

COLUSA COUNTY

PESTICIDE USE ENFORCEMENT

WORKPLAN

CY's 2013,2014,2015

County Resources

- Colusa County has five licensed Agricultural Biologist (AB) and the Assistant Agricultural Commissioner (AAC) that in CY2012 devoted over 5000 licensed hours to the Pesticide Enforcement Program.
- Three of the five licensed Agricultural Biologist have 45 years of combined experience in the county and contribute an astronomical amount of information and history on local conditions, cropping patterns and pesticide applications.
- The remaining two licensed Agricultural Biologist have less than two years' experience and are closely supervised and trained by experienced Agricultural Biologist.
- In CY2012, Colusa County had 5 AB's and the AAC that performed work in the pesticide program at varying percentages in their job responsibilities. There was a total of over 5000 hours expended within the scope of the pesticide program CY2012. The AAC spends 25% of his/her time in Pesticide Use Enforcement (PUE), 4.0 Ag Biologist spends 35% in PUE and the Pesticide Supervisor Ag Biologist III spends 50% of his/her time in PUE.
- Workload expectations for CY13,14, and 15 include:
40 operator identification numbers, 1,100 restricted material permits (including permit updates), 20 non-ag permits, a minimum of 4,000 NOI's, all of which must be documented, reviewed and approved or denied by licensed staff.

A. Restricted Materials Permitting

Permit Evaluation

- Permits are issued to the operator of the property or authorized representative.
- Letter of Authorization is required for issuance of a permit when the signature is someone other than the operator of the property. (As per California Code of Regulations Chapter 3 section 6420)
- Approximately 90% of permits are scheduled by appointment and additional time is allotted if the operator requires the Private Applicator Certification (PAC) test to be taken.
- The PAC test takes approximately one hour and the permit issuance takes approximately one hour. Additional time is needed for a multi-crop permit and permittee's with employees handling pesticides. The PAC is valid for 3 years and Biologists reviews the Private Applicator Certificate to assure the certificate is valid before the permit is issued.
- There is a determination before issuing a RMP whether an Operator Identification Number (OIN) suffices for the pesticide the permittee wishes to purchase and use.
- RMP's are issued for a period of one year or less with the expiration date of December 31st of the calendar year in which they are issued.

- Renewal of annual RMP begins in mid-December for the upcoming year. RMP's are only issued to a person that has a current Private Applicator Certificate, a valid Qualified Applicator Certificate (QAC) or Pest Control Advisor (PCA) license from Department of Pesticide Regulation (DPR).
- Individual appointments are required for permit issuance which allows the AB's the opportunity to review the permit for potential hazards and allow sufficient time be spent with each permittee. New permit applicants are prescreened for hazards that may necessitate denial. Due process is provided when denying a permit.
- RMP's and OIN's are always entered into the CalAg Permit System, printed, signed and copies given to distribute to their pesticide dealers and pest control businesses. Pesticide handouts that are given to the permittee are as follows: NOI log and instructions, County Restricted Material Conditions, County Worker Protection Standards (WPS) check list, Pesticide Safety Information Series (PSIS) A or N, California Restricted Materials list, Written Pesticide Training Program forms, leaflets pertaining to field worker requirements and pesticide use report forms.
- Criteria that is considered before issuing a permit includes Permittees' use report history and whether employees handle pesticides.
- Training sessions offering Continuing Education (C.E.) are scheduled in early December of each year to provide PAC's with C.E. hours to renew their certificate.
- All production agricultural permits are site specific and detailed maps of these sites are reviewed by the licensed biologists for any hazardous areas (human health or environmental). Permit changes involving the addition or deletion of a pesticide, commodity, or site require the permittee's signature and date. Changes to contact information are just noted on the permit. Permittee receives a copy of the amended permit.
- Pesticide specific conditions are issued for phenoxy's, Clincher, Regiment and Propanil herbicides to help prevent drift occurrences to crops such as grapes, prunes, cotton, vine seed crops as well as urban/rural settings. Also, given to the permittee are General Drift Minimization measures as recommended permit conditions. These measures are encouraged to be utilized in order to prevent environmental contamination. The classifying of Regiment and Clincher as permit materials for applications on rice fields have increased NOI's tremendously for Colusa County.
- All restricted material applications must have a written pesticide recommendation before an NOI is submitted (PCB application) and application is made. We do not require that recommendations be sent to our office but they have to be in the possession of the Pest Control Business (PCB) and/or operator before the NOI is filed. Pest Control Advisor and Grower completed recommendations include they have considered feasible, reasonable and effective mitigation measures before using pesticides.
- Non-Ag permit applications are also entered into the CalAg Permit System database and only completed by licensed staff.
- Permits are evaluated to determine if a substantial adverse environmental impact may result at the time of issuance. The notice of intent (NOI) is also evaluated when the NOI is submitted.
- A permit or NOI is approved or denied by licensed staff and conditioned to mitigate any hazards known to exist. All permit and NOI denials are be documented and counted in the Pesticide Regulatory Activities Monthly Report (PRAMR) for that month. All permit denials will be based upon evaluation of information submitted with the permit application and will address due process. These actions shall follow the review and appeal process outlined in the Food and Agriculture Code section 14009. Appropriate mitigation considerations include but are not limited to the knowledge of local conditions, pest management guidelines, restricted material hazard chart, pesticide safety information series, local permit conditions and Food and Agriculture regulations (including sections 6443 and 6450 through 6489).
- The NOI is recorded on the appropriate form and includes required information including, but not limited to : date of intended application, site and permit number, method of application including dilution, volume per acre, dosage, name of pest control business (if

