



# *County of San Diego*

**LISA M. LEONDIS**  
AGRICULTURAL COMMISSIONER/  
SEALER OF WEIGHTS & MEASURES

**SAN MARCOS OFFICE**  
(760) 752-4700  
FAX (760) 724-4098

## **DEPARTMENT OF AGRICULTURE, WEIGHTS AND MEASURES**

9325 Hazard Way, Suite 100, San Diego, CA 92123-1217

Phone: (858) 694-2739 FAX (858) 467-9697

<http://www.sdcawm.org>

**SANDY PARKS**  
ASSISTANT DIRECTOR

**WEIGHTS & MEASURES**  
(858) 694-2778  
FAX (858) 467-9278



## **San Diego County**

### **Work Plan**

## **Pesticide Regulation Program**

### **2013 and 2014**

## **Work Plan Pesticide Regulation Program 2013 and 2014**

### **Program Resources**

#### **PROGRAM STAFF**

The Pesticide Regulation Program (PRP) is one of the programs within the San Diego County Department of Agriculture, Weights and Measures (AWM). PRP is comprised of twelve full-time inspectors, two supervising inspectors, four office assistants, and one deputy agricultural commissioner. Last year, the program underwent many staff changes, with the recruitment of five inspectors, and installation of two supervising inspectors and program manager all new to their positions. The new supervising inspectors and program manager combined to bring over twenty-five years of PRP enforcement experience to the program.

Due to contractual obligations of other AWM programs and for the purpose of succession planning, up to seven PRP inspectors may need to conduct cross-program inspection activities throughout the year. All inspectors are licensed to perform pesticide regulation inspections, six are bilingual and four have more than 10 years of experience in pesticide regulation.

PRP staff is distributed primarily by geographic area, but also work on specific identified countywide issues. All inspectors perform both agricultural and structural regulatory activities. Inspectors are equipped with mobile computer tablets, portable printers and GPS units to conduct their work. Five inspectors participate in the County's Government Without Walls program (GWOW). These inspectors start each day at a remote location associated within their assigned work area. GWOW increases efficiency by decreasing the amount of time the inspector spends traveling, thus, allowing for more time for regulatory activities.

Two additional inspectors also perform Agricultural Water Quality (AWQ) and Hazardous Materials (HM) inspections. Whenever possible, the inspectors combine up to two program (PRP, AWQ, and HM) inspection activities into a single visit, improving efficiency.

San Diego County is currently integrating a web-based data management system - Accela Business Case Management System (BCMS) into all operational aspects department-wide. This comprehensive system provides an integrated approach to registration, inspection, investigation, compliance and enforcement for PRP and will improve the regulatory coordination with AWQ, HM, Civil Actions, PHPP, and Organic Programs.

#### **COMMUNITY**

San Diego County is a diverse community consisting of the eighth largest urban population of approximately three million, an international border with Mexico, military installations and a farming community of over 6,600 small farms. Statewide, the county is in the top five counties for Nursery Products, Flowers & Foliage, Tomatoes (Fresh Market), Lemons, Avocados, Eggs (Chicken), Mushrooms, and Grapefruit. In 2011, the total agricultural output value is \$1.68 billion with floricultural nursery products and avocados as the leading crops valued at \$1.1 billion. Local growers produce over 200 agricultural commodities on land mostly interspersed with residential and other sensitive sites. San Diego County has the largest community of

organic growers in the state and nation.

Approximately 28,000 to 34,000 farm workers are employed in San Diego County during the height of the growing season. This work force is primarily employed directly by growers, but some workers are employed through the 35 registered Farm Labor Contractors working in the County. Farm worker housing is limited, contributing to pesticide regulation compliance concerns related to clean work clothing, showers and decontamination. Some farm workers occupy makeshift camps with limited resources, especially potable water and water for sanitation.

Most of San Diego County's farms are small, family-owned operations with fewer than nine acres. On-farm employees handle most pest control decisions and applications. Pesticide applications may generate calls and concerns from area residents, especially when aerial applications are conducted. The combination of agricultural/urban interface and overall population growth results in pesticide-related complaints by neighbors of farms, and neighbor against neighbor complaints of misuse. These public complaints in addition to pesticide illness incidents received from the Department of Pesticide Regulation (DPR), the Poison Control Center, California EPA, and other local agencies result in an average of 133 investigations completed by PRP staff each year. Approximately 26% of these are related to pesticide injuries associated with antimicrobial use in hospitals, restaurants, and homes.

