

Baseline practices for performing 13645 WDO inspections.

Introduction

This document, “Baseline Practices for a WDO Inspection” represents the culmination of a nearly two year effort by a committee comprised of 12 members of the pest control industry. The WDO Inspection Practices committee was formed in August 2005 and met monthly with the purpose of developing a set of minimum practices for the purposes of performing Wood-Destroying Organisms Inspections (WDOI) *for real estate transactions*. The committee was comprised of members representing FPMA, CPCO, COSWFL, FDACS, University of Florida, and an attorney who represents the industry and numerous pest control operators/companies. It is noteworthy to mention that this effort was initiated by the industry and that DACS, while an integral part of the discussions, participated as a non-voting member of the committee.

The final product of the committee’s efforts was accomplished through the meticulous consideration and debate of each facet of a WDOI. Reaching consensus on a set of “good industry practice standards” (GIPS) among the varied groups represented on this committee with so many differing opinions was no simple task. Please consider that the committee’s intent was to improve this sector of pest control services.

Purpose – The purpose of this document is to develop “good industry practices” that describe the manner in which a 13645 inspection is conducted in accordance with Chapter 482 Florida Statutes and Chapter 5E-14 Florida Administrative Code. Chapter 482.226(1), Florida Statutes states in pertinent part that “The [WDO] inspection shall be made in accordance with good industry practice and standards...” The problem facing the Florida Pest Control Industry is that it does not currently have a set of good industry practices (GIPS) and/or standards for the performance of WDOIs. The following good industry practices establish guidelines for the performance of a wood-destroying organism inspection (Form 13645). These recommendations set forth the requirements for a minimally acceptable inspection. This document is intended for use by trained WDO inspectors. The recommended practices do not preclude a more stringent and comprehensive inspection.

It should be understood that the purpose of the Form 13645 inspection is to communicate the condition of the structure regarding the presence of WDOs *at the time the inspection was performed*. The report thus becomes a “snapshot in time” and provides no data as to the conditions of the structure before the inspection was made, or afterward. **It is important to note that industry-wide acceptance of these GIPS should not impact the majority of pest control companies who currently provide adequate WDOI services.**

Expectations - Licensees and Certified Operators in Charge should ensure that they obtain Wood-Destroying Organism Identification Cards only for persons who possess

adequate knowledge of wood-destroying organisms based on appropriate validation by the licensee or certified operator in charge and that the individual has the ability to perform wood-destroying organism inspections. Additionally, the Licensee and Certified Operator in Charge should provide the training, tools and equipment necessary to perform an inspection in accordance with these good industry practices.

Document Objectives

The resulting GIPS delineated herein represent a “bare bones minimum” set of WDO inspection practices. The document is NOT intended to:

- Limit a company from implementing their own inspection requirements which exceed those delineated in this document, or
- Read like a company policy.

Projected Results

- Industry-wide acceptance of a set of GIPS offers a reasonable first step toward making needed improvements in the performance of WDOIs in Florida by “raising the bar” on the performance of WDOI.
- By following these GIPS a licensee may help mitigate some of the high costs of litigation related to WDOI complaints.
- Protect pest control companies performing these services by defining expectations and limitations of WDOIs.
- Demonstrate a concern for the consumers by setting the expectations and limitation of a WDOI

Regulatory Requirements

Inspection for wood destroying organisms is regulated as a pest control activity under the Florida Structural Pest Control Act, Chapter 482, Florida Statutes. § 482.226 requires that when an inspection for wood destroying organisms is conducted for the purposes of a real estate transaction, and either a fee is charged, or a written report is requested, that a person qualified under Chapter 482 FS issue the report. § 482.226 are provided below.

Section 482.226 also includes requirements as to what the report must include (482.226 (2) FS), and a requirement that a notice of the inspection be posted in the access area to the attic or crawl or other accessible area of the structure inspected (482.226 (4) FS). Licensees who perform wood destroying organism inspections for real estate transactions are required to have a minimum of \$50,000 in insurance coverage (or a bond) for professional liability for errors and omissions, or demonstrate an equity or net worth of no less than \$ 100,000 (482.226 (6) FS).