applied by a PCB) and the operator of the property that is using the pesticide. The NOI's can be faxed, phoned in on the NOI answering machine, submitted in person or emailed.

- These NOI's are transcribed 100% of the time by a licensed Ag Biologists (AB). The weekend NOI's are reviewed by the AB that is on duty for that weekend during the busy rice season. AB's work a minimum of 4 hours each day on Saturday and Sunday. NOI's submitted with less than 24 hour prior notice can be approved by licensed staff if it determines that effective control cannot be obtained if the application is delayed or that 24 hours are not necessary to adequately evaluate the intended application.
- The submittal of pesticide use reports (PUR's) are required for the use of all pesticides applied that have an EPA Registration Number on the label. Growers are required to submit pesticide use reports on a monthly basis (by the 10th of the following month) and Pest Control Businesses are required to submit pesticide use reports within 7 days after application. They can submit the PUR's by mail, fax, in person or electronically through Agrian, California Data Management Systems (CDMS), California Electronic Data Transfer System (CEDTS) and CalAg Permit System. These electronic measures have increased our efficiency and timeliness of data entry to CDPR.

Strengths

- All five Ag Biologists are licensed in Pesticide Regulation, and Investigation and Environmental Monitoring and able to work in all areas of pesticide use enforcement.
- Staff meetings are scheduled regularly.
- Staff continues to receive training provided by DPR.
- Enforcement actions are reviewed by ACC for uniformity.
- Staff's experience and knowledge of local conditions assists in reducing substantial adverse environmental impacts.
- Issuance of one year permits allows for regular review of permits and reduces the chance of potential adverse impacts.

Weaknesses

- Issuing permits using the new CalAg Permit system is labor intense and time consuming. Additional training and development time is continued to be experienced.
- During high volume pesticide use it is difficult to meet all PUE inspections because of other concurrent program needs.

Goals and Objectives

- Remedy weaknesses identified during the evaluation process of restricted materials permits.
- Review the Restricted Materials Permit and evaluate the notice of intent (NOI's) and utilize this information to determine potential risks to prevent adverse effects of restricted material applications.

Areas Needing Improvement

- Increase efforts to review the data page for accuracy, i.e. phone numbers, addresses.
- Continue to update permittee maps and mark sensitive areas.

