

# Coordinating Oregon's Response to Pesticide Incidents



Oregon Department of Agriculture  
Oregon Department of Consumer and Business Services  
Oregon Department of Environmental Quality  
Oregon Department of Fish and Wildlife  
Oregon Department of Forestry  
Oregon Department of Transportation  
Oregon Poison Center  
Oregon Health Authority  
Oregon Office of State Fire Marshal

Prepared by the Pesticide Analytical and Response Center Board  
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## Acronyms

**DEQ** Oregon Department of Environmental Quality

**FIFRA** Federal Insecticide, Fungicide, and Rodenticide Act

**FY** Fiscal year; from 7/1/2009 – 6/30/2010, as an example

**NIOSH** National Institute of Occupational Safety and Health

**OAR** Oregon Administrative Rules

**ODA** Oregon Department of Agriculture

**ODF** Oregon Department of Forestry

**ODFW** Oregon Department of Fish and Wildlife

**ODOT** Oregon Department of Transportation

**OERS** Oregon Emergency Response System

**OHA** Oregon Health Authority

**OHSU** Oregon Health and Science University

**OPC** Oregon Poison Center, Oregon Health & Science University

**OR-OSHA** Oregon Occupational Safety and Health Division, Oregon Department of Consumer and Business Services

**ORS** Oregon Revised Statutes

**OSFM** Oregon Office of State Fire Marshal

**OSU** Oregon State University

**PARC** Pesticide Analytical and Response Center

**PEST** Pesticide Exposure, Safety and Tracking Program, Oregon Health Authority

**US EPA** United States Environmental Protection Agency

**USFWS** United States Fish and Wildlife Service

## Executive Summary

In the 1970s, the increasing use of pesticides elevated citizens' concerns regarding the possible adverse effects of these chemicals on people, animals, and the environment. In response to these concerns, the Oregon State Legislature established in 1979 the Pesticide Analytical and Response Center (PARC) (Per Oregon Revised Statute 634.550). In addition to acting as a centralized location to receive pesticide-related incident information, PARC also functions to assist with interagency communication and coordination when investigating pesticide incidents (See Figure 1 next page). Coordination and communication is primarily between PARC member agency Board members (See Appendix 1 for PARC Board contacts).

PARC does not conduct investigations. However, PARC member agencies may either conduct an investigation or conduct activities in support of an investigation, depending upon each individual agency's regulatory authority. The PARC member agencies that may conduct pesticide investigations are:

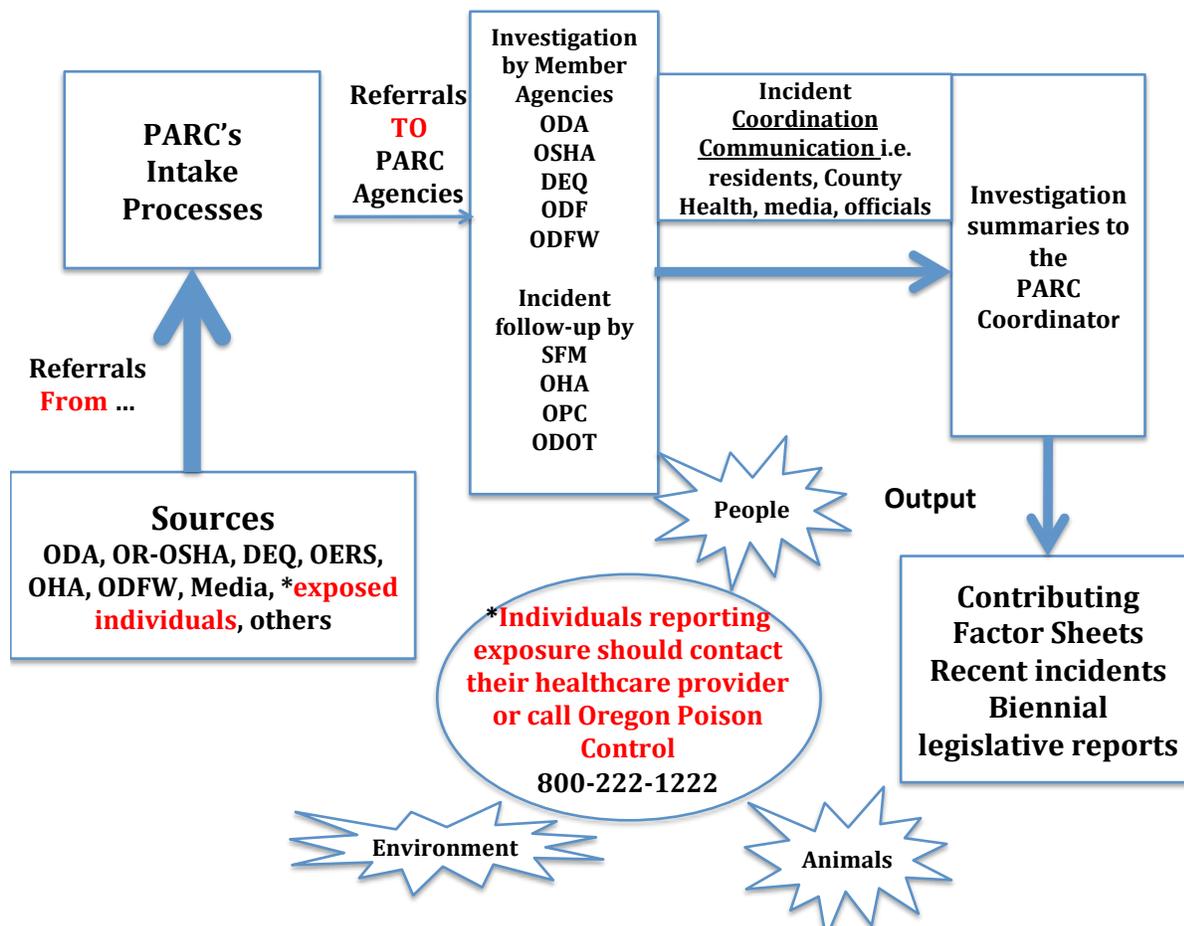
- Oregon Department of Agriculture (ODA)
- Oregon Department of Forestry (ODF)
- Oregon Department of Environmental Quality (DEQ)
- Oregon Occupational Safety and Health Administration (OR-OSHA)
- Oregon Department of Fish and Wildlife (ODFW)

The PARC member agencies that may conduct activities in support of an agency's investigations are:

- Oregon Health Authority (OHA)
- Oregon Poison Center (OPC)
- Oregon Department of Transportation (ODOT)
- Oregon Office of State Fire Marshal (OSFM)

To help Oregonians understand how state agencies coordinate investigating pesticide incidents, the PARC Board created this document titled *Coordinating Oregon's Response to Pesticide Incidents*. The purpose of this document is to describe to the citizens of Oregon how PARC functions, how PARC member agencies conduct pesticide investigations (See Appendix 2 – Incident Coordination Matrix), and what affected people may expect during and after a pesticide investigation is completed. Following the report of a pesticide incident to PARC, affected individuals can expect to hear from PARC or a PARC member agency within one business day. At that time, a main contact person for communication is established and contact information is provided or exchanged. Affected individuals can expect state lead agencies to share investigation results during and after the investigation. At the conclusion of the investigation, affected individuals may request investigation summaries. Details governing these procedures are provided within this document.

Figure 1. PARC acts as a centralized location to receive pesticide-related incident information and to assist with interagency communication and coordination when investigating pesticide incidents.



This diagram illustrates Oregon’s response to pesticide-related incidents. PARC receives pesticide-related incident information from a variety of sources, including state agencies. Based upon the information received, PARC makes referrals to the appropriate PARC member agency or agencies based upon each member agency’s referral criteria. Each agency that receives a referral from PARC responds to the incident based upon their agency SOP. PARC continues to assist with communication and coordination during an investigation. At the conclusion of each agency’s investigation, summary reports are submitted to PARC. PARC then prepares summary reports for all incidents that occur in a particular fiscal year. The PARC Board examines these reports for trends that are featured in the biennial legislative report. This report may make recommendations to a specific state agency or to the State Legislature about how to reduce pesticide-related incidents.

## Introduction

Oregon Revised Statute 634.550 established the Pesticide Analytical and Response Center (PARC) in 1979. PARC is open Monday through Friday, 8 a.m. to 5 p.m. to receive pesticide incident information and is staffed by the PARC Coordinator and Citizen Advocate and Liaison. PARC staff are responsible for receiving pesticide-related incident information and making the appropriate referrals to PARC member agencies. If a PARC member agency conducts an investigation, the summary reports are submitted to PARC. PARC, along with the Oregon Health Authority's (OHA's) Pesticide Exposure Safety and Tracking (PEST) Coordinator, assign contributing factors (See Appendix 3) to PARC incidents. For occupational incidents, the assigning of contributing factors is performed in conjunction with the Oregon Occupational Safety and Health Administration's (OSHA) Pesticide Coordinator. Select draft CF sheets are presented to the Board who then reaches a consensus on the factors that contributed to the PARC incident. The PARC Coordinator drafts a biennial legislative report and distributes it to the Board for review before it is finalized.

The standard operating procedures that follow govern the daily operations of PARC.

### **I. Receiving Pesticide Incident Information**

- a. Telephone calls - PARC tracks incoming telephone calls. When necessary, outgoing telephone calls are tracked as well.
  - i. PARC receives pesticide-related incident information through PARC's telephone number. Voice mail messages will be returned within one business day. PARC staff is responsible for obtaining the initial information necessary to make the appropriate referral PARC member agencies. This information includes, but is not limited to:
    1. Name
    2. Telephone number
    3. Address, including zip code
    4. Incident details, including time, date, and location of exposure, product information, and type of incident. Types of incidents may include occupational; forestry-related; affecting soil, water, or air; affecting fish/wildlife or their habitat.
    5. Details concerning animals exposed (e.g. number, type, and if seen by a veterinarian, the veterinarian's contact information
  - ii. Following the receipt of pesticide incident information, inform the complainant of PARC's role and the role of the agency in which their complaint is being referred.
  - iii. When the PARC Coordinator is unavailable, the primary designee will serve as PARC Coordinator.
- b. Email - PARC also receives pesticide-related incident information via email. ALL email referrals to PARC should use the following email address: PARC@ODA.state.or.us. This email address is routed to several other ODA staff in addition to the PARC Coordinator, so that appropriate actions will still be taken in the event that the PARC Coordinator is unavailable. (e.g. referrals to PARC member agencies)

## II. Sources of Pesticide Incident Information

- a. PARC receives information regarding pesticide-related incidents affecting people, animals, or the environment, through a variety of sources including:
  - i. ODA pesticide investigators
  - ii. ODA's online pesticide complaint form
  - iii. DEQ's complaint line/online complaint form
  - iv. Oregon Emergency Response System (OERS)
    1. OERS - The PARC Coordinator receives daily reports from the Oregon Emergency Response System (OERS) via email, which is responsible for coordinating and managing state resources in response to natural and technological emergencies and civil unrest involving multi-jurisdictional cooperation between all levels of government and the private sector.  
[http://www.oregon.gov/omd/oem/pages/tech\\_resp/oers.aspx](http://www.oregon.gov/omd/oem/pages/tech_resp/oers.aspx)
    2. Often, OERS reports do not contain specific information, i.e. EPA registration numbers. PARC follows up with those listed as contacts, for more information.
    3. OERS identifies chemicals using 'UN' numbers; these are four digit numbers that identify hazardous substances, including pesticides. UN numbers and the substances that they identify can be found at Wikipedia's page titled "List of UN numbers."
    4. Additionally, the specific identity of the product may be obtained by contacting the main contact person listed on the OERS report.
    5. When a referral is made to a PARC member agency based upon the OERS report, PARC provides the specific OERS report to the agency receiving the referral.
    6. DEQ follows up on pesticide spills reported to OERS. PARC requests that DEQ provide these reports to PARC via email, referring to the OERS report number in the subject line.
    7. When the DEQ report is received, PARC prints a hard copy, places it in a hardcopy folder with the original OERS report, and files it appropriately.
    8. ODA's Pesticides program tracks pesticide spills. The PARC Coordinator requests the specific OERS reports related to pesticide incidents (identified by the year, then the specific number, i.e. 2014-0967) and sends the report to ODA's Lead Pesticide Investigator/Case Reviewer.
  - v. OHA's Pesticide Exposure Safety and Tracking (PEST) Program
  - vi. OR-OSHA
  - vii. ODF
  - viii. ODFW
  - ix. USFW
  - x. 211info

1. 211info receives pesticide-related information from the public. 211info provides information on every pesticide-related telephone call to PARC within minutes of completion of the telephone inquiry.

- xi. Newspaper/television
- xii. EPA Region 10
- xiii. Request from health care providers

### III. Making PARC Referrals to PARC Member Agencies

- a. Referral criteria –PARC uses the criteria below to determine which PARC member agency will receive a referral following PARC receiving pesticide-related information. Each PARC board member or their designee are cc'd on PARC referrals.
  - i. ODA - ODA Pesticide program shall be notified as soon as possible whenever a violation of Oregon's Pesticide Control Law (ORS 634 and OAR 603) is suspected. This would include any suspected misuse, drift, or otherwise faulty, careless, or negligent acts related to pesticide use, storage, distribution, or disposal.
  - ii. ODF - ODF is notified any time there is a report or allegation of damage to natural resources, human health, or human property as a result of a forest pesticide application, spill, or other related activity. If the application is ongoing, immediate notification is requested. If it is finished, ODF requests notification as soon as is practical.
  - iii. OR-OSHA - Oregon OSHA is notified any time a pesticide-related incident or unreasonable exposure risk is occupational in nature.
  - iv. DEQ – DEQ is notified when there is a possible violation of the general pesticide permit (2300 permit), a possible misuse of a pesticide that has impacted a drinking water source or ground water, or improper disposal of solid waste containing pesticides. DEQ is notified through the agency complaint hotline (888-997-7888) or the online complaint form at <http://www.deq.state.or.us/complaints/> when state agencies conduct a non-urgent pesticide use investigation that involves potential impact to surface water, source water for public drinking water systems, or other environmental impact. Referrals to DEQ are sent to [complaintintake@deq.state.or.us](mailto:complaintintake@deq.state.or.us)
  - v. OHA - The Pesticide Exposure Safety and Tracking (PEST) Program the Oregon Health Authority (Public Health Division), is notified within one business day of reports of suspected pesticide-related human health symptoms.
  - vi. ODFW - ODFW is notified within one business day of any suspected pesticide-related poisoning of fish, wildlife, or impacts to habitat.
  - vii. OSFM - OSFM is notified via email regarding pesticide-related incidents at fixed locations where pesticides are stored.
  - viii. OPC - OPC is notified immediately at 800-222-1222 of any pesticide exposures for which assistance is needed in acute clinical management of the patient. PARC will provide OPC's number to

individuals who require immediate medical attention associated with pesticide exposure. A name and number will be requested if convenient.

- ix. ODOT - ODOT is notified of any pesticide-related incident that involves Oregon's state highway system.
- b. Following the receipt of pesticide-related information, PARC makes a referral to the appropriate PARC member agency within one business day of receipt. All referrals to PARC member agencies are made in a similar manner via email, based upon the PARC Member Agency Referral Criteria described above with the exception of ODA. The Lead Pesticide Investigator and PARC staff receives the same email notification when complaints come in via PARC's email, ODA's online Pesticide Complaint form, or the OERS report. PARC staff coordinates with ODA's Pesticide program staff on handling these complaints. Each PARC member agency conducts its own investigation, according to each member agency's policies and procedures (See SOPs in Appendix). The referral contains all the information necessary to follow-up on the referral. (See the information collected via telephone above.)
- c. If the pesticide-related incident information is from the OHA's PEST program and includes part A of an Exposure Pathway (EP), PARC furnishes the EP to all agencies receiving the PARC referral.

#### **IV. PARC Board meetings**

The PARC Board meets every other month, beginning in January, and meeting locations rotate between Salem (ODA) and Portland (OHA).

- a. Agenda - The PARC Coordinator schedules agenda planning meetings with both PARC Co-Chairs and the PARC Administrator at least three weeks in advance of the PARC Board meeting. This gives the Coordinator time to publish the draft meeting agenda to PARC's website.  
(<http://www.oregon.gov/ODA/programs/Pesticides/Pages/PARC.aspx>)
  - i. According to the Oregon Attorney General's Public Records and Meetings Manual, agendas are posted two weeks in advance of the meeting.
- b. Meeting minutes – The PARC Coordinator is responsible for producing PARC meeting minutes following every PARC Board meeting. Draft meeting minutes of the prior meeting are provided to Board members at every PARC Board meeting, for approval.
  - i. The draft meeting minutes are published on PARC's website within two weeks of the meeting.
  - ii. Following the approval of the prior meeting minutes, the PARC Coordinator makes corrections, removes the 'draft' watermark, and reposts minutes as 'final.'
- c. PARC Board meeting audio recordings – PARC Board meetings are also recorded and the recordings are posted on PARC's website.
- d. Recent incidents – PARC is responsible for providing PARC's recent incident to Board members at every PARC Board meeting. Incidents include those that occurred since the last PARC Board meeting.