In addition to agricultural/urban interface issues, San Diego County has a large structural pest control industry. More than 354 structural pest control businesses (PCBs) are registered in the county. Approximately 31 of the registered PCBs perform an average of 17,000 fumigations annually, depending on economic factors. In addition, San Diego County has a significant landscape maintenance pest control industry with approximately 110 registered maintenance gardener PCBs. Another 200 agricultural PCBs register each year and conduct applications in a variety of settings from landscapes to lakes throughout the county. These industries account for the majority of urban pesticide applications, excluding antimicrobial use and applications by homeowners.

## **Restricted Materials Permitting**

### **PERMIT EVALUATION**

Over the last several years, the number of restricted materials permits issued in San Diego County continues to decline from a high of 1000 to 394. In 2012, approximately three-quarters of the permits were agricultural and one-quarter was non-agricultural.

The county anticipates a continued decline when the local requirement to conduct all aerial abamectin applications to avocados under permit is removed. Abamectin does not require the issuance of a restricted materials permit; however, the commissioner has been requiring a use-restricted permit for aerial use since 2005. The commissioner has decided to remove the requirement as the result of a recent policy re-evaluation and the limited number of complaints about aerial pesticide drift and bee safety concerns over the years. In addition, drought, economic slowdown, and applicators' transition to softer non-restricted pesticide alternatives are believed to be contributing to the permit decline.

PRP staff has worked to reduce the number of chemicals per permit over the last several years by reviewing permits annually, discussing with growers their need for certain pesticides, and promoting consideration of possible alternatives to reduce the use of restricted materials. This interaction, combined with the availability of softer pesticides, has led to an overall

decrease in the number of restricted materials used. The majority of permits were issued for only one to three chemicals.

Due to the continued urbanization of San Diego County, the permits that are issued need to accurately reflect sensitive sites (surrounding homes, businesses, schools, playgrounds, hospitals, waterways, and wildlife habitats) that could potentially be affected by the pesticide use. Therefore, proposed use sites are evaluated after a site visit and direct observation of the use sites is made.

## **SPECIFIC PERMIT ISSUES**

PRP converted to the new California Agricultural Permits System (CAPS), which replaced the Restricted Materials Management System at the end of 2011. Inspectors use CAPS to prepare restricted materials permits and operator identification number/site identification number documents for issuance. Both pesticide users and PRP clerical staff use CAPS to record pesticide use information for subsequent submission to DPR. PRP plans to integrate Accela BCMS with CAPS. CAPS operator identification numbers, site identification numbers, and related data will be transferred into Accela BCMS to allow for full real-time use for use when conducting and documenting compliance and enforcement activities.

PRP issues restricted materials permits within the California Department of Pesticide Regulation (DPR) permitting framework. Each restricted materials permit (RMP) undergoes a multi-level risk assessment and mitigation process, starting with collection of proposed use information, document preparation, then review and evaluation prior to issuance by licensed PRP staff.

The approach is based on identified uniform criteria such as use type (production agriculture, non-production agriculture, non-agricultural non-sensitive, and non-agricultural sensitive), pesticides, use patterns, applicator qualifications, and site characteristics. These criteria are used to determine the level of risk for adverse environmental impact that may result from the proposed restricted material use.

In 2012, PRP developed an "Application for Restricted Materials Permit Inspector Worksheet" to help guide the applicant and inspector through the permit issuance process, including the environmental evaluation of all sites identified on the permit. Sites that are located near sensitive areas such as schools, daycare centers, wildlife habitats, waterways and any other sensitive areas are mapped. Feasible alternatives to restrict pesticide use and mitigate public health, safety, and environmental impacts are considered and implemented as necessary. Various mitigation measures may be considered based on knowledge of local conditions, pest management guidelines, pesticide safety information series, locally developed permit conditions, and applicable laws and regulations.