Deliverables

- Enforce Laws, Regulations and follow Department of Pesticide Regulation guidelines.
- Evaluate permits for adverse environmental impacts.

- Permit denials for pesticides shall be documented on a proper denial form and counted on the PRAMR.
- Review permits that have restricted materials that have not been used in the past two years and suggest to the permittee eliminating such pesticides.
- Assure NOI's contain all required information.

Measures of Success

Annually evaluate the permit process for deficiencies and other areas of concern.

Site Monitoring

There are 6 licensed staff members including the Assistant Agricultural Commissioner (AAC) who will log and review approximately 4,100 NOI's. The requirement of 5% of the total NOI's submitted to our office with pre application site inspections has not been met in the previous two years. Individual site monitoring will include evaluation of the basis for the intended application including toxicity of material, environmental concerns i.e. endangered species, buffer zone areas, ground water protection areas, problem areas identified from previous years, Section 18 registrations, and the written recommendation. All non-compliances detected in the field will have a follow-up inspection completed within 30 days to assure compliance. Non-compliance documents are kept in the permittees file to assist in evaluating a permittees non-compliance history. The AB will address the need for increased monitoring if a recalcitrant behavior is exhibited and the behavior has been documented during inspections and audits.

Strengths

- There are 5 Ag Biologists that are experienced and have knowledge of local conditions. The newly hired biologists have passed the state certification and have attended the Basic Inspector Academy and Breaking the Barriers training courses provided by DPR.
- Restricted Material Permits are issued for one year which keeps the permittees informed with current regulations and as a result lowers the number of non-compliances.
- The use of e-use reporting with Agrain, CDMS, CEDTS and CalAg Permits reporting system, has assisted in accomplishing 100% use reporting.

Weakness

- We lack experienced personnel issuing permits, performing field inspections of growers and PCB applications due to the hiring of two Ag Bio's. We address this by adjusting the workload and setting priorities.
- We will continue to update RMP's that have pesticides on the permit which are no longer being applied by the permittees. The AAC will keep staff on task to ensure that our goals are met.

Goals and Objectives

- Colusa County is committed to implementing appropriate measures in this area that ensure a site-monitoring plan that takes into consideration pesticide hazards, local conditions, weather patterns, cropping and field work patterns that are unique with our county. Staff has noticed an increase of orchard acreage and we will need to shift our focus from field crops to orchard crop for compliance criteria. Each day, AB's are scheduled to review NOI's and assure that all potentially hazardous areas of application of restricted materials are

evaluated and mitigated. Staff considers the differing pesticide characteristics mostly used (i.e. Phenoxy herbicides, Propanil, Regiment, Clincher, Gramoxone, Roundup, and Thiobencarb) and their pesticide class in relationship to the risks to the environment and human health.

- At permit issuance staff comprehensively reviews the permittees site locations, pesticides used and update permit as deemed necessary.

Areas Needing Improvement

- Meet the 5% Pre-Site Application inspections. The majority of the Notice of Intents are received during a 3 month period making it difficult to meet the minimum 5% requirement.
- Review and improve are non-compliance history documentation, inspection follow-up and worker safety program audits of private applicators.
- Review site maps for surrounding hazards. Update GIS maps, phone numbers and addresses, assess the different pesticide needs for each crop and allow additional time issuing permits to permittees with employees.
- ACC will schedule weekly staff meetings during the busy season to review current PUE issues and to receive feedback for the Ag Biologists. Adjustments to the program/schedule will be made if necessary.