- e. Contributing factor sheets
  - i. At the conclusion of an agency's investigation, investigation summaries and reports are emailed to PARC. Each PARC incident is assigned "contributing factors (CF)" These are factors that may have contributed to the incident (See Appendix 3). The Board reaches a consensus on the CFs for select PARC incidents as time allows. Due to the high volume, not all CFs for each incident can be reviewed at the Board meetings.
  - ii. OR-OSHA's Pesticide Coordinator, OHA's PEST Coordinator, and the PARC Coordinator will initially assign CFs for each PARC pesticide incident, using PARC member agencies' investigation summaries and report information.
  - iii. At PARC Board meetings, PARC Board members will reach a consensus on the contributing factors associated with select PARC incidents.
  - iv. CF sheets for the PARC incidents that will be discussed at PARC Board meetings are provided to PARC Board meetings in advance of the meeting.
- f. Biennial legislative report
  - i. The PARC Coordinator prepares the PARC biennial legislative reports and submits to the Board for review before it is finalized. These reports provide a summary and analysis of all PARC incidents that occurred in the two most recent fiscal years (FYs)
  - ii. Per ORS 634.550, the pesticide-related incidents will be examined to "...identify trends and patterns of problems," both in the reporting period, but also as they may occur over multiple reporting periods.
- g. Miscellaneous documents
  - i. Presentation handouts, others
- h. The PARC Coordinator provides meeting materials to PARC Board members. PARC attempts to provide meeting materials to PARC Board members approximately two weeks in advance of the next regularly scheduled PARC Board meeting. Meeting materials usually consist of:
  - i. Agenda (see above)
  - ii. Minutes from previous PARC Board meeting (see above)
  - iii. CF sheets (see above)
  - iv. Miscellaneous documents (see above)

**V. Coordinating Pesticide Incident Investigations**

- a. PARC assists in the coordination of pesticide investigations by initiating conference calls between PARC member agencies (and others) when an investigation involves three or more PARC agencies. The PARC Coordinator determines when to initiate a conference call with assistance from ODA's Pesticide Program Manager, following the guidance provided in the Incident Coordination Matrix. (See Appendix 2 for Incident Coordination Matrix)
- b. Pesticide use data requests may be necessary to assist the Oregon Health Authority (OHA) in conducting Public Health Assessments (PHA) or Exposure

Investigations (EI). The Pesticide Use Data Requests: Oregon Department of Agriculture (ODA) and Oregon Department of Forestry (ODF) document guides how to provide that information. (See Appendix 12, Attachment 5)

#### **VI. Responding to requests from health care providers**

Requests from a health care provider (HCP) for pesticide use information to treat people or animals should be directed to PARC via email at [PARC\\_HCP@oda.state.or.us](mailto:PARC_HCP@oda.state.or.us), using the HCP Request Form (Available on PARC's website; url above). The PARC Coordinator, ODA's Pesticide Program Manager, ODA's Pesticide Program Office Manager, ODA's Lead Pesticide Investigator, and Citizen Advocate and Liaison all receive the email. Pesticide use information to be provided to HCPs:

- i. Active ingredients, by percent
  - ii. EPA registration number
  - iii. Manufacturer's contact information
  - iv. Amount of product applied with dilution rate
  - v. Identity of additional tank components
- b. Following the receipt of the request form, the PARC Coordinator contacts the HCP within one business day of receipt, informing the HCP that his or her request has been received. The PARC Coordinator will cc: OHA's PEST Program for human incidents.
  - c. Following the receipt of the HCP request form by PARC, the coordinator contacts ODA's Pesticide Program Manager for assistance (on the same day that the request was received or within one business day). The PARC Coordinator provides to the Pesticides Program Manager a copy of the HCP request form. ODA's Pesticide Program Manager enlists the assistance of ODF's Field Support, Policy and Monitoring Manager or ODA's Lead Pesticide Investigator, when needed, to identify the applicator.
  - d. When the request form is received on a weekend day (Saturday or Sunday) or during a holiday, the PARC Coordinator will contact ODA's Pesticides Program Manager the next regularly scheduled workday.
  - e. ODA's Pesticides Program Manager provides the requested pesticide use information to the PARC Coordinator within one business day following receipt of the request form, if available.
  - f. The PARC Coordinator provides the completed request form to the HCP. The PARC Coordinator also provides the pesticide manufacturer's contact information. In cases of animal pesticide exposures, the PARC Coordinator makes a professional referral to Dr. Fred Berman (PARC Board Consultant), providing to Dr. Berman the contact information of the treating veterinarian(s).

Appendices - PARC Agency's Standard Operating Procedures (SOPs), in Appendices 5-13 (OR-OSHA, ODF, DEQ, ODA, ODFW, OPC, ODOT, OSFM, OHA)

## Appendices

### Appendix 1

#### PARC Board Contacts List

(See: <http://www.oregon.gov/ODA/programs/Pesticides/Pages/PARC.aspx>)

#### **Pesticide Analytical and Response Center**

**Contact:**

**Theodore Bunch Jr., PARC Coordinator**  
**503-986-6470 or 844-688-7272 (toll-free)**

[PARC@oda.state.or.us](mailto:PARC@oda.state.or.us)

[Oregon Department of Agriculture](#)

[635 Capitol St NE Ste 100](#)

[Salem, OR 97301-2532](#)

#### **Oregon Occupational Safety and Health Administration**

**Contact:**

Garnet Cooke, Pesticide Coordinator

503-378-3274

[garnet.r.cooke@state.or.us](mailto:garnet.r.cooke@state.or.us)

OR-OSHA Salem Field Office

P.O. Box 14513

1340 Tandem Ave NE, Suite 160

Salem, OR 97309

#### **Oregon Department of Forestry**

**Contacts:**

Brad Knotts, Forest Practices Field Coordinator

Private Forests Division

503-945-7484

[bknotts@odf.state.or.us](mailto:bknotts@odf.state.or.us)

Thomas Whittington, Incentives Field Support Coordinator

Private Forests Division

503-945-7399

[Thomas.Whittington@oregon.gov](mailto:Thomas.Whittington@oregon.gov)

Josh Barnard, Field Support Unit Manager

Private Forests Division

503-945-7493

[Josh.W.BARNARD@oregon.gov](mailto:Josh.W.BARNARD@oregon.gov)

Oregon Dept. of Forestry

2600 State Street

Salem, OR 97310

**Oregon Department of Environmental Quality**

Contact:

Brian Boling, Interim Laboratory Division Administrator  
503-693-5745  
boling.brian@deq.state.or.us  
Department of Environmental Quality  
3150 NW 229<sup>th</sup> Ave Ste. 150  
Hillsboro, OR 97124

**Oregon Department of Agriculture, Pesticides Division**

Contact:

Ray Jaindl, Director, Natural Resource Programs, PARC Board Administrator  
503-986-4713  
rjaindl@oda.state.or.us  
Oregon Department of Agriculture  
635 Capitol St. NE  
Salem, OR 97301

**Oregon Department of Fish & Wildlife**

Contacts:

Danette Faucera, Water Policy Coordinator  
503-947-6092  
danette.l.faucera@state.or.us  
Oregon Department of Fish & Wildlife  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

**Oregon Poison Center**

Contact:

Sandy Giffin, Director, Oregon Poison Center  
503-494-8600  
giffin@ohsu.edu  
Oregon Poison Control Center  
3181 SW Sam Jackson Park Road  
Mail Code-CSB  
Portland, OR 97201-3098

**Oregon Department of Transportation**

Contact:

Will Lackey, Vegetation Management Coordinator  
503-986-3010  
william.lackey@odot.state.or.us  
Oregon Department of Transportation  
355 Capitol Street NE, MS11  
Salem, OR 97301-3871

**Oregon Office of State Fire Marshal**

Contact:

Michael Heffner, Assistant Chief Deputy  
503-934-8030  
michael.heffner@state.or.us  
Office of State Fire Marshal  
4760 Portland Rd. NE  
Salem OR 97305-1760

**Oregon Health Authority, Public Health Division**

Contact:

Curtis Cude, Environmental Public Health Surveillance Program Manager, PARC Board Co-Chair  
971-673-0975  
curtis.g.cude@state.or.us  
Oregon Health Authority  
800 NE Oregon Street, No. 640  
Portland, OR 97232-2162

**Oregon Health and Science University, Oregon Institute of Occupational Health Sciences**

Fred Berman, Director, Toxicology Information Center

Contact:

503-494-7366  
bermanf@ohsu.edu  
Oregon Health Science University, Oregon Institute of Occupational Health Sciences  
3181 SW Sam Jackson Park Road  
Portland, OR 97201-3098

**Oregon State University**

Contact:

Jeff Jenkins, Professor, Environmental and Molecular Toxicology  
541-737-5993  
jenkinsj@ace.orst.edu  
Oregon State University  
333 Weniger Hall  
Corvallis, OR 97331-7301

## Appendix 2

### Pesticide Analytical and Response Center (PARC) Incident Coordination Matrix

This incident coordination matrix assists PARC in determining the proper member agencies to notify when pesticide-related incidents occur. When three or more member agencies are involved in an the investigation, the PARC Coordinator will initiate a conference call to brief member agencies and to coordinate communication and incident responses regarding the event.

Functions of PARC member agencies:

**Oregon Department of Agriculture (ODA)** – Regulate the sale, use, and distribution of pesticides in Oregon.

**Oregon Department of Environmental Quality (DEQ)** – Protect the quality of Oregon’s environment, including Oregon’s air, land and water.

**Oregon Occupational Safety and Health Administration (OR-OSHA)** – Improve workplace safety and health in Oregon.

**Oregon Department of Forestry (ODF)** – Protect, manage, and promote stewardship of Oregon’s forests.

**Oregon Department of Fish and Wildlife (ODFW)** – Protect and enhance Oregon’s fish and wildlife and their habitats.

**Oregon Health Authority (OHA)** – Improve the lifelong health of Oregonians.

**Oregon Office of State Fire Marshal (OSFM)** – Protect citizens, their property, and the environment from fire and hazardous materials.

**Oregon Poison Center (OPC)** – Provide emergency treatment information for patients experiencing a poisoning or toxic exposure in Oregon, Alaska, and Guam.

Additional agencies:

**Oregon Health and Science University (OHSU)** – Consultation

**United States Fish and Wildlife Service (USFW)** – Threatened and endangered species and anadromous fish

**United States Environmental Protection Agency Region 10** – Endangered species and anadromous fish

**Oregon State Police (OSP)** – ODFW enforcement

**National Oceanic and Atmospheric Administration (NOAA)** – Anadromous fish

Agencies listed below in **bold** will take/share the lead in the investigation.

#### Human

Circumstance	Agencies to Contact
Individual(s) report adverse health as a result of pesticide exposure? Occurring on forested lands?	<b>ODA, OHA</b> Add ODF
Individual(s) report occupational exposure to pesticides? On forested lands?	<b>OR-OSHA, ODA</b> Add ODF
Drinking water impacted by pesticides?	<b>DEQ, OHA, ODA</b>

IF criminal activity suspected, EPA Region 10 will take the lead.

Exposure to five or more individuals must be reported to EPA Region 10 and any exposures resulting in hospitalization must also be reported to EPA Region 10.

### Animal

<b>Circumstance</b>	<b>Agencies to Contact</b>
Domestic pet(s) affected by pesticides?	<b>ODA, OHSU</b>
Aquatic organisms or wildlife negatively affected by pesticides? Migratory birds? Anadromous fish? Threatened or endangered species? Forestry? Water quality concern?	<b>ODA, ODFW</b> Add <b>Region 10 EPA, USFW</b> Add NOAA Add Region 10 EPA, USFW Add <b>ODF</b> Add DEQ
Fish or wildlife habitat affected by pesticides?	<b>ODA, ODFW</b>

IF criminal activity suspected, EPA Region 10 will take the lead.

IF sampling will be done by DEQ, coordinate with as well.

### Environmental

<b>Circumstance</b>	<b>Agencies to Contact</b>
Pesticide spill? On an Oregon highway?	<b>DEQ</b> Add ODOT
Fire involving pesticides?	Local fire department
Air quality concern?	<b>DEQ, ODFW</b>
Soil quality concern?	<b>DEQ, ODFW</b>
Drinking water concern?	<b>OHA, DEQ, ODFW</b>
Water quality concern?	<b>DEQ, ODFW</b>
Environmental sampling required?	<b>DEQ</b>
Forestry?	<b>ODF</b>

IF criminal activity suspected, EPA Region 10 will take the lead.

IF sampling will be done by DEQ, coordinate with as well.

## **Appendix 3**

### **PARC Contributing Factors List**

#### **A) Incident Site Categories**

1. Private residence
  - a. Single family home
  - b. Multi-unit housing (apartment)
  - c. Mobile home/trailer
  - d. Housing authority building
2. School
3. Institution
  - a. Nursing home/care facility
  - b. Hospital
  - c. Homeless shelter
4. Hotel/motel
5. Vehicle
6. Forestry
7. Agricultural (e.g. farm, nursery)
8. Commercial (e.g. office park, retail)
9. Road, right-of-way, trail, Non-Ag
10. Public/municipal park
11. Industrial (e.g. manufacturing)
12. Golf course
13. Construction
14. Other\_\_\_\_\_

#### **B) Data Sources for Incident**

1. OPC Fax
2. Reporter Interview with PEST
3. PARC Agency Report/Findings
  - a. ODA Report
  - b. OR-OSHA Report
  - c. ODF Report
  - d. ODFW Report
  - e. OSFM Report
  - f. DEQ Report
  - g. Dr. Berman
  - h. Other
4. Medical Record
  - a. Human
  - b. Vet
5. Insufficient environmental data
6. Environmental data sufficient for Regulatory Decision
7. OERS Report
8. News Media
9. No return call to PEST

10. ODOT
11. USFW
12. EPA Region 10

C) Intended Target

1. Bed bugs
2. Other indoor insect pest
3. Other indoor pest e.g. mold, bacteria, mice, rats
4. Vegetation e.g. weed control
5. Outdoor pest control e.g. moss/mold/insect/rodent
6. Forestry
7. Agriculture
8. Roadside/Right-of-way
9. Community Application (Japanese beetle, gypsy moth etc...)
10. Irrigation ditch
11. Non-native/invasive fish
12. Human (e.g. Deet)
13. Vector e.g. mosquito/rodent
13. Other

D) Application Factors (as determined by Agencies)

1. Spill/splash of liquid or dust (not involving application equipment failure)
2. Application equipment failure
3. Mixing of incompatible products
4. Improper storage leading to release
5. Label reportedly not read
6. Excessive application of pesticide
7. Drift – commercial-Ag-forestry-vector control
8. Drift – originating from application by resident
9. Misapplication – homeowner, indoors
10. Repeated incident/violation by Applicator
11. Misapplication – homeowner, outdoors
12. Misapplication – vector control operator
13. Misapplication – use of cancelled product
14. Misapplication – pest control operators, indoors
15. Intentional Harm
16. Misapplication – pest control operator, outdoors
17. Misapplication – Forestry operator
18. Misapplication – Agricultural operator
19. Misapplication – RofW/Non-Ag
20. Application by minor
21. Improper storage within reach of child
22. Gaseous release (from fumigant use)
23. Unlicensed applicator (when required)
24. Licensed applicator not properly trained/supervised
25. Industrial accident

26. Impaired applicator (applicator exposure led to applicator impairment)
27. Gaseous release (from fumigant deactivation)
28. Illegal pesticide used/illegal dumping of pesticide
29. Total Release Fogger used

E) Exposure Factors (may not be verified by Agencies)

1. Required Notification/posting lacking or ineffective
2. People were in the treated area during application
3. Inadequate ventilation of treated area before re-entry
4. Early re-entry
5. Contact with treated article
6. Mixing & loading antecedents
7. Occupational exposure
8. PPE Eye (required eye protection not worn/inadequate)
9. PPE Gloves – (required gloves not worn/inadequate)
10. PPE Respirator (required respirator not worn/inadequate)
11. Performing unauthorized activity
12. PPE Other (other PPE not worn/inadequate)
13. Decontamination not adequate or timely
14. Exposure/symptoms
15. Label insufficient to protect public or non-target health
16. Chemical Sensitivity
17. Inadvertent animal exposure
18. Veterinary product exposure
19. Vegetation symptom consistent w/ formulation
20. Off-site movement/odor
21. Pediatric exposure of children <6

F) Other Factors

1. Neighbor-to-Neighbor conflict
2. Residential - Ag Interface
3. Group exposure ( $\geq 3$  or more people)
4. Residential - Forestry Interface
5. Site with Repeated reports of exposure/symptoms
6. No PHD access to other ingredients (b/c CBI)
7. Medical treatment sought
8. Pesticide poisoning dx/suspected by HCP, but not reported, per OAR 333-018-0015.

G) Remedial Actions by Agencies

1. Referral to community-based mediation source
2. ODF Citation
3. ODA Citation
4. Agency Letter Ordering
5. OR-OSHA Citation
6. OR-OSHA Hazard Letter
7. ODA Letter Advising

8. No violations documented

H) Referrals to ...

1. ODA
2. PEST
3. OR-OSHA
4. ODFW
5. DEQ
6. ODF
7. OSFM
8. OPC
9. ODOT
10. Other

Incident notable because?

1. Bumble bee death
2. Honey bee death
3. Multi-unit housing and notification (not required)
4. WPS-related
5. Unaware of \_\_\_\_\_ PARC member
6. Aerial application
7. Transportation-related spill/accident
8. Other

**Appendix 4**  
**Oregon Occupational Safety and Health Division Policies and Procedures**

<b>OREGON OCCUPATIONAL SAFETY AND HEALTH DIVISION POLICIES &amp; PROCEDURES</b>		<b>Number 58</b>	<b>Page 1 of 5</b>
<b>Subject:</b> Oregon OSHA Pesticide Incident Referral Procedures to the Pesticide Analytical and Response Center (PARC)		<b>Effective Date:</b> 2/1/2015	
<b>Prepared by:</b> Garnet Cooke	<b>Approved by:</b> Marilyn Schuster, Deputy Administrator	<b>Supersedes:</b> 3/1/2013	

**Purpose:** To establish uniform procedures to make pesticide related incident referrals to the Pesticide Analytical and Response Center (PARC) and to guide Oregon OSHA’s actions following the receipt of a PARC investigation referral, in accordance with the Oregon OSHA’s Compliance Officer’s Guide.

This SOP also establishes uniform procedures for coordinating and communicating with other PARC member agencies during PARC incident investigations.

**Scope:** Oregon OSHA’s investigation of work-related pesticide exposures.

Pesticides include defoliant, desiccants, fungicides, herbicides, insecticides, nematocides, plant regulators, disinfectants, antimicrobials and any substance, or mixture of substances intended to be used for defoliating plants or for preventing, destroying, repelling or mitigating all insects, plant fungi, weeds, rodents, predatory animals or any other form of plant or animal life which is, or which the Department of Agriculture may declare to be a pest, which may infest or be detrimental to vegetation, humans, animals, or be present in any environment thereof. [See: ORS 634.006(8)].

**Background:** PARC does not have regulatory authority; however, PARC is mandated to perform the following functions when pesticide-related incidents adversely affect humans, animals or the environment:

- Collect incident information
- Mobilize expertise for investigations
- Identify trends and patterns of problems
- Make policy or other recommendations for action
- Report results of investigations
- Prepare activity reports for each legislative session

PARC’s primary function is to collect and analyze information about reported incidents and to coordinate necessary investigations. Member agencies conduct most of the

investigations and take any necessary enforcement action(s). Member agencies are listed in Attachment # 1. Oregon OSHA is a binding member of PARC and is represented on the PARC Board by Oregon OSHA's Pesticide Coordinator.

Staff will receive training on the procedures outlined in this SOP, and an annual review of the procedures will occur to ensure effectiveness.

