

Worker
Protection
Standard (WPS)
for *COMMERCIAL*
PESTICIDE
HANDLING
ESTABLISHMENTS

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What is WPS?

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Farm, Forest, Nurseries or Enclosed Space Production Facilities

WPS Terms

- ▶ Agricultural Pesticide

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment, restricted-entry intervals and notification of workers.

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- ▶ Agricultural Plants
- ▶ Agricultural Establishment

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- ▶ Agricultural Pesticide
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- ▶ Agricultural Establishment
- ▶ Agricultural Employer
- ▶ **Commercial Pesticide Handler Employer (CPHE)**

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Commercial Pesticide Handling Establishment (CPHE)

A custom pesticide application business hired by a farm, forest, nursery, or enclosed space agricultural production facility to apply pesticides or provide crop-consulting services.

A commercial pesticide handler employer is any person who employs any handler to perform handler tasks on an ag establishment.

Crop advisor is considered a “handler” under the WPS only if they are conducting handler tasks, which include entering a treated area that is under an REI.

Commercial Pesticide Handler Employer must ensure that:

All pesticides are used consistent with the pesticide product label at all times, including the WPS requirements when applicable.

Each handler must be at least 18 years of age.

Employees are not to not clean, repair, or adjust pesticide application equipment without completing WPS handler training

Commercial Pesticide Handler Employer must ensure that (cont.)

Handlers are given instruction in the safe operation of equipment to mix, load, transfer, or apply pesticides.

Before any equipment is used to mix, load, transfer, or apply pesticides, it must be inspected for leaks, clogged nozzles, and worn or damaged parts. Any faulty equipment must be fixed or replaced before use.

Handlers that apply pesticides on an ag establishment must know about the location and description of any treated areas where an REI is under effect, and the restrictions of entering those areas.

Training for Pesticide Handlers

There is no grace period for WPS Handler Training! Handlers must be trained before performing any handler task.

All handlers must be trained every 12 months.

Employees are only exempt from WPS handler training if they are certified applicators

Only qualified trainers can do training and they must be present during the entire training to answer questions. Must use EPA-approved training materials.

Get a translator/translation service if your Handlers do not speak English

Records must be kept for 2 years.



Handler Training Topics

- ▶ List of these are in Appendix B of the HTC Manual and includes understanding the meaning of the posted warning signs used to notify workers of restrictions on entering treated areas.
- ▶ How to follow directions and or/signs about keeping out of Pesticide Treated areas subject to an REI
- ▶ Where and in what forms pesticides may be encountered during work
- ▶ Pesticide toxicity,
- ▶ Routes of exposure
- ▶ Signs and symptoms of pesticide poisoning.
- ▶ Etc!

Decontamination Supplies for Handlers



To prevent pesticide exposures, the Custom Applicator is required to provide supplies to each handler for routine washing to remove pesticide residues, emergency decontamination, and immediate eye-flushing in certain situations.



Handlers need 3 gallons or more of water at the start of the work period.



Emergency eye-flushing stations are

A system capable of delivering gently running water at a rate of at least 0.4 gallons per minute for at least 15 minutes, or

At least 6 gallons of water in containers suitable for providing a steady stream of gently running water for eye flushing for 15 minutes.



Additionally, when applying a pesticide that requires protective eyewear, 1 pint of water must be immediately available to each handler (applicator) in a portable container.

Personal Protective Equipment Duties for Handler Employer

Provide Handlers with the PPE required by the pesticide labeling and be sure it is

- Clean

- Worn according to manufacturers instructions

- Inspected each day of use

- Repaired or replaced as needed

When a respirator is required by product labeling, handlers need:



Medical Evaluation

A medical evaluation must be conducted to determine whether the handler is physically able to use a respirator before the handler is fit-tested or required to use a respirator.

Medical evaluation must be done at no cost to the employee

Handlers must complete a confidential medical questionnaire at a time and place convenient to the handler during work hours

A medical evaluation is required one time and is good for 1, 2, or 3 years.

The physician or licensed health care professional will send the handler employer written results.

A copy of the written medical release must be kept on file for 2 years.

