

**For Pesticide Enforcement Activities  
by  
Department of Pesticide Regulation  
and the  
Ventura County Agricultural Commissioner  
for  
Calendar Years 2019-2020**

County

Name: Andy Calderwood  
Title: Deputy Agricultural Commissioner  
Date:

  
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20 SEP 2019

Name: Edmund E. Williams  
Title: Agricultural Commissioner  
Date:

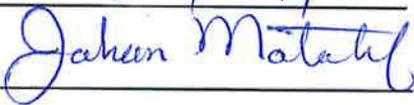
  
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9/20/2019

DPR

Name: Kamrul Bhuiyan  
Title: Environmental Scientist  
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9-24-2019



Agricultural Commissioner  
Edmund E. Williams

Chief Deputy  
Korinne M. Bell



# Pesticide Use Enforcement 2019-2020 Work Plan

## County Program

### Resources

#### Staff

1 Deputy Commissioner	2,000 hrs
2 Supervising Inspector / Biologists	4,000 hrs
8 Inspector / Biologists	14,000 hrs
1 Clerical Support	2,000 hrs
2 Student Aides	3,000 hrs

#### Bilingual Skills

One of the supervisors, four of the inspectors and the clerical support are fluent in Spanish.

#### Equipment

8 vehicles

Sample collection equipment (jars, bags, alcohol, etc.)

Each staff member has a:

Work cubicle

Computer terminal w/ internet access

Field tablet

Cell phone

## Offices

### *Santa Paula*

1 Supervising Inspector  
4 Inspectors  
1 Student Aid  
Clerical support

### *Camarillo*

1 Supervising Inspector  
4 Inspectors  
1 Student Aid  
Clerical support

## I. Restricted Materials (RM) Permitting

### A. Current Status (2018)

Ag Permits Issued: 283  
Non-Ag Permits Issued: 66  
Operator ID Numbers: 292

(All include New Permits + Renewals, not Supplements or Corrections)

- Permits issued according to Chapter 7 of DPR's *Pesticide Use Enforcement Program Standards Compendium*.
- Pre-Site Inspections: 227.  
Selection Criteria for Notices of Intent (NOI) for Pre-sites:
  - Proximity to schools, homes or historically sensitive sites;
  - Field fumigation;
  - Chlorpyrifos;
  - Poor compliance record.
- All Notices of Intent (NOI) are evaluated.
- Fumigation NOI evaluated by select staff only.
- Nineteen NOI denied. When staff find a non-compliant NOI, they contact the applicator to adjust the application or permit.
- Chlorpyrifos use fell from 6400 gallons in 2017 to 750 gallons in 2018, due to tighter permit conditions.

### B. Planned Improvement

- Add Paraquat to NOI Pre-site selection criteria.
- Train staff in coming changes in paraquat restrictions.
- Map all fumigations digitally.
- Train all PUE staff in fumigation NOI.

- Deny non-compliant NOI instead of adjusting them.
- Adopt DPR's strict ¼-mile buffer zone and other conditions suggested by DPR for chlorpyrifos permits.
- Develop a plan to phase out chlorpyrifos, following DPR's proposed cancelation of the pesticide.

### C. Goals and Projected Deliverables

- More Paraquat Pre-site inspections.
- Fumigations mapped and available to all inspectors.
- All inspectors evaluating fumigation NOI.
- Reduce chlorpyrifos use through ¼-mile buffer zone and other permit restrictions.

### D. Measures of Success

- Increased staff flexibility as all staff able to evaluate fumigation NOI.
- Fewer NOI submitted out of compliance with permit.
- Fewer chlorpyrifos NOI.
- Less chlorpyrifos use.

## II. Compliance Monitoring

### A. Current Status

- 680 complete compliance monitoring inspections, exceeding 2018 Work Plan targets.
- Compliance levels:

Inspection Type	Inspections (includes incomplete)		
	w/ Violations	Inspections	Violation %
Ag Applications	6	394	1.5 %
Non-Ag Applic.	6	44	14
Structural	13	104	13
Branch 1	6	71	7
Branch 2	7	33	21
Fieldworker Safety	2	72	2.8
HQ, Grower	2	21	9.5
HQ, Non-Ag	2	5	40
HQ, Structural	3	6	50

- Compliance levels high in ag applications.

- Compliance levels low in non-ag applications, including structural.
- Compliance levels low in headquarters inspections of small growers and non-ag businesses.

## B. Planned Improvement

- Increase outreach to non-ag businesses and small growers.
- Increase inspection targets for Branch 2 structural applications.
- Inspect the headquarters of ¼ of structural pest control businesses with branches in our county, approximately 20, per year.
- Increase inspection targets for landscape businesses.
- Increase inspections of small growers.

Inspection Type	2018 Target	2019 Target
Pre-site (102)	154	150
Application-Grower (104)	46	50
Application-PCB (104)	71	80
Mix/Load-Grower (104)	20	30
Mix/Load-PCB (104)	15	25
Field Fumigation (106)	55	50
Commodity Fumigation (105)	5	5
Fieldworker Safety (103)	60	70
Headquarters-Grower (109)	21	25
Headquarters-PCB (110)	10	10
Headquarters-SPCB (110)	5	20
Headquarters-Dealer (109)	3	3
Headquarters-PCA (109)	10	10
Structural-Branch 1 (107)	50	50
Structural-Branch 2 (108)	8	30
Structural-Branch 2-Mix/Load (108)	0	3
Structural-Branch 3 (108)	3	5
Structural-Branch 3-Mix/Load (108)	0	1
<i>Totals</i>	<i>536</i>	<i>617</i>

- Train mostly new staff in inspection procedures, with emphasis on quality inspections.