**Action #1:** When Oregon OSHA is notified of a work related death, catastrophe or a hospitalization due to a pesticide exposure, the following procedures apply:

**Procedures:**

- 1) The Oregon OSHA employee receiving the pesticide-related notification will immediately forward that information to Oregon OSHA's Pesticide Coordinator or, in his/her absence, a representative delegated these duties.
- 2) Oregon OSHA's Pesticide Coordinator or representative will collect the information and notify PARC within 24 hours via telephone and also by e-mail. Contact information is included in Attachment #1.
- 3) Oregon OSHA will prioritize response to these pesticide exposure events based on the following criteria:
  - **Imminent danger:** Investigation initiated within 24 hours. Imminent danger is a condition, practice or act which exists in any place of employment and could reasonably be expected to cause death or serious physical harm immediately.
  - **Serious:** Investigation initiated within 5 days. A serious condition, practice or act is one which exists in any place of employment and could reasonably be expected to cause serious physical harm.
- 4) When an Oregon OSHA investigation reveals issues related to potential violations of the rules of other enforcement agencies, Oregon OSHA's Pesticide Coordinator will establish communication with those agencies and maintain appropriate communication throughout the course of the investigation. (The other enforcement agencies are: the Oregon Department of Agriculture, Oregon Department of Forestry and the Oregon Department of Environmental Quality.) Oregon OSHA's Pesticide Coordinator will also coordinate communications between Oregon OSHA field staff and the Oregon Health Authority's PEST Program including any necessary clarifications regarding exposure pathways and pesticide identities if they were misidentified or unknown at the time of the original intake.

**Action #2:** When Oregon OSHA receives an investigation referral from PARC, the following procedures apply:

**Procedures:**

- 1) Oregon OSHA's Pesticide Coordinator or representative will take all investigation referrals from PARC and initiate Oregon OSHA's response.
- 2) Referrals from PARC will be investigated in accordance with the Oregon OSHA's Compliance Officer's Guide. (Use Occupational Pesticide Exposure Incident Report Form.) Oregon OSHA will prioritize response to these referrals based on the following criteria and respond within the indicated time limits:

- **Imminent danger:** Imminent danger is a condition, practice or act which exists in any place of employment and could reasonably be expected to cause death or serious physical harm immediately. Investigation initiated within 24 hours.
  - **Serious:** A serious condition, practice or act is one which exists in any place of employment and could reasonably be expected to cause serious physical harm. Investigation initiated within 5 days.
- 3) When the investigation is completed, the compliance officer will e-mail a copy of the narrative and inspection number to the Pesticide Coordinator. The Pesticide Coordinator will report the findings of the investigation to PARC when the enforcement action is issued.

**Action #3:** These procedures apply when Oregon OSHA discovers or is notified of an incident or accident involving pesticides. (This type of accident or incident does not include pesticide-related death, catastrophe, or hospitalization covered in Action #1.)

Information may be obtained from:

- A complaint alleging health or safety hazards involving pesticides.
- A referral from another section of Oregon OSHA or another agency or department.
- A reported accident where an individual has experienced an adverse health affect due to a pesticide exposure.
- A media referral.
- Inspection-related interviews, or the inspected employer's OSHA 300 log.

**Procedures:**

- 1) The Oregon OSHA employee who discovers or receives the pesticide-related notification will forward that information to Oregon OSHA's Pesticide Coordinator -- or, in his/her absence, a representative delegated these duties -- within one business day.
- 2) The referral information should always include:
  - Contact information for any persons exposed.
  - Location where exposure occurred.
  - Time and date of exposure.
  - Nature of the pesticide incident (potential misuse, threats to humans, fish/wildlife habitat or the environment).
  - Name of or type of pesticide involved.
- 3) Oregon OSHA's Pesticide Coordinator or representative will use that information to notify PARC via telephone and also by e-mail within 24 hours. Contact information is included in Attachment #1.
- 4) This type of occupational pesticide exposure incident will be investigated in accordance with Oregon OSHA's Compliance Officer's Guide, using Attachment #2: *Occupational Pesticide Exposure Incident Report Form*, or equivalent.

## **Oregon OSHA's Applicable Pesticide-Related Rules**

- OAR 437 Division 1, General Administrative Rules
- OAR 437 Division 2, General Industry, including:
  - 2/I, Personal Protective Equipment
  - 2/Z, 437-002-0171 (40 CFR 170), Worker Protection Standard
  - 2/Z, 437-002-0382 Oregon Rules for Air Contaminants
  - 2/Z, 437-002-1910.1200, Hazard Communication Standard
  - 2/Z, 437-002-0373 Oregon Rules for Thiram
- OAR 437 Division 3, Construction, including:
  - 2/Z, 437-003-1000 Oregon Rules for Air Contaminants
- OAR 437 Division 4, Agriculture, including:
  - 4/I, Protective Equipment
  - 4/N, 437-004-1680 Storage of Hazardous Chemicals
  - 4/W, 437-004-6000 (40 CFR 170) Worker Protection Standard
  - 4/Z, 437-004-9000 Oregon Rules for Air Contaminants.
  - 4/Z, 437-004-9010 Fumigated Areas.
  - 4/Z, 437-004-9720 Thiram
  - 4/Z, 437-004-9800 Hazard Communication Standard for Agricultural Employers
- OAR Division 7, Forest Activities, including:
  - 7/A, 437-007-0010 Worker Protection Standard
  - 7/D, Personal Protective Equipment and Programs

### **Attachments:**

#1. *Oregon OSHA's Occupational Pesticide Exposure Incident Report Form*  
(For use by OSHA personnel to document contributing factors.)

**Attachment #1:**

**Oregon OSHA's Occupational Pesticide Exposure Incident Report Form**

(For use by OSHA personnel to document contributing factors.)

PARC Case # \_\_\_\_\_ OPT Report # \_\_\_\_\_

Received from PARC/Referred to PARC on: \_\_\_\_\_

Employer name: \_\_\_\_\_

Address: \_\_\_\_\_

Employees involved:     Single:     Group Exposure

\_\_\_\_\_  
Pesticides Involved & EPA Reg. #s:

\_\_\_\_\_  
Description of event

\_\_\_\_\_  
Symptoms:

Symptoms associated with pesticide: Yes No

Medical treatment sought: Yes No    Hospitalized: Yes No

Type of facility: (*Circle all that apply*) See attached sheet. **Ag:** General farm Orchard Nursery Other

**Forestry Structural Landscaping Transportation School Right of Way Other:** \_\_\_\_\_

Application Factors: (*Circle all that apply*) See attached sheet. Hand labor Mix/Load Applicator Spill Splash Equip. Malfunction Drift Bystander Structure (office/warehouse) Handling treated product

Type of Exposure: **Direct** (using product) **Indirect** (exposed to product)

Structural Exposure: Informed of application prior? Yes No

MSDS provided? Yes No

PPE Worn: All/according to label    Some    None

PPE Worn, but incorrect (list issues) \_\_\_\_\_

No PPE Worn    Not required for task being done

Decontamination:    Occurred/Present    Did not occur/Present    Did not occur/Not present (no supplies)

Training:

WPS Handler    WPS Worker    Hazard Communication    Health Haz Control    other

Ventilation: Outside    **Structural:** # hours ventilated: \_\_\_\_\_ No ventilation occurred

Label insufficient: \_\_\_\_\_  Referred to

ODA/EPA

Violations:

Yes (*attach*) No

Hazard Letter:

Yes (*attach*) No

Referral to other PARC agency:

\_\_\_\_\_  
OR-OSHA Contact

Info: \_\_\_\_\_

**Appendix 5**  
**Oregon Department of Forestry Standard Operating Procedures**  
**for Pesticide-Related Incidents**

	<b>Oregon Department of Forestry</b> <b>Standard Operating Procedures for Pesticide-Related Incidents</b>
<b>Effective Date:</b>	January 1, 2015
<b>Last Revision Date:</b>	

**Introduction/Purpose**

The Oregon Department of Forestry (ODF) administers the regulations of the Oregon Forest Practices Act (FPA), including rules for natural resource protection when pesticides are used on forestland.

The purposes of this document are to outline the following:

- ODF responses to complaints or reports from the public of problems related to forest pesticide use.
- ODF responses to referrals of information from the Pesticide Analytical and Response Center (PARC), based on ODF’s referral criteria.
- ODF’s role in supporting uniform procedures for coordinating and communicating with and among PARC member agencies during all pesticide-related incidents.

This document is an extract from ODF policy, procedure, and guidance documents related to investigation and reporting for all reported incidents (not just those related to pesticides).<sup>2</sup>

**Scope**

The Oregon Forest Practices Act regulates forest pesticide use and other commercial forestry activities. The FPA establishes the policy of the State of Oregon as encouraging the growing and harvesting of forest trees, consistent with sound management of soil, air, water, and fish and wildlife resources. The FPA focuses on natural resource protection, recognizing that other federal and state regulations protect human health and property, as well as the environment. The Oregon Department of Forestry administers the FPA.

The Oregon Board of Forestry (Board) has adopted forest practice rules requiring operators to notify ODF before starting pesticide applications or other forestry activities. Notifications to ODF must contain a description of the planned activity, including a list of

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<sup>2</sup> For a list of these ODF documents, see “Oregon Department of Forestry Complaint Investigation and Reporting Procedures” in Attachment 1.

pesticides the operator plans to use.<sup>3</sup> Notification data is available to the public upon request.

The Board has also adopted rules regulating forest pesticide use. Those rules focus on natural resource protection, recognizing that other federal and state regulations protect human health and property, as well as the environment. When operators apply pesticides, they must record weather conditions and pesticides that were used.<sup>4</sup> Operators must provide the records to ODF upon request. ODF requests the records as needed for ODF investigations or at the request of PARC.

ODF investigates reports of concerns over forest pesticide applications, and takes enforcement action for violations of the FPA. ODF works with PARC and member agencies in investigating pesticide-related incidents.

### **Standard Operating Procedures**

- I. Upon receiving reports (from PARC, the public, or other sources) of concerns related to pesticide applications on forestland, ODF will:
  - a. Designate an ODF employee as investigator for the report.
  - b. Designate an ODF employee as the local contact for the reporting party.
  - c. If a call back is needed, contact the reporting party within one business day<sup>5</sup> of receipt of the report.
  - d. During the first conversation with the reporting party, gather the following information:
    1. Name and contact information of the reporting party, if willing to provide.
    2. The nature of the reported problem.
    3. The location of the reported problem.
    4. Names of operators or landowners involved, if known.
  - e. Provide information to the reporting party as indicated in this document, including the contact information for the ODF contact.
  - f. Advise reporting parties as follows:
    - i. For a health or safety emergency, contact 911 or the Oregon Poison Center. Clarify that PARC is not an emergency service.
    - ii. For a non-emergency health problem, contact a health care provider.
    - iii. If reporting personal health information, report it to PARC and not to ODF; PARC will be able to withhold the information from public disclosure, while ODF may not be able to do so.
    - iv. Provide contact information for PARC to reporting parties, who may contact PARC directly. PARC will advise other agencies that need to be involved.

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<sup>3</sup> See Attachment 1 for a more detailed list of information required in the notification of operations.

<sup>4</sup> See OAR 629-620-0600 in Attachment 1 for a list of information that must be recorded.

<sup>5</sup> ODF will strive to achieve this and other response times in all instances, but fire emergencies or other circumstances may unavoidably lengthen ODF's response times in some situations.

- g. Inform reporting parties of ODF's planned next steps, including timelines.
  - h. Hold any personal medical information received from PARC as exempt from public exposure. ODF rarely receives such information from PARC, typically only for PARC Board-related business (not for ODF investigations).
  - i. Treat all reporting parties with respect. Avoid downplaying concerns over pesticide use.
  - j. Describe the coordinated federal-state scheme of pesticide regulation and refer concerned persons to sources of pesticide-related information such as the Oregon Poison Center and the National Pesticide Information Center.
  - k. Forward reported information to PARC within one business day of ODF receipt when the information involves reports of adverse effects from pesticides on human health or property (including pets or other domestic animals), or the environment. ODF will forward complaints or reports related to the following:
    - i. Ongoing or completed pesticide applications or activities;
    - ii. Reports regarding specific pesticide applications or activities that have not yet occurred. This does not include reports of concerns about pesticide use in general.
  - l. Determine if a reported situation is related to activities subject to the FPA.
    - i. If it is, ODF will open an investigation in coordination with other involved agencies.
    - ii. If it is not, ODF will refer the report to the appropriate agency or entity, including PARC.
- II. If a reported situation is related to activities subject to the FPA, ODF will investigate to evaluate compliance with the regulations in that law.
- a. If a report involves an ongoing operation, ODF will visit the activity site within one business day of receiving the report.
  - b. If an ongoing operation is not involved, ODF will visit the site as soon as is feasible, but typically within three business days of receiving a report.
  - c. Upon discovery of a violation of the regulations of the FPA, ODF may take enforcement action, including an order to stop any ongoing violations, and to repair natural resource damage.
  - d. ODF will document investigation results using its Complaint Report Form, shown in Attachment 2.
  - e. ODF will communicate ODF investigation results to reporting parties and to PARC and member agencies. Typically, ODF investigations will be complete within 120 calendar days of receiving a complaint or report about a pesticide application or activity that was in progress or had already occurred at the time of the report.
- III. If PARC notifies ODF that a member agency investigation of a forest pesticide application has been opened, ODF will open an investigation of the application for compliance with FPA standards and will coordinate the investigation with PARC and member agencies.
- IV. In consultation with PARC and member agencies, ODF will provide PARC with information from the ODF notification of operation database or ODF files.

- V. ODF will obtain application information from an operator under the following conditions:
  - a. Upon request from PARC. Based on the data requested, ODF may need to obtain the daily chemical application records from the operator. In that case, ODF will forward the records to PARC. Where the request is for an Oregon Health Authority (OHA) Public Health Assessment or Exposure Investigation, ODF will follow the procedures outlined in the ODA/ODF document titled “Pesticide Data Use Request” (see Appendix 12, Attachment 5).
  - b. When ODF opens an investigation related to compliance with the FPA, ODF will obtain the daily chemical application records from the operator.
- VI. When ODF receives daily chemical application records from operators under the authority of OAR 629-620-0600, ODF will:
  - a. Review the records for compliance with FPA standards.
  - b. Forward the records to the Oregon Department of Agriculture (ODA) through PARC to allow ODA to review the application data for compliance with standards in pesticide product labels and/or Oregon’s Pesticide Control Law.
- VII. Where ODF or other agency investigations involve large amounts of notification or application record data, ODF will provide GIS-related services to manage the data, in coordination with PARC and member agencies.
- VIII. ODF will respond as follows to public requests for information on pesticides that have been applied:
  - a. If an interested party requests information on forest pesticide applications, ODF will provide any information currently in its notification of operation database<sup>6</sup> or other files, including any information it has received on what was actually applied.
  - b. ODF does not have the resources to respond to public requests to obtain daily application records when there is not an ODF or PARC member agency-based need to obtain the records. If ODF has already obtained the records or plans to obtain them, ODF will provide the records to the requesting party. ODF will encourage concerned citizens to contact the landowner and/or operator for information on what was applied.
  - c. Health care providers may request information on pesticides that were applied at a specific place and time. Within one business day of receiving such a request, ODF will refer the request to PARC for follow up based on PARC standard operating procedures.
- IX. Any notification or application information ODF holds is public record. ODF will provide such information to requesting parties as soon as is feasible, based on state public records law.
- X. ODF will review available information to determine if there may be violations of pesticide product label standards or Oregon’s Pesticide Control Law. ODF will forward any indications of potential violations to PARC for referral to ODA.

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<sup>6</sup> Additionally, ODF has a fee-based, automated subscription system that allows interested parties to receive copies of notifications before the listed activities begin. Notification information is also available via standard public records requests.

- a. The ODF review will be a relatively coarse review of available information, designed to determine if referral to ODA is needed. ODA has the needed authority, knowledge, and expertise to evaluate compliance with pesticide product label standards and Oregon's Pesticide Control Law.
  - b. ODF will inform reporting parties and persons named on any related notifications of operations of potential noncompliance and/or referrals to ODA under item X.a. above.
- XI. ODF will continually coordinate with and provide information to PARC and/or member agencies during investigations conducted by ODF or other agencies.
  - a. ODF will share information, including interim investigation reports, with PARC and member agencies on an ongoing basis.
  - b. ODF will provide PARC and member agencies a final report within five business days of completion of an ODF investigation. If enforcement action is needed, there may be an extended timeline for completion of the final report. In that instance, ODF will continue to provide interim reports.
- XII. Information to Reporting Parties
  - a. As appropriate for each situation, ODF will provide interim reports back to reporting parties. One example might be reporting back on a question of whether a person applying pesticides on forestland had filed a notification of operations with ODF.
  - b. ODF will provide reporting parties with a final investigation report within five business days of completion of an ODF investigation. Reports may be verbal (in person or telephone) for relatively simple incidents, and in writing (including email or similar media) for more complex investigations.
  - c. At any point in an investigation, upon request, ODF will provide reporting parties or other interested parties with information it holds.
- XIII. ODF will coordinate with and assist ODA when sample collection may be needed. ODF has neither the resources nor the expertise to collect and/or analyze samples, so this work will be in support of ODA, which would be the lead agency.
- XIV. In coordination with PARC and member agencies, ODF will provide public information support for working with the media and for responding to public information requests.

