



COLORADO ENVIRONMENTAL PESTICIDE EDUCATION PROGRAM

Pesticide Fact Sheet
CEPEP 7/06

Federal Worker Protection Standard

T. L. Steinke
S.K. McDonald

This fact sheet is intended as a checklist for agricultural employers to self-evaluate their compliance with the Worker Protection Standard (WPS).

www.cepep.colostate.edu

Worker Protection Standard Self-Audit Inspection Checklist

This checklist is designed for the owner of an agricultural establishment (farm, forest, nursery or greenhouse) who would like to self-evaluate their compliance with the Worker Protection Standard (WPS). It is not a comprehensive list of WPS requirements. Refer to the complete WPS regulations in the [Code of Federal Register 40 Part 170](#) for the official version. The *How To Comply With the Worker Protection Standard for Agricultural Pesticides* manual provides information to help you comply with the requirements of WPS for agricultural pesticides, 40 CFR part 170, as published in 1992 and as amended in 1995, 1996, and 2004. Since the inception of the WPS, five amendments have been made. Amendment updates include changes to training period and retaining intervals; training for crop advisors; irrigation activities; limited contact activities; and restricted entry intervals for low risk pesticides. EPA may issue additional guidance about WPS and it may be amended in the future.

Information on WPS is found in the EPA's [How to Comply With the Worker Protection Standard For Agricultural Pesticides](#) - manual, originally published in 1993 and revised in 2005. The revision incorporated the amendments. In this checklist each item is followed by the page number of the EPA *How to Comply – Manual* (versions 1993 and 2005) where more detailed information can be located. The part and section number of 40 CFR 170 are also listed.

For additional information contact:

EPA Region 8
999 18th Street - Suite 300
Denver, CO 80202-2466
Phone 1-800-227-8917
<http://www.epa.gov/region08>

National Agriculture Compliance
Assistance Center
Washington DC 20460
Phone 1-888-663-2155
Fax 1-913-551-7270
www.epa.gov/agriculture

Colorado Environmental
Pesticide Education Program
Colorado State University
1177 Campus Delivery
Fort Collins, CO 80523-1177
Phone (970) 491-6027
Fax (970) 491-3862
www.cepep.colostate.edu

Colorado Department of
Agriculture/ DPI
700 Kipling Street, Suite 4000
Lakewood, CO 80215-8000
<http://www.ag.state.co.us/DPI/home.html>

Wyoming Department of
Agriculture
2219 Carey Ave
Cheyenne, WY 82001
(307) 777-7321
<http://wyagric.state.wy.us/>

Facility Name: _____ Date: _____

This checklist was originally developed by EPA Region 8 based on the 1993 manual. This checklist has been reworked by the Colorado Environmental Pesticide Education Program to include page numbers from the 2005 edition of the How to Comply Manual .

Duties for ALL Employers				
	How to Comply Manual		40 CFR 170	✓
	1993	2005		
Central Notification Area (CNA)				
The approved safety poster is displayed	43, 101	19, 83	135(b), 235(b)	
Emergency medical information is displayed (name, address, phone)	23	19	135(b), 235(b)	
The site is located where it can be readily seen and read by workers & handlers	24	19	135(b), 235(b)	
Workers & handlers are informed of the location of the CNA	24	19	135(b), 235(b)	
Does the information remain legible while posted?	24	20	135(b), 235(b)	
The application information is displayed (location of treated area, date & time of application, product name, EPA reg. #, active ingredient, REI)	23, 24	19	122(c), 222(c)	
Pesticide Safety Training Assurance				
<i>Applies to workers who are NOT certified applicators or trained handlers. 130(b) (40 CFR 170)</i>				
Workers have been trained within the last 5 years	25, 26, amend	21	130(a)(1), amend	
Workers have been trained before early entry during an REI	25	24	130(a)(2)	
There is verification on file that the required Pesticide Safety Information was provided to workers before entry where WPS pesticides have been applied within the last 30 days	amend	21	130(a)(3)(i), amend	
Workers have received the required additional training before the 6th day of entry in to any area where WPS pesticides have been applied within the last 30 days	amend	22	130(a)(3)(ii), amend	
<i>Applies to handlers who are NOT certified applicators or certified crop advisors. 230(b) (40 CFR 170)</i>				
Handlers have been trained within the last 5 years	25	22	230(a)	
Handlers have been trained before performing any task	25	22	230(a)	
Pesticide Safety Training Program				
Safety information is presented in a manner that workers and handlers understand	27	22	130(d)(1)	
Does the pesticide safety information meet the criteria?	27, amend	23	130(c)	
Does the content of the additional training materials meet the criteria?	27, 103, 104	23, 87, 89	130(d)(4)	
Is the trainer qualified to train workers (certified applicator, train-the-trainer, or trained handler)?	26	22	130(d)(2)	
Does the content of training materials meet the criteria?	27	23	230(c)(4)	
Is the trainer qualified to train handlers (certified applicator, train-the-trainer)	26	22	230(c)	

