

Cotton Producers Facing the Worker Protection Standard



An Easier Approach

Volume 1, Number 1

Some Definitions:

Worker...is anyone who is employed (including self-employed) for any type of compensation and who is involved in the production of an agricultural plant (cotton) on a farm.

Handler...is anyone who is employed (including self-employed) for any type of compensation by an agricultural establishment or a commercial pesticide handling establishment that uses pesticides in the production of agricultural plants on a cotton farm with responsibilities such as, mixing, loading, applying, cleaning, flagging and other related tasks.

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Cotton Production: Beginning the Season

This is the first in a series of newsletters designed to provide timely information on the **Worker Protection Standard (WPS)** as it relates to seasonal cotton production practices. The information contained in the newsletter is provided as an aid to you by The National Cotton Council to help reduce compliance costs and to make compliance easier while lowering your *liability* and insuring protection of your workers and pesticide handlers.

Cotton producers are concerned about protecting their employees in order to reduce the risk of a shortage in their on-farm work force or a delay in work activities. Likewise, pesticide contamination is not acceptable to cotton producers because the land offers livelihood and often the farm is their site of residence.

The WPS, implemented in 1995, is a federal regulation issued by the Environmental Protection Agency. The regulation is designed to protect and inform workers and handlers on farms, forests, nurseries, and greenhouses engaged in commercial and research agricultural production to reduce the risk of pesticide related illness and injury.

The intent of this newsletter and future newsletters is to provide practical advice for cotton producers to more easily comply with the WPS. These newsletters will not address issues related to crops other than cotton.

Don't Overlook Exemptions For You and Your Family

\$ Cost Saving If you do not employ workers and handlers on your cotton farm because it is a family operation, then you and your immediate family (which includes only your spouse, children, stepchildren, foster children, parents, stepparents, foster parents, brothers, and sisters) are entitled to exemptions specified in the WPS. However, the EPA encourages that the protections be offered to you and your family members despite the exemptions. The exemptions allow growers to use alternate means (of their choosing) to achieve the goal of protection of themselves and their immediate

families. The following is a list of exemptions from the WPS that applies to you and your immediate family....read the details of each exemption in the rules, "How to Comply Manual," or state sources:

- Information at a central location
- Pesticide safety training
- Decontamination supplies
- Emergency assistance
- Notice about applications
- Monitoring handlers
- Equipment safety
- Duties related to care and management of PPE
- Some early entry requirements

Getting Ready For the 1998 Cotton Production Season

Check List

Things to consider before the beginning of the cotton production season....

- Do you have your workers and handlers trained as required by state and federal WPS laws?

_ yes _ no

- Have you purchased the appropriate personal protective equipment (PPE), notification and decontamination supplies for this season?

_ yes _ no

- **\$ Cost Saving** Have you checked the condition of your existing PPE, posting signs and decontamination supplies? New supplies may not be needed.

_ yes _ no

- Have you reviewed the pesticide labels of products that you plan to use?

_ yes _ no

Meeting Your Safety Training Requirements

There are two areas to consider under the "Pesticide Safety Training" requirements of the WPS. These are safety training and verification of training.

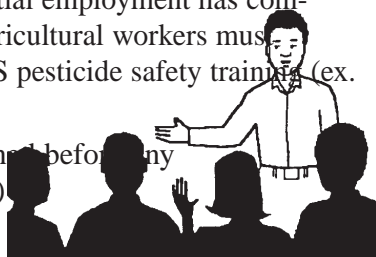
■ Train Your Workers and Handlers

Workers, handlers and early entry workers must be trained before undertaking specific assignments on a cotton farm. Different levels of training and timing of the training are required as follows:

Workers.... must be provided basic pesticide safety information before entering a treated area on the establishment and complete pesticide safety training no more than 5 days after their initial employment has commenced. All untrained agricultural workers must receive the complete WPS pesticide safety training (ex. cultivation).