## ODF Attachment #1

### Statutes and Rules Related to Forest Pesticide Regulation

- Oregon Forest Practices Act. ORS 527.610 to 527.770, 527.990(1) and 527.992.  
[https://www.oregonlegislature.gov/bills\\_laws/lawsstatutes/2013ors527.html](https://www.oregonlegislature.gov/bills_laws/lawsstatutes/2013ors527.html)
- ORS 527.630. Describes the policy of the State of Oregon regarding regulation of forest practices.  
[https://www.oregonlegislature.gov/bills\\_laws/lawsstatutes/2013ors527.html](https://www.oregonlegislature.gov/bills_laws/lawsstatutes/2013ors527.html)
- Oregon Forest Practice Rules. OAR chapter 629, divisions 600 through 680.  
[http://arcweb.sos.state.or.us/pages/rules/oars\\_600/oar\\_629/629\\_tofc.html](http://arcweb.sos.state.or.us/pages/rules/oars_600/oar_629/629_tofc.html) (use this link to access Oregon Administrative Rules cited below)
- Requirements for Notifications of Operations to ODF
  - Information required in a notification of operations to ODF is described in the following:
    - Name and contact information of the operator and landowner
    - Description of the nature, location, method, and general timing for any planned activities
    - For pesticide application, the notification must include specific active ingredients of pesticides to be used (and the product brand name if known at the time of notification), and any other products that will be added to spray mixes. The notification must also describe whether the application will be by aerial or ground-based methods.
  - More detail on notification of operations requirements are available in:
    - ORS 527.670(6), (7), and (8).
    - OAR 629-605-0140 and 629-605-0150
- OAR 629-674. Outlines the fee-based system for interested parties to receive copies of notifications.
- OAR 629-620. Chemical and Other Petroleum Product Rules. Outlines the specific resource protection requirement for forest pesticide application.
- OAR 629-620-0600. Outlines daily application record requirements as follows:

#### 629-620-0600 Daily Records of Chemical Applications

(1) Whenever pesticides are aerially applied or applied using a pressurized, ground-based, broadcast application system on forestland, the operator shall maintain a daily record of application operations which includes:

- (a) The legal description of the location of the operation area actually treated with chemicals;
- (b) The acreage actually treated with chemicals;
- (c) Brand name or EPA registration number of the chemicals used, the carrier used, and the application rate;
- (d) Date and time of application;
- (e) Air temperature, to be measured within the operation area and recorded at least hourly for aerial applications and at least at the beginning and end of each day's application for ground applications;

(f) Relative humidity, to be measured within the operation area and recorded at least hourly for aerial applications and at least at the beginning and end of each day's application for ground applications;

(g) Wind velocity and direction, to be measured within the operation area and recorded at least hourly for aerial applications and at least at the beginning and end of each day's application for ground applications;

(h) The name of the person making the application, including the contractor's name and pilot's name when applied aerially, or the contractor's name and/or employee's name for ground application.

(2) Whenever pesticides are applied on forestland using methods other than those described in section(1) of this rule, the operator shall maintain a daily record of all information listed in subsections (a), (b), (c), (d), and (h) of section(1).

(3) Whenever fertilizers are applied on forestland, the operator shall maintain a record of all information listed in subsections (a), (b), (d), and (h) of section(1) of this rule and shall also record the application rate and the formulation used.

(4) The records required in sections (1), (2) and (3) of this rule shall be maintained by the operator for three years from the date of application and be made available at the request of the State Forester.

1. Oregon Department of Forestry Forest Practices Note Number 3: Chemical and Other Petroleum Product Rules, at <http://www.oregon.gov/odf/privateforests/docs/fpnote3chemv6.pdf>.
2. Oregon Department of Forestry Complaint Investigation and Reporting Procedures (available upon request)
  - a. ODF Complaint Investigation and Reporting Policy
  - b. ODF Complaint Investigation and Reporting Procedures
  - c. ODF Complaint Investigation and Reporting Guidance
3. Oregon Department of Agriculture/Oregon Board of Forestry Memorandum of Agreement: Regulation of Forest Pesticide Use (available upon request)

**ODF Attachment 2**  
**Oregon Department of Forestry Oregon Forest Practices Act Complaint**  
**Investigation Form**

**OREGON DEPARTMENT OF FORESTRY**

**FORM 6-4-1-100**

**OREGON FOREST PRACTICES ACT**  
**COMPLAINT INVESTIGATION REPORT**

COMPLAINT FROM (Name) \_\_\_\_\_  
(Organization) \_\_\_\_\_  
(Address) \_\_\_\_\_  
(Phone) \_\_\_\_\_

COMPLAINT RECEIVED BY (Name) \_\_\_\_\_  
(Title) \_\_\_\_\_  
(Office) \_\_\_\_\_  
(Date) \_\_\_\_\_ (Time) \_\_\_\_\_

COMPLAINT RECEIVED VIA  Phone  Mail  
 In Person  Other \_\_\_\_\_

COMPLAINT INVESTIGATED BY (Name) \_\_\_\_\_  
(Title) \_\_\_\_\_  
(Office) \_\_\_\_\_  
(Date) \_\_\_\_\_ (Time) \_\_\_\_\_

LOCATION OF COMPLAINT (Legal) \_\_\_\_\_  
(Landowner) \_\_\_\_\_  
(Stream Name) \_\_\_\_\_

DESCRIPTION OF COMPLAINT \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
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INVESTIGATION RESULTS: GENERAL \_\_\_\_\_

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INVESTIGATION RESULTS: DAMAGE (Type) \_\_\_\_\_  
(Extent) \_\_\_\_\_  
(Operator) \_\_\_\_\_  
(Rules Violated) \_\_\_\_\_

INVESTIGATION RESULTS: FOLLOW-UP ACTION

- Described investigation findings and follow-up action to complainant
- Citation issued  Court appearance required
- Repair order issued Date repair to be completed \_\_\_\_\_
- Referred to another agency for investigation

REMARKS \_\_\_\_\_

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- DISTRIBUTION
- ODF Area Office
  - ODF Private Forests Field Support Unit
  - ODF Public Information Officer
  - Department of Agriculture
  - Department of Environmental Quality
  - Department of Fish & Wildlife
  - Department of Geology & Mineral Industries
  - Division of State Lands
  - Pesticide Analytical and Response Center
  - \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

## **Appendix 6**

### **Oregon Department of Environmental Quality, Standard Operating Procedures Relating to Pesticide Complaint Intake, Response and Referral Process**

#### **Introduction/Purpose**

The Oregon Department of Environmental Quality (ODEQ) administers the regulations of the Clean Water Act (CWA), the Clean Air Act (CAA), Resource Conservation and Recovery Act (RCRA), and Oregon's Groundwater Quality Protection Act. The purpose of this Standard Operating Procedures (SOP) is to outline procedures for response to pesticide-related incidences. This document outlines the complaint intake, actions taken by staff during response to the incident and follow-up with the Pesticide Analytical and Response Center (PARC).

#### **Scope**

ODEQ has two distinctly different processes that are followed depending on the nature of the pesticide incident. The first being that of Emergency Response when ODEQ is notified of a spill or release of a pesticide from the Oregon Emergency Response System (OERS). The second process is that of a complaint received from our complaint intake system. This SOP will focus on the complaint process and not the emergency response through OERS. Additional information about Emergency Response can be found here <http://www.deq.state.or.us/lq/cu/emergency/>. DEQ's objective when responding to a complaint is to work cooperatively with ODA and other agencies to determine if there is a violation of the general pesticide permit (2300 permit), a possible misuse of a pesticide that has impacted a drinking water source or ground water, or improper disposal of solid waste containing pesticides.

#### **Standard Operating Procedures**

##### **I. DEQ Complaint Intake Procedure**

Pesticide incidents may be received via Web form<sup>7</sup> or by phone from the public or other agencies referring an incident to ODEQ. When a complaint intake specialist receives a call involving a pesticide incident that needs emergency response, get the calls immediately to the Oregon Emergency Response System (OERS) at 800-452-0311 using ODEQ standard spill procedures. Also forward the information to PARC Coordinator. Do not log this as a complaint but log call in the phone log.

If PARC or another agency is calling ODEQ to inform us of a pesticide complaint investigation, log the information as a complaint and assign it to the appropriate regional contact and ODEQ PARC board member.

If a citizen reports a pesticide complaint, log the complaint into the database and assign it to the appropriate regional contact and ODEQ PARC board member. If it is a caller, inform them that the complaint will be forwarded to PARC and the appropriate agency may be in contact. Forward complaint to the PARC Duty Officer within one business day of the complaint:

Oregon Department of Agriculture  
Pesticide Analytical and Response Center (PARC)  
503-986-6470 or [parc@oda.state.or.us](mailto:parc@oda.state.or.us)

The intake specialist will document general information about the complaint:

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<sup>7</sup> See website <http://www.deq.state.or.us/complaints/>

- a. Information about the complaint
  - a. Complainant Name and contact information. This is optional and can complaints can be made confidentially over the phone and by web form.
- b. Description of the Incident
  - a. Date/Time
  - b. Description of the incident
- c. Location of Incident
  - a. Address
  - b. Any waterway information
  - c. Any other description that may be helpful (north side of the barn, west of the circle irrigation, etc.)
- d. Potentially Responsible Party
  - a. Name
  - b. Address
- e. Others that have been notified
  - a. Other agencies that were notified (federal, state or local)

**II. DEQ Complaint response procedure**

- a. ODEQ regional staff will respond to complaints that occur in their region. Once the complaint is received, ODEQ staff will call the Oregon Department of Agriculture Lead Pesticide Investigator or Pesticides Program Manager to exchange information about the incident and determine next steps that will have ODEQ involvement. In the case of a complaint received directly by ODEQ from a citizen, ODEQ and ODA will attempt to discuss within two business days which agency will follow-up with the citizen.

ODA Pesticides Program at 503-986-4635

- b. The information gathered during the investigation will be documented in the Pesticide Incident Worksheet and attached to the complaints database. In addition, any documents, pictures or other information will be stored in the complaint database.
- c. In the case of an incident involving potential risk to groundwater, the groundwater risk assessment information will be used to help inform the significance of the risk. ODEQ groundwater staff or drinking water source protection staff may be called upon for assisting the investigation and understanding the relative risk that the incident has on the environment.
- d. Once information about the incident is gathered, ODEQ staff will update their manager and the ODEQ PARC board member with details of the incident and any recommendations for next steps. ODEQ will coordinate with other agencies on additional next steps that may include but not limited to: additional sampling, follow-up interviews, or enforcement. The regional manager will have the final decision on what additional response to the incident, if any, that ODEQ may have.
- e. Once the complaint and next steps are complete the staff will close the complaint in the database. The goal is to complete all complaint investigations within 90 days.

**Attachment A  
ODEQ Pesticide Incident Worksheet**

<b>General Information</b>			
Complaint #		DEQ Staff Name	
Inspection Date		ODA Inspector Name	
OERS Number		ODA Inspector Phone #	

**General Pesticide 2300 Permit Questions**

<b>Question</b>	<b>Answer</b>	<b>Additional information</b>
Does the application fall under the general pesticide 2300 permit?	<p align="center">Yes    No</p> <p align="center"><input type="checkbox"/>    <input type="checkbox"/></p> <p>If No Skip to next section</p>	
Does the responsible party need to register for the Permit?	<p align="center">Yes    No    N/A</p> <p align="center"><input type="checkbox"/>    <input type="checkbox"/>    <input type="checkbox"/></p>	
Is the responsible party registered if required?	<p align="center">Yes    No    N/A</p> <p align="center"><input type="checkbox"/>    <input type="checkbox"/>    <input type="checkbox"/></p> <p>If yes fill in Permittee information table</p>	
Did the application meet the requirements of the permit?	<p align="center">Yes    No    N/A</p> <p align="center"><input type="checkbox"/>    <input type="checkbox"/>    <input type="checkbox"/></p>	

<b>Permittee Information</b>	
Name of Permittee	
DEQ Permit No.	
Address of Location	
Operator	
Operator Contact(s)	
Operator Personnel	
Other(s)	

**General Environmental risk/impact questions**

Question	Answer	Additional information
Are there public drinking water supplies within vicinity of the incident?	Yes      No <input type="checkbox"/> <input type="checkbox"/>	
Were there any private drinking water sources that may be impacted? (Ground or surface waters)	Yes      No N/A <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
Was there any apparent loss to wildlife or death/distress of non-target organisms observed?	Yes      No N/A <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
Were surface waters impacted?	Yes      No N/A <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	
Are surface waters in vicinity already impaired for pesticides on state list	Yes      No N/A <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	

**Observations**

List any observations made by agency staff or through interviews. Information may include the following:

- Effect of incident & species involved: type, number dead, number distressed
  - Area of water affected
  - Application rate and where: water's edge, canopy, in water
1. Are lab samples needed: water, foliage, soil

Observations

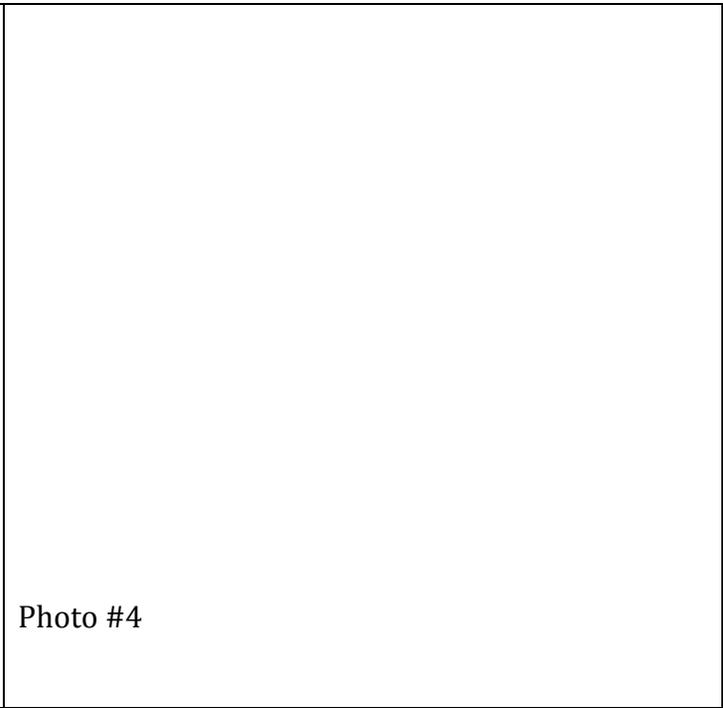
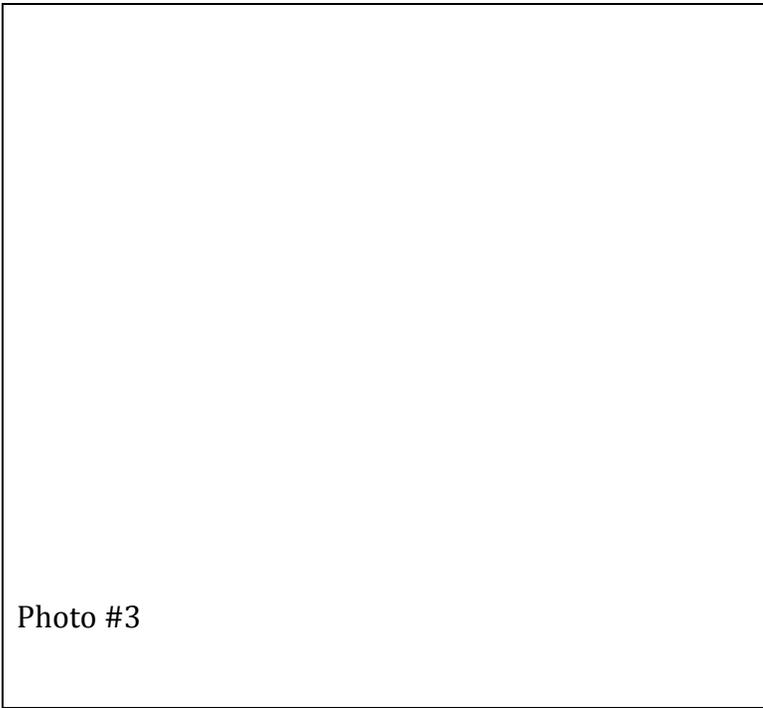
**Observations**

List any findings that would be a violation or non-compliance to the 2300 permit. Possible reasons may include:

- 2. Records not up to date
- 3. Application did not follow the label requirements
- 4. Spill or non-target species were impacted not reported

<b>Violations/Non-Compliance to 2300 permit</b>

DEQ Inspection Photo Log			Inspection Date	
Facility Name		ID#	Photographer	
Photo #1			Photo #2	



DEQ Inspection Photo Log				Inspection Date	
Facility Name		ID#		Photographer	

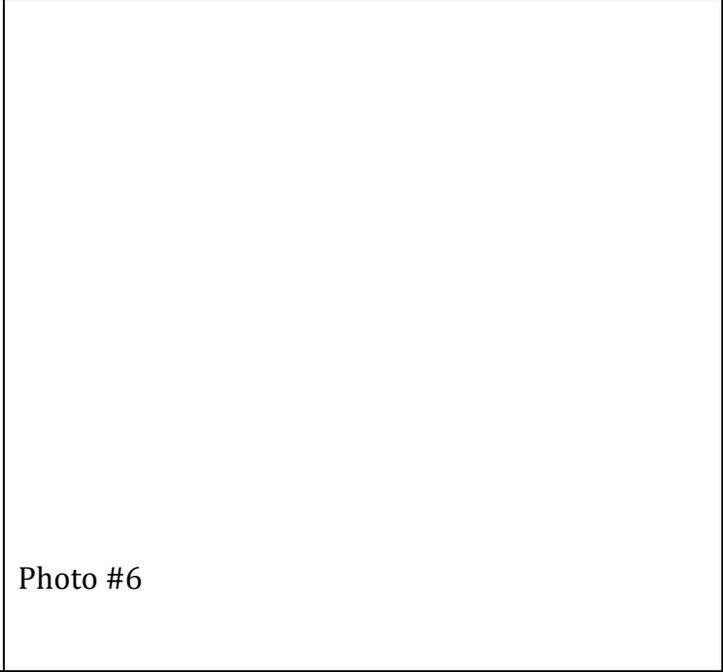
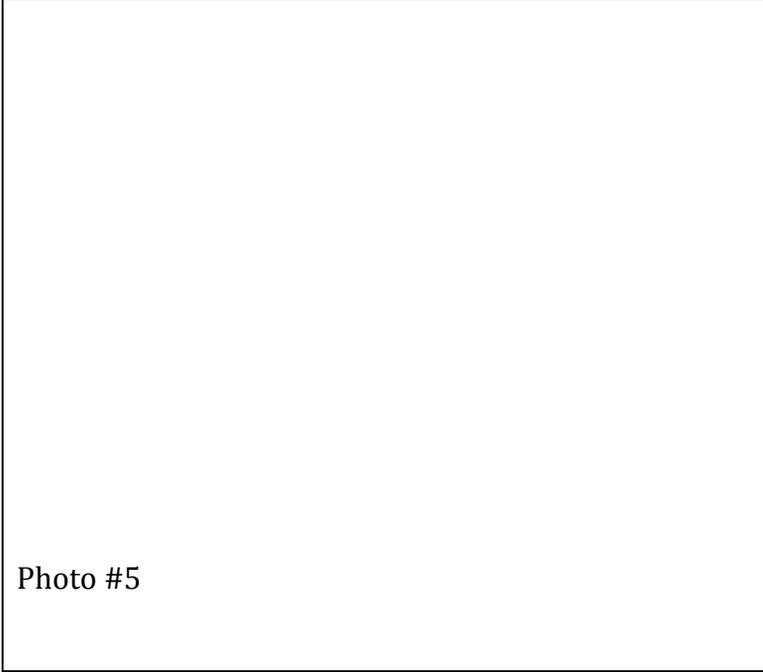


Photo #3

Photo #4

## **ODEQ Decision Tool To Be Used To Determine When To Test For Groundwater Contamination**

***Purpose*** – The purpose of this document is to describe the process to be used to determine when it is appropriate to test groundwater for contamination resulting from a pesticide-related incident (e.g., suspected spill or inappropriate application). Due to the specific details surrounding a pesticide-related incident, it is not always useful, practical, or possible to test groundwater for pesticide contamination.

