



**DEPARTMENT OF AGRICULTURE
& WEIGHTS AND MEASURES**

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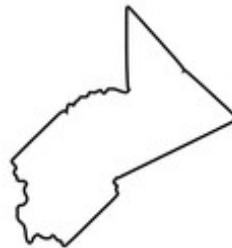
STANISLAUS COUNTY

AGRICULTURAL COMMISSIONER'S OFFICE

PESTICIDE USE ENFORCEMENT PROGRAM WORKPLAN

Calendar Years

2023-2025



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I. INTRODUCTION

The Stanislaus County Agricultural Commissioner's (Stanislaus CAC) Office is committed to having a high-quality Pesticide Use Enforcement (PUE) program through education, compliance inspections, and enforcement. To increase the compliance rate, PUE staff works very closely with the industry to address any questions and concerns they might have regarding the use of pesticides and worker safety. The Stanislaus CAC philosophy is that full compliance is difficult to achieve in this ever-changing regulatory world. The Stanislaus CAC Office believes compliance should be achieved not only through enforcement actions but also through education, strong field monitoring presence, prompt follow-up and follow-throughs, and partnership building.

Pesticide Use Enforcement Resources and Workload:

In calendar years 2020, 2021, and 2022, the Stanislaus CAC Office personnel spent 18,013, 20,616, and 20,551 hours respectively, performing pesticide use enforcement activities. In the year 2023, one deputy agricultural commissioner, one Agricultural Inspector IV, 10 Agricultural Inspectors, 1 Administrative Clerk III, 1 Application Specialist, 1 Software Developer/Analyst, and 1 Software Developer will support Stanislaus County's Pesticide Use Enforcement Program. Two of the dedicated program staff are bilingual in Spanish.

Organization & Personnel Resources

Stanislaus County is currently divided into 4 geographical areas known as districts. Each district has assigned Pesticide Use Enforcement (PUE) inspectors with varied levels of experience and training. Senior inspectors provide training, review investigation reports, prepare paperwork for enforcement actions, and cover other areas as needed. District inspectors are responsible for regulatory inspections, audits, complaint investigations, and other pesticide-related investigations. In addition, the department has 13 full-time inspectors, of which two are bilingual in Spanish. The Inspectors work in other program areas but are cross trained in PUE and assist PUE inspectors when necessary. There is one Deputy Agricultural Commissioner position responsible for the administration and supervision of the PUE program. One application specialist manages the GIS program and updates crop and sensitive site layers from CalAgPermits. One full-time Administrative Clerk III position assists with pesticide use report data entry, registrations, and other associated job duties. Additional Administrative Clerks help with pesticide use report data entry as time permits. One software developer/analyst is assigned to maintain CalAgPermits, CalPEATS, and process data requests. One software developer is assigned to develop new program applications for the pesticide program. All staff works out of the centrally located office in Modesto.

Equipment/Facilities/Assets:

- Each PUE Inspector has an assigned vehicle for daily use in the field. The vehicle is equipped with an investigation response kit, decontamination kit,

iPad, smartphone with internet browsing capability, phosphine monitor, wind gauge, range finder, soil thermometer, and personal protective equipment kit.