Permit conditions include: restrictions on wind velocity, acreage/area, number of applications, field posting, treatment and aeration buffer zones, accident response plans, and recordkeeping. Permit mitigation is conducted on a site-by-site basis. Field fumigant use is limited to North County row crop operations. The eventual phase-out of Methyl Bromide has led to the use of alternative materials such as Telone, In Line, Metam Potassium (K-Pam), and Chloropicrin. The introduction of Phase II field fumigant labels are of limited impact because only seven permits are issued by two trained inspectors who prior to issuing permits review all use requirements and related documents with the permit applicant, including such topics as labeling, fumigation management plan, posting, training, and buffer zones. DPR recommended permit conditions are used when issuing the permits. After the issuance of the permits the same two inspectors monitor use.

All too frequently, invasive pest infestations result in quarantines that may require the use of restricted materials to treat quarantined commodities prior to movement. When this occurs, PRP works with other AWM inspectors and California Department of Food and Agriculture to provide accurate pesticide safety information to the affected growers and public.

### **Goals**

Provide a more consistent, accurate and understandable permit. It enables pesticide regulatory personnel to evaluate and mitigate the risks of restricted material use and process RMP applications in a more efficient and effective manner. By simply describing and identifying sites, pesticides, and accompanying permit conditions and focusing on uniformity, simplicity and accuracy, it also provides improved clarity to the regulated community to comply with permit requirements.

### **Deliverables**

1. Issuing inspector will complete and attach an "Application for Restricted Materials Permit Inspector Worksheet" to each issued permit.
2. Determine ways to mitigate risk to public safety and the environment from proposed restricted material use by using identified uniform criteria such as use type, chemical, use pattern, applicator qualification, and site characterizes.
3. Before issuing permit conditions we consider: production agriculture (growers, grove management, nurseries), non-production agriculture (parks, cemeteries, rights-of-way, greenbelts, golf courses), non-agricultural non-sensitive and non-agricultural sensitive (institutional, commercial, industrial, schools, landscape maintenance) use types.
4. Permit conditions are specific to the pesticides listed on the permit.
5. A new, reviewed or revised map documenting all identified sensitive areas is to be attached to each site specific permit annually.
6. Permits denial will be documented per DPR compendium.
7. Ensure that agricultural permits issued to persons other than the property operator, have a letter from the property operator on file authorizing the permit to be signed by the "authorized representative."

### **Measures**

Uniform and consistent evaluation of RMP applications.

RMP format is effective in communicating the use requirements and restrictions to affected parties.

Meet requirements when issuing RPMs as stated in DPR's compendium for Restricted Materials and Permitting.

## **SITE EVALUATION**

PRP currently conducts Pre-Application Site Evaluations of five percent of all agricultural use Notices of Intent (NOI) per Title 3 of California Code of Regulations section 6436. Recognizing the value of increasing the number of unique agricultural site evaluations, PRP will continue to conduct NOI-initiated site evaluation activities while monitoring no less than five percent of the total number of sites identified in agricultural permits. To address areas with potentially greater hazards or potential for complaints, priority will be given to evaluating sites where field fumigations and aerial applications will be conducted. Priority will also be given to applications at sensitive sites. For non-agricultural uses, PRP will conduct a site evaluation or a monitoring inspection with each permit holder annually.

### **Goals**

Site evaluations and NOI review together enable County personnel to monitor the site, at which a restricted material is proposed to be used, for any changes that may have occurred since the permit was issued. This approach allows for an opportunity to address such changes that may adversely affect public safety and the environment and confirm compliance with permit conditions. In choosing to place emphasis to aerial applications, fumigations and sensitive sites, the County is focusing limited available resources on restricted materials use with the highest potential for non-compliance and complaints from area residents.

Ensure that an increased number of agricultural sites identified on restricted materials permits are visited and evaluated for proposed use. Complete Pre-Application Site Evaluation forms at these sites and document review of any written recommendations.

Ensure the review of submitted NOIs is completed prior to proposed use.

Ensure that for all restricted materials permits issued for non-agricultural uses, a site evaluation or a monitoring inspection is conducted with each permit holder annually.

### **Deliverables**

1. Evaluate no less than 5% of the sites identified in agricultural restricted materials permits and document evaluation on Pre-Application Site Evaluation forms.
2. Review NOIs submitted to the commissioner prior to proposed use.
3. Document the results (approved, denied...) of each NOI review. Follow DPR guidance when denying NOIs.
4. Conduct a site evaluation or a monitoring inspection with each non-agricultural permit holder once per year.