The report must include at a minimum (482.226 (2)(a) FS):

1. *The licensee's name.*
2. *The date of the inspection.*
3. *The address of the structure inspected.*
4. *Any visible accessible areas not inspected and the reasons for not inspecting them.*
5. *The areas of the structure that were inaccessible.*

6. *Any visible evidence of previous treatments for, or infestations of, wood-destroying organisms.*
7. *The identity of any wood-destroying organisms observed or discovered and any visible damage caused.*
8. *A statement that a notice of the inspection has been affixed to the property in accordance and a statement of the location of the notice.*

The inspection report must also include a statement certifying that neither the inspector nor the licensee by whom the inspection is made has any financial interest in the property inspected or is associated in any way in the transaction with any party to the transaction other than for inspection purposes (482.226 (2)(d) FS).

In addition, if treatment is made to the structure at the time of the inspection, the report must include information on the name of each WDO for which treatment was provided at the time of the inspection, the name of the pesticide used, and the conditions and terms associated with that treatment (482.226 (2)(b) FS).

An inspection report does not constitute a guarantee of the absence of wood-destroying organisms or damage unless the report specifically states the extent of such guarantee (482.226 (2)(c)), F.S.

The Department has adopted a rule (Chapter 5E-14.142 (2)(c), Florida Administrative Code) that specifies form 13645 (rev. 2/04) be used to report any inspection conducted under Chapter 482.226 (1) FS. Form 13645 includes all of the information required under Section 482.226(2)(a) FS and the statements required in Section 482.226(2)(b), (c), and (d) FS.

The rule also states the general standards that must be met when conducting an inspection. These include:

- inspection of all areas accessible by normal means, except those areas that are enclosed or inaccessible, areas concealed by wall coverings, floor coverings, furniture, equipment, stored articles, insulation, or any portion of the structure in which inspection would necessitate removing or defacing any part of the structure,
- that the inspection be visual but that it may include probing and sounding of structural members *as deemed necessary* by the inspector, based upon a preliminary finding of visual evidence of infestation or damage, and
- that the inspection shall include an examination for visual evidence of wood-decaying fungi and damage caused by wood-decaying fungi.

Section (3) of 5E-14.142 (2) (c) states that wood-decaying fungi are fungi that can cause damage to wood, such as those that produce white rot, brown rot, poria, and cubical rot, but not surface molds that do not cause damage to sound wood.

Damage and deterioration in structures caused by exposure to water and sunlight are not reportable on a WDO 13645 report.

Examples of the above include delamination of wood veneer materials, water stains, peeling, separation and other breakdown of cellulose materials (i.e., particle board and masonite siding) where wood decay fungi are not present.

Definitions Pertaining to WDO Inspections

For purposes of performing a wood-destroying organism's inspection for a real estate transaction, the following definitions shall apply:

1. **“Attic Access”** – a visible and unobstructed opening, scuttle or ladder installed specifically for physical entry into attic area of a structure.
2. **“Accessible Area”** – an area of a structure to which the person performing the inspection can either gain physical entry in order to identify and/or determine the presence of wood-destroying organisms.
3. **“Access Panel”** – a visible and unobstructed removable cover, plate or panel installed specifically for the purposes of conducting a visual inspection of the interior of a wall or void.
4. **“Damage” (caused by WDO's)** – any degradation or deterioration of wood, cellulosic, or non-cellulosic components of a structure through the activity of WDO. Damage is not limited to wooden structural members. Examples of damage include insect consumption of cellulose materials (galleries and mining), or WDO created holes (adult emergence holes, kick out holes, swarm holes) in any structural material. Additionally, the deterioration of any cellulose material by the presence of wood decay fungi creates damage. Areas of a structure that may have been obscured by paint or patching materials but that can still be identified by the inspector as WDO damage, must be reported as damage.
5. **“Defacement to property”** – when the inspection process causes damage or creates unsightliness to the structure being inspected whether it be intentional or accidental.
6. **“Evidence”** – *visible* signs of wood-destroying organisms other than damage or live activity the presence of which *indicates* possible infestation. Examples of evidence include; termite wings, *dead insects*, drywood termite fecal pellets, powder post beetle frass, old house borer frass, subterranean mud shelter tubes and carton material. Areas of a structure that may have been obscured by paint or patching materials but that can still be identified by the inspector as WDO evidence, must be reported as evidence.
7. **“Good Industry Practice”** – performance of wood-destroying organisms inspections in keeping with guidance set forth in this document (2006) developed by the

structural pest control industry in cooperation with the Florida Department of Agriculture and Consumer Services.

