

# **Glenn County Work Plan for Calendar years 2015 through 2016**

## **RESOURCES**

### **County Resources:**

Glenn County has five licensed biologists and historically devoted approximately 3.2 positions (5760 man-hours) per year to the Pesticide Enforcement Program. We will be undergoing some major changes at the beginning of 2015 as the Deputy and Assistant Commissioner will be retiring on December 31, 2014. As new positions are filled, additional training will be necessary. We increased our hours in the program from 5,760 (2011) to 7,304 (2014). With the additional hours, we exceeded our expected workload. Unfortunately, with the additional training needed to bring new staff up to speed, attaining those numbers the first year may be unrealistic. For the ensuing reasons the workload expectations should change to the following number below: Glenn County only has two dealers, most Pest Control Advisors use computer programs to write recommendations, less field workers are entering fields that have been treated within 30 days, fewer sites are being fumigated, fewer Pest Control Businesses have employees and due to the drought, fewer acres are being planted.

Workload Expectation- will be similar to our 2014 work plan. Workload expectations include:

- 45 property operator application inspections
- 36 pest control business application inspections
- 3 structural operator inspections
- 3 field worker inspections
- 25 property operator mix/load inspections
- 25 pest control business mix/load inspections
- 5 commodity and 5 field fumigation inspections
- 15 property operator headquarter inspections
- 2 dealer inspections
- 2 pest control operator record inspections
- 0 advisor record inspections
- Minimum of 5% pre-application site inspections at an estimated 150 inspections.

Expected Program Changes- we are seeing orchard crop acreage continuing to increase in the County therefore we will continue to shift some focus from field crops (rice) to the orchard crops for compliance criteria. The Rice Water Hold program is still a priority but applications are not as prevalent due to reduced material use.

## **CORE PROGRAM ACTIVITIES**

### **Restricted Material Permitting:**

Glenn County uses the statewide permitting program Cal Ag Permits (CAP). We use high-quality aerial photography-based maps which help to define use sites and surrounding

environment. Newly identified hazards are mitigated by addressing established guidelines. We also give handouts to the growers that explain any permit conditions we have.

### **Compliance Monitoring/Inspections:**

#### *Strategy, goals and objectives*

Inspections are conducted by staff on both a random basis and a focused basis. Management has developed inspection goals (numbers) based on previous years inspections which have identified problem areas or compliance weakness. We can also see what areas of the county tend to be overlooked. We will review all our grower permits to see which ones are “overlooked” and which ones are inspected frequently due to location along regularly traveled roads.

We will continue to focus on the use (or lack of) personal protective equipment through outreach and increased inspections in orchard and row crops where more pesticides are used by growers and employees than in rice where most applications are through pest control businesses. Where needed, we will increase enforcement actions as called for under the enforcement response regulations.

When appropriate, headquarter inspections will follow use monitoring inspections when non-compliances are noted. Discussions with our DPR Enforcement Branch Liaison (EBL) are also used to help identify and address statewide goals and concerns. Inspections will continue to focus in areas where past inspections have identified increased non-compliances. Management will continue to review past inspection records to identify possible increased inspection areas.

In order to address the reduced Pest Control Advisor inspections, staff will review all recommendations written by PCAs when they are a part of the pre-application site evaluation process.

To become more efficient, follow-up activities will be conducted within 60 days of the initial non-compliance. We will work closer with our EBL to ensure our program’s effectiveness and that improvements are continually made in our site monitoring prioritization and enforcement activities.

### **Investigation Response and Reporting:**

We will initiate investigation within 48 hours of receipt and complete non-priority episode investigations with a target goal of 60 days. We will log the information and make it available to our EBL upon request. We will work with our EBL to make sure that our reports meet DPR’s criteria for completion.

### **Enforcement Response:**

#### *Violation history tracking*

When a violation is noted during an inspection, the inspector will review the firm/person's compliance file for previous violations and will review this with the deputy within (5) five days of the incident.

### *Implementation Process*

Once the review has been completed by the inspector, the information is presented to the deputy and a preliminary action plan is formulated as to what enforcement action could be taken. The enforcement guidelines are referenced in the decision making process. A recommendation is then made to the commissioner or assistant within 14 days of the incident for further processing. Actions, whether they are compliance or enforcement, are written by the inspectors. If no enforcement action is taken, a written justification is required from the inspector.

All enforcement actions for Class A and B violations will be reviewed by our EBL then reviewed by the Deputy and Commissioner for the final determination prior to being mailed to the respondent.

### *Goals and Objectives*

The goal of the enforcement response plan is to provide a timely, fair and consistent response to non-compliances and to:

- Prioritize our efforts toward the violations most likely to cause harm to people and the environment
- Promote the notion that the most serious violations should draw the most serious penalties
- Promote future compliance by the grower/regulated business community.

### **Priorities and other pesticide regulatory activities**

A. Non-Fumigant VOC Regulation Compliance (San Joaquin Valley), when regulations are final: ***Does not apply to Glenn County***

B. Compliance with sole fumigation Phase II labeling: Glenn County staff has attended all DPR sponsored training sessions for the Soil Fumigant Training. ***These applications have always been high priority. The Glenn County Ag Department strives to monitor all soil fumigations, including orchard replant and tree-hole fumigations with either a pre-application site or use monitoring inspection. GCDA works closely with C DPR, 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. .***

C. Chloropicrin mitigation: ***Measures will be implemented when available. There is minimal use in Glenn County. GCDA will address as applicable***

D. Structural inspection activity Branches 1, 2 & 3: ***Glenn County Department of Ag seldom has Branch 1 applications. GCDA 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: ***GCDA 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, GCDA 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 Glenn County.***
- I. Compliance with Ground Water Regulations (i.e., participation with DPR's Environmental Monitoring Branch on related studies): ***as with E, above, GCDA 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 Glenn County***
- K. Regulatory outreach and education: ***Sponsor and participate in one grower meeting each year. Also provide monthly attendance and participation at Farm Bureau, Farm Service Agency and other meetings.***
- L. Investigative Review: ***GCDA 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: ***GCDA 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 CalAgPermit query, 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: ***GCDA 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.***