### **Measures**

A successful program will minimize the impact of the use of restricted materials on the public, workers and the environment.

Fumigation management plans are reviewed prior to the issuance of RMPs for the use of Phase II field fumigants.

The use of Phase II field fumigants occurs without incident.

## **Compliance Monitoring**

PRP plans to conduct approximately 1,000 pesticide inspections per year. This number may need adjustment during the year depending on the number of public complaints, pesticide illness incident investigations, quarantines, or other factors such as workload reprioritization, funding reduction and emergency projects. DPR will be informed of any reduction. Every attempt is made to balance the workload so that both structural and agricultural concerns are met.

San Diego County has been participating in the Structural Fumigation Enforcement Program (SFEP) since January 2009. This program requires structural fumigators to pay a \$5 fee per completed fumigation to the county agricultural commissioner, who must use these funds for structural fumigation inspections, undercover surveillance, and enforcement activities. The program was first initiated by industry in the mid-1990s in response to a need for increased regulatory oversight. The chaptered AB 1736 reauthorized the SFEP from January 1, 2011 to January 1, 2014.

PRP strives to maximize the available regulatory oversight resources. With limited resources available, it is necessary to distribute those resources to provide the most effective compliance monitoring possible. PRP inspects 2% of the total number of completed structural fumigations each year. In 2011 and 2012, an average of 374 complete, partial, and undercover fumigation inspections were conducted, constituting a 2.2% inspection rate out of approximately 17,000 completed structural fumigations. Undercover inspections are planned for numerous fumigation companies operating in San Diego County with the highest priority given to companies with a history of non-compliance. The SFEP supports an identified ongoing compliance issue: Branch 1 businesses conduct fumigations correctly when monitored, but sometimes fail to follow regulations in the perceived absence of regulatory oversight.

In 2012, DPR adopted regulations to reduce potential runoff of surface water contamination from nonagricultural applications of specified pyrethroid products. The regulations affect the use of 17 pyrethroid insecticides when applied in outdoor non-agricultural settings including structural, residential, industrial, and institutional sites by persons performing pest control for hire. San Diego County strives to promote improved water quality and enforcement of this regulation.

The State Water Quality Control Board for Region 9 is in the process of revising and reissuing the Regional Municipal Separate Storm Sewer System Permit. AWM inspects nurseries, greenhouses, golf courses, cemeteries and pest control business throughout the unincorporated areas of the county to ensure compliance with water quality requirements. Groves and irrigated agriculture are inspected based on complaints. The draft permit, as currently written, may require AWM to inventory and eventually inspect all commercial agricultural locations in the unincorporated areas of the county. This change would increase the inventory to approximately eight times the current level and requires significant regulatory resources.

## **INSPECTIONS**

PRP conducts approximately 1,000 inspections yearly, balanced between agricultural, structural, and local areas of concern. Higher priority is given to inspections based on the following criteria.

- Applications using more toxic materials, more hazardous formulations, fumigants, and restricted materials
- Sensitive sites/surrounding areas and applications where there is a greater potential for worker and public exposure and environmental impacts
- Unlicensed/unregistered companies and individuals
- Companies and individuals with a history of non-compliance
- Applications that have historically resulted in complaints
- More problematic methods of application (aerial, fumigation and power spraying)
- A higher number of employees engaged in pesticide work activities (handlers and field workers)

Inspectors record their findings in the "as found condition." All inspection criteria marked as a non-compliance receive appropriate compliance or enforcement actions as required by the Enforcement Response Regulation [3CCR 6128-6131] (violation notice, warning letter, civil penalty, or referral to the district attorney, city attorney or state agencies).

### **Goal**

Promote the safe and legal use of pesticides in San Diego County by maintaining an effective pesticide use monitoring system to protect public health and the environment.

Perform complete and thorough inspections.

Strive to increase regulatory understanding and compliance with surface water regulation.

Document violations and ensure evidence collected is adequate to address follow-up non-compliance activities.

Promote improved water quality by conducting focused monitoring activities with pest control businesses applying specified pyrethroid pesticide products.

Maintain well trained staff to conduct soil fumigation inspections using Phase II fumigant labels that became effective December 1, 2012.