Annual Fit Testing



QUALITATIVE FIT
TEST



QUANTITATIVE FIT
TEST

Respirator Seal Check

Anyone using a tight-fitting respirator must perform a respirator seal check before using it to ensure an adequate seal is achieved each time the respirator is put on

- ▶ Negative-pressure check
 - ▶ Cover the inlet openings of the cartridges or canisters with the palms of your hands and inhale gently so that the facepiece collapses
 - ▶ Hold your breath for about 10 seconds. The seal is effective if the facepiece stays collapsed.
 - ▶ If the facepiece expands or you can feel air leaking under the facepiece, reposition it and repeat.
- ▶ Positive-pressure check
 - ▶ Block the exhalation valve cover with the palm of your hand
 - ▶ Exhale gently into the facepiece, creating a slight positive pressure
 - ▶ If you can feel air leaking under the facepiece, reposition the facepiece and repeat until you have an effective seal.

Annual respirator training

- ▶ Handlers must be provided with annual training in the use of the respirator specified on the pesticide product label and demonstrate the following:
 - ▶ Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator
 - ▶ What the limitations and capabilities of the respirator are
 - ▶ How to select cartridges and canisters and know the schedule for changing
 - ▶ How to use the respirator in emergency situations, including situations in which the respirator malfunctions
 - ▶ How to inspect, put on, remove, use and check the seals of the respirator
 - ▶ Repair maintenance and storage procedures
 - ▶ And how to recognize medical signs and symptoms that may limit or prevent the effective use of respirators

Recordkeeping

A written record of the respirator training must be maintained for 2 years and should contain:

- ▶ Name and signature of handler trained
- ▶ Date of training
- ▶ Trainer's name
- ▶ Training topics.

Care of PPE

- ▶ Store and wash used PPE separately from other clothing
- ▶ If PPE will be reused, clean it before each day of reuse
- ▶ Dry the clean PPE before storing
- ▶ Store clean PPE away from personal clothing and apart from pesticide-contaminated areas

Replacing respirator parts

- ▶ Replace **particulate filters or filtering facepiece respirators** when any of the following conditions are met:
 - ▶ *When breathing becomes difficult*
 - ▶ *When the filter is damaged or torn*
 - ▶ *When the respirator label or pesticide label requires it*
 - ▶ *After 8 total hours of use – in the absence of any other instructions.*

Replace **vapor-removing cartridges/canisters** when any following condition is met

- ▶ *When odor/taste/irritation is noticed*
- ▶ *When the respirator or pesticide label requires it*
- ▶ *After breathing resistance becomes excessive*
- ▶ *After a total of 8 hours of use, in the absence of any other instructions.*

Disposal of PPE

- ▶ Discard, do not clean, coveralls and other absorbent materials that are heavily contaminated with pesticides having a signal word Danger or Warning
- ▶ Other PPE may be disposed of in the trash.

Emergency Assistance

If there is a reason to believe that a handler employee has experienced a potential pesticide exposure during or within 72 hours after their employment, and needs emergency medical treatment, the employer must:

- ▶ Take them to the nearest hospital
- ▶ Provide emergency information to the treating emergency medical personnel including
 - ▶ Safety Data Sheet (SDS including product name, EPA Registration #, and active ingredients to which the person may have been exposed (pesticide label also suffices)
 - ▶ Circumstances of application and/or use of pesticide at the agricultural establishment
 - ▶ How exposure could have happened

Employer Information Exchange

- ▶ Before any application, a commercial pesticide handler employer but make sure the owner/operator of the ag establishment where a pesticide will be applied is aware of:
 - ▶ The location of the area to be treated
 - ▶ Date of application, estimated start time, and estimated end time of the application
 - ▶ Product name, EPA Registration number, active ingredients, and REI
 - ▶ Whether the product label requires both oral and written treated area posting

Owner/operators of ag establishments must make sure any commercial pesticide handler employer they hire :

- ▶ The specific location and description of any treated areas on the farm under an REI that the commercial pesticide handler may be in (or walk within $\frac{1}{4}$ mile of).
- ▶ And any restrictions on entering those areas.
- ▶ The CPHE must provide that information to their Handlers.

What if the information changes?

- ▶ The custom applicator must provide the farmer with updated information PRIOR to the application when there are changes to
 - ▶ The location being treated
 - ▶ REI
 - ▶ Method of notification
 - ▶ Labeling requirements to protect workers
 - ▶ The start time if earlier than estimated.



[Link to the How To Comply Manual](#)

<https://www.epa.gov/pesticide-worker-safety/pesticide-worker-protection-standard-how-comply-manual>

contact Annie Macmillan with any questions: 802-461-6118 or anne.macmillan@vermont.gov