Deliverables

- Colusa County will initiate changes to improve the program throughout the year and AAC will insure that AB's implement them.
- Enforce all Laws and Regulations fairly and follow DPR guidelines with input from Enforcement Branch Liaison (EBL).
- Ensure that all Ground Water Protection Areas (GWPA) are tracked for pesticide use. Conduct application inspections to ensure that all applicable laws are adhered to and no GWPA pesticides are applied in prohibited areas
- AB's will evaluate all NOI's and noted hazards to avoid adverse environmental impacts.
- Approve, deny or condition restricted material permits as necessary.
- Record and evaluate NOI's for all applicable requirements by licensed staff.
- Issue permits and review for completeness and accuracy with special emphasis on mapping of site locations. Cleanup permits by deleting old pesticides not used anymore from the permit.
- Once a year the ACC will complete a ride along evaluation with each AB's to assure that they are following the field inspection protocol.

Measure of Success

Periodically evaluate permitting process for deficiencies and change process in certain areas if there is not a quality element present. Achieve Environmental Justice and have a transparent pesticide program. Review permits, non-compliances, PRAMR, and discuss these with licensed staff and EBL to make certain environmental and human concerns are considered.

We did reach our target goal of 200 inspections for the rice monitoring program assuring water quality protection in the use of Thiobencarb.

B. Compliance Monitoring

Comprehensive Inspection Plan

The inspection program evaluation for Colusa County reveals that 100% of our grower and Pest Control Business Headquarters Safety Inspections are scheduled. They are randomly chosen unless prior history and/or usage dictate re-inspection. These scheduled inspections comprise 10% of our total inspection workload. The remaining 90% of our inspection activities are more random and focus on applications/inspections during periods of increased pesticide usage.

Inspections are performed by 5 licensed staff Monday thru Friday during business hours (7:00 a.m. – 4:30 p.m.) and on weekends during the busy rice herbicide season. During the busy season (March – July) 80% of the inspections are completed. Audit inspections are completed in winter months except for audits that are following a noncompliance issue, illness investigation or drift problem.

In CY's 13, 14 and 15 there will be an emphasis to follow-up on grower non-compliances. During permit issuance AB's will review worker safety requirements with permittees that have employees applying pesticides.

Strength

- Permits are issued annually and updated throughout the year when needed for new crops, sites and environmental hazards. Enforcement districts are assigned unofficially to biologists allowing them to become familiar with pesticide usage, hazardous areas, cropping patterns and repeated non-compliances by permittee in those districts. AB's knowledge of sites near areas identified as sensitive such as schools, daycare centers, wildlife areas, greenhouses, residential areas, waterways and sensitive crops.
- An annual review of previous year records effectively identifies non-compliances.
- AAC's involvement with staff with regards to their inspections increases the quality and consistency of those inspections.

Weaknesses

The need for AB's to perform work in other concurrent department programs during the busy rice season makes it difficult to conduct pesticide inspections.

Areas Needing Improvement

- The necessity to perform and meet the 5% Pre-Site Application.
- Assuring uniform completion of inspection forms and interpretation of the laws while in the field by AB's. Weekly staff meetings will help maintain uniformity.
- Increased inspections of grower pesticide applications to check the compliance rate and continue to monitor them.

Goals or Objectives

- Colusa County's main goal is to reduce risks to humans and the environment by increasing the level of compliance. Special focus will be placed on areas of non-compliances identified during property operator headquarters safety inspections.
- To be in the field at all times of the year when pesticides are being applied to assure that our compliance monitoring program is effective at discovering violations and correcting them to avoid future noncompliance.

- Continue to train PUE staff on site-monitoring inspections.

Deliverables

- Maintain monitoring of agriculture/urban pesticide applications to ensure safety to residences, schools and businesses.
- Conduct and document 200 rice field waterhold inspections to assure waterhold requirements are met and no illegal water releases occur.
- Conduct application inspections to ensure the no GWPA pesticides are used in prohibited areas.
- Headquarter inspections will be performed within 30 days when multiple violations are discovered. There will also be a headquarter audit when violations are of a serious nature (human or environmental exposure).
- The ACC will perform random “oversight inspections” as the need arises with all licensed AB’s to insure completeness, accuracy and uniformity with respect to pesticide inspections.