### **Deliverables**

1. Conduct approximately 1,000 inspections annually with growers, pest control businesses, field worker, pesticide dealers and pest control advisors. Priorities will be fumigation inspections and other applications using a Category 1 (highest toxicity) pesticide, specified pyrethroid pesticides, and businesses with employees.
2. Conduct follow-up with businesses found to be out of compliance in an effort to improve compliance.

3. Inspect 2% of structural fumigations (Branch 1) to reflect continued regulatory focus. Fumigation inspections may include complete inspections and undercover inspections with priority given to companies with history of non-compliance. With the reauthorization of the SFEP, the inspection rate may be increased.
4. Identify businesses that utilize the specified pyrethroid pesticide products through pesticide use reports. Inspect 10% of those businesses identified to document compliance with surface water regulation. Provide information regarding surface water regulations during inspections. Conduct follow-up with businesses found to be out of compliance with the surface water regulations in an effort to improve compliance.
5. Monitor pesticide applications that have historically received or may receive public complaints. The County Vector Control District is utilizing larvicide to reduce mosquito populations to prevent outbreaks of West Nile Virus. These applications are conducted by helicopter to standing water in residential and urban areas throughout the county. These high visibility applications have resulted in complaints. PRP staff will monitor at least 1% of these applications to assure public health and safety.
6. Conduct compliance monitoring for commodity and field fumigations.
7. Conduct a site evaluation or a monitoring inspection with each non-agricultural permit holder at least once per year.
8. Assign inspector workload goals based on the inspector's work area characteristics and workload activities such as number and types of restricted materials permits, number and type of pest control businesses, PRP goals and responsibilities, agricultural water quality, and hazardous materials inventory goals. Inspectors may need to conduct cross-program inspection activities throughout the year. Inspection goals will also reflect the county's strategic initiatives for safe communities and sustainable environment.
9. Each supervisor will evaluate one inspector's fieldwork and provide feedback per month to ensure appropriate procedures and policies are followed.
10. Transition from a paper process when documenting inspections into an electronic process using Accela BCMS to reduce omissions when completing inspection records.
11. Facilitate up to two monthly DPR Enforcement Branch Liaison (EBL) oversight inspections with different inspectors to ensure regulatory activities are conducted according to DPR's standards and guidance.
12. When a noncompliance is determined during an inspection, 90% of noncompliance is returned to compliance by the time the first re-inspection is conducted.

## Measures

Inspections identify areas of non-compliance that need corrective actions. These activities also serve as a method of obtaining feedback for PRP. The measure of success is a regulated community that is:

- All non-compliances noted when conducting inspections or investigations are recorded in the "as found condition." The inspection form with the appropriate notation serves as the violation notice.
- Aware that these laws and regulations are intended to protect the public, workers and the environment.
- Licensed businesses found in non-compliance return to compliance.

## INVESTIGATION RESPONSE AND REPORTING

Approximately 133 pesticide incident investigations are completed annually. These investigations are initiated by external agencies (such as DPR and Poison Control) and the public. Incidents may include alleged pesticide exposures or illnesses and complaints of misuse. The majority of public complaints relate to agricultural/urban interface or neighbor-versus-neighbor conflicts concerning pesticide use. Illness referrals received from DPR and Poison Control are often related to the use of antimicrobial products (disinfectants and sanitizers).

## Goals

Produce quality investigative reports in a timely manner that meets DPR guidelines.

Respond to public complaints of pesticide exposure, illness, and misuse in a timely manner.

Investigate all complaints and referrals, whether reported to AWM directly or brought to AWM's attention through other means, such as public complaints, San Diego County Department of Environmental Health Hazardous Materials Division's weekly incident reports, or media reports.

## Deliverables

1. Collaborate with DPR to ensure priority investigations receive focused attention and are done according to procedure and timeframe by submitting the priority investigative reports to DPR within 45 days of completing the investigation.
2. Review and refine investigative processing procedure and optimize use of Accela BCMS to increase efficiency.
3. Review requirements related to antimicrobial investigations and adopt changes to improve efficiencies.
4. Maintain timely response to pesticide illness incident referrals received from DPR and Poison Control by submitting investigative reports to DPR within 120 days of completion of the report or reasons why the guideline cannot be met will be documented and provided.