***Rationale*** – It is unlikely that groundwater in the vicinity of a pesticide-related incident has been analyzed for pesticides, particularly recently and for the pesticide of concern. Pesticide-related incidents that could result in a recommendation for further investigation include those in which a pesticide is likely to be found in groundwater, as well as incidents where a pesticide is less likely to be found in groundwater but is highly toxic.

***Aspects to Consider in Decision Making*** - The decision to test for a pesticide will be based on an evaluation of the depth to groundwater, soil drainage characteristics, the amount and timing of pesticide used, the physical properties of the pesticide that affect its movement in the environment, and its toxicity and potential health effects. While the decision tool quantifies some aspects of pesticide movement and aquifer vulnerability, the decision to recommend sampling or not will ultimately be made by a professional with experience in groundwater contamination using the information generated by this process and their best professional judgment.

***Decision Tool Steps*** – The following steps are to be followed when using the Decision Tool:

*(1) Estimate the Depth to Groundwater* – A shallow water table (e.g., less than 50 feet) is more vulnerable to contamination than a deep water table.

*(2) Estimate the soil drainage characteristics* – Well-drained soils are more likely to leach chemicals than poorly draining soils

*(3) Estimate Amount and Timing of Pesticide Use* – A higher volume of pesticide used generally equates to a higher potential for contamination.

*(4) Compile and Record Physical Properties* - The physical properties that affect pesticide movement in the environment (i.e., adsorption coefficient, soil half-life, and solubility) should be identified. A pesticide held strongly to soil particles is less likely to leach. Highly soluble pesticides are likely to be removed from the soil by runoff or by leaching below the root zone. A pesticide that is rapidly broken down by a degradation process is less likely to leach because it may remain in the soil only a short time.

### **Pesticide Physical Properties as Relative Risk Factors for Groundwater Contamination**

<b>Physical Property</b>	<b>Relevance</b>	<b>Low Risk</b>	<b>Medium Risk</b>	<b>High Risk</b>
Adsorption Coefficient (Koc) <i>unitless or ml/g</i>	A pesticide held strongly to soil particles is less likely to leach.	> 1,000	300 to 1000	< 300

Solubility <i>mg/l</i>	Highly soluble pesticides are likely to be removed from the soil by runoff or by leaching below the root zone.	< 1 mg/l	1 to 30 mg/l	> 30 mg/l
Soil Half-Life <i>Days</i>	A pesticide that is rapidly broken down by a degradation process is less likely to leach because it may remain the soil only a short time.	< 30 days	30 to 100 days	>100 days

(5) *Compile and Record Toxicity Information* – The more toxic a chemical is, the greater the importance to know its potential impacts.

(6) *Calculate a Pesticide Movement Rating* - Using the soil half-life and soil adsorption coefficient, a “Pesticide Movement Rating” of “extremely low” through “very high” should be calculated.

(7) *Calculate a Physical Property Risk Factor* - Using the adsorption coefficient, soil half-life, and solubility, a “Physical Property Risk Factor” should be calculated.

(8) *Flag Potential Analyte* – A pesticide should be flagged as a potential analyte if it exhibits a moderate to very high Pesticide Movement Rating, a Physical Property Risk Factor of 7, 8, or 9, a large quantity used, or a “standard” of  $\leq 0.1$  mg/l . A pesticide should also be flagged as a potential analyte if the depth to groundwater is less than 50 feet and/or the soil drainage characteristics are well drained to excessively well drained.

(9) *Refine Potential Analyte List* – A pesticide could be eliminated from the Potential Analyte List based on a qualitative evaluation of amount and timing of pesticide used, its physical properties, and its toxicity.

(10) *Identify Analytical Capability* - Not all potential analytes have a readily available analytical test method. The analytical methodologies capable of quantifying each of the potential analytes should be researched to determine the possibility of analyzing groundwater for the pesticide of interest.

(11) *Determine Appropriate Response* – Based on the relative risk associated with the pesticide-related incident, the analytical capability to analyze the pesticide, and other site-specific considerations, a decision should be made if, who, and when groundwater sampling should occur. The decision could be that a State Agency (e.g., DEQ) should conduct sampling, the pesticide applicator should conduct sampling, property owners should conduct sampling, or no sampling is warranted.

This information along with any historical environmental data should be used in determining if any additional steps should be taken in the investigation. In addition the risk information should be passed along to the ground water monitoring group for potential follow-up in site section during statewide ground water monitoring efforts.

**Appendix 7**  
**Oregon Department of Agriculture Standard Operating Procedures**

<b>OREGON DEPARTMENT OF AGRICULTURE</b>		<b>Page</b> 1 of 4
<b>Subject:</b> Pesticides Program, Standard Operating Procedure, Pesticide Complaint Intake and Referral Process		<b>Adoption Date:</b> 11/21/2014
<b>Prepared by:</b> Mike Odenthal, Pesticide Lead Investigator	<b>Approved by:</b> Dale Mitchell, Pesticide Program Manager	<b>Revision Date:</b> 12/15/14

**I. Introduction/Purpose**

The Pesticides Program seeks to protect people and the environment from adverse effects of pesticide use while maintaining the availability of pesticides for beneficial uses. This includes regulating the formulation, distribution, storage, transportation, application, and use of pesticides. Investigative findings may result in enforcement actions as authorized by statute. The program also provides educational assistance to the public and pesticide users, and provides compliance assistance.

This document, in combination with the Investigator Notebook, covers all aspects of an Investigator’s activities, including types of investigations and how to conduct them, how to sample, and how to use the Investigator database (database user guide). Additionally, it establishes uniform procedures to respond to pesticide complaints and referrals, for example notifications to the Pesticide Analytical and Response Center (PARC).

In addition, this document facilitates the timely transfer of pesticide incident information and coordination between PARC member agencies. Each agency has developed Standard Operating Procedures (SOPs) as a supplement to the statewide document “Coordinating Pesticide Incidents in Oregon”. The individual SOPs outline the statutory authority, pesticide-related jurisdiction(s), and/or areas of expertise for each member agency.

**II. Scope**

Oregon Department of Agriculture (ODA), Pesticides Program, is the state lead agency regulating the formulation, distribution, storage, transportation, application, and use of pesticides in the State of Oregon. In carrying out and enforcing the provisions of ORS 634, ODA may establish limitations and procedures deemed necessary and proper for the protection of persons, pollinating insects, bees, animals, crops, wildlife, land, or environment.

**III. Standard Operating Procedure**

Following is the process that ODA follows when a pesticide complaint is received from a complainant directly (via phone call, email or other). The PARC Coordinator and other

agencies also might provide referrals to the Lead Investigator when a complaint is received. The Lead Investigator assigns the referral to an Investigator. The goal is for cases to be completed or an enforcement action issued within 120 days or less.

**Note: If immediate medical attention is needed, individuals are directed to contact the Oregon Poison Center at 800-222-1222.**

4. When a complaint is received, the complainant is contacted within (1) business day or as staff availability allows. Complainant's contact information including name, address, telephone number(s), and email address is collected.
5. Specific information from complainant regarding the concern, such as the following, is collected:
  - a. Nature of incident
  - b. Date and time of incident
  - c. Type of application
  - d. Name of applicator
  - e. Location (type) and address of incident: farm, home, business
  - f. Any adverse effects on humans, animals, or the environment
  - g. Contact information for applicator and/or other witnesses or parties involved
6. When adverse health effects to humans are described, the complainant is advised to contact his or her health care provider or Oregon Poison Control Center at 800-222-1222. When adverse health effects to domestic animals are reported, the complainant is advised to contact his or her veterinarian or the local animal emergency clinic. Contact information for animal health care provider is collected, if available.
7. The complainant is provided the ODA Pesticide Complaint Form. The complainant is requested to complete and submit the form to the Department (see Investigator Notebook Appendix for example; editable pdf version available on Investigator Wiki).
8. The investigative process and ODA Pesticides Program regulatory authority is explained in the ODA Pesticide Investigator Notebook.
9. The complainant is provided ODA contact information (phone number and email) and a time to meet with the complainant is requested. The complainant is informed that the ODA contact will serve as the primary point of contact for any questions or information related to the compliance investigation (See Communications Section of Investigator Notebook).
10. When adverse health effects to humans, animals, or the environment are alleged (including pre-application concerns), the complainant is informed that their concerns will be referred to PARC. Send an email ([PARC@oda.state.or.us](mailto:PARC@oda.state.or.us)) to the PARC Coordinator with the case number, complaint form (if completed), and any other

available information (e.g., health care provider information, veterinarian contact information).

- a. When the allegation involves a human death or hospitalization due to pesticide exposure, the PARC Coordinator is notified immediately.
- b. All other PARC-related complaints are provided to the PARC Coordinator within (1) business day or as soon as possible.

11. Lead Investigator is informed of the complaint.

12. The Investigator Notebook provides specifics on conducting the investigation and continuing communication with the complainant and other involved parties.

13. Complaints that reveal issues related to the regulatory and non-regulatory authority of other state or federal agencies such as OR-OSHA, ODF, DEQ, ODFW, OHA, OSP, US EPA, USFWS, USDA APHIS, and FAA will be evaluated by the Lead Investigator or Program Manager. When appropriate, agency representatives are contacted as soon as possible to determine whether additional sampling or evidence could be secured while performing complaint site visit and evaluation. It may also be appropriate to conduct a joint investigation with the following relevant agencies:

- OR-OSHA — Any workplace pesticide exposure injury. OR-OSHA has protocols that its employees must follow for their investigations. This includes not contacting employers prior to a site visit. ODA will contact and coordinate any follow-up or joint site visits with OR-OSHA staff.
- ODF — State and private forestland pesticide incidents can fall within the Oregon Forest Practices Act. ODA will contact and coordinate any follow-up or joint site visits with ODF staff.
- DEQ — Allegations of adverse impacts to the environment, air, soil, or water quality issues can involve DEQ. ODA will contact and coordinate any follow-up or joint site visits with DEQ staff.
- ODFW — Incidents involving fish and wildlife or damage to habitat may involve ODFW. ODA will contact and coordinate any follow-up or joint site visits with ODFW staff.
- US EPA — If the incident meets Significant Case criteria as defined in the US EPA/ODA Cooperative Agreement, the Lead Investigator will coordinate with USEPA Region 10 staff any follow-up or joint site visits.

14. All requests from media or other parties not directly involved in the investigation are directed to the Program Manager or Lead Investigator. Program Manager and Lead

Investigator will coordinate responses with ODA Director of Communications and other agency representatives.

15. The Case Reviewer/Enforcement staff emails a copy of the case report to the PARC Coordinator when "Refer to PARC?" is checked "Yes" on the Overview Tab and the case is completed or an enforcement action is issued. In addition, a notice of case completion or actions taken are issued to parties involved when the case is completed.

#### **IV. Reference Information**

(Reference to documents identified within this SOP are maintained by ODA Pesticides Program and available upon request.)

1. ODA Pesticide Investigator Notebook
2. ODA Pesticide Complaint Form
3. Notice of Case Completion or Actions Taken
4. US EPA/ODA Cooperative Agreement
5. Pesticide Use Data Request (ODA, ODF, OHA) See Appendix 12, Attachment 5

**Appendix 8**  
**Oregon Department of Fish and Wildlife Standard Operating Procedures for Pesticide-Related Incidents**

	<b>Oregon Department of Fish and Wildlife  Standard Operating Procedures  for Pesticide-Related Incidents</b>		
Prepared by: Danette Faucera, Water Policy Coordinator	11/20/14	Version 1.0	

**I. Introduction**

The Oregon Department of Fish and Wildlife’s (ODFW) mission is to protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations. One means of implementing ODFW’s mission involves coordinating with other State and federal agencies, including the Pesticide Analytical and Response Center (PARC), on pesticide-related incidents involving a suspected fish or wildlife poisoning or a spill that affects fish and wildlife and/or their habitat. Pesticide incidents may involve referrals from PARC or other entities, require notification to PARC and/or the Oregon Emergency Response System (OERS), and may involve concurrent investigations with PARC member agencies and/or the federal government.

In order to facilitate the timely transfer of incident information specifically between PARC and its member agencies, each member agency has developed Standard Operating Procedures (SOPs) as a supplement to the statewide document “Coordinating Oregon’s Response to Pesticide Incidents”. The individual SOPs outline the statutory authority, pesticide-related jurisdiction(s), areas of expertise, and investigative procedures for each member agency.

**II. Purpose**

The purpose of this document is to establish uniform procedures to make pesticide-related incident referrals (e.g., notifications to PARC and/or OERS) and to describe ODFW’s actions following notification of a pesticide-related incident involving a suspected fish or wildlife poisoning or a spill that affects fish and wildlife and/or their habitat.

These procedures will guide ODFW staff in the response and investigation of natural resource losses or destruction and injury of fish, wildlife, and their habitat specifically related to pesticide incidents.

Note: ODFW intends to use this document as a supplement to ODFW’s “Draft Natural Resource Losses Response, Investigation, and Wildlife Rehabilitation Procedures Manual” (May 2013), which provides a more detailed procedure, investigation forms, and instructions. Applicable ODFW staff will be provided with this document and offered further guidance from the Water Policy Coordinator or Habitat Resources Program Manager in Headquarters, as needed (*see* **Contact Information**, Attachment A).

### **III. Scope**

These procedures apply to pesticide incidents that cause injury, death, contamination, or destruction of fish or other wildlife or injury or destruction of fish or wildlife habitat or from any violation of the conditions set forth in any permit, order, or rule of the Environmental Quality Commission that cause injury, death, contamination, or destruction to fish, wildlife, or their habitat. Specific responsibilities of ODFW personnel for incidents occurring in estuaries and the Pacific Ocean are outlined in “Protocol and Organizational Structure for Oil and Hazardous Spills in Marine and Estuarine Waters”, ODFW Marine Region, December 1992. More detailed information on ODFW’s role in pollution or hazardous material incidents can be found in the “Draft Natural Resource Losses Response, Investigation, and Wildlife Rehabilitation Procedures Manual”, ODFW, May 2013. ODFW will use the procedures described in these manuals to the extent practical given available personnel, resources, and technical and safety considerations specific to each incident. ODFW will review and update these procedures as needed.

### **IV. Standard Operating Procedures**

ODFW’s policy to investigate natural resource losses is governed by [OAR 635-410](#) (Natural Resource Losses), with further jurisdiction to seek compensation for damages provided under [ORS 468B.060](#) (Liability for Damage to Fish or Wildlife or Habitat) and the [Comprehensive Environmental Response, Compensation and Liability Act of 1980](#) (CERCLA). ODFW will implement OAR 635-410-0015 during the field investigation of the natural resource loss in order to:

- (1) Analyze and determine the cause(s) of losses;
- (2) Promptly respond to and mitigate losses;
- (3) Determine habitat or fish and wildlife management measures that may be required to restore fish and wildlife production in affected areas;
- (4) Determine violations of statute, rule or permits; and
- (5) Inform Department staff, other agencies, the general public and news media on the extent, nature, and causes of natural resource losses.

To implement the policies and procedures, ODFW will perform the following steps upon discovering or receiving a report of a suspected pesticide-related incident from the public or other entity (including PARC):

#### Step 1. Document Initial Information

ODFW shall be notified by PARC as soon as practical, within one business day, of any suspected pesticide-related poisoning of fish or wildlife or impact to habitat. Staff will document incoming information on ODFW’s Initial Report Form (Appendix B).

If ODFW discovers a pesticide-related incident or is notified of such by another source, staff will first document available information on the Initial Report Form .

#### Step 2. Notify Response Agencies

ODFW staff receiving an initial report will notify other appropriate ODFW staff, the State of Oregon Emergency Response System (OERS), and PARC, as applicable. Staff will share information recorded on the Initial Report Form (Appendix B).

ODFW will:

- Immediately report **pesticide spills** to OERS at 1-800-452-0311.
- Notify the PARC Coordinator at (503) 986-6470, (844) 688-7272, or [PARC@oda.state.or.us](mailto:PARC@oda.state.or.us) within one business day of any **non-spill incident related to pesticides** (e.g., label violations, drift resulting in injury, non-target impacts, etc.) that are alleged to have had an impact on human and/or animal health or the environment (air, soil, or water).
- Notify the District Biologist, Watershed/Region Manager, and Natural Resources Damage Assessment (NRDA) Coordinator of pesticide-related incidents involving a suspected fish or wildlife poisoning or a spill that affects fish and wildlife and/or their habitat.

### Step 3. Respond

When notified of a suspected fish or wildlife pesticide poisoning or spill that affects fish and wildlife and/or their habitat, ODFW District Biologists will confer with their Region or Watershed Manager and make a decision if an initial response per OAR 635-410-005 (Natural Resource Losses) is warranted based on available information. ODFW will base the response decision on suspected cause, species impacted, and extent of damage to fish and wildlife and their habitat (Table 1) and may respond with either an on-site assessment or technical advice. Response outside of normal business hours may be delayed as a call down list is initiated to contact appropriate field staff.

Initial response consists of emergency actions taken by agencies to gain control of the situation and to protect the public and the environment. ODFW's role in the initial response phase is to minimize impacts to fish and wildlife and their habitat. ODFW may assist in identifying potential fish and wildlife receptors, habitats, and resources that are at risk, assess extent of damage to the resource(s), collect specimens and samples, and identify laboratories for analysis. ODFW staff are not first responders, but select District staff have required basic training under [Federal OSHA law 29 CFR 1910.120 \(Hazardous Waste Operations and Emergency Response\)](#) and can assist with an investigation after a site is stabilized and declared safe to enter. Each District is equipped with a "Natural Resource Losses Investigation Kit," which is supplied with *basic* equipment for collection of specimens/samples and damage assessment. ODFW will collect fish, aquatic organisms, and wildlife (depending on the severity of the incident), but generally relies on the Department of Environmental Quality or the Department of Agriculture to take water quality, vegetation, and soil samples during a coordinated investigation because ODFW staff do not have adequate expertise or advanced equipment to do so. Advanced procedures pertaining to an investigation can be found in the "Draft Natural Resource Losses Response, Investigation, and Wildlife Rehabilitation Procedures Manual".

