

Cotton

Cotton Producers Facing The Worker Protection Standard

Spring 2001

Information Sheet 2

Training Workers and Handlers On A Cotton Farm

The Worker Protection Standard requires training of workers and handlers engaged in the production of agricultural plants on a cotton farm. Training must be completed with the appropriate training aids and in accordance with specific time intervals before workers and handlers complete tasks on a cotton farm where pesticide exposure may occur. The WPS does require that training is verified. An approved verification card may be provided trainees by some state regulatory agencies when specific training requirements are met.

Pesticide Worker Training

Worker Defined:

A worker is anyone who: (1) is employed (including self-employed) for any type of compensation and (2) is responsible for tasks, such as harvesting, weeding or watering, relating to the production of agricultural plants on a farm, forest, nursery or greenhouse. This term does NOT include persons who are employed by a commercial establishment to perform tasks as crop advisors.

Timing of Training:

Workers must be trained before they accumulate more than five separate days of entry into treated areas on the establishment where, within the past 30 days, a pesticide has been applied or a restricted entry interval has been in effect. These five days of such entry need not be consecutive and may occur over several periods of employment or over several seasons or years.

Workers must be retrained at least once every 5 years (state laws may vary), counting from the end of the month in which the previous training was completed.

Early Entry Workers must be trained before contacting anything treated with a pesticide (i.e., removal of irrigation pipe if entry into treated area).

Consider ... The number of elements required in training for workers is the same, but less than the training requirements for handlers. However, all elements required for training workers are met with handler training. Many employees do both handling and working tasks during their employment on a cotton farm; therefore, if employees are likely to do both worker and handler tasks, consider training them as handlers (unless state laws prohibit) and they can then do both worker and handler tasks.

Worker Trainer Identified:

The person who trains workers must be qualified to present handler training; currently be trained as a handler who works under the supervision of a certified pesticide applicator; currently be trained as a WPS handler; or have completed a pesticide safety train-the-trainer program approved by a state, federal or tribal agency having jurisdiction or be a certified pesticide applicator.

Pesticide Handler Training

Pesticide Handler:

A pesticide handler is anyone who: (1) is employed (including self-employed) for any type of compensation by an agricultural establishment or a commercial

SAMPLE LABELING

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 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 (PPE), notification to workers and restricted entry interval. The requirements in this box apply to uses of this product that are within areas covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 48 hours. The REI is 72 hours in outdoor areas where average annual rainfall is less than 25 inches a year.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water is:

- coveralls over long-sleeved shirt and long pants
- chemical-resistant gloves, such as barrier laminate or viton
- chemical-resistant footwear plus socks
- protective eyewear
- chemical-resistant headgear

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

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pesticide handling establishment that uses pesticides in the production of agricultural plants on a farm, forest, nursery or greenhouse, and (2) is performing any of the following tasks: mixing, loading, transferring or applying pesticides; handling opened containers or pesticides; acting as a flagger; cleaning, handling, adjusting or repairing the parts of mixing, loading or application equipment that may contain pesticide residues; assisting with the application of pesticides, including incorporation of the pesticide into the soil after the application has occurred; disposing of pesticides or pesticide containers; and other areas dealing with greenhouse, or soil fumigation. Crop advisors ... see regulation for more details.

Timing of Training:

Pesticide handlers must be trained before doing any handling task (i.e., spraying) and must be retrained at least once every 5 years similar to workers.

Consider ... If a handler is a certified pesticide applicator under the Pesticide Applicator Training Program implemented by all states in compliance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA),

then WPS training requirements are met in most states (contact state regulatory agencies to confirm if this approach is acceptable).

Handler Trainer Identified:

A person who trains must currently be a certified applicator of restricted-use pesticides (in any category of certification); currently be designated as a trainer of certified pesticide applicators or pesticide handlers by a state, federal or tribal agency having jurisdiction; or have completed a pesticide safety train-the-trainer program approved by a state, federal or tribal agency having jurisdiction.

Training Materials and Methods

Persons conducting training for workers and handlers must use Environmental Protection Agency (EPA) approved written and/or audio-visual training materials. The training must be presented orally or audio-visually and in a manner that the trainee can understand. This could involve the use of a translator if necessary, making certain to respond to trainees' questions in non-technical terms.

Educational materials created by EPA are available for training from state regulatory agencies. These materials include manuals, video tapes, displays and other aids.

Verification of Training

Verification is achieved through the issuance of a *Verification Card* to each worker and handler following training. Some states adopted the card, others developed approved verification cards and systems of verification and others decided not to have a verification program. A record of training is usually maintained by the State Department of Agriculture and the cotton producer (employer). Some states accept private pesticide applicator training and certification as a method of verification. *If you are uncertain about verification of training methods for your workers and handlers, contact your State Department of Agriculture.* The following are phone numbers for State Departments of Agriculture:

Departments of Agriculture	
State	Phone No.
Alabama	(334) 242-2656
Arizona	(602) 407-2901
Arkansas	(501) 225-1598
California	(916) 445-4000
Florida	(850) 488-3314
Georgia	(404) 656-4958
Kentucky	(502) 564-7274
Louisiana	(504) 925-3763
Mississippi	(601) 325-3390
Missouri	(314) 751-2462
New Mexico	(505) 646-2133
North Carolina	(919) 733-3556
Oklahoma	(405) 521-3864
South Carolina	(846) 646-2150
Tennessee	(615) 360-0130
Texas	(512) 463-7622
Virginia	(804) 371-6558

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