- An "Incident Response Van" is equipped and available to respond to priority investigations and drift complaints.
- Each PUE Inspector has a laptop and shared copier/printer for use in the office. All Inspectors utilize the CalPEATS program, with an iPad Pro, to perform inspections in the field.
- The CalAgPermits, a statewide web-based (online) pesticide permitting program, is used by the department. It has a web-based application for the electronic submittal of Notice of Intent (NOI) and Pesticide Use Reports (PURs), which are currently used by growers and Pest Control Businesses (PCBs). CalAgPermits is compatible with other web-based agricultural programs which are used for NOI and PUR submittal.
- The department uses Arc Map GIS software. Permits and static GIS layers showing crop and acreage information are available for use by the inspectors both in the office and the field.
- All Permits and Operator Identification Numbers are scanned so that PCBs, Growers, Pest Control Advisors (PCAs), Dealers, and Inspectors have electronic access to signed permits with site maps.
- California Pesticide Enforcement Activity Tracking System (CalPEATS) has a component to track Inspections, Investigations, and Enforcement. This tracking database is used to track compliance histories, outstanding investigations, and enforcement actions.
- Stanislaus County has a new electronic submission complaint system, on the Stanislaus County homepage, where pesticide-related complaints may be entered and directed to the appropriate department for response. In addition, a complaint may also be entered on our department website.
- Stanislaus County has after-business hours and weekend monitored phone lines to allow the public to reach out to the department during nonoperational hours with pesticide-related concerns.

Expected/Anticipated Changes:

- Expected continued increase in PUE hours due to staff cross-training and continued updates to laws and regulations.
- Expected increased number of inspections as staff becomes more experienced and trained.
- Improvement in the timeliness of investigations as staff becomes more experienced and trained and Investigation Report Review templates and timelines are effectively tracked.
- Expected consistency in enforcement responses for inspections and investigations.

- The expected increase of “compliance assistance” inspections to assist the industry in achieving compliance.
- The expected improvement in Bee Notifications is due to the implementation of the BeeWhere program.
- An expected increase in community outreach with increased social awareness and community engagement.

II. RESTRICTED MATERIALS PERMITTING:

Permit Issuance/License Registration Component

A. Current Status: Stanislaus CAC Office utilizes the Restricted Material permitting process to protect the environment, public, workers, and crops by mitigating hazards while still allowing for effective pest management.

1. Permit Issuance/Licenses Registered (3-Year Statistical History)

	Year 2020	Year 2021	Year 2022	3 Year Average
Valid Restricted Materials Permits	1996	1990	1915	1967
Private Applicator Certifications	404	562	530	499
Notice of Intents Reviewed	3377	4323	4732	4144
Valid Operator Identification Numbers	155	141	164	153
Pest Control Business Registrations	198	201	196	198
Structural Pest Control Business Registrations	135	156	164	152
Pest Control Advisor Registrations	239	229	206	225
Pest Control Pilot Registrations	24	20	24	22
Farm Labor Contractor Registrations	110	124	130	121

2. Local Conditions – Crop Patterns: Stanislaus County produces over 200 commodities.

- Stanislaus County's primary agricultural crops include almonds, walnuts, wine grapes, forage crops (oats, corn, alfalfa), and vegetable crops (tomatoes, beans, cantaloupes, pumpkins, sweet potatoes, etc.).
- Crop patterns vary based on micro-climates, water availability and delivery systems, soil type, and historical farming practices. Production nurseries produce transplants and commercial nursery crops. Stanislaus County also has numerous post-harvest commodity processors.

3. Local Conditions – Sensitive Sites: During permit renewal, an evaluation of the sensitive sites is completed with the permittee to document mitigation measures. Sensitive sites include but are not limited to:

- a. Residences and occupied structures near application sites.
- b. Other sensitive sites near application areas: sports parks, shopping centers, hospitals, schools, and licensed daycare facilities.
- c. Rural communities including farm labor residential areas, rural schools, and churches in close vicinity to production and non-production agricultural operations.
- d. Agriculture-urban interface around expanding cities (Patterson, Oakdale, Hughson, Turlock, Modesto, Riverbank, Waterford, and Salida).
- e. Dormant season applications to trees and vines near residential areas, schools, and waterways.
- f. Sensitive crops (protection of organic production, transplants, and applications near crops at certain times of the year).
- g. Applications of pesticides toxic to bees.
- h. Endangered species habitat.
- i. Groundwater protection areas (276 Sections).

4. Permit Issuance Process: Approximately 2,000 agricultural and nonagricultural Restricted Material Permits (RMPs) and 150 Operator Identification Numbers (OINs) are active in Stanislaus County.