Based on our inspection program evaluation, the following inspection goals were determined:

PRE-SITE APPLICATION	5.0%
MIX & LOAD	
PROPERTY OPERATORS	20
BUSINESSES	28
HEADQUARTERS/EMPLOYEE SAFETY	
PROPERTY OPERATORS	14
BUSINESSES	4
STRUCTURAL	1
APPLICATION INSPECTIONS	
PROPERTY OPERATORS	20
BUSINESSES	36
STRUCTURAL	
BRANCH 1	1
BRANCH 2 & BRANCH 3	5
COMMODITY	2
FIELD FUMIGATION INSPECTION	2
FIELD WORKER SAFETY INSPECTION	7
BUSINESS RECORDS	
PEST CONTROL	4
DEALER	2
ADVISER	10
WATER HOLD INSPECTIONS	200

Targeted surveillance activities will be carried out during the Rice Pesticide Program as in past years. In 2012, we conducted 271 waterholds inspections which met our goal of 200 inspections. The goal of 200 waterhold inspections will be the same for CY's 2013, 2014, and 2015. There will be a special emphasis to conduct inspections during the rice season to assure that worker safety requirements are met and also environmental concerns with water quality (i.e. Thiobencarb).

Targeted inspections will be used to efficiently direct personnel in the areas of the enforcement program to improve compliance within the county and also to allow AB's to use knowledge of areas inspected to protect the environment and human health hazards (schools, residential areas, daycares, businesses).

The Ag Biologist III overseeing the Pesticide Program will review all inspection reports and activities of the enforcement personnel. All non-compliances will be tracked and reviewed by the AAC.

Measure of Success

Review of the NOI yearly totals and Pre-Application inspections will reveal if the minimum 5% site inspections was met.

A good measure of a comprehensive pesticide inspection plan is the increase of compliance within the county. A decrease in non-compliances is an effective indicator of success. Striving to increase the effectiveness of our compliance activities by further refining targeted inspection plans may in short term, increase the number of non-compliances identified. Achieving our goals in all areas of inspection will measure success. The degree and number of complaints will be taken into consideration as a measure of success.

Investigation Response and Reporting

Complaint/Investigation Log

All complaints or incidents received are documented on a complaint form either by clerical staff, AB's or the AAC. An AB is assigned each case and reports directly to the AAC. Colusa County will assure the use of a Complaint/Investigation Log and make certain that it contains the following information: date, tracking number or file name, name of the pesticide involved in the episode, location and type of the episode, FAC and/or 3CCR violations found and the date the case was closed.

Investigation Tracking System

The AAC and Pesticide Supervisor will oversee the Investigation Tracking System. The timely initiation and completion of all investigations, priority or non-priority will be assured and all DPR policies and guidelines will be utilized.

2012 CY there was 1 illness investigation, 1 antimicrobial, and 4 environmental investigations. They were completed on time. All Priority Episode Investigations will be conducted with the ACC having the lead. There was one agricultural civil penalties issued from these investigations.

Priority investigations need to be initiated within 2 days of receiving notification. Priority investigations need to have a preliminary update to DPR within 15 days of receipt by CCDA.

DPR/CACASA/EPA Cooperative Agreement.

Extensions can be obtained based on the following criteria:

- Injured person is unavailable.
- Sample lab analysis may take longer.
- Delay in obtaining medical information.

Pending enforcement action should not delay submission of investigative report. Investigation report and supporting documents are sent to Enforcement Branch regional office.

Non priority Human Effects Episodes.

Investigation report is sent to Worker Health and Safety.

Complaints:

In 2012 there were two complaints logged. These included two environmental effects complaints/drifts resulting in no Ag Civil Penalties issued. If it is a Department of Industrial Relations (DIR) referral, investigation report is sent to DIR.

Investigation reports are sent to DPR regional office. Records requests must be submitted on a request form for allowable information to be given out.

Strengths

- The AAC oversees all investigations to advise and assist with the AB's to assure a complete and thorough investigation. Experienced Ag Biologist III's and their increased awareness of local conditions result in a stronger quality investigation.
- A good working relationship with the Colusa County District Attorney and when the need arises for a case referral.

