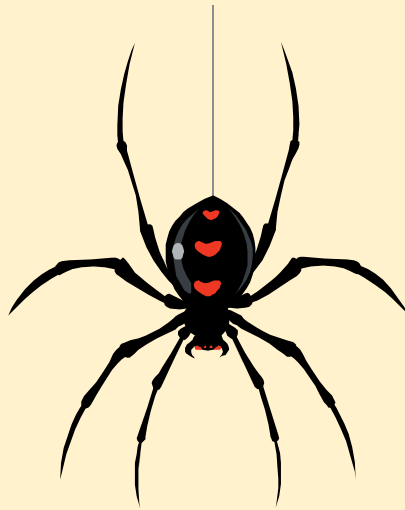


# **Structural Branch 2 & 3 Inspection Form 108**

Valerie Wilson  
California Department of Pesticide Regulation  
2019

# Structural Branch 2 & 3 Inspections



Br 2 - General Pest

Br 3 - Termites

# Pesticide Use Enforcement Compendium – Volume 4

## Inspection

### Inspection Detail

**Inspection:** 108-43-19-WD00-001

**Inspection Date:** 08/14/2019

**Status:** In Progress

**Inspector:** Wilson, Valerie

**Inspection Time:** 11:44 AM

**Action:**

Alerts

Edit

Generate PDF

### Contacts

Firm Inspected - Structural

Add

Person Inspected - Structural

Add

Other

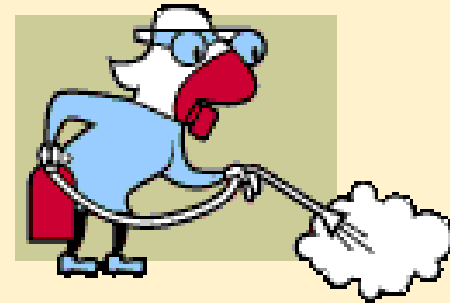
Add

# FAC 15204

Required for Structural PCBs:



- Annually & prior to doing pest control work\* in each county
- For pesticide applications
- Non-pesticide methods (Definition: BPC 8505)



# Written Notice: BPC 8538

- All pesticide applications by a registered structural PCB
  - To owner/agent and occupant
  - Prior to application
- For Periodic Service Contracts
  - Only prior to initial treatment

# Written Notice

## Must Include Info / How Provided:

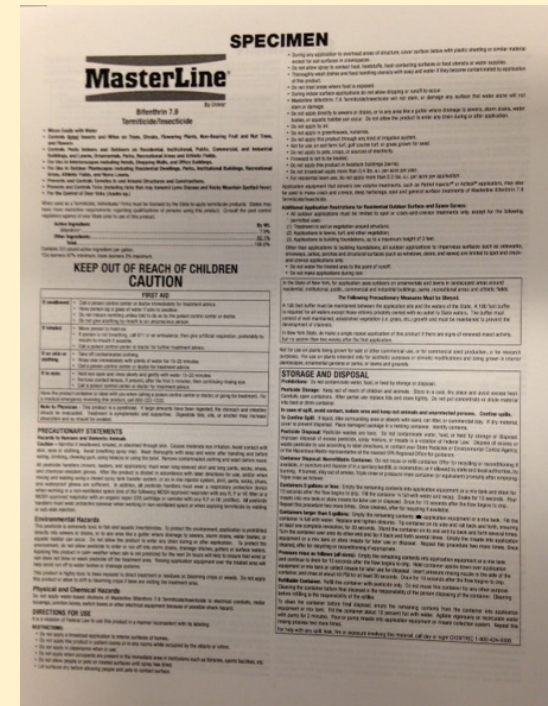
- Pest to be controlled
- Pesticide(s) to be used/Active Ingredient
- For contracts – Frequency of Service (Treatment)
  - by first class mail or electronic mail if email has been provided
  - Posting in a conspicuous place (laundry room, community room, etc.) or
  - Personal delivery

# Pesticide Disclosure Available: 16CCR 1970.4 (c–e)

- Leave in a conspicuous place around the structure (>4 units vs. <5 units)
- Common, generic, or chemical name of each pesticide applied
- Via: Door hanger, invoice, or billing statement w/company contact information
- Multi-family structure: to owner or designated agent & posted

# DPR Registered Label @ Use Site: 3CCR 6602

- Binder in vehicle / on container
- Substantially similar to the registered label
- “Specimen Label”
- Electronic labeling acceptable
- Must be able to produce label.





