

---

---

# BRANCHING OUT

---

---

Volume 1, Issue 1

Santa Clara County Department of Agriculture Pesticide Update

March 2002

---

---



## Background

### *History of Branch 1 Investigations*

In 1998 the Santa Clara County Department of Agriculture began a program of focused inspection activity targeting Branch 1 structural fumigations.

Inspections of the pretreatment and application stages of the fumigation identified deficiencies in employee safety and methodologies. This resulted in a significant number of enforcement actions.

In response to our findings, we provided educational materials and guidance to companies to improve compliance. This effort resulted in a significant increase in compliance. We hope to continue working closely with the industry to continue this trend and to strengthen relationships within the industry.

Recent focus on the clearing stage of the fumigation has however raised new concerns. Many employees have been found not using or incorrectly using the Interscan. As a result they are certifying structures safe for reentry when they may not be. This obviously poses great risk to both employees and homeowners and is of major concern to our Department.

---

---

## Employee Training Section 6724 CCR

### **Who needs to be trained annually?**

All employees who 'handle' pesticides. (See page 2)

Training records must be kept on file for the current year and two years previous.

### **Who is exempt from training requirements?**

- QAL and QAC holders
- Field Representative License holders

### **What if an employee has been trained by a previous employer?**

The employee is considered trained if the previous employers training covered the same pesticides. You must have a copy of these records on file. They must participate in your next annual training before their training records expire.

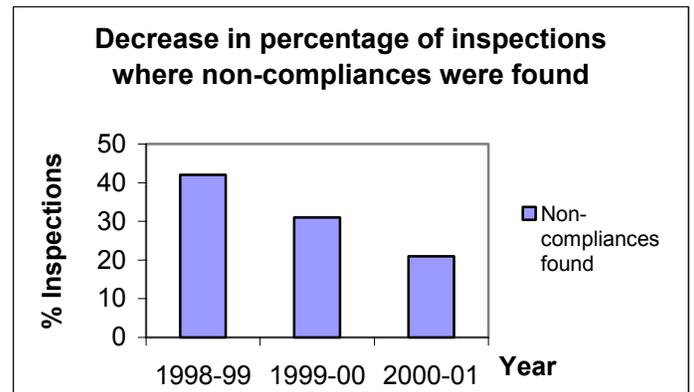
---

---

## Compliance on the up

*Increased compliance a result of increased regulatory activity*

Since 1998, overall compliance of Branch 1 companies has improved. We believe this is due to our increased regulatory involvement in the industry.

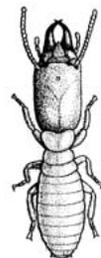


## Web site

The following information may be of use to your company and can be found at:

<http://santaclaracounty.org/agweights/>

- Annual pesticide handler training form
- Written training form
- Use reports
- Code sections related to our inspection form
- Link to the Structural Pest Control Board



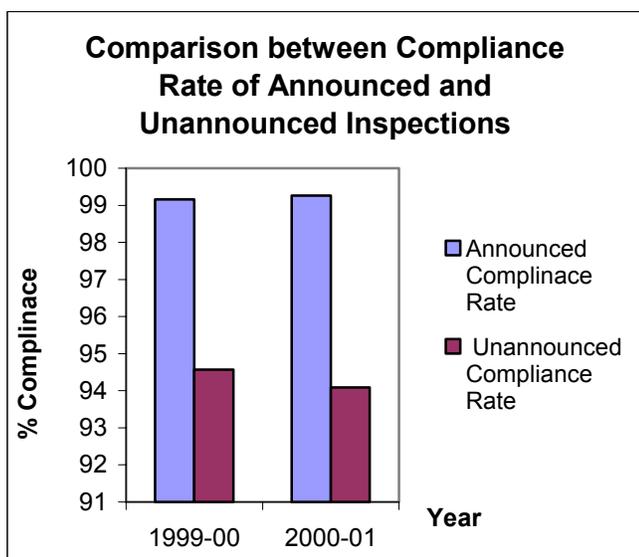
## Compliance rate lower for unannounced inspections

*The importance of supervising your employees*

Inspectors find more non-compliances when they perform inspections without disclosing their presence until the end. Compliance rates for these “unannounced” inspections are 10% lower for some companies.

This suggests that most employees are aware of the requirements but do not always adhere to them. These problems can be addressed by:

- Closer supervision of employees
- Enactment or increased use of an employee disciplinary program



## Major areas of non-compliance

*Areas to focus on during employee training.*

Several Branch I activities continue to present an unacceptably high rate of non-compliance. Thirty three percent (33%) of all violations related to the availability, repair or use of personal protective equipment (PPE). The most common violation was the failure to wear correct PPE.

Table 1. **Most common areas of non-compliance**

Code Section	Areas of Non-Compliance
12973	Use (rate) in conflict with label
12973	Use (Aeration) in conflict with label
12973	Label specified PPE not worn
6726	Medical posting
6702	PPE not supplied/worn
6738	Eyewear not provided/worn
1974	Posting of warning signs

We are concerned about this trend. It shows either a lack of understanding or lack of concern for the potential health risks associated with Vikane or a deficiency in employee training.

Areas where your company should focus more attention during annual training are:

- How to read and interpret a label
- The hazards of pesticide exposure
- Ways to avoid pesticide exposure
- Correct use of PPE
- Employee responsibility to wear PPE
- The correct use of an Interscan.

## Who is considered a handler?

- Applicators
- Tarp removers
- Employees who mix, load, transfer pesticides
- Anyone that maintains pesticide equipment

Refer to Section 6000 CCR for full definition.