	How to Comply Manual		40 CFR 170	✓
	1993	2005		
Emergency Assistance				
Prompt transportation to an emergency medical facility is available for employees who become injured by pesticides	35	27	160(a), 260(a)	
Information is provided to medical personnel regarding the pesticide to which employees may have been exposed	36	27	160(b), 260(b)	
Decontamination Sites <i>The employer must follow these decontamination requirements for workers and handlers</i>				
Decontamination sites have soap, single-use towels, and enough water for washing & emergency eye flushing	29, 30, 31	24, 25	150(b), 250(b)	
The decontamination water is of the quality and temperature required	29	24	150(b)(1), 250(b)(1)	
1 pint of eye flush water is immediately available to handlers using pesticides requiring protective eye wear and the early entry workers when working in areas treated with pesticides requiring protective eye wear for early entry	31	25	150(b)(4), 250(d)	
The decontamination site is within 1/4 mile of the work site	30	25	150(c)(1), 250(c)(1)	
<i>The employer must follow these decontamination requirements for workers</i>				
Decontamination sites are provided for workers entering treated areas until 30 days following expiration of the REI	29	24	150(a)(1)	
Decontamination sites are provided for early entry workers during and after early entry	29, 67, 68	24	112(c)(8), 150(d)	
<i>The employer must follow these additional decontamination requirements for handlers</i>				
Enough water is provided to handlers for washing the entire body in case of an emergency	30	24	250(b)(1)	
One clean change of clothing is provided to handlers for use in an emergency	30	24	250(b)(4)	
Decontamination supplies are at the mix/load site	30	25	250(c)(1)	
Decontamination supplies for pilots are kept in the airplane or at the loading site	30	25	250(c)(2)	
Handler decontamination supplies are kept out of treated areas unless they are in enclosed containers	31	25	250(c)(4)	
Decontamination supplies are located where handlers remove PPE for washing thoroughly after handling activities	31	25	250(e)	
Restrictions During Applications				
Workers are prohibited in treated areas during application and until REI's have expired	45	36	110(a), 112(a)(1)	
Workers are prohibited in treated areas plus the additional buffer area during application in NURSERIES	51, 52	36	110(b)	
Workers are prohibited in a GREENHOUSE during application and until ventilation criteria are met	53-55	36	110(c)	

	How to Comply Manual		40 CFR 170	✓
	1993	2005		
Additional Duties for WORKER Employers				
Worker Early Entry During REI				
The employer provides the correct PPE and ASSURES that workers wear PPE for early entry work	69	52-56	112(a)(4), 112(c)(4)	
The employer ASSURES that early entry workers receive human hazard and safe use information before early entry	65	53	112(c)(5)	
Early entry workers are prohibited in treated areas during the first 4 hours after application	59, 60	47	112(c)(3)	
Early entry workers are limited to 1 hour of work in a 24 hour period in treated areas during the REI	59	47	112(c)(2)	
Early entry workers who perform irrigation and limited contact activities are limited to 8 hours of work in a 24 hour period	amend	48	amend	
<i>The employer MUST ASSURE the following for workers who wear PPE during early entry</i>				
PPE is worn correctly, inspected, cleaned, maintained and stored properly	69, 70	56	112(c)(6)(i), (ii), (iv), (v)	
Contaminated PPE is disposed of properly	70	56	112(c)(6)(iii)	
Workers receive instruction on using and cleaning PPE	70	55	112(c)(6)(ix)	
Employer has measures to prevent HEAT-RELATED ILLNESS for early entry workers using PPE	69	55	112(c)(7)	
Notice of Applications to Workers				
All GREENHOUSE applications are posted with WPS warning signs	41, 42	33	120(a)	
Workers are given both oral and posted notification when required by the pesticide label	41	33	120(b)(2)	
Workers are given notification of applications (either orally or posted) for other applications	41	33	120(b)(2)	
Workers are told which method will be routinely used (oral or posted notification)	41	33	120(b)(2)	
<i>Posted Warning Signs</i>				
The employers uses the approved WPS warning signs for posted notification	43, 102	34	120(c)(1), (2)	
The signs are posted at all entrances of worker entry to the treated area	42	34	120(c)(4)	
The signs ARE put up no sooner than 24 hours prior to application	43	34	120(c)(6)(i)	
The signs are removed within 3 days after the end of the REI	43	34	120(c)(6)(iii)	
<i>Oral Warnings</i>				
Oral warnings are given in a manner that workers can understand	44	35	120(d)	
Oral warnings include the location/description of the treated area, REI and instruction not to enter during the REI	44	35	120(d)	