8. **“Inaccessible Area”** – any area of a structure which is not accessible including, but not necessarily limited to those areas that are enclosed or concealed by wall coverings, floor coverings, furniture, equipment, stored articles, insulation or any portion of the structure in which inspection would necessitate removing or defacing any part of the structure, or cannot be inspected due to the area’s height, width, or safety concerns.
9. **“Live”** – the detection and observation of living immature or adult wood-destroying insects and active wood decay fungi.
10. **“Multi-Unit Structure”**—after 5E-14.102(9), F.A.C. A structure, consisting of one or more stories, composed of functionally distinct units, such as stores, offices, apartments, town houses, and condominiums, in which units share a common wall of wood or metal studs or single masonry walls, including fire walls.
11. **“Normal Means”** – inspection of visible and accessible areas performed following the guidance in this document.
12. **“Probing”** – the act of penetrating through the surface of a suspected area to determine the type of WDO present/ Probing will cause some degree of “defacement to the property”. Defacing property shall be strictly limited to that which is required to determine the type of WDO damage/evidence present.
13. **“Sounding”** – the non invasive act of tapping on suspected areas of the structure with a tool in order to detect possible evidence of a WSO that may not be visible.
14. **“Structure”** – For the purpose of a WDOIR, this means a building with a roof built for habitation or storage, including attached decks, and the portion of any fence touching or adjoining to a structure, on the designated property. The following are not considered structures for the purpose of a WDOIR, unless specifically requested to be inspected:

Vehicles

Transport trailers

Boats

Treehouses

Detached pumphouses

Pet houses

Play houses

Detached storage sheds constructed entirely of metal or plastic

Transportable storage units

Docks

Note: the definition of structure as defined in Chapter 482.021(26), F.S. was intended to address fumigation issues. For the purposes of a WDO inspection the definition of structure is as set forth above.

15. **“Substructure”** - a shallow space below the living/occupied areas of at least a partially basementless structure normally enclosed by the foundation walls.
16. **“Substructure Access”** – a visible and unobstructed removable cover or opening that provides for physical entry beneath a structure.

17. **“Tools”** – see Tools and Equipment section for the list of required tools.
18. **“Treatment”** - is any method or device or the application of any substance routinely performed by a Pest Control Company for the purposes of preventing, controlling, eradicating, mitigating, diminishing, or curtailing a WDO in, on, or under a structure.
19. **“Visible”** - Can be seen by the person performing the inspection at the time of the inspection without the need for visual enhancement other than illumination.

Tools and Equipment

Minimum tools and equipment that must be available are:

1. Flashlights or portable lights sufficient to illuminate areas which need to be illuminated during inspection.
2. Ladder sufficient for inspector to safely reach up to 8 feet to access interior attic openings.
3. Slotted head and Phillips head screw drivers.
4. Inspection notices as required by Chapter 482 FS.
5. Hand lens or magnifying device¹ with sufficient power to distinguish and identify wings, pellets, frass, etc., of a WDO.
6. Measuring device or tape measure.

¹Can be available at the office

Inspection Procedures

Attic Inspections

General:

Attic inspections must provide for the following clearance for inspection purposes.

Height to Access Opening:

The maximum (with out a pull-down ladder or staircase) should be 8 feet. No furniture, debris, permanent fixtures, shelving, appliances, household or stored items are to be under or around the opening/access area that hinders safe access. Opening or access area to attic must be specifically designed for the function of accessing the attics. Dropped ceiling panels are not to be considered as an access opening. There must be sufficient room to safely place and utilize a ladder (if necessary to gain access) without causing damage to the home or items in the area of the attic access. If any of these conditions exist, that particular attic access is considered inaccessible for the purposes of this inspection.

Attic Access Opening:

The opening should be a minimum of 20” X 20”.

Interior space of Attic:

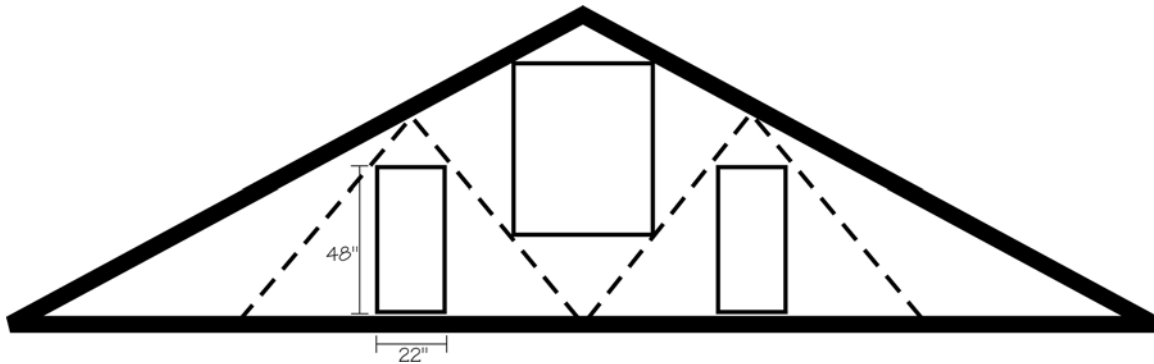


Fig 1. Cross section of attic space.