Weaknesses

- AB's staying on task to complete the investigation in a timely matter, during the busy months of pesticide use, sometimes results in a delayed investigation report.
- The lack of a bilingual staff person often delays investigations.

Goals and Objectives

- To assure all of the priority and non-priority investigations are completed according to DPR Policy and Guidelines and that they are on time, accurate, identify violations and contain recommendations and justifications for enforcement action taken or not.
- Make arrangements with the Williams Migrant Housing staff for assistance during an investigation when translation is necessary.

Deliverables

- Investigations are performed by the 5 AB's. They have received training and continue to receive training pertaining to investigation techniques, field inspections and report writing. The selection of the AB to perform the inspection is on a rotation bases. This enables all of the AB to obtain experience with investigations.
- AAC is responsible to review all investigations for completeness and accuracy and then approves them for submittal to DPR. Every 3 years our program is formally evaluated by our EBL and deficiencies are discussed and corrected.

Measure of Success

The AAC will assure the timely (within 120 days for non-priorities and 60 days for priorities) completion and submission of all investigations and complaints.

C. Enforcement Response

Enforcement Response Evaluation

- Prevention and prompt investigation of pesticide use or misuse incidents.
- Prompt response to all incidents when there is a possibility laws and regulations have been violated.
- There are 5 AB's and the AAC that investigate incidents and complete both compliance and enforcement actions.
- All non-compliances, investigations and enforcement actions are reviewed by the AAC for accuracy, completeness and timeliness. The issuance of any compliance or enforcement action are completed and mailed out to the party by certified mail to assure receipt, signature and future compliance accountability.
- A Pesticide Enforcement Compliance Action Summary is prepared for every Ag Civil Penalty.
- Upon completion, all actions are e-mailed to the Enforcement Branch Liaison.
- Most non-compliance's are worker safety in nature, i.e. the lack of PPE, decontamination station and training of the employees.
- Each week the AB's and the AAC have a staff meeting to discuss recent non-compliances issued and to discuss any problems and/or their solutions.
- The fine and hearing procedural guidelines will be followed and our DPR liaison will review the enforcement actions taken.
- If the action or fine deviates from the guidelines a Decision Report is written for justification and sent with the Ag Civil Penalty.
- All actions are reviewed and signed by the Agricultural Commissioner.

Strengths

- Keeping track of the enforcement actions and its effect on the party to whom they are issued. Follow-up and re-inspections are completed and tracked to assure compliance.
- Pesticide Enforcement Supervisor and the AAC are in contact with all licensed staff daily to keep staff informed, give advice and updates on any pertinent issues. Three of the agricultural biologists have many years of experience in the field and are very knowledgeable of the counties various crops and pesticide uses.

Weaknesses

Colusa County does not have sufficient staff to cover all of the county's enforcement needs during the busy rice season.

Areas Needing Improvement

- The need to follow-up on violations in a timely manner to assure growers are aware of the seriousness of the violation.

- The need to organize all of the inspections completed by the AB's and for the AAC to maintain a log of all non-compliances and violations for future enforcement of compliance actions.

Goals and Objectives

The goal of Colusa County's enforcement response plan is to improve and protect the public health, property, pesticide workers and the environment of the County. And to perform these tasks in a timely and effective manner. All actions taken will be in agreement with the DPR's Enforcement Response Regulations.

Deliverables

- Scheduling of staff meetings each week to review actions that are being taken.
- Use of all the Citabel Sections as a resource for guidance.
- Prompt and appropriate responses to potential violations and processing of those cases.
- Application of Enforcement Guidelines set forth by DPR.
- Assuring the use of Environmental Justice parameters when applying corrective action and keeping a transparent program.

Measure of Success

The success of the county's enforcement response program is best done by looking at the level of compliance for the various businesses that are regulated. Tracking and following up of non-compliant operators and businesses and seeing corrective action with sustainable compliance in those areas will indicate success. Less non-compliance will indicate a successful program.