	How to Comply Manual		40 CFR 170	✓
	1993	2005		
Additional Duties for HANDLER Employers				
Application Restrictions & Monitoring				
Both the employer & handler assure that no pesticide is applied (either directly or through drift) so as to contact anyone other than trained and PPE-equipped handlers	79	59	210(a)	
Handlers are monitored visually or by voice every 2 hours when handling SKULL & CROSSBONES pesticides	77	59	210(b)	
The handlers have continuous visual or voice contact with another trained and PPE-equipped handler when handling a FUMIGANT in a GREENHOUSE	77	59	210(c)	
Specific Instructions for Handlers				
The employer assures that handlers read the label or are informed (in a manner they can understand) about the label requirements for safe use before performing handling activities	75	60	232(a)(1)	
The handlers have access to the product labeling during handling activities	75	60	232(a)(2)	
The COMMERCIAL HANDLER EMPLOYER informs the commercial handler of treated areas, REI's and entry restrictions on the ag establishment that they may be within 1/4 a mile of	76	60	232(b)	
Safe Operation of Equipment				
The handler is instructed in the safe operation of handling equipment before it is used	76	61	234(a)	
Handling equipment is inspected and repaired before each day of use	77	61	234(b)	
The employer assures that only trained and PPE-equipped handlers repair, clean or adjust any handling equipment that contains pesticides or pesticide residues	77	61	234(c)	
Personal Protective Equipment Requirements for Handlers				
The handler employer provides the handler with appropriate and clean PPE	79	62	240(c)	
The handler employer assures that PPE is worn and used correctly	79	62	240(a), (a)(1)	
The handler employer assures that PPE is cleaned, inspected and repaired or replaced before each day of use	79, 80	62	240(e)(2), (f)(1)	
The handler employer assures that filters are replaced on respirators when required	80	63	240(f)(6), (f)(7)	
Handlers have a clean place to store personal clothing, put on PPE and remove PPE after application	79	62	240(f)(9)	
The handler employer takes appropriate measures to prevent heat-related illness for handlers using PPE	79	62	240(g)	

	How to Comply Manual		40 CFR 170	✓
	1993	2005		
Family Establishments				
Employees are only spouse, children, stepchildren, foster children, parents, stepparents, foster parents, brothers & sisters	91	71	104(a)(1)	
Non-handlers are prohibited in treated areas during application and until REI's have expired	45, 92	36, 72	110(a), 112(a)(1)	
Non-handlers are prohibited in treated areas plus the additional buffer area during application in nurseries	51, 52, 92	36, 72	110(b)	
Non-handlers are prohibited in a greenhouse during application and until ventilation criteria are met	41, 55, 92	36, 72	110(c)	
Early entry workers are prohibited in treated areas during the first 4 hours after application	93	47, 72	112(c)(3)	
Early entry workers are limited to 1 hour of work in a 24 hour period in treated areas during the REI	93	47, 72	112(c)(2)	
Early entry workers who perform irrigation and limited contact activities are limited to 8 hours of work in a 24 hour period	amend	48, 72	amend	
The correct PPE is provided for early entry work	93	52-56, 72	112(a)(4)	
The handler wears the label-specified PPE during handling tasks	82, 83, 92	56, 72	240(a)	
The label-specified PPE for handling activities is provided in clean and operating condition	34, 92	56	240(c)	
This establishment notifies commercial handlers regarding the location of treated areas and REI's on the establishment	33, 34, 91	26	124	
Commercial handlers notify you of the required application information prior to application	33	26	224	
This publication is distributed for educational purposes only. Individuals who use agricultural chemicals are responsible for ensuring that the intended use conforms to the product label and complies with current Federal, State, and Local regulations. Refer to the complete WPS regulations at 40 CFR Part 170.				

Resources

CEPEP Website - WPS. <http://www.cepep.colostate.edu/wpsResources.htm>