- a. Permits are issued on an annual or multiyear basis according to the California Food and Agriculture Code (FAC) Section 14007, Title 3 of the California Code of Regulation sections 6420-6432, and the PUE Standards Compendium, Volume 3, Restricted Materials and Permitting. RMP application forms for new and renewal RMPs have been updated to comply with the requirements of 3CCR section 6428 and Alternative and Mitigation Measures 3 CCR 6426.
- b. Permits are renewed via in-person or online meeting appointments during which a discussion of risk mitigation and compliance information is provided to the permit applicant.
- c. From mid-November through mid-February, Restricted Materials permits, and Operator Identification numbers are issued on an appointment basis. Up to 6 agricultural inspectors issue permits and process registration renewals daily.
- d. One Administrative Clerk III supports the permitting and registration renewal process. Permit applicants are informed to bring updated crop information, and anticipated pesticide needs.
- e. During the permit process, site maps are reviewed and updated in the CalAgPermits Program. This information is also used for more accurate maps for investigations and complaints.

- f. Before permit issuance, feasible alternatives and mitigation measures are evaluated, including, but not limited to requiring buffers, assessing buffers, best management practices, using alternative types of equipment to avoid drift, and utilizing inspectors to monitor applications around sensitive sites. Permits are conditioned utilizing the Department of Pesticide Regulations (DPRs) suggested permit conditions or Stanislaus County Permit conditions to mitigate hazards. As needed, permits are amended to incorporate new regulations or policies (Section 18s, crop rotations, the addition of pesticides to sites, etc.).
- g. Private Applicator Certification can be handled at the same time as permit issuance. If a Private Applicator needs to take the exam, it is administered and scored in advance of permit issuance. If the renewal is by Continuing Education (CE), the Private Applicator records are checked to verify the completion of the requirements. CE hours are tracked for growers by the county in a database program.
- h. Upcoming Regulatory changes are discussed during the appointment and Worker Health and Safety forms are offered.

5. Continuing Education Program:

a. Stanislaus County strives to provide relevant education topics to the regulated members of the community on laws and regulations based on an understanding of regulated community needs. Challenges were faced during the emergence of the COVID pandemic in 2020. By 2021, Stanislaus County had implemented an online model for live continuing education classes and later that year adopted a hybrid model to provide alternative choices in education access.

b. Due to the small number of sessions held in 2020, Stanislaus County committed to increasing to 12 sessions in 2021 to provide opportunities for additional hours.

	Year 2020	Year 2021	Year 2022	3 Year Average
Continuing Education Sessions	1	14	9	8
C.E Session Attendance	84	865	681	543

c. In addition to Stanislaus CAC Office's Continuing Education schedule, the Deputy Agricultural Commissioner and Inspectors also participate in several sessions sponsored by other local organizations.

6. Significant Accomplishments:

- a. Permit maps are updated, and PDF maps are created for each grower in the CalAgPermits Program.

- b. Using the CalAgPermits Program and the GIS system, staff can identify properties claimed by different operators, and discrepancies are resolved.
- c. Permit conditions are updated annually and contain required application information.
- d. Signed Letters of Authorization are obtained when required.
- e. During the permit appointments, inspectors offer compliance assistance inspections for growers. These inspections have increased, and the growers have improved in their compliance.
- f. Communication, outreach, and training are provided to the growers and schools affected by School Notification Regulations. These efforts have improved compliance with these regulations. During the permit appointments, inspectors assist these growers to submit their school notifications for the next cycle. Inspectors also encourage growers to separate blocks within ¼ mile of a school site, when possible, to provide better operational clarity.
- g. The department educates growers and pesticide applicators to utilize BeeWhere, a statewide bee registration and notification system.
- h. Inputting registrations into CalAgPermits promptly to facilitate efficient Notice of Intent (NOI) and Pesticide Use Report (PUR) review.