# Labeling: site / rate / conc. / other

## FAC 12973

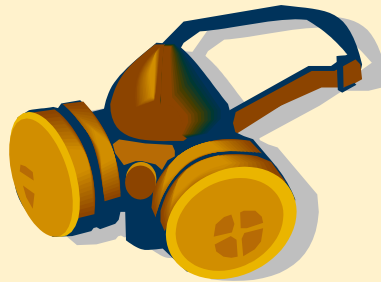
- Watch for label statements:
  - “such as”, “for exterior use only” or
  - “including, but not limited to...”
- Label requirements change from time to time so...
  - Ask the handler how much, for what pest, etc. AND read the label
- Watch for “double mixing” or applying too frequently; spot vs. broadcast spraying

# Label – PPE

## 3CCR 6738 & 6739



- Employer shall provide
  - Protective eyewear
  - Gloves
  - Footwear – chemical resistant
  - Respirators



# Label – PPE

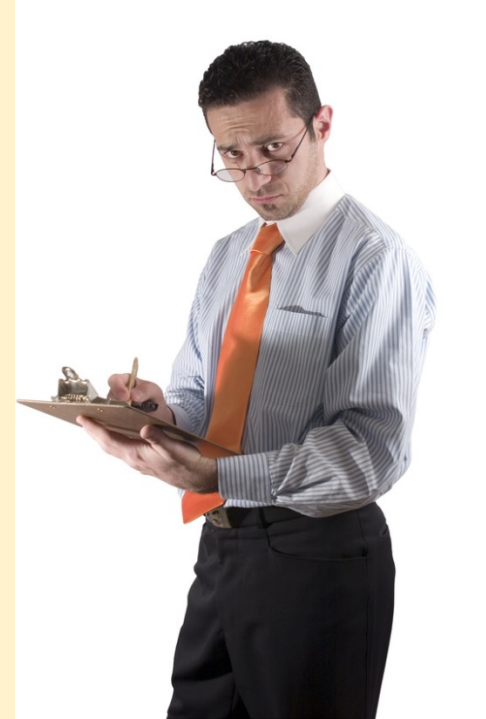
## FAC 12973

- Label required PPE

applies

to

everyone



# 6738 Personal Protective Equipment Care: Employer shall.....

- Provide all PPE required.....
- PPE kept clean and separate from pesticide exposure while stored.....
- Assure PPE is used correctly.....
- Kept and washed separately.....
- Assure that PPE stay on the employers property.....
- Assure sub-contractors are protected.....

# Regulation - specific PPE:

## 3CCR 6738.1

- Employer shall assure PPE worn when:
  - When required by labeling, regulation, or permit condition.
  - Mixing or loading
  - Cleaning, adjusting or repairing equipment.
  - Applying using hand-held, vehicle mounted or towed equipment.

# Regulation - specific PPE: 3CCR 6738.2 Eyewear

- Protective eyewear required:
  - Safety glasses that provide front, brow, and temple protection.
  - Eyewear that label specifies must be worn.

# Regulation-Specific Gloves

## 3CCR 6738.3

- Appropriate gloves used.....
- If barrier material is specified.....
- All barrier material must be 14 mils or thicker except, barrier laminate and polyethylene materials.
- If a glove is not specified, the gloves must be 14 mil and can be any material cited in Category A.
- There are exceptions.....

# Regulation-Specific Gloves

## 3CCR 6738.4

- Here is where you will find PPE exemptions.....