Attics will be inspected whenever there is an opening through the truss webbing (passageways) with dimensions of at least 48" in height and 22" in width (See Fig 1). Inspections of truss tails and soffit areas should be included to the extent they are accessible under the conditions existing in the interior attic space at the time of the inspection. Areas of the attic space may be considered inaccessible for inspection purposes if traversal of the interior attic space is obstructed by insulation which conceals the ceiling joists and no other means of traversal exists. Areas to be inspected that are concealed or blocked by insulation, HVAC equipment, electrical or other utility lines, stored items, pipe and chimney chases are considered inaccessible.

Specific Areas:

- Inspect all visible wood members for signs of WDO
- Look for evidence on top of insulation, in spider webs, or on any visible surface in the attic

However those areas that are not completely accessible but can be observed and the WDO identified by the use of a lighting device should be reported.

Inspecting the Exterior of the Structure

General

WDO inspectors must familiarize themselves with the structure(s) to be inspected. The inspection of each structure shall include all sides of the building exterior and shall be limited to the first level, ground floor level up to a height of ten (10) feet (exception – areas above the 10 foot level that can be visually identified by the naked eye as evidence or damage by WDOs may be reported). An inspection of the exterior will not require use of a ladder or necessitate the inspector entering onto the roof.

Areas of the exterior perimeter of the structure may be considered inaccessible if obstructed by structural or landscaping features such as, but not necessarily limited to:

- Attached sheds, decks, fences and other structures or attachments
- Shrubbery and ornamental plantings
- Mulch and/or ground cover
- Stored items and debris

Visual evidence or damage of WDOs that cannot be verified, accessed or confirmed may be reported in the Comments Section of the WDO Report Form, 13645.

The inspection will be visual but may include probing and sounding of structural members as deemed necessary by the inspector, based upon a preliminary finding of visual evidence of infestation or damage (5E-14.142(2)(c)2).

Specific Areas

Examples of areas to inspect that may lead to the presence of WDO's include the following:

- Wood/soil Contact
- Planter Boxes
- Siding
- Fences (must be inspected at the point of attachment to the structure if accessible.)
- Exterior doors
- Windows, door frames and shutters
- Window wells
- Balconies accessible by normal means
- Fascia and soffit
- Decks (attached or contiguous with the structure must be inspected if accessible)
- Lattice work and skirting around mobile homes and crawl spaces
- Chimneys
- Porches

Inspecting the Interior of the Structure

General

It is suggested that the inspector perform a general overview of the structure to familiarize themselves with the general layout of the structure to be inspected.

Evidence of and damage caused by WDOs in living areas is often hidden by furniture, floor coverings and interior finish and trim. Inspectors need to concentrate their efforts in those areas most likely to present visible evidence of WDOs.

The inspection will be visual but may include probing and sounding of structural members as deemed necessary by the inspector, based upon a preliminary finding of visual evidence of infestation or damage (5E-14.142(2)(c)2).

Specific Areas

General interior of rooms

- Areas obstructed by items such as furniture, wall coverings/hangings, floor coverings (rugs, mats), blinds & drapery (cornice and valance), stored items (boxes, containers, clothing, etc), plants, or other household items will be considered inaccessible.
- Interior inspections are performed from the floor level of each room inspected.
- General signs of infestation for the specific areas listed below include insect exit holes, frass, fecal pellets, mud tubes, termite wings, blistering, and wood-decay
- Evidence of and/or damage caused by WDOs may come in the form of wings, frass, fecal pellets, mud tubes, galleries, and termite exit holes.
- An exit hole caused by a WDO is both evidence and damage.

Access Panels

Open and/or remove access panels and inspect the accessible area for evidence or activity of WDOs and/or damage such as termite wings, mud tubes and galleries. Access panels may include areas that are not specifically related to plumbing.

Doors and Windows

Inspect window and door frames for evidence of or damage caused by wood-destroying organisms. Wood-decay fungi problems are common in frames due to water intrusion. Frames are also subject to subterranean termite infestation because of their close proximity to the ground and moisture. It is suggested the inspector also look for evidence in spider webs, door and window tracks.