5. The reporting of public complaints is encouraged and investigated.

### **Measures**

Pesticide investigations are important in determining whether a pesticide use activity is in compliance with all pesticide laws and regulations, and in providing information to DPR on labeling issues, reentry intervals, rates of pesticide use, etc. In order for DPR to make exposure determinations, investigative reports will:

- Provide enough information for the reviewer to identify where problems may be reoccurring.
- Be conducted promptly and submitted in a timely manner.
- Be complete and including labels, exposure information, and violations found.
- Include evidence when violations are found necessary to proceed with enforcement response.

### **Enforcement Response**

Food and Agricultural Code Section 12999.5, identifies the commissioner as the sole issuing authority for agricultural civil penalty actions. Business and Professions Code 8617 also authorizes the commissioner to propose structural civil penalties. Violations are classified according to the Food and Agricultural Code, Business and Professions Code, and Titles 3 and 16 of the California Code of Regulations. The goal is to issue all Notices of Proposed Action (NOPAs) within 60 days from the date the violation is determined .

PRP has provided evidence to the District Attorney's Office and Structural Pest Control Board to prosecute unlicensed and non-compliant companies and will continue to exercise this enforcement option for the most non-compliant companies or most egregious violations affecting the health and safety of workers, the public and the environment.

During 2011 and 2012, PRP closed 123 civil penalty cases of which 55 were structural civil penalties (SCP) and 68 were agricultural civil penalties (ACP). Hearings were requested in 14 (12%) of the case and all but one were upheld by the Hearing Officer, and the one case was modified from a moderate to a minor violation. One structural fumigation company was referred to the San Diego city attorney for serious violations, resulting in a settlement that included cost recovery for PRP.

When a violation is documented, the commissioner's Enforcement Response Determination (ERD) process is initiated to uniformly apply the Enforcement Response Regulations. The process includes a detailed review of the inspector's findings documented in the inspection and investigative report and relevant evidence collected to ensure the violation is properly supported. The resulting compliance and/or enforcement action aligns with DPR's interpretation of the Enforcement Response Regulations and allows the commissioner applicable discretion as necessary. The ERD process will be used to analyze trends and determine areas of non-compliance needing additional regulatory focus.

**Goal**

Apply California Code of Regulations' Enforcement Response Regulations in a fair, effective and timely manner.

Follow the provisions of the Enforcement Response Regulations to determine violation class, fine amount, and compliance or enforcement action to be taken.

Timely processing of NOPAs continues to be a top priority, second only to priority investigations and determining response to pesticide illness incidents and public complaints.

**Deliverables**

1. Take appropriate compliance and/or enforcement actions according to the Enforcement Response Regulations with documented consideration of the individual circumstances for each case within identified timeframes.
2. In the case of certain priority investigation, provide an opportunity to the District Attorney, City Attorney, or Circuit Prosecutor to participate in the investigation and/or pursue a civil or criminal action when a violation may have occurred.
3. Using Accela BCMS, develop an Enforcement Response Determination (ERD) database to ensure all violations are addressed appropriately, providing an overall view of both business and individual compliance history.
4. Continue to refine internal procedures for processing enforcement actions within the resources of the department, preparing evidence packets, and identifying responsible parties within 60 days of the date the violation was determined.
5. Facilitate DPR EBL review of NOPAs with violations categorized as "Class A" or "Serious" prior to being signed by the commissioner.
6. Notify the DPR EBL of all ACP/SCP hearing requests in a timely manner.
7. Notify the DPR EBL of any structural or agricultural enforcement cases referred to outside agencies, such as the Structural Pest Control Board for licensing action or to the city/district attorney for prosecution, in a timely manner.

**Measures**

- Alter the behavior of repeat violators.
- Successful enforcement action

**Enforcement Staff Training**

AWM or PRP has experienced many staff changes in the past year, with the recruitment of five inspectors, two supervising inspectors and a deputy agricultural commissioner, all new to their positions. AWM recognizes the importance and necessity for a highly knowledgeable and trained staff. Training is performed on several levels. DPR and other state training are utilized

when available. The deputy and supervising inspectors continuously train and update inspectors on specific aspects of pesticide regulation.