# Respiratory Protection: 3CCR 6739

- When required by:
  - Label
  - Regulation
  - Employer
  - Voluntary use



# Handlers Trained: 3CCR 6724



- Observe how they:
  - Mix/Load
  - Apply or Handle
- Ask open-ended questions:
  - When
  - How
  - What would you do if...?

# Emergency Medical Care: 3CCR 6726

## At Work Site:

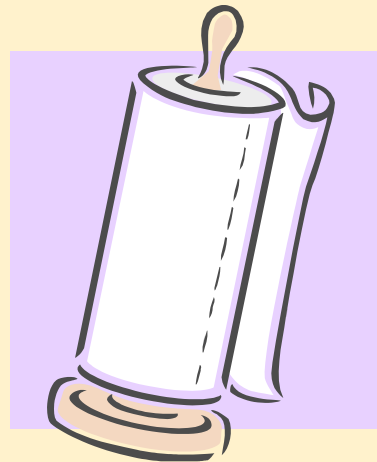
- Name
- Address
- Phone number
- Nearest hospital
- In binder, open?
- In wallet?
- Posted In vehicle?



# Decontamination Facility: 3CCR 6734



- Pesticides:
  - “Danger” & “Warning” Signal word
- Within **100** feet of
- Mix/load site



# Safe Equipment: 3CCR 6742

Openings on tanks:

- Shall have covers that
- Prevent spills and splashes



# Coveralls: 3CCR 6736

- Employees
- “Danger” or  
“Warning”  
signal words
- Can be 1 or 2-piece



# Certified Applicator Supervising Restricted Materials: 3CCR 6406



- Federal & California RMs
- Availability of the certified applicator shall be related to the actual or potential hazard
- Physical and visual presence if label requires.

# Accurate Measurement: 3CCR 6604

- Calibrated to the smallest unit in which the pesticide is being weighed or measured
  - Estimates
  - Uncalibrated
  - Unmarked





# Protection of Person / Animals / Property: 3CCR 6614

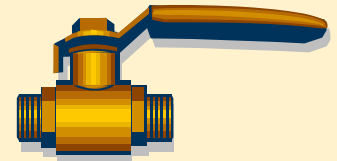


# Backflow Prevention Air Gap

## 3CCR 6610 mix/load



➤ Air gap



- Draw water from an outside source
- Double check valve

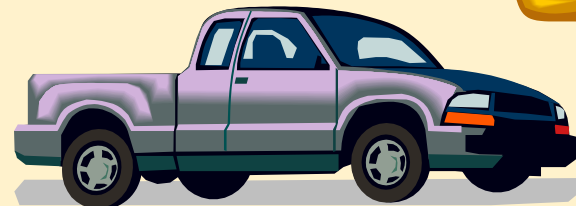
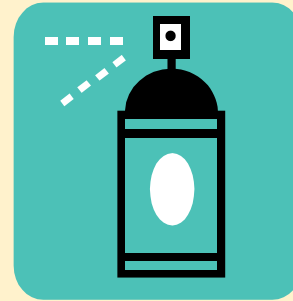
# Equipment Identified: 3CCR 6630

- Engaged for Hire:  
Pest Control
- Business Name
- Licensed Pest Control  
Operator
- Signs readable from  
25 feet



# Containers Labeled / Securely Closed: 3CCR 6676

- Registrant's label
- Lids securely tightened
- When stored or transported



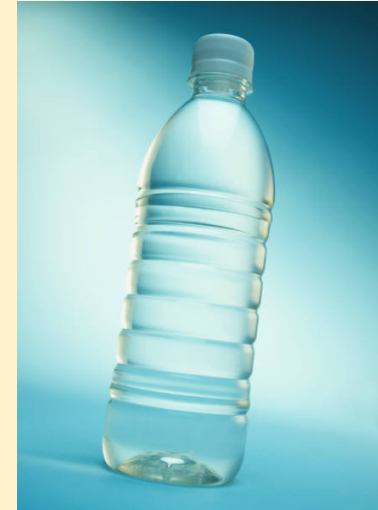
# Service Container Labeling: 3CCR 6678

- Name and address of responsible party
- Identity of the pesticide
- Signal word