Interior Walls

Visually inspect wall surfaces for waviness, blistering, slightly raised areas and peeling. If termites have been working inside the wall, they sometimes consume the paper between the gypsum and the paint, and this area may crumble when pressed.

Baseboards and Trim

Emphasis should be placed on the inspection of all accessible baseboards and trim due to the propensity for infestation of these areas. When visible evidence or damage is present in this area, sounding and probing are recommended to ascertain the type of WDO present.

Wood Flooring

Inspect accessible wood flooring for WDO evidence and damage. Special attention should be given to flooring adjacent to entry areas, plumbing penetrations, HVAC registers, areas of obvious buckling in the floor, fireplaces and staircases. Wood floors at ground level may indicate the presence of a substructure crawl space (see substructure crawl space).

Cabinets

Inspect accessible areas of kitchen, bathroom and other cabinets; particularly those that contain sinks and pipes. Also check built in bookcases and alcoves.

Substructure Inspections

General

Substructure areas will be inspected whenever there is an entryway to the area that has an opening of at least 16" in height and 24" in width. Substructure areas that are blocked by plumbing, ductwork or other items may be excluded from the inspection. Additionally, areas that are less than 24" from the bottom of the floor joists to the ground are not required to be physically entered. However, those areas that cannot be physically entered into yet can be observed by use of a lighting device should be inspected visually to the extent possible. Investigation should be made to ascertain if an interior entryway exists for crawl space areas that do not have an exterior entryway. (See Definition of "Accessible Area", "Access Panel" for inspecting areas where full accessibility is limited).

Safety Concerns

Safety concerns rendering a substructure or portions thereof inaccessible include but may not be limited to items such as:

- Sewage waste
- Broken glass
- Unprotected electric lines
- Biting arthropods
- Vermin or other animals
- Plenum space

Portions of a substructure may be deemed inaccessible due to a safety concern. However, this does not automatically render the entire substructure inaccessible unless no other path to traverse the remaining structure exists. Any and all portions that are accessible are to be inspected and findings reported.

Visible Evidence of Previous Treatment

The following items may be indicators of treatment for termites and other WDOs. Items, which cannot be positively confirmed as a treatment for WDOs by a copy of a contract or warranty, may be reported in the comment section of the report form.

Look Inside For

- Treatment notices
- Drill holes along expansion joints or stress cracks found in garage and interior areas
- Drill holes near plumbing penetrations.
- Above ground termite bait stations.
- Dye on exposed wood studs and sheathing in garage or unfinished rooms.
- Drill holes in exposed surfaces (usually in a line or pattern). Drywood termite spot treatments

Look in Attic For

- Treatment notices at or near access opening.
- Evidence of previous treatment such as:
 - Drill holes related to WDO treatments
 - Dye on exposed wood rafters, joists or sheathing

Look in Substructure For

- Treatment notices on or near crawl door
- Evidence of previous treatment such as:
 - Drill holes in block foundation walls and/or block piers
 - Evidence of trenching adjacent to foundation walls, piers or pier footings
 - Dye on exposed wood sills, floor joists or flooring
 - Drill holes in exposed wood related to WDO treatments
 - Moisture barrier related to the control of Wood decay fungi
 - Baiting systems for termites

Look Outside For

- Drill holes in foundation walls from horizontal drilling (supported or floating slabs)
- Drill holes along any attached slab such as patio, air conditioner slab, or walkway expansion joints
- Evidence of trenching along foundation perimeter
- Baiting systems for termites
- Clearly identifiable termite treatment port for injection under the slab

Inspecting Multiunit Structures

When a WDO Inspection is requested for an entire multi-unit structure, the inspection will be performed in accordance with recommended standards set forth in this document.

When a WDO Inspection is requested for less than an entire multi-unit structure, when the unit being inspected is at ground level, that unit shall receive an exterior and interior inspection; any unit above the ground level shall receive an interior inspection. When an attic space exists and is accessible from within the unit being inspected the attic is to be included in the inspection. When inspecting a unit above the ground floor that has a balcony or porch the visible and accessible areas are to be inspected without the use of a ladder.

When a WDO inspection is performed on an individual unit or portion of a multi-unit structure or a multi-unit dwelling, as defined in Chapter 5E-14.102(9)&(11), FAC, it shall be identified on the Wood-Destroying Organism's Inspection Report (Form 13645) that the inspection is specific to those unit(s) or portion(s) identified on the Report form.