B. Planned Improvements:

- 1. Additional cross-training for department-wide staff to promote more consistency in permit issuance.
- 2. Review of pesticide use reports at the time of permit issuance, especially for vertebrate pest control to assure 100% reporting of use.
- 3. Quarterly Review of NOIs without pesticide use reports, and pesticide use reports without NOIs.
- 4. Review of pesticide handler regulations requirements for growers with employees.
- 5. Review of new and proposed regulations, during permit appointments.
- 6. Continue to conduct outreach in March and April to growers who did not have to renew their permits or did not complete their school site notifications to ensure 100% compliance by April 30th.

C. Goals and Projected Deliverables:

- 1. Evaluation of the entire permit process to identify problem areas and implement solutions to improve the consistency and effectiveness of the permitting process.

2. Permit conditions will be updated as needed, and at least yearly to reflect changes in the regulations and suggested DPR permit conditions.
3. Consistency in the documentation of the description of sites and accurate maps are essential to provide clearer information on site locations.
4. Continue to develop employee training programs by Deputy Commissioner and DPR.
5. Review of error PURs will result in accurate data and promote electronic pesticide use reporting in Stanislaus County.

6. 75% Compliance with school notifications by February 1st, 90% by April 1st, 100% by April 30th.

D. Measures of Success:

1. The Stanislaus CAC Office will continue to evaluate its Restricted Material permitting program to identify areas that may be enhanced for greater effectiveness, consistency, and efficiency.
2. Trained staff updated permit conditions, and better consistency in the documentation of permit changes, will help to streamline the permitting process and provide a more complete Restricted Material Permitting Program. An accurate sensitive site map will provide for a quick check for permit renewals and NOI review. This will benefit the public, environment, workers, and industry by delivering a safe and effective pesticide management program.

Permit Site Monitoring Component

A. Current Status:

1. NOIs are received in person, by phone, electronically, by email, or by fax. Currently, the office duty inspector and assigned district inspectors review NOIs daily.
2. Proposed applications are checked for accuracy, completeness, and compliance with the label and permit conditions. Product labels and site evaluations (Pre-Application Site Inspections) are used to determine whether mitigation measures are needed for the proposed application.
3. The applicator and property operator are promptly notified if there is a denial of the proposed application. The denial is documented on a "Permit/Notice of Intent Denial" form with the reason for denial and the property operator is entitled to due process. NOIs submitted with less than 24-hour notice are approved only if the commissioner agrees that weather conditions, pest pressure, or irrigation could impact effective pest control if the application is delayed.

4. Regulations require that 5% of NOIs submitted must have a Pre-Application Site Inspection. When selecting NOIs for site inspection, consideration is given to sensitive sites, weather conditions, soil moisture and temperature, pesticide toxicity, and type of application (fumigation, aerial, etc.).

B. Planned Improvements:

1. A better review of Restricted Materials Permits and pesticide labeling to assist in the evaluation of the NOIs.
2. Training of new staff to further their understanding of permit conditions for applications involving field fumigants.
3. Improve evaluation of NOIs and PURs involving Aluminum Phosphide for vertebrate control.

C. Goals and Projected Deliverables:

1. NOIs for non-fumigant applications are submitted 24 hours prior to pesticide applications and reviewed promptly. Fumigant NOIs are submitted 96 hours prior to application to allow ample time for Pre-Application Site Inspections. Some fumigation applications are subject to additional county permit conditions.
2. PUE staff is using the "Permit/Notice of Intent Denial" form for documentation of denials, which has resulted in consistent and proper documentation of NOI denials.
3. Increased focus to conduct Pre-Application Site Inspections for field fumigation NOI's, Paraquat NOI's and NOI's submitted for sites within ¼ mile of a school site.
4. All non-agricultural restricted material use permittees are inspected at least once annually.
5. Increase of Pre-Application Site Inspections for Paraquat NOIs to utilize as an outreach opportunity to check compliance with certified applicator and EPA training requirements.