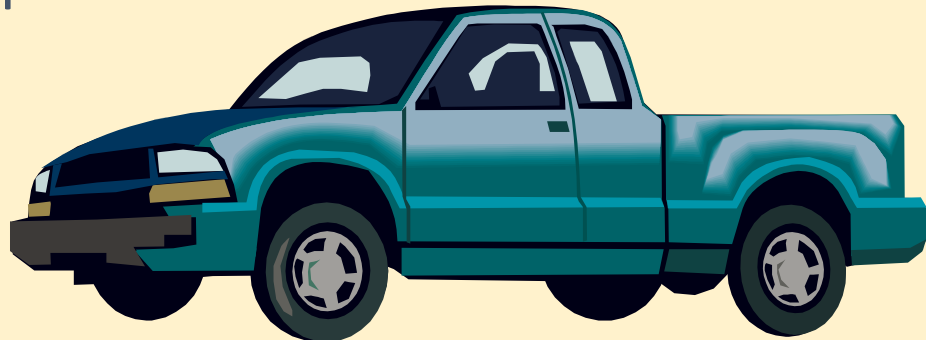
# Proper Container: 3CCR 6680

- No Pesticide shall be in:
  - Food
  - Drink
  - Household product



# Proper Pesticide Transport: 3CCR 6682

- Not in the same compartment with:
- People/pets or
- Food or
- Feed



# Proper Pesticide Transport :

## 3CCR 6682

- Secured to prevent spillage
- Covered to protect against moisture





# Containers Properly Rinsed: 3CCR 6684




- All containers
  - Except refillable containers
  
- Triple rinsed at time of use
  - Rinsate in spray tank



# Pesticide Handling / Use / Storage: 16CCR 1983

- Pesticide stored, carried, transported:
  - Out of reach of children
  - Labeled
  - Storage unlocked or unattended



- Bait station 
- Food or drug contamination
- Oil based insecticide  
not near flames



# Wellhead Protection: 3CCR 6609

- Within 100 feet of a well:
  - No mixing, loading or storing any pesticides
  - No rinsing of spray equipment or pesticide containers
  - No maintaining equipment that could spill pesticides  
UNLESS
  - Slope, berm

# Suitable

## Methods / Manner / Climate

### 3CCR 6600

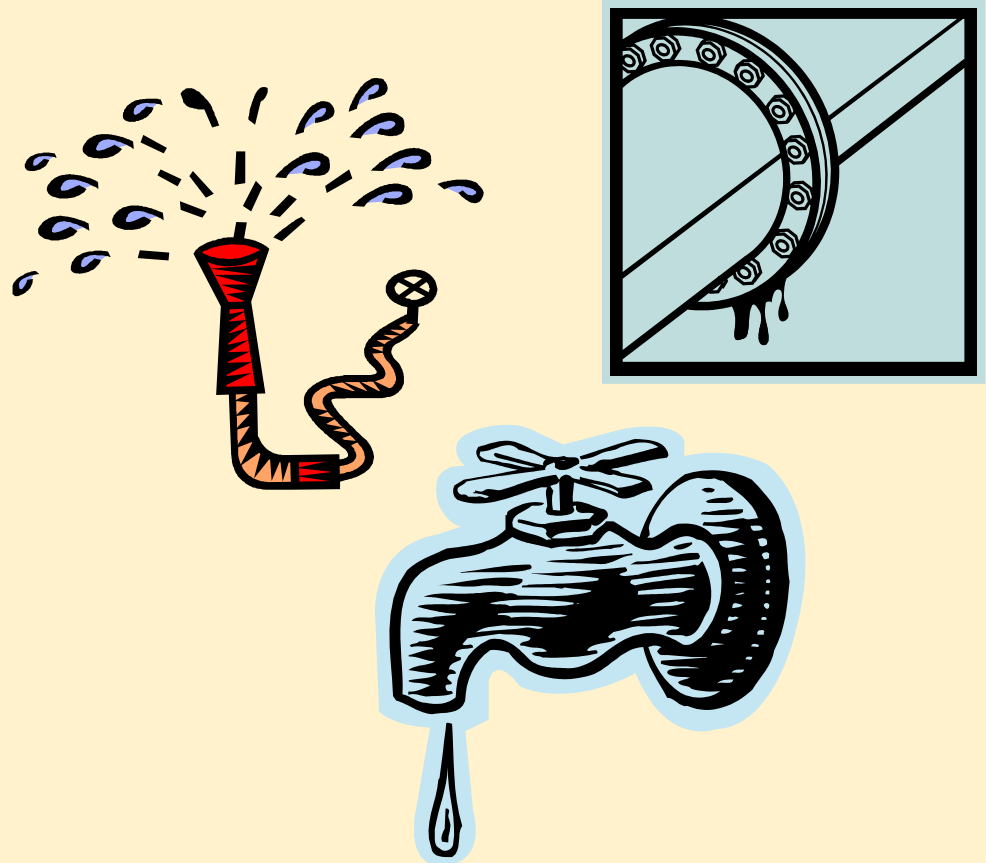
- Each person performing pest control:
- Use Equipment in Good Repair
- Careful and Effective Manner
- Methods and Equipment Suitable
- Suitable Climatic Conditions