Handlers.... must be trained before any handling tasks (spraying) are performed.

Early Entry Workers.... train before contacting any-



thing treated with a pesticide (removal of irrigation pipe if entry into treated area).

Time Saving

Quick Answers to Training Questions:

- **How often must workers and handlers be retrained?**

5 years (state laws may vary)

- **Who can train?**

Certified applicators under the Federal Insecticide, Fungicide and Rodenticide Act (you, as a cotton producer) who are in compliance with state laws, designated trainers of certified pesticide applicators (State Cooperative Extension Services) or anyone trained as a trainer under approved state, federal, or tribal agency jurisdiction (consultants or industry representatives).

- **Who are some of the trainers in cotton production states?**

No agency or organization has been designated to provide WPS training. Each state varies, but some qualified to train include the certified cotton producer, Cooperative Extension Service, Farm Bureau Federation, pesticide sales organizations, pesticide distributors, and others. The EPA funds the AmeriCorp to do training in several cotton-producing states, which is a free resource for producers.

Time Saving

Many employees fall into both handler and worker categories during their employment on a cotton farm. All elements required for training workers are met with handler training. Therefore, if your employees fall into both categories during their employment on your farm, consider training them as handlers and they can do both worker and handler tasks.

Training Verification of Workers and Handlers

The EPA Training Verification Program is a *voluntary* program. The WPS requires that you either train all workers and handlers or that you have verification that your agricultural employees have been trained. "The issuance of EPA training verification cards (blue and green cards developed as part of a voluntary training verification program by EPA and illustrated in the newsletter) to trained workers and handlers is not a WPS requirement. Trainers can provide workers and handlers with pesticide safety training that meets the WPS requirements without the obligation of issuing EPA training verification cards to the trained workers

and handlers. However, trainers who do issue cards and the states that oversee the issuance of the cards are bound by the conditions of the EPA Verification Training Program.”¹

“If a state chooses to participate in the program, the Training verification Program must include a signed agreement between EPA and the State and signed agreements between the State and training providers.

The State and the training providers must agree to (1) use only training materials developed or approved by EPA, (2) provide quality, interactive training, and (3) issue EPA training verification card.”¹

Contact your State Lead Agency (often...State Department of Agriculture) for more information on training and verification:



☺ Liability Protection

Cotton producers should consider their liability risks associated with the WPS. Protect yourself by maintaining evidence that training of your workers and handlers was completed in accordance with the WPS. Some State Lead Agencies or other State representatives have developed legal documents for use by producers following training of workers and handlers. Producers have utilized video taping of training sessions as additional evidence of proper training and employee participation. Another suggestion is to have workers and handlers trained through the State Pesticide applicator certification training Program offered by State Cooperative Extension Services (if approved by state laws, contact your state department of Agriculture).

¹ Pont, Richard, Interim Final WPS Training Verification Program Document, March 1994.

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Project Coordinator and Contributing Editor

Dr. Jim Hamer, Mississippi State U. (Retired)
President, Professional Consulting Services, Inc.

Steering Committee

State Departments of Agriculture

California - Paul Gosselin

Florida - Steven J. Rutz

Texas - Donnie Dipple

Mississippi - Robert McCarty

University

Arkansas - Ples Spradley

Florida - Norman Nesheim

Producers

South Carolina - Roy Baxley

Texas - Jimmy Dodson

Environmental Protection Agency

Kevin Keane and Don Eckerman, Washington area (703) 305-7666

Carlton Layne and Jane Horton, Region 4, (404) 562-9012 Atlanta

Karen Heisler, Region 9, (415) 744-(1100) (1065) San Francisco

National Cotton Council

Frank Carter

Fred Middleton

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State Dept. Of Agriculture

State	Phone No.
Alabama	(334) 242-2656
Arizona	(602) 407-2901
Arkansas	(501) 225-1598
California	(916) 445-4000
Florida	(850) 487-0532
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) 463-1093