ODFW will:

- Determine if an on-site response is warranted per OAR 635-410-005 (Natural Resource Losses).
- Coordinate ODFW's initial field actions, when applicable, with incident command and/or other response agencies.

- Avoid entering contaminated areas, refrain from any investigation or wildlife rescue, work within potentially contaminated areas or work with potentially contaminated material or wildlife until incident command or a HAZMAT specialist from an emergency response agency has determined the identity of any hazardous materials, identified appropriate safety requirements, and authorized entry.
- Not enter potentially contaminated areas that require the use of respirators.
- Wear appropriate protective clothing and observe all other safety requirements prescribed by incident command and/or a HAZMAT specialist from an emergency response agency when working in potentially contaminated areas or working with potentially contaminated material or wildlife.
- Perform initial reconnaissance to determine the severity of impacts to fish, wildlife and their habitat (Table 1).
- Advise incident command, if established, of initial response measures to protect fish, wildlife and their habitat.
- Coordinate any required wildlife rehabilitation response.
- Keep accurate records of ODFW initial response activities (*see **Natural Resource Losses Investigation Report Form**, Appendix C*) and expenses.
- Coordinate with PARC, other applicable state and federal agencies, and the public throughout an investigation, as appropriate.

#### Step 4. Assess Damage

Damage assessment is the process of documenting and evaluating data from field investigations and other sources to determine injury to natural resources. ODFW is the lead state agency for damage assessment for fish and wildlife and their habitat. ODFW works with the federal fish and wildlife agencies, neighboring fish and game agencies, other trustees, and the potentially responsible party (PRP) in making a quantitative determination of the injury to fish and wildlife resources and in the determination of appropriate restoration measures.

ODFW typically undertakes the field investigation for damage assessment for smaller incidents using procedures outlined in this manual. For larger incidents, ODFW, together with the federal fish and wildlife agencies, may request that the PRP provide consultants and any other resources needed to conduct the field investigation according to a recommended plan of study.

ODFW will:

- Conduct a field investigation, if warranted, for damage assessment (Table 2; also see “Draft Natural Resource Losses Response, Investigation and Wildlife Rehabilitation Procedures Manual” for more detailed information on survey protocol)
- Count or collect samples (primarily dead, dying, or injured fish, aquatic organisms, and wildlife, but may also include water, vegetation, and soil)
- Ensure the proper care, custody and analysis of samples taken for evidence
- Keep accurate records of ODFW field investigation data and expenses
- Coordinate with PARC, other applicable state and federal agencies, and the public throughout an investigation

### Step 5. Follow Up

ODFW Administrative Rules for natural resource losses outline the basis for determining the monetary value of fish and wildlife destroyed or injured by a pollution incident (OAR 635-410-0030). The rules also provide the basis for determining appropriate restoration measures as well as administrative procedures for recovery of damages from the PRP and implementation of the restoration plan. As allowed under ORS 468B.060 (Liability for Damage to Fish or Wildlife or Habitat) and the Comprehensive Environmental Response, Compensation and Liability Act of 1980, ODFW may bring legal action, in coordination with the Attorney General, to recover the value of fish and wildlife injured or killed as the result of pollution or violation of the condition of any permit, and for all costs of restoring fish and wildlife production in affected areas, including habitat restoration.

ODFW will:

- Assist in the Damage Recovery Process described in OAR 635-410-0035 to recover the value of the loss and to restore wildlife productivity, when applicable
- Provide investigation forms and reports to PARC as they become available and/or at the conclusion of an investigation and to other interested parties as requested

Table 1. Information assessed by ODFW during an initial response to a pesticide-related incident to determine the severity of an incident.

	<b>Level 1</b>	<b>Level 2</b>	<b>Level 3</b>
# of Affected Fish and Wildlife	Few	Many	Numerous and/or affects to long-term productivity
Sensitive, Threatened, or Endangered Species	No	Potential	Yes
Critical Habitat	No	Potential	Yes
Geographical Area Impacted	Small (< 1/8 mile)	Local but significant	Extensive
Value of Habitat to Fish and Wildlife	Low	Important	High value for maintaining abundance or diversity
Longevity of Impact	No lasting damage	Short term	Long lasting, may require restoration
Suspected Violation	No	Yes	Major violation or release of hazardous materials
Equipment/Staff Needs	Region	Assistance needed	Large number of staff needed, specialized training and equipment
Expense to Agency	Low	Moderate staff time	Efforts to investigate, rehabilitate wildlife obtain compensation, and restore habitat result in much expense and major demands on staff time
Public/Media Interest	Low	Potential	High

Table 2. Investigative procedures performed by ODFW during an investigation of a pesticide-related incident.

	<b>Level 1</b>	<b>Level 2 and 3</b>
Initial Report Form	Yes	Yes
Investigation Form	Pages 1-2	Yes
Safety Clearance	As needed	Obtain permission to investigate only after the area is deemed safe to enter
State Coordination	Contact PARC	Region, HQ (request assistance), PARC, other responding agencies
Federal Coordination	As needed	USFWS and/or NOAA (federally-protected species such as migratory birds or threatened or endangered species)
Describe Habitat Damage	Yes	Quantitative estimates of habitat loss by type
Estimate Injury	Count dead and injured fish and wildlife by species	Estimate number of dead or injured fish and wildlife by species
Collect Samples	No	Collect samples of dead fish and aquatic organisms and wildlife as evidence (initiate chain of custody); collect samples of soil, water, and vegetation if appropriate agency experts are not available (initiate chain of custody)

**ODFW Attachment A**  
**ODFW Contact Information**

Oregon Department of Fish and Wildlife  
4034 Fairview Industrial Drive SE  
Salem, OR 97302  
(503) 947-6000  
<http://www.dfw.state.or.us/>

General Pesticide Issues:  
Danette Faucera, Water Policy Coordinator  
(503) 947-6092

Spills:  
Jon Germond, Habitat Resources Program Manager and OERS Contact (with 24-hr pager)  
(503) 947-6088

For local assistance during normal business hours, contact the closest ODFW field office:  
[http://www.dfw.state.or.us/agency/directory/local\\_offices.asp](http://www.dfw.state.or.us/agency/directory/local_offices.asp)

**Attachment B**  
**OREGON DEPARTMENT OF FISH AND WILDLIFE HAZARDOUS MATERIALS RELEASE**  
**INITIAL REPORT FORM**

I. Obtain Preliminary Information: \_\_\_\_\_

\_\_\_\_\_

Reported by: \_\_\_\_\_

Address: \_\_\_\_\_

Affiliation: \_\_\_\_\_

Phone: \_\_\_\_\_ Date of Report: \_\_\_\_\_ Time: \_\_\_\_\_  
(Month Day Year) AM or PM

Other agencies contacted/on scene:

Local Responders \_\_\_\_\_

DEQ \_\_\_\_\_

State Police \_\_\_\_\_

Tribes \_\_\_\_\_

DOI \_\_\_\_\_

Other \_\_\_\_\_

II. Get Information About HAZMAT Release:

A. Name of responsible party: \_\_\_\_\_

Address: \_\_\_\_\_

Affiliation: \_\_\_\_\_

Phone: \_\_\_\_\_

B. Date of release: \_\_\_\_\_ Time: \_\_\_\_\_  
(Month/Day/Year)

AM or PM

**OREGON DEPARTMENT OF FISH AND WILDLIFE HAZARDOUS MATERIALS RELEASE  
INITIAL REPORT FORM (Continued)**

III. Name of water body or other affected areas:

\_\_\_\_\_

\_\_\_\_\_

1. Location of release: \_\_\_\_\_

\_\_\_\_\_

(River mile, highway, milepost, township, range, section)

\_\_\_\_\_ County: \_\_\_\_\_

2. Release source or potentially responsible party: \_\_\_\_\_

\_\_\_\_\_

Materials involved (description and volume): \_\_\_\_\_

\_\_\_\_\_

3. Species of fish and/or wildlife affected and extent of damage: \_\_\_\_\_

\_\_\_\_\_

IV. Notifications

Have the following been notified?

Local Emergency Response Organization (911)	Yes		No		Time
(OERS) 1-800-452-0311					
ODFW Wildlife Division					
Regional Office					
Watershed District					
ODFW Office of Information & Education					

V. Prepared by: \_\_\_\_\_ Title: \_\_\_\_\_

Office: \_\_\_\_\_

Note: Send copy of this information to Headquarters Wildlife in Salem.

**Attachment C**  
**Oregon Department of Fish & Wildlife**  
**Natural Resource Losses Investigation Report Form**

A) Loss reported by: \_\_\_\_\_

Street: \_\_\_\_\_ City: \_\_\_\_\_ Zip: \_\_\_\_\_

Date: \_\_\_\_\_ Time: \_\_\_\_\_ Phone: \_\_\_\_\_ Mobile: \_\_\_\_\_

B) Name of water body or locality: \_\_\_\_\_

River Mile (RM): \_\_\_\_\_ or Township: \_\_\_\_\_ Range: \_\_\_\_\_ ¼ Section: \_\_\_\_\_

Nearest landmark: \_\_\_\_\_ County: \_\_\_\_\_

C) Time and date loss first observed: \_\_\_\_\_

D) Time and date of investigation: \_\_\_\_\_

E) Duration of loss: From Time: \_\_\_\_\_ Date: \_\_\_\_\_

To Time: \_\_\_\_\_ Date: \_\_\_\_\_

F) Extent of the loss: \_\_\_\_\_

Stream Miles or Acreage: \_\_\_\_\_ (RM \_\_\_\_\_ to RM \_\_\_\_\_)

G) Species of fish/or wildlife affected: \_\_\_\_\_

\_\_\_\_\_

H) Condition of fish/or wildlife: (Check one or more)

Distressed	<input type="checkbox"/>	Dying	<input type="checkbox"/>	Recently Dead	<input type="checkbox"/>	Dead greater than 24 hours	<input type="checkbox"/>
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I) Physical appearance of dead fish: \_\_\_\_\_

J) Signs of distressed fish and wildlife: \_\_\_\_\_

K) Water conditions: Temp. (Degrees F) \_\_\_\_\_ Flow: (CFS) \_\_\_\_\_ Acre feet: (AF) \_\_\_\_\_

Clarity or other appearance: \_\_\_\_\_

**Oregon Department of Fish & Wildlife**  
**Natural Resource Losses Investigation Report Form (Continued)**

L) Suspected cause of loss: \_\_\_\_\_

M) Identity of potentially responsible party: \_\_\_\_\_

Street: \_\_\_\_\_ City: \_\_\_\_\_ Zip: \_\_\_\_\_

Phone: \_\_\_\_\_ Mobile: \_\_\_\_\_

N) Pollution source: \_\_\_\_\_

O) Identity and volume of the pollutant: \_\_\_\_\_

P) Map of the affected area: (sketch below) Attach photos or other geographic media.

17. Water Sample Data (show location on map, line 16).

Location	Bottle Number <sup>1</sup>	Date	Time	DO	pH	Temp. F /C	Other Data

<sup>1</sup> Bottle numbers of quart Mason jars provided with the Natural Resources Loss Investigation Kit are engraved under the red mesh.

18. Biological, Sediment, Soil or Vegetation Sample Data (show location on map, line 16).

Location	Container Number	Date	Time	Species	Other Data

**Oregon Department of Fish and Wildlife**

**Natural Resource Losses Investigation Report Form (Continued)**

19. Fish and/or Wildlife Kill Transect Data (show transect location on map, line 16).

Transect Number	Fish or Wildlife Counted	Width	Length	Surface Area	PM or Land Mark
<b>Total</b>					

20. Fish or Wildlife Species Composition and Loss Estimates by Species.

Species/Life Stage	Number Counted	# of Total Counted	Estimated Number Killed

21. Other Comments: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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22. Recommendations for Restoration: \_\_\_\_\_

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Prepared by: \_\_\_\_\_

Investigator

Date: \_\_\_\_\_ Title: \_\_\_\_\_

## **Appendix 9**

### **Oregon Poison Center Pesticide Analytical and Response Center Standard Operating Procedures Relating to Pesticide Exposures**

#### **I. Introduction**

The Oregon Poison Center (OPC) is the designated accredited regional poison center serving the state of Oregon. The OPC is a comprehensive toxicology resource, established by the Oregon State Legislature in 1978. The roles and responsibilities of the OPC established in this legislation include:

- I. Emergency telephone management and treatment referral of victims of poisoning and overdose incidents;
- II. Information to health professionals involved in management of poisoning and overdose victims;
- III. Community education programs designed to inform the public of poison prevention methods.

The OPC is accredited by the American Association of Poison Centers (AAPCC) and operates according to these national accreditation standards. Accreditation standards define criteria related to: access and services provided by the poison center, professional expertise of staff, data collection, patient management guidelines, emergency planning and preparedness, and ongoing quality review. The OPC is staffed by Registered Nurses with advanced training in toxicology and Emergency Medicine Physicians who are board certified Medical Toxicologists.

The OPC provides emergency assistance to the public regarding potential exposures to poisoning and toxic substances, and as well as emergency responders and health care providers seeking consultation regarding management and treatment assistance for patients experiencing and toxic exposure. Referrals to the OPC are facilitated through a national emergency number (800) 222-1222. Calls to this number are routed directly to the regional poison center serving the caller's location.

In addition to provision of emergency medical assistance for individuals experiencing a poisoning or toxic exposure, the Poison Center is a training site for health care providers and students of many disciplines. The poison center also provides community outreach education regarding poisoning and toxicology.

#### **II. Purpose**

The purpose of this document is to describe the Oregon Poison Center's role in pesticide exposure management, standard operating procedures for managing pesticide exposure cases and procedures related to the referral of incidents to PARC agencies and receipt of referrals from PARC agencies.

#### **III. Standard Operating Procedures**

##### **Pesticide Exposures:**

The OPC manages over 42,000 calls annually from throughout Oregon regarding poisoning and toxic exposures to a wide variety of substances including pesticides, pharmaceuticals, envenomations, industrial chemicals, plants, and household products.

The poison center utilizes standard operating procedures for assessment and management of all exposure cases. The OPC staff collects detailed substance exposure data on each case, but utilizes

Careful assessment and evaluation to determine the significance of that particular exposure to the actual medical condition of the patient. As a result, OPC data reflect large numbers of potential exposures to substances with varying levels of causality.

Upon receipt of a call to the poison center, the RN specialist conducts an assessment of patient condition, circumstances of exposure, substance of exposure as well as a patient health history. The RNs work collaboratively with the medical staff of the poison center to determine a risk assessment and to develop a treatment plan. The OPC staff has access to an extensive variety of resources and databases to assist in identification of product ingredients contained in the multitude of substances implicated in cases referred to the poison center. Many exposures can be safely managed at home, with the OPC staff providing ongoing instructions for home care and conducting a series of follow-up calls to ensure the patient is responding well to treatment and no additional problems arise. More complex cases are referred to a health care facility for additional assessment and treatment. In these cases, the OPC staff contact the receiving facility to let them know of the patient referral and to provide treatment recommendations to the health care provider. The OPC continues to monitor these patients while in the hospital to provide ongoing assessment and treatment guidance to the health care team. The role of the OPC is not a regulatory one, but to provide medical guidance and recommendations for effective patient treatment. The OPC activities and records are confidential and protected by the provisions of the Federal Health Information Portability and Accountability Act.

The OPC generates an electronic medical record for each call. Specific data elements are collected, including substance, time and site of exposure, clinical effects, therapies, treatment site, and ongoing patient assessment and treatment criteria. De-identified data from the patient record is electronically transmitted in real time to the National Poison Data System (NPDS). NPDS is utilized for National Toxicosurveillance by Centers for Disease Control to identify and track potential sentinel events representing potential public health concerns.

#### IV. Referrals to PARC

To assist in meeting the requirements of ORS 413.042, 433.004 & 433.006 (that pesticide poisonings diagnosed or suspected by a healthcare provider be reported to local or state public health authorities), the OPC reports significant symptomatic pesticide exposures to the Pesticide Exposure Safety & Tracking (PEST) program staff of the Oregon Health Authority. Symptomatic pesticide exposure case records are faxed to PEST at the time the case record is closed and complete. PEST staff evaluates each case to determine whether it meets criteria for follow-up. Contact information for those cases which meet criteria for follow-up and in which the patient/guardian has given permission, is provided to PARC for review.

In addition to the process described above for routine referrals to PARC, there may be isolated instances in which the OPC staff may consult with PARC and member agencies. These rare, isolated instances would be in the event additional information is needed regarding the circumstances or substances of exposure for the purpose of effectively managing the patient's medical condition.

#### V. Referrals from PARC/Member Agencies

PARC/ Member agencies can refer pesticide exposure cases (patients and/or treating health care providers) requiring medical assistance, directly to the Oregon Poison Center 24/7 through the

national poison center emergency number at 1-800-222-1222. Once contacted, the OPC will utilize standard procedures to conduct a patient assessment and to provide ongoing assistance in patient management and treatment. Patient information and medical records are confidential and will not be shared without written consent of the patient. In addition to patient referrals, PARC/Member agencies seeking toxicologic information regarding medical effects of pesticides can contact the OPC for information and consultation.

## Appendix 10

### Oregon Department of Transportation Pesticide-Related Incident Referral Procedures

#### **PURPOSE**

To provide guidance to the Oregon Department of Transportation to ensure proper internal communication occurs in order to appropriately refer pesticide-related incidents to the Pesticide Analytical and Response Center (PARC). Also, to ensure proper internal coordination occurs when pesticide-related incidents are referred to the Department from PARC.

#### **BACKGROUND**

The Department may receive pesticide-related concerns directly from the public to managers or staff or more formally through AskODOT. Certain pesticide-related concerns are to be referred to Pesticide Analytical and Response Center (PARC) for follow up.

PARC was created by Executive Order in 1978 to ensure timely and formal review and investigation of pesticide-related incidents involving alleged impacts to human health, animal health, and/or the environment. PARC Board members, and affiliated members, and required to refer known incidents to the PARC Coordinator. The Department is affiliated with PARC through a letter of agreement that documents the Department's commitment.

#### **POLICY**

Pesticide-related incidents provided to the Department that involve alleged impacts to human health, animal health, and/or the environment, shall be referred to the Pesticide Analytical and Response Center (PARC) as appropriate for follow up.

When the Department receives a referral from PARC, appropriate and timely internal investigations will be conducted and all related information will be shared with PARC.