PRIORITIES AND OTHER PESTICIDE REGULATORY ACTIVITIES

- A. Non-Fumigant VOC Regulation Compliance (San Joaquin Valley), when regulations are final: *Does not apply to Colusa County*
- B. Compliance with Sole Fumigation Phase II labeling: *CCDA staff has attended all DPR sponsored training sessions for the Soil Fumigant Training. These applications have always been high priority. CCDA strives to monitor all soil fumigations, including orchard replant and tree-hole fumigations with either a pre-application site or use monitoring inspection. CCDA works closely with CDPR, U.S. EPA, registrants and applicators to facilitate the implementation to the Phase II soil fumigant training in 2013. There are significant areas of this that are not resolved, difficult to interpret and still may change. CCDA is participating with Tehama County to work towards resolution of questions about dazomet use restrictions for tree-hole fumigations.*
- C. Chloropicrin mitigation: *Measures will be implemented when available. There is limited use in Colusa County. CCDA will address as applicable*
- D. Structural inspection activity Branches 1, 2 & 3: *CCDA has few Branch 1 applications and perform at least one inspection for each operator every year. CCDA will continue to focus on resident operators for Branch 2 and 3, performing a headquarters or use monitoring inspection annually and will emphasize the new surface water regulation.*

- E. Efforts to work collaboratively with the State Regional Water Quality Board and DPR Environmental Monitoring Branch regarding applications of diazinon, chlorpyrifos and diuron near water bodies: *CCDA has not been asked by any agency to assist with water quality issues, but would do so if approached.*
- F. Staff Training: *The county work plan will be reviewed at regular staff meetings and staff will be focused to address goals. Staff will attend training provided by DPR when practicable.*
- G. Compliance with pesticide use at schools: *During routine headquarters inspection of pest control businesses, CCDA will identify any pesticide usage at schools and verify compliance with school pesticide use reporting.*
- H. Secured Web Access (SAW) for pilot counties: *Does not apply in Colusa County.*
- I. Compliance with Ground Water Regulations (i.e., participation with DPR's Environmental Monitoring Branch on related ground water topics): *as with E, above, CCDA has not been approached to do this work, but would do so if requested.*
- J. Chilean Fruit Air Monitoring (CFAM) and other commodity fumigation focused activities: *Does not apply to Colusa County*
- K. Regulatory outreach and education: *Sponsor and participate in one grower meeting each year. Also provide monthly attendance and participation at local Farm Bureau, Resources Conservation District and other meetings.*
- L. Investigative Review: *CCDA meets regularly with the EBL to discuss possible enforcement action, including referral to DPR for state action.*
- M. Compliance with Non-Ag Surface Water Regulations: *CCDA will incorporate this into the compliance monitoring scheme. Goals for this activity are described above. Surface water regulations will be emphasized at appropriate use monitoring inspections and headquarters inspection.*
- N. Federal rodenticide regulation compliance: *will be ensured by requiring certification and enforcement of use restrictions. This is also evolving, as second generation rodenticides are being evaluated by U.S. EPA. Second generation bait requirements will be addressed as applicable.*
- O. Focused inspections on employers with employees: *At least 25% of all headquarters inspections, as identified by use report data, will be targeted at employers who have employee handlers who handle pesticides of concern (highly toxic and/or organophosphates/carbamates).*
- P. DPR reporting for report of loss related to bee kills: *CCDA will continue to maintain a log of complaints and track those regarding bee losses may be associated with pesticide applications.*
- Q. Collaboration with DPR in addressing U.S. EPA activities or requests: *Should this arise, we will coordinate our efforts with DPR and U.S. EPA.*
- R. Other: *Historically, we have provided review, feedback and local support to state and federal projects. Thiobencarb (Bolero) and other rice herbicides, including Clincher, propanil and Regiment, as they relate to water hold inspections and/or application buffer distances.*