D. Measures of Success

1. Timely evaluation of proposed applications will help to mitigate any potential hazards prior to the application. A proactive evaluation of the sites based on the most current permit conditions, site conditions, and applicator will provide for more safe applications. Continuing with in-person/online meeting permit renewals will foster partnership-based education to increase regulatory understanding and compliance.
2. 24-96 hours of notice will help the inspector to better evaluate the proposed applications with the potential to impact the environment or human health.

3. Increased focus to conduct Pre-Application Site Inspections for field fumigation NOI's, Pre-application site inspections for Paraquat NOIs and Pre sites for NOI's submitted within ¼ mile from school sites.
4. Cross-train by team inspectors from other programs with inspectors that are licensed and assigned in PUE to assist with Pre-Application site monitoring.

III. COMPLIANCE MONITORING:

The Stanislaus CAC Office will continue to assure that compliance monitoring is effective and thorough and that non-compliances are followed-up to ensure the safety of pesticide handlers, fieldworkers, the public, and the environment using an inspection strategy that has a measurable effect on compliance improvement.

Comprehensive Inspection Plan

A. Current Status:

1. Pesticide use monitoring inspections are conducted based on the potential hazard posed by the application, proximity to sensitive sites, and compliance history of the permittee or applicator. Inspections will continue to emphasize verification of compliance with worker safety standards, field fumigation requirements, and monitoring agricultural/urban interface, as well as Business Records and Employee Safety Inspections for a better overall picture of pesticide use compliance.
2. The PUE Deputy Agricultural Commissioner assures that all PUE staff have the most current version of the inspection and investigation procedures manual and other supporting manuals, and enforcement letters, and advises when updated information or guidance is available.
3. New inspectors conduct ride-along sessions for training purposes with Inspector IIIs for a month before conducting their own inspections.
4. PUE Inspectors refer to CalPEATS and CalAgPermits in the field at the time of inspection to review compliance history at the time of inspection.
5. PUE Inspectors discuss violations with Deputy Agricultural Commissioner the same day they occur for prompt review; During this time, the Inspection Procedures Manual is cross-referenced to ensure consistent guidelines.
6. Cease and Desist orders are discussed with Deputy Agricultural Commissioner as it is occurring in the field to provide ample support in enforcing public safety actions.
7. The PUE Deputy Agricultural Commissioner reviews completed inspections on CalPEATS. Feedback is given to staff for training purposes. The inspections are generally complete with supporting notations and photographs as applicable to support findings. The inspections have been conducted following the Inspection Procedures Manual.

8. The PUE Agricultural Commissioner identifies issues with inspection requirement consistency due to gaps in training reinforcement further exacerbated during the COVID pandemic. As each issue arises, the matter is communicated during biweekly staff meetings or emails to all PUE staff.
9. While some challenges were experienced in 2020 and 2021 due to the COVID pandemic and managerial transitions, in 2022, headquarters follow-ups to inspections with worker health and safety violations were conducted promptly.
10. 2021 and 2022 Inspection numbers have increased in comparison over the last six calendar years. During 2021, a 12% increase in inspections over the 6-year average was observed. In 2022, a 40% increase in inspections over the 6-year average was observed:

Pesticide Inspections Completed in Stanislaus County by Numerical Type Code* and Year

	103	104A	104B	104C	105	106	107A	107B	108A	108B	109A	109B	109C	109D	110A	110B	110C	110D	Total
2017	9	92	18	8	32	22	5	0	26	3	23	6	6	16	6	3	6	3	284
2018	14	96	33	3	40	27	7	0	34	3	48	12	8	20	17	9	17	9	397
2019	10	99	31	2	38	22	6	1	30	2	63	16	12	18	17	7	17	7	398
2020	2	132	25	17	34	6	3	1	31	4	10	0	2	2	1	0	1	0	271
2021	29	104	22	2	37	28	9	1	37	6	48	15	13	27	24	6	24	7	439
2022	28	163	40	5	33	22	6	0	38	2	80	24	10	35	24	11	24	12	545
6 Year Average	13	105	26	6	36	21	6	1	32	4	38	10	8	17	13	5	13	5	389