Specific focus is placed on core responsibilities, such as permit issuance, inspections and investigations as outlined in the Pesticide Use Enforcement Program Standards Compendium Volume 3, Restricted Materials and Permitting, Volume 4, Inspection Procedures, and Volume 5, Investigation Procedures. DPR provides local training, review, evaluation, feedback and guidance through EBL. The EBL reviews permits and inspections for inaccuracies and omissions, reviews investigative reports for completeness, and conducts regular ride-along oversight inspections with inspectors. PRP works closely with the EBL on complex and priority investigations. The deputy and supervising inspectors address identified areas of needed improvement during staff training sessions, staff meetings, and individual sessions with inspectors.

The deputy and supervising inspectors train inspectors using established procedures, forms and documents prepared by DPR and PRP. Inspectors use the "Application for Restricted Materials Permit Inspector Worksheet" developed internally to ensure permit applications are properly and consistently processed in timely, efficient, and effective manner. Inspections are expected to be conducted in an "as found" condition and documented in a consistently accurate manner. Pesticide-related incidents are expected to be investigated promptly, consistently, and thoroughly and investigative reports to be clear, concise, and complete. All documents related to the issuance of permits and pesticide incident investigations are reviewed and updated yearly as needed.

### **Goals**

Develop a highly trained, accurate and efficient work force.

Provide ongoing training of staff, focusing on needed aspects, using internal and external resources.

Provide regular hands-on opportunities and coaching feedback as learning approaches.

### **Deliverables**

1. Provide a minimum of six enforcement staff trainings annually, focusing on pesticide regulation activities, such as permit issuance, investigative procedures, residue sampling, inspection procedures, and civil administrative hearings.
2. Facilitate DPR provided training when available.

### **Measures**

Professional response to complainant and industry concerns.

Conduct inspections in a professional, consistent and timely manner.

### **Outreach**

Outreach to the regulated community provides a proactive method of disseminating information

about requirements to growers, applicators, fieldworkers, structural and agricultural pest control businesses, and other operations that use pesticides. Outreach is also done to educate the public about pesticide safety.

### **Goals**

Provide compliance assistance to growers, applicators, fieldworkers, structural and agricultural pest control businesses.

Educate the public regarding the importance of pesticide safety.

Educate industry regarding the importance of pesticide safety, including the need for enforcement, the roles and responsibilities of DPR, the commissioner, and the regulated community to protect human health and safety and the environment.

Promote the use of the California Agricultural Permits System (CAPS) for pesticide use reporting by growers and pest control businesses.

### **Deliverables**

1. Conduct approximately 10 outreach activities (CAPCA, PAPA, Target, PCOC, etc.) annually.
2. Conduct a minimum of two fieldworker training sessions in Spanish utilizing bilingual staff annually.
3. Continue with the quarterly San Diego Structural Fumigation Enforcement Committee meetings as a discussion forum for industry and PRP.
4. Submit at least one article addressing compliance issues or regulatory updates to professional trade journals or other publications annually.
5. Include compliance information on various topics in the registration renewals mailed at the end of each year to growers, pest control businesses, pest control advisors, and farm labor contractors.
6. Provide compliance assistance to individuals and groups making quarantine compliance treatments. During eradication projects, attend public meetings as needed to provide information about pesticide application requirements and perform monitoring as appropriate to ensure compliance.

### **Measures**

Communication with the regulated community is paramount to ensure for the safe and legal use of pesticides. To that end, the commissioner will facilitate ongoing contact through outreach opportunities with the pesticide use community and foster dialog to assure attainment of the County's strategic initiatives for safe communities and sustainable environments.

- Informed community of pesticide hazards and increase questions to the commissioner.
- Improve the understanding of pesticide requirements by the regulated community.

- Compliance improvement by the regulated community.
- Promote the use of technology such as CAPS to maximize resources and increase efficiency and effectiveness.

**Work Plan Duration**

San Diego County PRP will revise its work plan biennially.

**Work Plan  
Pesticide Regulation Program  
2013 & 2014**

**California Department of Pesticide Regulation  
&  
San Diego County  
Department of Agriculture, Weights & Measures**

Department of Pesticide Regulation

Name: Jahan Motakef

Signature:

Title: Environmental Program Manager I

Date:

San Diego Department of Agriculture, Weights & Measures

Name: Lisa M. Leondis

Signature: *Lisa Leondis*

Title: County Agricultural Commissioner/Sealer

Date: *March 29, 2013*