# Suitable Methods / Manner / Climate

## 3CCR 6600

- Leaks
- Worn hoses



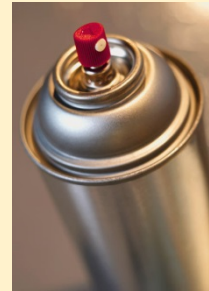
# Suitable Methods / Manner / Climate

## 3CCR 6600



# Suitable Methods / Manner / Climate

## 3CCR 6600



# Surface Water Regulations

## 3CCR 6970-6972

- Outdoor Non-Ag settings
- Pyrethroids listed in 3CCR 6970
  - Application method restrictions
  - Spot, pin stream, crack and crevice
  - Broadcast to horizontal permeable surfaces >2 feet away from horizontal non-permeable surfaces



# Surface Water Regulations 3CCR 6970-6972

- Outdoor Non-Ag settings
- Pyrethroids listed in 3CCR 6970
  - Perimeter band treatment around buildings
  - No >3 feet from building
  - No application:
    - In rain (except under eaves)
    - Standing water or
    - Within 25 feet of a down gradient aquatic habitat or drainage system component

# 17 Regulated Pyrethroids

Active Ingredient	Product Example
Bifenthrin	Talstar
Cyfluthrin	Tempo 20 WP
Beta-cyfluthrin	Tempo SC, Cyguard
Gamma-cyhalothrin	Standguard
Lambda-cyhalothrin	Demand, Cyonara
Cypermethrin	Demon Max
Deltamethrin	Enforcer, Deltagard
Esfenvalerate	Ortho Bug B Gon
Fenpropathrin	Tame
Tau-fluvalinate	Mavrik
Permethrin	Dragnet, Raid

# 17 Regulated Pyrethroids

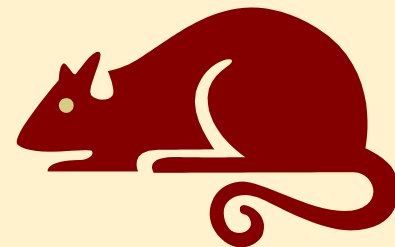
Active Ingredient	Product Example
Bioallethrin	Ace Wasp & Hornet Killer
S-bioallethrin	Zep Ant & Roach Spray
Phenothrin	Wasp & Hornet Killer
Prallethrin	Flying Insect Spray
Resmethrin	Black Flag Fogging Insecticide
Tetramethrin	Ortho Hornet & Wasp Killer 4

# Second Generation Anticoagulant Rodenticides (SGARs) 3CCR 6400, 6471

- Used to manage “commensal” rodents
- (only house mouse, Norway rat, and roof rat)
- in or around man-made structures