*See page 18 for inspection description by numerical code

11. The PUE Deputy Agricultural Commissioner places focus on adding a seasonality factor to focus on inspection types to achieve proper levels of monitoring during the proper timing of the year.
12. The PUE Agricultural Commissioner attends quarterly San Joaquin Valley PUE Deputy Group meetings to share, learn, and be consistent with enforcement in the valley region.

B. Planned Improvement:

1. Inspector IV and Deputy will ride along with all PUE Inspectors to ensure proper standards and procedures are followed following CDPR guidelines. Additional sessions will take place with new Inspectors to ensure proper foundational training has taken place.
2. Continued cross-training of licensed inspectors from other departments to meet the required work plan inspection numbers and maintain PUE enforcement competency.
3. All county headquarters follow-up inspections of worker health and safety violations found during monitoring inspections will occur within 30 days unless out-of-our-control delays occur due to operator issues.

4. Headquarters Inspections workload has been increased to reflect a three-to-four-year rotation for all the Stanislaus County Permittees who employ pesticide handlers/field workers.
5. Assign a dedicated Inspector during priority cases to ensure proper investigation procedures take place expediently.
6. Focus on the use of pesticides in the maintenance gardener industry and provide education on required regulations.
7. Continue to conduct all types of inspections to monitor different areas of pesticide use for a more complete picture of compliance.
8. Increase Business Records and Employee Safety Inspections to set expected standards with growers and businesses.

C. Goals and Projected Deliverables:

1. Baseline PUE monitoring goals are established and distributed to the PUE Inspectors at the start of the calendar year and updated at least biweekly. A range of minimum inspectors by type is assigned to the inspector to maintain a level of competency and familiarity with each inspection type.
2. Continue to achieve yearly inspection numbers at or above the average of the last three years and continue with increased field presence in areas of high non-compliance.
3. Better documentation on reports at the time of inspection when non-compliances are identified.
4. Conduct several types of inspections for a more complete picture of pesticide use. Also, utilize "compliance assistance" inspections for educational purposes and follow up with an actual inspection.
5. Increase business records and employee safety inspections of registered pest control businesses, dealers, and advisors to achieve 100% inspection every three years.
6. Increase safety inspections of growers with employees to achieve 100% inspection every 3-4 years.
7. Continue to develop employee training programs by Deputy Commissioner and DPR.
8. Perform the Annual Inspection Workload shown on page 13:

D. Measure of Success:

1. Achieve the Annual Inspection Workload.
2. Complete a headquarters follow-up to any inspection with worker health and safety violations within 30 days to better evaluate the root cause of non-compliance and act promptly and accordingly if systematic issues are revealed.

3. Refer a Headquarter request to Home County within 7 days.
4. Complete Inspection Consolidation cases within 60 days.

2023-2025 ANNUAL INSPECTION WORKLOAD (APPROXIMATIONS)

Completed Investigations/Complaints	All
Application Inspections (non-fumigation):	
Property Operator	120
Pest Control Business/Maintenance Gardener	30
Structural Branch II	40
Structural Branch III	5
Fieldworker Safety Inspection	30
Mix/Load Inspection	
Property Operator	30
Pest Control Business/Maintenance Gardener	10
Structural Branch II/III	2
Fumigation Monitoring Inspection	
Field Fumigations	20
Commodity Fumigations	35
Structural Branch I	5
Headquarters/Employee Safety Inspections	
Property Operator	80
Pest Control Business/Maintenance Gardener	30
Structural	15
Other	20
Records Inspections	
Pest Control Business/Maintenance Gardener	25
Pest Control Advisor	35
Dealer	10
Structural	15
Pre-Application Site Inspections	5% of total NOIs submitted.
Restricted Materials: Nonagricultural Use	Minimum of one annual inspection
Rice Water Holding	3
Conditional Ag Waivers	If/when necessary

Investigation/Complaint Response and Reporting:

A. Current Status:

1. During 2021 and 2022, a 22% and 58% respective increase was observed in yearly total accounting for completed and pending investigations over the last six years.