#### **DEFINITIONS**

**PARC:** The Pesticide Analytical and Response Center was established by statute (ORS 634.550). PARC's primary function is to collect and analyze information about reported incidents and coordinate necessary investigations. Member agencies conduct most of the investigations and take any necessary enforcement action(s).

**ODOT Statewide Integrated Vegetation Management (IVM) Coordinator:** Located in the ODOT Maintenance and Operations Branch of the Highway Division, the Statewide IVM Coordinator is responsible for managing and establishing best management practices for pesticide use on Department property. The ODOT Statewide IVM Coordinator represents the Department at PARC meetings.

**Responsibility**

All employees

**Action**

Refer all known pesticide-related incidents involving alleged impacts to human health, animal health, and/or the environment to the ODOT Statewide IVM Coordinator.

Report pesticide spills meeting reportable quantity levels to the Oregon Emergency Response System (OERS) at 1-800-452-0311.

Managers and Supervisors

Communicate this policy to all employees. Monitor and ensure policy compliance.

ODOT Statewide IVM Coordinator

Notify PARC by email [PARC@oda.state.or.us](mailto:PARC@oda.state.or.us) within one business day, or as soon as possible, upon receipt of a pesticide-related incident occurring on Department owned property that is alleged to impact human and/or animal health, or the environment (air, soil, or water).

Ensure accurate and timely information is provided in support of PARC-referred investigations.

**Appendix 11**  
**Oregon Office of the State Fire Marshal Standard Operating Procedures**

	<p><b>OFFICE OF STATE FIRE MARSHAL</b></p> <p><i>COMMUNITY RIGHT TO KNOW UNIT</i></p> <p><b>STANDARD OPERATING POLICY</b></p>	<p><b>Number:</b> CR2K-0001</p> <p><b>Adoption Date:</b> 11/20/2014</p> <p><b>Revision Date:</b></p>
<p>OSFM Approved: _____ Date _____</p> <p>Mark Johnston – Community Right to Know Program Coordinator.</p>		
<p><b>SUBJECT:</b> CR2K Response and Support to Pesticide Incidents or Referrals.</p> <p><b>OBJECTIVE:</b> To establish a policy detailing how CR2K supports and responds to PARC referrals and notifies PARC of a pesticide incident.</p>		

**I. SCOPE**

This SOP applies to all CR2K staff and addresses how the CR2K Unit handles notifications from PARC of a pesticide incident and how CR2K will process incident referrals.

**II. DEFINITIONS**

PARC (Pesticide Analytical and Response Center) -

A governing board consisting of multiple state agencies, including Oregon State Police/Office of State Fire Marshal. Its primary functions are to coordinate pesticide investigations and to collect and analyze information about reported pesticide incidents. See ORS 634.550.

Pesticide Incident -

An alleged or actual case in which a pesticide is involved and one or more of the PARC member agencies are investigating.

Referral -

The initial notification from the PARC to CR2K that a pesticide incident is being investigated or the initial notification from a complainant to CR2K about a possible pesticide incident and is trying to notify the PARC.

**III. PURPOSE**

To provide a policy by which CR2K will respond to notifications of a pesticide incident, how CR2K responds to a request for information from PARC, and to provide a policy for CR2K to refer information regarding a pesticide incident to PARC.

## **IV. POLICY**

### **Part A - CR2K Information and Support of Incidents**

CR2K will provide information to the PARC in support of investigations a PARC member agency or agencies may be conducting. Releasing information that has been classified as secured will be done so on a case-by-case basis and only with the approval of the CR2K Program Coordinator or an OSFM manager. The PARC may access our information in any of three ways.

1. CR2K On-Line Searchable Databases
2. The CR2K HSIS program
3. Custom Information Requests (Completion of an Information Request Form is required)

For more information regarding accessing CR2K information and what information is available, see the attachment "Instructions for accessing Community Right to Know Information."

For assistance with requesting information the PARC may contact either or both of the CR2K contact people listed on the PARC Referral Criteria Document.

### **Part B - Notification from PARC of a pesticide incident**

When PARC determines that OSFMCR2K should be notified of an alleged or actual pesticide incident, PARC will either email or call both the CR2K contacts listed on the PARC Referral Criteria document. Based on the information received from PARC, the CR2K Program Coordinator will determine what actions CR2K will take to ensure the facility is in compliance with the CR2K reporting requirements. Actions may include an on-site inspection or a desk audit. The PARC Coordinator will be notified what actions will be taken by CR2K.

### **Part C - Receiving a pesticide complaint from other than PARC**

If CR2K receives a complaint or is notified of an alleged or actual pesticide incident from a party other than the PARC, the CR2K staff member will complete the OSFM Pesticide Incident Information Intake form. This form will then be forwarded to the PARC by email or fax.

The caller will be advised that CR2K will notify the PARC of the information and that it is recommended the caller also notifies the PARC directly.

## **V. ATTACHMENTS**

Community Right to Know Overview  
Instructions for accessing CR2K information  
Pesticide Incident Information Intake form  
CR2K Information Request form

# Oregon Office of State Fire Marshal

## Emergency Response Branch

### Community Right to Know Program



The Oregon Community Right to Know and Protection Act (CR2K) was passed by the Oregon Legislature in 1985 (ORS 453.307 to ORS 453.520). This law requires facilities with certain quantities of hazardous substances to annually report information about those substances to the Oregon Office of State Fire Marshal (OSFM), using the Oregon Hazardous Substance Information Survey (HSIS). The intent of the law is to provide emergency responders, pre-planners, and the public with information about hazardous substances in their communities so they may be better informed and prepared should an incident involving hazardous substances occur. This law also requires emergency responders to report incidents involving the release, or threatened release of hazardous substances to the OSFM.

The information collected on the HSIS includes the name of substance, the hazardous ingredient, the amounts stored at the facility, the type of container it is stored in, its temperature and pressure, health hazards associated with the substance, and if it contains an Extremely Hazardous Substance (EHS) as defined by the Federal Environmental Protection Agency.

Prevention ♦ Preparedness ♦ Response

The CR2K program takes steps to validate the information reported and then disseminates it to the Oregon Regional Hazardous Materials Response teams, each Oregon fire department, and other first responder agencies in Oregon, emergency managers, and health professionals. The information is also provided to the public and others when requested.

Office of State Fire Marshal  
4760 Portland Road NE  
Salem, Oregon 97305  
503-934-8249

Released October 2011 v.3

**Appendix 12**  
**Oregon Health Authority/Pesticide Exposure Safety & Tracking (PEST)**  
**Program's Standard Operating Procedures Relating to the**  
**Pesticide Analytical and Response Center (PARC)**

## **I. Introduction/Purpose**

OHA's PEST program collects information about reports of human acute pesticide illness and injury (APII) in order to identify the causal connection or "exposure pathway," if present, between the person's symptoms, the nature of the exposure, and the known toxicology of the pesticide product. From the information it gains from individuals reporting APII (or their parent/guardian), PEST sends to PARC the reported pesticide Exposure Pathway (EP), its main deliverable. [Details of an EP are discussed below.]

For PARC and its agencies, the EP serves two main purposes. First, PARC agencies, upon receiving the EP from PARC, have the option of using it to initiate an investigation into the incident. The EP's intent is to help agency staff begin their own investigation or review/corroborate their own findings. Second, EP's can assist the PARC Board in assigning Contributing Factors to the incident in question for the appropriate biennial PARC Report to the Legislature on pesticide incidents in Oregon.

*Please note: This SOP is a "living" document and will be evaluated and changed, as needed.*

## **II. Scope**

### Authority to Investigate Disease & Significant Health Conditions

Specific administrative rules (OAR 333-019-0000) under Oregon statute (ORS 413.042, 431.110, 433.004, 437.010, 616.010 & 624.005) allow the Oregon Health Authority to investigate reportable diseases, including APII. In addition, OAR 333-019-0005 allows the Authority conduct special studies concerning the causes and prevention of diseases, and other significant health conditions.

By statute (ORS 413.042, 433.004 & 433.006), healthcare providers in Oregon shall report cases of pesticide poisonings, whether diagnosed or "suspected," to OHA (*preferred*) or the local public health department (LHD) in the patient's county of residence. All individuals with suspected or confirmed pesticide poisoning must be reported within 24 hours (including weekends and holidays) of identification. All related medical records, including the individual's contact information, should be faxed to either the [Pesticide Exposure Safety & Tracking \(PEST\) Program](#) at Oregon Health Authority at 971-673-0979, or the [local public health department \(pdf\)](#).

By statute (ORS 431.110, 431.120, 433.004, 437.010, 616.010 & 624.005), when a local public health department (LHD) receives such reports, it shall notify OHA immediately. LHD staff should fax the reports to the PEST Program at OHA at 971-673-0979.

Under the PARC-OHA Memorandum of Agreement, PEST provides to PARC, as appropriate, information it receives relating to actual and alleged reports of human APII. PEST does this by following up on a portion of the reports of human APII it receives according to established criteria (detailed below), and available resources. Using information gained from the person reporting an APII, OHA's PEST program develops an Exposure Pathway (EP) to characterize that person's report of pesticide exposure. This EP is split into two parts. Part A, which is sent to the assigned investigator of the appropriate agency(ies) via the PARC Coordinator, contains the individual's report on the sequence of events that reportedly led to their APII, as well as their contact information. See Attachment 1 (*PEST Reported Exposure Pathway - Part A*).

Part B contains the person's reported symptomatology and other protected health information; it's not released outside of OHA. See Attachment 2 (*PEST Reported Exposure Pathway - Part B*). Going forward in this document, use of the term "EP" refers to "Part A" only.

## **Standard Operating Procedures**

### OHA's Case & Investigation Criteria

OHA's case criteria for an APII are those pesticide incidents in which a person reports:

- one dermal symptom, or;
- one ocular symptom, or;
- two systemic symptoms (nausea, headache, etc.) or;
- a referral from PARC

OHA initiates follow-up action on those incidents which meet the case criteria, and involve a death, or;

- A) has healthcare provider (HCP) involvement, or;
- B) is a report of work-related APII, or;
- C) involves two or more people, or;
- D) are referred by PARC

The PEST Program is passive, population-based tracking program that is set up to detect and bring forward to PARC, as appropriate, reported cases of APII in Oregon. Within those parameters, it conducts follow-up on five prioritized subsets of pesticide poisoning cases reported to OHA. PEST does not conduct field investigations nor does it operate in a regulatory capacity.

The criteria above have been in place since 2006 and have been found to allow for an accurate characterization of the burden of APII in Oregon, as reported to OHA and confirmed under nationally-used criteria for APII from Sentinel Event Notification System for Occupational Risk (SENSOR) Program at the Centers for Disease Control & Prevention. The PEST Program at OHA strives to conduct follow-up on reports of APII that meet case criteria according to the schedule in the "Procedures (with Timelines & Rationale)" section below:

### **Procedures (with Timelines & Rationale)**

This section is designed to detail the PEST Program steps that are followed for two different types of referral: incidents of reported APII that referred to PEST by PARC as well as the converse, incidents of reported APII that are referred to PARC by PEST. See Attachment 3 (*PEST Contact Information*) for PEST's current point of contact.

#### *General Rationale for the PEST Program Making Contact with Reporters of APII*

By design, the PEST Program staff make contact with reporters of APII occurs after the emergent phase of a reported APII has passed. Reporters of APII (or their parent/guardian) often look forward to getting back to their "regular" lives after such an experience.

Yet they may not realize that, in addition to the effects that it may have on their health, aspects of their reported APII may fall into the regulatory or topical purview of one or more PARC agencies. Agency attention to the circumstances of the reported APII may result in findings that agency rules were violated. Moreover, such reporters may not realize the role their reported APII can play in shaping pesticide policy in Oregon as well as on the national level.

So that reporters of APII in Oregon know of these opportunities, the PEST Program's standard procedure is to phone them at the phone number(s) of record on two separate occasions leaving messages, as needed. Because APII reporters may just want to get back to their "regular" lives,

they may not return such calls. Out of respect for the individual’s privacy, PEST does not make a third call if either of the first two is unrequited.

**Note: If OHA staff are in contact with individuals who believe they need immediate medical attention, staff will direct such contacts to the Oregon Poison Center at 800-222-1222**

Incidents referred to PARC by PEST

<b>PEST’s Source of Incident</b>	<b>Timeline for Contact with Individual Reporting Symptom(s) of APII</b>	<b>Rationale &amp; Context</b>	<b>Permission to Refer to PARC?</b>
Direct report to OHA by individual reporting exposure <u>with</u> HCP involvement.	As soon as possible (but within 3 business days of receipt), PEST will contact, by phone, the individual reporting exposure. If call is not returned, PEST will call again within 5 more business days, leaving messages, as needed.	The involvement of a HCP can indicate a high-severity APII and/or infringement of pesticide regulations not known to PARC agencies, so these are prioritized for follow-up.	Individual accounts of APII that are directly reported to OHA are referred to PARC <u>only</u> if permission to do so is given to PEST by that individual (or a parent/guardian). Such permission is needed under confidentiality regulations in Oregon’s statutes.
Oregon Poison Center (OPC) faxes <u>with</u> HCP involvement	<p>As soon as possible (but within 3 business days of receipt), PEST will request medical records (MR) from the clinician of record to gain contact information for the individual reporting the exposure.</p> <p>After receiving medical record (MR), PEST will contact, by phone, the individual reporting exposure as soon as possible. If call is not returned, PEST will call again within 5 more business days, leaving messages, as needed.</p>	<p>As their purpose is to record an emergency, OPC faxes with HCP involvement do not contain the patient/reporter’s contact information.</p> <p>Extra time is needed so that PEST can:</p> <p>A) gain MR from HCP that includes patient’s contact information; and</p> <p>B) make contact with that individual.</p> <p>HCP-involvement can indicate a high-severity APII and/or infringement of pesticide regulations not known to PARC agencies, so these are prioritized for follow-up.</p>	Individual accounts of APII that are directly reported to OHA are referred to PARC <u>only</u> if permission to do so is given to PEST by that individual (or a parent/guardian). Such permission is needed under confidentiality regulations in state of Oregon and/or federal statutes.

<b>PEST's Source of Incident</b>	<b>Timeline for Contact with Individual Reporting Symptom(s) of APII</b>	<b>Rationale &amp; Context</b>	<b>Permission to Refer to PARC?</b>
Direct report to PEST from HCP or LHD, per Oregon Reportable Disease statutes	As soon as possible (but within 3 business days of receipt), PEST will contact, by phone, the individual reporting exposure. If call is not returned, PEST will call again within 5 more business days, leaving messages, as needed.	The involvement of a HCP can indicate a high-severity APII and/or infringement of pesticide regulations not known to PARC agencies so these are prioritized for follow-up.	Individual accounts of APII that are directly reported to OHA are referred to PARC <u>only</u> if permission to do so is given to PEST by that individual (or a parent/guardian). Such permission is needed under confidentiality regulations in state of Oregon and/or federal statutes.
OPC faxes reporting work-related APII or APII involving 2+ individuals <u>not</u> involving a healthcare provider.	As soon as possible (but within 5 business days of receipt), PEST will contact, by phone, the individual reporting exposure. If call is not returned, PEST will call again within 5 more business days, leaving messages, as needed.	Making contact with these cases is also important because of the potential for additional APII if unsafe practices are not addressed by regulatory agencies.	Individual accounts of APII that are directly reported to OHA are referred to PARC <u>only</u> if permission to do so is given to PEST by that individual (or a parent/guardian). Such permission is needed under confidentiality regulations in state of Oregon and/or federal statutes.
Direct call to OHA by individual reporting an APII that is <u>not</u> work-related, <u>doesn't</u> involve a healthcare provider, <u>nor</u> involves the reported exposures of two or more individuals	As soon as possible (but within 5 business days of individual's initial contact), PEST will contact, by phone, the individual reporting exposure. If call is not returned, PEST will call again within 5 more business days, leaving messages, as needed.	Cases in this category account for less than the 1% of the reports of APII that come to PEST's attention.	Individual accounts of APII that are directly reported to OHA are referred to PARC <u>only</u> if permission to do so is given to PEST by that individual (or a parent/guardian). Such permission is needed under confidentiality regulations in state of Oregon and/or federal statutes.

PEST's Source of Incident	Timeline for Initiating Contact with Individual Reporting Symptom(s) of APII	Rationale & Context	Permission to Refer to PARC?
PARC	As soon as possible (but within 5 business days of receipt), PEST will contact an individual reporting exposure once and then again within 5 business days, leaving messages as needed.	Because PARC already possesses basic information needed by agencies to initiate their investigations, information on PEST's EP is likely to be supplemental to an agency investigation. EPs will be important when PARC drafts the Contributing Factor sheet for the case.	

***For ALL Incident Sources***

If calls to a reporter are not returned to PEST after 20 business days, incident will be coded "No Further Action." [Case will be re-opened should the individual call back or at PARC's request].

**Additional Procedures for PEST Exposure Pathways (EP)**

Discussed earlier in this SOP, EP's provide a single "dashboard" of information (Part A + Part B) that's currently available to OHA for a case of APII that's been referred to/from PARC. [Please see *Attachments 2 and 3.*] EP's assemble reported causal connection ("exposure pathway") between a person's symptoms (type, duration, resolution), the nature of the exposure (route of exposure, length of exposure, proximity to application site, weather, use of PPE, etc.), and the reported pesticide product and or active ingredient. Occupational information, if the exposure is reportedly work-related, is also provided in the *EP - Part A* sent to PARC.

For cases that originate from OHA, *EP - Part A* are intended to alert PARC regulatory agencies to the incident's basic context, as conveyed to OHA, as well as the APII reporter's contact information so PARC agencies can investigate, if they choose.

When PEST refers a case to PARC, not all of the information fields in the "dashboard" will be known. The blank data fields in an EP are intended to give a "heads-up" to receiving PARC agencies to look for the missing information so it can be sent back to OHA via PARC.

As the *EP Part A* will be sent to the PARC agency investigator that's been assigned (if the agency decides to investigate the PARC referral), the expectation is that he/she will send their own findings (which may include that missing information) back to PEST staff via the PARC Coordinator.

## Use of EP for Assigning PARC Contributing Factor (CF) Coding

Approximately one month before the PARC Board is scheduled to assign Contributing Factors (CF) to a group of PARC cases, the PARC Coordinator sends PEST staff CF sheets with the draft codes thought to be appropriate.

PEST staff review the sheets for each case using appropriate EP's (*Part A* and *Part B* for the case) as well as additional information which may have been gained by PARC agencies since investigations commenced. PEST adds or subtracts CF's, but always gives explanation. If needed, discrepancies are resolved in discussions between PEST staff and the PARC Coordinator. Those draft CF sheets are reviewed at a PARC meeting with the Board finalizing assigned CF's to a case by consensus.