## C. Goals and Projected Deliverables

- Create outreach packet for structural pest control businesses to help them better understand what is expected regarding records, pesticide storage,

- PPE storage, decontamination, etc.
- Achieve Inspection targets set above.

#### D. Measures of Success

- Increased inspections of structural Branch 2 applications, structural headquarters, and other non-ag businesses.
- Increased compliance percentages for Branch 2 and other non-ag in 2020.

### III. Enforcement Response

#### A. Current Status

- period from non-compliance to enforcement action often more than 12 months.
- In 2018, from 47 compliance actions, 9 agricultural and 13 structural civil penalties levied.

#### B. Planned Improvement

- Shorten time from non-compliance to enforcement action.

#### C. Goals and Projected Deliverables

- Non-compliance to Enforcement Action: 180 days (2019).
- Non-compliance to Enforcement Action: 60 days (2020).

#### D. Measures of Success

- Notice of Proposed Action (NOPA) sent within two months of a violation.

### IV. Beekeeper Notification

#### A. Current Status

- Requirement to notify beekeepers not enforced.
- New app, *Bee Where*, to be available in 2019, facilitating all aspects of beekeeper notification.
- Apiary locations mapped onto a GIS layer by a single staff member, who is the only one who can query data to execute a beekeeper notification inquiry.

## B. Planned Improvement

- Outreach to applicators, Pest Control Advisors (PCA), and beekeepers on their obligations under 3CCR Section 6654 and the FAC.
- Monitor Pesticide Use Reports (PUR) to check that applicators are doing the notification required.
- Document Proximity-to-Apiary queries from applicators of pesticides toxic to bees.
- Move notification function to new *Bee Where* app when it becomes available.

## C. Goals and Projected Deliverables

- Conduct at least five presentations on bee protection at industry meetings.
- Determine level of compliance with bee protection regulations.
- Bring beekeepers into compliance regarding registration and notification of apiary movements.
- Create and maintain formal record of bee notification inquiries.
- Employ *Bee Where* app for notification.

## D. Measures of Success

- High rate of compliance with notification obligation.
- Beekeepers registering and notifying CAC of apiary movement.
- Apiary registrations increase.
- *Bee Where* app widely used by beekeepers, PCA's, applicators and CAC staff, with most beekeepers taking over management of their own apiary location records through *Bee Where*.
- Few reports of bee kills.

## V. Tarp Sampling

### A. Current Status

- County does not test Totally Impermeable Films (TIF) to confirm efficacy.

### B. Planned Improvement

- Under contract with DPR, sample ten fumigation tarps and submit for testing.
- Conduct investigations when tarp specs fall short of TIF standards.

### C. Goals and Projected Deliverables

- Sample ten fumigation tarps and submit for testing.
- Conduct investigations as needed.

#### D. Measures of Success

- Data collected on tarp quality.

### VI. Pesticides and Industrial Hemp

#### A. Current Status

- Industrial hemp not grown commercially in California.
- Registration of industrial hemp to begin Spring 2019.

#### B. Planned Improvement

- Prepare for pesticide applications on hemp.
- Evaluate pesticide labels for use on hemp.
- Reach out to applicators regarding drift onto hemp crops.

#### C. Goals and Projected Deliverables

- Create Hemp Working Group so that hemp growers and other stakeholders can meet to discuss the special problems posed by this new commodity.
- Develop protocol for adding hemp to permits and Op ID's.
- Present information on hemp and pesticides to industry groups.
- Develop list of pesticides allowed on hemp.

#### D. Measures of Success

- Growers use products permitted for use on hemp.
- Few complaints of pesticide drift onto hemp.
- Illegal residues not detected on hemp.

### VII. Maintenance Gardeners

#### A. Current Status

- Most landscape maintenance gardeners (MG) applying pesticides not licensed by DPR nor registered with the CAC.
- No formal program to bring unlicensed MG into compliance.

#### B. Planned Improvement

- Actively seek contact with MG.

- Follow up on contacts with MG.
- Improve outreach to MG.
- Increase inspection numbers and surveillance.

### C. Goals and Projected Deliverables

- Create standard contact form to give to MG.
- Log contacts with MG on a master file.
- Map MG contacts and create schedule for revisiting MG and monitoring progress toward compliance.

### D. Measures of Success

- Large list of unlicensed MG created.
- Increase in licensed and registered MG.
- Fewer unlicensed MG encountered in field.

## VIII. Pesticide Container Recycling

### A. Current Status

- Conduct two pesticide container recycling events per year in Santa Paula, one in spring and one in fall.
- In 2018, collected 24,000 lbs of plastic for recycling.

### B. Planned Improvement

- Conduct one of the two events on the Oxnard Plain, closer to more pesticide operations.

### C. Goals and Projected Deliverables

- Run two recycling events, one at the Camarillo Airport, one in Santa Paula.

### D. Measures of Success

- Increase in total weight of plastic collected.

## IX. Pesticide Residues on Produce

### A. Current Status

- 20 cases of illegal pesticide residues on produce coming from Ventura County farms (“T-cases” from *Tolerance*) in 2018, highest number by far in CA.

- Many cases taking 6 months or more to complete.

## **B. Planned Improvement**

- Shorten time to complete t-case investigations.
- Reach out to growers to teach about known causes of illegal residues.

## **C. Goals and Projected Deliverables**

- Conduct five presentations covering illegal residues before industry groups.
- Conduct compliance interviews with growers with a history of illegal residues.
- Complete t-case investigations within 3 months of initiation.

## **D. Measures of Success**

- Fewer cases of produce residues above tolerance.
- T-cases completed within 3 months.