Year	Investigations Completed	Pending Investigations	Total Investigations
2017	75	0	75
2018	70	0	70
2019	81	0	81
2020	62	0	62
2021	96	23	119
2022	113	33	146

2. A total of 3 Priority investigations occurred in Stanislaus County during the 2020-2022 work plan year.
3. CalPEATS and Stanislaus County web complaint systems are used to track all illnesses, investigations, and complaints to assist with the timely completion of cases.
4. 9 of the 10 PUE inspectors are trained and licensed in investigation procedures.
5. Participate in CalPEATS for illness investigation reporting to DPR.
6. All staff conducting investigations hold a license in Investigation and Environmental Monitoring or are supervised by a licensed inspector or deputy. Staff responds to all complaints and incidents that may be related to pesticides.
7. All investigations and complaints are responded to and must be completed promptly.
8. DPR sampling protocols are utilized. Each inspector carries an Investigation Sampling Kit with the required supplies. The Pesticide Incident Response van is equipped (sampling supplies, personal protective equipment, etc.) to respond to all incidents, primarily those classified as a priority.
9. DPR is contacted as assistance is needed. Cases are referred or provided to other agencies when necessary.

B. Planned Improvement:

1. Continued training is needed for staff on conducting investigations, sampling, interviewing complainants, respondents, and witnesses, and writing investigative reports.
2. Utilization of the Peer Review process and Investigation Report Review rubrics will provide standardized feedback to PUE Inspectors.

C. Goals and Projected Deliverables:

1. Through continued training and reinforcement for staff on conducting investigations, sampling techniques, effective interviewing of complainants, respondents, and witnesses, and writing investigative reports, investigations can be completed in a timely, accurate manner. Better training will also provide consistent enforcement of pesticide laws and regulations.
2. Readily available sampling supplies will ensure that approved evidence is collected and the collection is performed timely and correct. A tracking log will provide investigation status information and assignment tracking, to help with efficiency.
3. Accurate and complete investigations benefit all parties involved by mitigating future incidents.

D. Measure of Success:

1. Thoroughly investigate all reported pesticide-related incidents, using DPR investigative procedures, and complete investigations promptly with accurate and supportive documentation. Complaints or reports of loss related to bee kills, associated with alleged pesticide applications, are reported to DPR.
2. PUE Inspectors promptly respond to all complaints and incidents that may be related to pesticide use. All WHS investigations will be completed within the 120-day limitation.
3. Completion within 6-month completion of drift-related cases
4. Dedicated assignment of staff for priority cases for more prompt investigation closure.
5. Sampling kits will provide efficient and ready-to-use sampling equipment when necessary. The incident response van will be stocked and made available for the staff to use in the event of any type of pesticide-related incident. An additional kit will be available ready to be used by a licensed Inspector if needed.

IV. ENFORCEMENT RESPONSE

The Stanislaus CAC Office commits to improving the enforcement response associated with violations of pesticide laws and regulations, and to applying DPR's Enforcement Response Regulations (ERR) consistently and equitably to incidents in which a violation of pesticide laws and/or regulations have been confirmed and documented.

When non-compliances are found, evidence for each violation is documented in the inspection report or investigative report. Several tools are used to achieve compliance. Responses to violations can range from

education, outreach, decision report, administrative civil penalty, compliance interview, and civil or criminal court action. Decisions are made at the appropriate level by consideration of history, the severity of the non-compliance, and consultation with the deputy, commissioner, and DPR Enforcement Branch Liaison. The department utilizes the CalPEATS database to monitor compliance history. The inspectors input the results of inspections and investigations with violations into CalPEATS. A file is created with a unique case number. This database provides efficient tracking and quick reference of compliance history which enables the staff to efficiently evaluate repeat violators to achieve long-term and consistent compliance.