## **Additional Pesticide-Related Processes Involving OHA**

### Multi-Person and Multi-Household Pesticide Events

When more than one person is reporting symptoms to the same pesticide release, or if reports of APLI are received from multiple households, OHA will email PARC the addresses/locations of the individuals reporting exposure. This will aid in agency investigations, which may include sampling for pesticide residues. OHA will send PARC the EP documents as they become available.

For the Oregon Public Health Division and PEST's standard operation procedure for such incidents, see Attachment 4 (*OHA/Oregon Public Health Division's SOP for Reported Multi-Household Pesticide Exposure Events*).

### Pesticide Use Data Requests

Situations involving pesticide use may require various state agencies, such as Oregon Department of Agriculture (ODA) and Oregon Department of Forestry (ODF), through the Pesticide Analytical and Response Center (PARC), to provide assistance in collecting pesticide use data for Oregon Health Authority (OHA) to conduct public health assessments. See Attachment 5 (*Pesticide Use Data Requests*).

## Schedule for Delivery of EP's

<b>Type of Deliverable</b>	<b>Type of Incident</b>	<b>Timeline for Emailing EP to PARC</b>
Reported Exposure Pathway (EP)	<p>Cases with HCP involvement in the form of:</p> <ol style="list-style-type: none"> <li>1) an OPC fax;</li> <li>2) a HCP's direct report to OHA;</li> <li>3) a direct call to OHA by individual reporting an APII.</li> </ol>	<p>Within 3 business days of PEST's discussion with reporter of APII, (with permission to refer to PARC), an EP's sent to the PARC Coordinator.</p> <p>Per PARC &amp; Agency SOPs, the EP is to be sent to the case investigator (if one's to be assigned) by the agency's PARC Representative.</p>
	<p>Cases of work-related APII or APII involving 2+ individuals <u>not</u> involving a healthcare provider</p>	<p>Within 5 business days of PEST's discussion with reporter of APII, (with permission to refer to PARC), an EP's sent to the PARC Coordinator.</p> <p>Per PARC &amp; Agency SOPs, the EP is to be sent to the case investigator (if one's to be assigned) by the agency's PARC Representative.</p>
	<p>Referrals from PARC</p>	<p>Within 5 business days of PEST's discussion with the reporter of APII referred by PARC, an EP will be sent to PARC Coordinator.</p>

**Attachment 1**  
**PEST Reported Exposure Pathway – PART A**

**PARC ID** \_\_\_\_\_ Individual reporting symptoms: \_\_\_\_\_  
**PEST Investigation - Reported Exposure Pathway – Part A** Date of discussion: \_\_\_\_\_  
Staff: \_\_\_\_\_  
PEST Case No. \_\_\_\_\_  
Main contact #: \_\_\_\_\_ Alt Contact #: \_\_\_\_\_ Name of reporter (if different): \_\_\_\_\_  
Reporter's Mailing Address: \_\_\_\_\_  
Additional individuals reporting symptoms?  YES How many? \_\_\_\_\_  
Exposure investigated for others?  YES (see related PEST reports with same PARC ID No.)

**Key Data on Reported Exposure Pathway:**

**Reported Application:** 1<sup>st</sup> Application Date: \_\_\_\_\_

1<sup>st</sup> pesticide reported as: \_\_\_\_\_ 2<sup>nd</sup> pesticide reported as: \_\_\_\_\_ 3<sup>rd</sup> pesticide reported as: \_\_\_\_\_

1<sup>st</sup> EPA Reg.: No \_\_\_\_\_ 2<sup>nd</sup> EPA Reg. No.: \_\_\_\_\_ 3<sup>rd</sup> EPA Reg. #: \_\_\_\_\_

1<sup>st</sup> Product confirmed/determined \_\_\_\_\_ 2<sup>nd</sup> Product confirmed/determined \_\_\_\_\_ 3<sup>rd</sup> Product confirmed/determined \_\_\_\_\_  
by ODA/OSHA/ODF?  YES \_\_\_\_\_ by ODA/OSHA/ODF?  YES \_\_\_\_\_ by ODA/OSHA/ODF?  YES \_\_\_\_\_

Release/Application site type (private residence, farm, etc.) & address: \_\_\_\_\_

Application equipment description: \_\_\_\_\_

Potential locations for environmental sampling = A: \_\_\_\_\_ B: \_\_\_\_\_ C: \_\_\_\_\_ [Sampling question TBD]

Method of release of pesticide: \_\_\_\_\_

Actual or intended target of application \_\_\_\_\_

Animals involved:  YES Comments: \_\_\_\_\_

Spill or other pesticide contamination:  YES Comments: \_\_\_\_\_

**Reported Exposure:** Date of Exposure to 1<sup>st</sup> Application: \_\_\_\_\_ Have there been other exposures & applications?  YES [See other EP's.]

Exposure site type (& address): \_\_\_\_\_

Activity when exposed: \_\_\_\_\_

Weather: \_\_\_\_\_ Wind direction from: \_\_\_\_\_

Individual's estimated distance to application site when exposed (in car lengths): \_\_\_\_\_

Felt product on skin?  YES

Reported Exposure Type

(Drift, Targeted, Indoor, Air, Treated Surface, Leak/spill, Unknown/Other) \_\_\_\_\_

Report of how exposed: \_\_\_\_\_

Estimated duration of exposure: \_\_\_\_\_

**Occupational Exposure Report:**  YES

Worker's job title \_\_\_\_\_ ? Activity when exposed? \_\_\_\_\_

Do you apply pesticides where you work?  YES

Have you had pesticide safety training for applicators?  YES

Have you had general pesticide safety training (the video, flip chart or book?)  YES How recent was the training? \_\_\_\_\_

What is the name of the employer? \_\_\_\_\_ Address? \_\_\_\_\_ Phone Number? \_\_\_\_\_

Supervisor on day of event? \_\_\_\_\_

Did symptoms result in time away from work?  YES How many days? \_\_\_\_\_

**Other Key Information:**

Clothing worn when exposed: \_\_\_\_\_ PPE?  YES. What PPE? \_\_\_\_\_

PPE Provided by: \_\_\_\_\_ Community-based mediation referral?  YES

Other Information Relevant to Pesticide Release: \_\_\_\_\_

Other Information Relevant to Exposure Pathway: \_\_\_\_\_

Permission given to refer to PARC?  YES Date: \_\_\_\_\_ Not applicable  (Already a PARC Case)

**PEST Next Steps:** \_\_\_\_\_

**Attachment 2**  
**PEST Reported Exposure Pathway - PART B**

**PARC ID**      **PEST Case No.**      **Individual reporting symptoms:**      **Main**  
**contact #:** \_\_\_\_\_

**PEST Investigation - Reported Exposure Pathway - Part B Date of discussion:**  
**Staff:** \_\_\_\_\_

\_\_\_\_\_

	<b>Onset</b>	<b>Resolution</b>
<b>Symptoms reported from exposure:</b>	<u>Date/Time</u>	<u>Date/Time</u>

- 1) \_\_\_\_\_
- 2) \_\_\_\_\_
- 3) \_\_\_\_\_
- 4) \_\_\_\_\_
- 5) \_\_\_\_\_
- 6) \_\_\_\_\_
- 7) \_\_\_\_\_
- 8) \_\_\_\_\_

**Medical Care Sought:**

NO Name of clinic/hospital: \_\_\_\_\_ Clinician: \_\_\_\_\_ Contact #: \_\_\_\_\_ Fax # \_\_\_\_\_  
More clinical information below:  YES

**Other Key Information:**

DOB: \_\_\_\_\_ Health just before application: \_\_\_\_\_ Other household members ill just before application: \_\_\_\_\_  
Known pre-existing medical conditions: \_\_\_\_\_

**Other related clinical information reported:**

\_\_\_\_\_

**Attachment 3  
PEST Contact Information**

**Pesticide Exposure Safety & Tracking (PEST) Program**

Justin Waltz, Program Coordinator  
Pesticide Exposure Safety & Tracking (PEST) Program  
Environmental Public Health Section  
(971) 673-1217  
[justin.waltz@state.or.us](mailto:justin.waltz@state.or.us)

Brett Sherry, Program Manager  
Healthy Homes, Schools & Workplaces Program  
Environmental Public Health Section  
(971) 673-0442  
[brett.w.sherry@state.or.us](mailto:brett.w.sherry@state.or.us)

[If unavailable and the matter urgent, callers may contact OHA's Environmental Public Health Section at 971-673-0440.]

Mailing:

Oregon Health Authority  
Pesticide Exposure Safety & Tracking (PEST) Program  
800 NE Oregon St., Suite 640  
Portland OR 97232

**Attachment 4**  
**OHA/Oregon Public Health Division's SOP for Reported Multi-Household<sup>8</sup>**  
**Pesticide Exposure Events**

Cases of human acute pesticide illness and injury (APII) reported as affecting individuals in **one** location (i.e. household, business, etc.) should be reported to staff of OHA/Oregon Public Health Division's [Pesticide Exposure Safety & Tracking \(PEST\) Program](#) 971-673-0400. Callers should ask to speak with the PEST staff on duty.

In contrast, this Multi-Household Pesticide Exposure Event SOP below should be followed when initial report meets the following circumstances:

- 1) A specific incident of a pesticide product being applied/spilled/released (i.e. Event site) is suspected/known

**AND**

- 2) Two or more people from **more than one** household are reporting symptoms that they attribute to the same pesticide release or Event.

**AND**

- 3) The source of the substance causing symptoms is suspected/known to be a pesticide product;

The criteria above help ensure the efficient use of the Public Health Division's resources. For clusters of symptoms reported as being due to non-pesticidal or unknown substances, contact the **On-Call Public Health Emergency Preparedness Duty Officer** - 971-246-1789 (cell) 503-938-6790 (pager).

If these conditions aren't met, send report to PHD's PEST Program for follow-up ([justin.waltz@state.or.us](mailto:justin.waltz@state.or.us); 971-673-1217).

Stage 1: Initial Reporting of Multi-Household Pesticide Exposure Event.

PEST receives reports of human APII two ways: 1) directly from health care providers, the public, and the Oregon Poison Control Center; 2) from the Pesticide Analytic Response

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<sup>8</sup> \*"Household" is the traditional public health term used to denote homes, businesses or other geographically-separate locations.

Center (PARC), a multi-agency coordinating center, which includes the Oregon Health Authority and Departments of Agriculture, Forestry, and Environmental Quality.

- If PEST receives a report of a multi-household event directly from a healthcare provider, the person reporting exposure, or Oregon Poison Center, it will:
  - a) Contact and interview person reporting symptoms so that PEST staff can complete a *PEST Reported Exposure Pathway Parts A & B*, and so PEST staff might gain permission to refer to Pesticide Analytical and Response Center (PARC). [See *Attachment 1* and *Attachment 2*.]
  - b) If permission is given, the *PEST Reported Exposure Pathway - Part A* report (see Attachment 1) is sent to PARC Coordinator at [PARC@ODA.state.or.us](mailto:PARC@ODA.state.or.us). Per its SOP, the PARC Coordinator will send EP on to appropriate PARC agencies (per the PARC Member Agency Referral Criteria) for use by agency investigator(s), if assigned.
  - c) [If denied, PEST will file case accordingly, but will look out for additional cases being attributed to that Event, and seek permission to refer to PARC from those individuals.]

*Note: PEST Reported Exposure Pathway - Part B may contain medical and health details reported to PEST by the individual that may be protected health information. Part B is retained by OHA. [See Attachment 2.]*

- If PEST receives a report of a multi-household Event from another PARC agency it will:

Contact and interview persons reporting APII for a *PEST Reported Exposure Pathway Part A* report (EP), which PEST will send to PARC Coordinator at [PARC@ODA.state.or.us](mailto:PARC@ODA.state.or.us). Per its SOP, the PARC Coordinator will send EP on to appropriate PARC agencies (per the PARC Member Agency Referral Criteria) for use by agency investigator(s), if assigned.

With “Initial Reporting” completed, PEST staff will:

- A. Inform the Oregon State Health Officer and Public Health Division Communications;
- B. Inform local health department in the appropriate county and transmit the initial report from PARC agency that includes (if available):
  - i. Location of treated site (field, forestry parcel, etc.) that may be the source of the Event;

- ii. Preliminary identification of the pesticide(s) involved based on application record (if available).

Stage 2: Initiate Public Health Surveillance for Cases

After initial communications, PEST staff will then shift efforts to public health surveillance for additional cases. PEST will:

A. *Alert local healthcare providers:*

- a. This may be accomplished using the Health Alert Network or a similar communications platform and should include alerting local emergency departments and healthcare providers to watch for patients presenting with: 1) X symptoms; 2) after doing Y activities and/or 3) who report onset of symptoms at/soon after they were present at Z location;
- b. If available, the known signs and/or symptoms of exposure to the active ingredient(s) of the preliminarily-identified formulation(s) should be provided to local emergency departments and healthcare providers;
- c. Ensure treating healthcare providers know of the option of gaining pesticide use information, within one business day, from PARC for medical treatment of those reporting APII. This is done by the healthcare providers submitting a request form to the PARC Coordinator at <mailto:parc-hcprequest@oda.state.or.us>. The request form is available on PARC's website at <http://www.oregon.gov/ODA/programs/Pesticides/Pages/PARC.aspx>.
- d. Remind treating healthcare providers of Oregon Poison Center's ability to provide toxicological advice, diagnostic algorithms and treatment advice 24 hours a day, 7 days a week – 800-222-1222;
- e. Emergency department staff and healthcare providers should be directed to report, per ORS 333-018-0015, suspected or confirmed pesticide poisonings to the PEST Program by fax within 24 hours.

- B. *Notify toxicological resources of incident:* PEST staff will notify staff at both [National Pesticide Information Center](http://www.epa.gov/natcen) (800-858-7378) and [Oregon Poison Center](http://www.opc.or.gov) (800-222-1222) of this incident by conveying the date, the approximate location of the incident, and the incident's preliminarily identified active ingredients. In that communication, PEST staff will:

- a. Ask that call center staff for both take note of callers who are reporting symptoms of APII after spending time near the approximate location of the incident at the reported date/time the pesticide(s) were released. Call center staff should urge those callers to contact PEST;
  - b. [National Pesticide Information Center](#) call center staff should be asked to contact PEST regarding cases it takes from such callers.
- C. *As appropriate, PEST may initiate conference call(s) or meeting(s) between representatives of the local health department, PARC, Oregon Department of Agriculture's Pesticides Division, and others regarding current situation in Event area and intended agency actions.*
- D. *PEST will provide the following information to the local health department: that residents in the vicinity of Event, who are reporting adverse health effects which they believe are related to the pesticide Event, do the following:*
- a. Symptomatic residents encountered by state agency or local health department staff should be encouraged to see their primary health care provider or call Oregon Poison Center at 1-888-222-1222 for treatment advice;
  - b. Contact PARC, which will refer them to PEST (and email their contact information to PEST as well); and
  - c. Contact their neighbors, who may also be reporting adverse health effects, and urge them to contact PARC, which will refer them to PEST (and email contact information to PEST, as well).

Stage 3: Provide Technical Assistance:

After the first two stages have been initiated, PEST may assist with or initiate the following:

- A. *Designate Public Health Division contact(s) for media,;*
  - a. Determine frequency of status updates for the media spokesperson, as well as the local health department;
- B. *Make educational materials available so that local health department can disseminate to residents:*
  - a. Describe the acute symptoms known to be associated with exposure to the active ingredients reportedly involved;
  - b. Make available [Active Ingredient Fact Sheets](#), from the [National Pesticide Information Center](#);
  - c. Advise individuals to consult their own healthcare provider if concerned about their own health;
  - d. Direct residents concerned about chronic or long-term effects of the reported active ingredients to contact National Pesticide Information Center (1-800-858-7378 or [npic@ace.orst.edu](mailto:npic@ace.orst.edu)).
- C. *Direct healthcare providers with treatment or diagnostic questions to contact Oregon Poison Center:*

- a. Ensure local health department knows to direct any and all requests by treating healthcare provider, regarding medical treatment or diagnosis, to Oregon Poison Center;
- b. Ensure that the local health department has the appropriate name and contact information for the lead PARC regulatory agency (e.g. Oregon Dept. of Agriculture, Oregon Dept. of Forestry, etc.) for non-medical pesticide questions.

**Disclaimer: The Public Health Division does not have the capacity to conduct medical assessment/treatment of individuals nor to engage in pesticide sampling of people or the environment.**

## Attachment 5 Pesticide Use Data Requests

**Goal:** To Assist Oregon Health Authority (OHA) in conducting Public Health Assessments (PHA) or Exposure Investigations (EI).

**Background:**

Situations involving pesticide use may require various state agencies, such as Oregon Department of Agriculture (ODA) and Oregon Department of Forestry (ODF), through the Pesticide Analytical and Response Center (PARC), to provide assistance in collecting pesticide use data for Oregon Health Authority (OHA) to conduct public health assessments (PHA) or exposure investigations (EI).

An initial meeting among the involved agencies will be held to discuss data needs and to establish a centralized point of contact. Data needs may include the following:

- **The specific area of study** (TRS, GIS mapping) based on the location of the concerned citizens and physical properties of the pesticides most likely to have been applied.
- **The time frame for the study** (years or dates) based on the persistence of the pesticides most likely to have been applied.
- **The required data points.** The following are examples of possible data points. There may be additional data needed depending on the question needing to be answered.
  - Date pesticide applied
  - Location of application
  - EPA Registration No. of products applied
  - Amount applied/acre
  - Specific crop or property/site
  - Method of application
  - Any other fertilizer, adjuvant, etc. included in the tank mix

**Process:**

1. ODA and ODF (when appropriate) will **establish a timeline** for collecting the required data points.
2. Each agency involved will **identify necessary resources** (FTE & funding sources).
3. ODA and ODF will **identify the parties required to maintain pesticide use** information. For forestry applications, ODA and ODF will coordinate the parties such that only one letter is sent requesting the use data.
4. A unified **letter will be sent to the identified parties** requesting the required data points.
5. The parties will **submit the use data reports** electronically to a centralized location with paper reports available for those unable to report electronically.
6. ODA and ODF will **consolidate and verify submitted data.**
  - ODA and ODF will **follow up with parties not responding** to the request for data.

- ODA and ODF will **perform QA/QC on the collected data.**
7. ODA and ODF will **provide the requested data to PARC.**
  8. PARC will **provide the requested data to OHA.**