QUICK PESTICIDE CHECK

Cotton Fungicides+

Product	EPA Number	Active Ingredient	RUP	Signal Word	REI	Noti- fication+++	PPE	Early Entry PPE	Use	Seasonal Company
Apron 50W	100-738	metalaxyl	no	caution	12	oral	aeg	beg	FN	Novartis
Dithane DF	707-180	mancozeb	no	caution	24	oral	degjk	deg	FN	Rohm and Haas
Dithane F-45	707-156	mancozeb	no	caution	24	oral	degjk	deg	FN	Rohm and Haas
Dithane M-45	707-78	mancozeb	no	caution	24	oral	degjk	deg	FN	Rohm and Haas
Kumulus DF	7969-61	sulfur	no	caution	24	oral	aegj	begj	FN, AC	BASF
Manzate 200 DF	352-449	mancozeb	no	caution	24	oral	degjk	deg	FN	Du Pont
Microthiol Special	4581-373	sulfur	no	caution	24	oral	aeg	beg	FN, M	Elf Atochem
Penncozeb 75DF	4581-370	mancozeb	no	caution	24	oral	degik	deg	FN	Elf Atochem
Ridomil 2E	100-607	metalaxyl	no	warning	12	oral	afgj	bfgj	FN	Novartis
Ridomil 50W	100-735	metalaxyl	no	warning	12	oral	aegj	begj	FN	Novartis
Ridomil5G	100-628	metalaxyl	no	caution	12	oral	aeg	beg	FN	Novartis
Telone C-17	62719-12	dichloropropene+ chloropicrin	yes	danger	72	oral	fhjlmn	fhjln	FN, NE	DowElanco
Telone II	62719-32	dichloropropene	yes	warning	72	oral	fhjklmn	fhjmn	FN	DowElanco
Terraclor 10%G	400-402	PCNB	no	caution	12++	oral	aeg	beg	FN	Uniroyal
Terraclor 2EC	400-400	PCNB	no	warning	12++	oral	afgjm	bfgj	FN	Uniroyal
Terraclor SuperXE	400-405	PCNB	no	warning	12++	oral	afgjm	bfgj	FN	Uniroyal
Terraclor Super XG	400-406	PCNB++thiadiazole	no	warning	12++	oral	afgjm	bfgj	FN	Uniroyal
Terraclor 6.5% ++										
Di-Syston	400-411	PCNB ++disulfoton	yes	danger	48++	oral, post	cehjklm	cehjl	FN, I	Uniroyal
Thiolux DF	55947-78	sulfur	no	caution	24	oral	aegj	begj	FN, M	Sandoz

+Check product labels for approval for use in California. ++REI may vary; refer to product label for detailed information. +++ Check product label for specific requirement. When label is silent on notification requirement, users may choose oral or posting.

- | | | | | |
|---------------|---------------|---------------------|--|--|
| Seasonal Use: | AC Acaricide | Personal Protective | a...Long-sleeved shirt and long pants | h...Chemical resistant footwear plus socks |
| | FN Fungicide | Equipment(PPE): | b...Coveralls | j...Protective eyewear |
| | I Insecticide | | c...Coveralls over short sleeved shirt and short pants | k..Chemical resistant apron when cleaning equipment, mixing or loading |
| | M Miticide | | d...Coveralls over long sleeved shirt and long pants | l... Chemical resistant headgear for overhead exposure |
| | NE Nematicide | | e...Waterproof gloves | m..Approved respirator |
| | | | f...Chemical resistant gloves | n...Chemical resistant protective suit |
| | | | g...Shoes plus socks | o...Face shield |

Information presented in this table is for preliminary planning only. Exclusive reliance must be placed on the pesticide label and labeling information, specifics in the WPS statement on the label, and other information provided by the manufacturer.

ADDRESS SERVICE REQUESTED

Memphis, TN 38182-0285
P.O. Box 820285



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