will be completed (ex: use reports, training records).

- b) If you see there are company vehicles on site that have a posted pesticide storage sign, ask whether they will be leaving soon or will be remaining onsite for the next hour or two. If the manager says they will be leaving in awhile, ask if you can inspect at least a couple of the vehicles first so you are not unduly detaining them from their route. If trucks are parked out front, you can at least check for backflow devices on application vehicles as you walk in or as they are on their way out. (You might even catch a PCB mix-load before they leave for their first site.)
- c) Whether or not the manager needs to leave early, work through your HQ inspection as systematically as possible. For example, don’t look at some of the use reports, then go out and inspect the storage, then go back in to look at more paperwork, then go back out and look at vehicles. You can either do all the “outside” inspection items first (especially if there are weather concerns) or do all the “indoor” paperwork inspection items first and then finish with the storage area and/or onsite vehicle inspections. There are advantages to doing the storage site inspection first, especially if vehicles are not present.
- d) During the storage site inspection, check to see if their inventory matches recent PURs. Protect yourself and put on gloves before you touch any containers or application equipment! Watch for any pesticides that have specific storage requirements on their labels (such as fumigants). In addition to confirming containers are properly labeled, etc. check for any stored pesticides that don’t fit their license category (such as a Branch 2 company with “ag use only” pesticides or vice versa). If you know what pesticides they’ve been reporting you will also find it easier to spot possible unregistered products in the storage area.
- e) For PCBs: while reviewing service records, copy some addresses and schedule times (“2<sup>nd</sup> Tuesday”) so you can observe applications later!