A. Current Status:

1. CalPEATS has been implemented to track the compliance history of individuals and businesses.
2. CalPEATS is also used for documentation of the enforcement response action.
3. Significant progress has been made on the submission of Decision reports to DPR within 60 days of the non-compliances or follow-ups.

B. Planned Improvements:

1. Utilize the Investigation Review Template to better organize timeline requirements for Decision Reports.
2. Issuing Enforcement Actions promptly such as to avoid future incidents.
3. Training for staff to promote consistency of enforcement of laws and regulations.

C. Goals and projected deliverables:

1. Continue to develop employee training programs by Deputy Commissioner and DPR.
2. Efficient tracking and quick reference of compliance histories for identifying repeat violators.
3. Adherence to Enforcement Response regulations will ensure equal and fair enforcement and compliance actions.
4. Take appropriate enforcement or compliance action within applicable statutes of limitations.

D. Measures of success:

1. Fully trained staff will provide enforcement consistency and an overall more effective PUE program.

2. Fair, consistent, and prompt action holds violators accountable while maintaining county-wide program integrity and effectiveness.

V. PRIORITIES AND OTHER PESTICIDE REGULATORY ACTIVITIES

The Stanislaus CAC has incorporated the following priorities and activities requested by DPR into the work plan:

- A. **Soil fumigants use compliance regarding labels, regulations, permit conditions, and application.** Stanislaus CAC Office's commitment to increased pre-application site inspections for field fumigation use, assures higher oversight of field fumigation activities and allows for increased communication with the applicators and business partners to foster collaboration and risk management.
- B. **Training of county staff on pesticide laws and regulations, including DPR policy and compendium guidance manuals.** Stanislaus CAC will continue to cross-train all department inspectors for PUE competency and review its current training checklist and process for needed improvements and competency milestone tracking. Stanislaus CAC attend and will continue to attend DPR training. Additional in-house training will be conducted monthly.
- C. **Regulatory outreach and education for growers and licensed applicators.** Stanislaus CAC will undertake efforts to properly inform all regulated applicators and licensees on recent regulatory changes for compliance with 40CFR.
- D. **The pesticide Disposal Project provides a safe means for farmers/growers to dispose legally of pesticides.** Stanislaus and three neighboring counties have been awarded funds and Stanislaus CAC will be hosting multi-day events during 2023.
- E. **Outreach and education for community /stakeholder engagement.** Stanislaus CAC has developed working relationships with local communities in the development of the Pilot Project. Stanislaus CAC will continue to meet with communities and stakeholder groups as requested to ensure collaboration and partnership building.

Numerical Code	Inspection Type Title
102	Pre-Application Site Inspection
103	FW Safety
104A	Use Monitoring Inspection - Application
104B	Use Monitoring Inspection - Mix Load
104C	Use Monitoring Inspection - Water Hold
105	Commodity Fumigation Inspection
106	Field Fumigation Inspection
107A	Structural Branch I - Application
107B	Structural Branch I - Tarp Check
107C	Structural Branch I - Aeration
107D	Structural Branch I - Certification
108A	Structural Branch II/III Application
108B	Structural Branch II/III Mix/Load
109A	Headquarter Inspection - Employee Prod Ag
109B	Headquarter Inspection - Employee Other
109C	Dealer Records/ Storage Inspection
109D	Pest Control Adviser Records Inspection
110A	Agricultural Pest Control - Employee Safety Inspection
110B	Structural Pest Control - Employee Safety Inspection
110C	Records/ Storage Inspection Agricultural PCB
110D	Records/ Storage Inspection Structural PCB