*Anticoagulants: Interfere with blood clotting, animals die from internal bleeding several days after ingestion. Can administer Vitamin K1 as antidote.*

- First generation “multiple dose”:
- Second generation “single dose”:



**SGARs = higher toxicity**

# Second Generation Anticoagulant Rodenticides

- “Man-made structures constructed in a manner so as to be vulnerable to commensal rodent invasions and/or to harboring or attracting rodent infestations.”
  - Examples of such structures are:
    - Homes and other permanent or temporary residences;
    - Food-processing facilities;
    - Industrial and commercial buildings;
    - Trash receptacles;
    - Agricultural and public buildings;
    - Transport vehicles (ships, trains, aircraft); and
    - Docks and port of terminal buildings and related structures around and associated with these sites

# New Regulations to protect wildlife (effective date July 1, 2014)

- Designate four SGARs as CA-restricted material
  - **Active Ingredients:**
    - Brodifacoum
    - Bromadiolone
    - Difenacoum
    - Difethialone
- Restrict SGAR use to certified applicators
- Allow SGAR use only within 50' of a man-made structure (unless feature of site harbors target rodents)



# Bait Stations



- Tamper resistant
- Attached or weighted
- Service container labeling

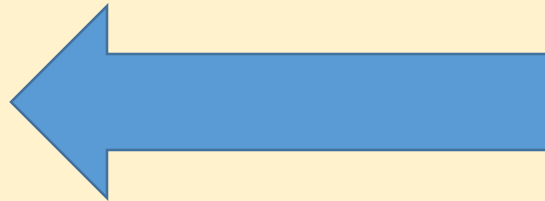


# How to record regulations not on the checklist

19. Containers Labeled / Closures	6676	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20. Service Container Labeling	6678	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21. Proper Containers	6680	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
22. Proper Pesticide Transport	6682	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
23. Containers Properly Rinsed	6684	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
24. Pesticide Handling / Use / Storage	1983	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
26. Suitable Manner / Climate	6600	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
27. Surface Water Protection in Outdoor Non-Agricultural Settings	6970	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



- 1) Exempt 25b
- ) 2nd Gen





# Exempt pesticides

3ccr 6147

HOW TO FILL OUT  
THE INSPECTION FORM  
FOR PESTICIDES EXEMPT  
FROM REGISTRATION

# Determining whether a pesticide is “exempt” or “unregistered”

## Exempt

Phyta-Guard®

Citronella Natural Insecticide /  
Repellent Oil

### ACTIVE INGREDIENTS:

Soybean Oil . . . . . 45.0%

Citronella . . . . . 40.0%

### INERT INGREDIENTS:

Lecithin . . . . . 15.0%

CAUTION:

KEEP OUT OF REACH OF CHILDREN

## Unregistered

- Active Ingredient(s) NOT on 25b approved list
- Doesn't list all inerts
- Any public health or disease control claims
- Doesn't meet other specific requirements (see section 6147)

# Recording an Exempt Pesticide on an inspection report

## Application Branch 2 Branch 3

PESTICIDE NAME / MANUFACTURER	LABEL REGISTRATION NUMBER	SIGNAL WORD	FORMULATION	RATE
----------------------------------	---------------------------	----------------	-------------	------

	SECTION	COMPLIANCE		
		YES	NO	N/A
1. Registered in County	15204	X		
2. Written Notice to Occupant	8538	X		
3. Pesticide Disclosure Available	1970.4	X		
4. Labeling Available at Use Site	6602			X
5. Labeling Site / Rate / Conc. / Other	12973			X
6. Labeling - Personal Protective Equipt.	12973			X

Essentria IC - 25(b) product, exempt from registered labeling.

Criteria: 4, 5 and 6 **N/A**

#4: A copy of the registered labeling that allows the manner in which the pesticide is being used shall be available at each use site.

#5 & 6: The use of any pesticide shall not conflict with labeling registered pursuant to this chapter which is delivered with the pesticide.

The End