

# Cotton Producers Facing the Worker Protection Standard



A Practical Approach

Volume 1, Number 2

## 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 covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of \_\_ 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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## Cotton Production: Beginning the Season

Planning activities are important at this time of the season. Most of the farming activities which include ground preparation, preplant herbicide use, fungicide choice, seed purchase and preemergence have been done. However, postemergence herbicide use and other operations are being done. It's also a good time to be thinking about the Worker Protection Standard (WPS). It's not that difficult if you begin now.

### Take a Few Minutes and Read The Pesticide Label

**Time Saving/Liability Protection** Read the label.....of the products that will be used this cotton production season. The *first step* is to determine if the product has a WPS statement on the label. If not, then provisions of the WPS do NOT apply, only other Federal laws, State laws and the pesticide labeling of each product.

Many herbicides and fungicides are not restricted use pesticides (applied only by certified applicators or under their direct supervision), but the labeling will require WPS compliance. Compliance requirements for the WPS can be determined by looking for the statement, Agricultural Use Requirements, on a pesticide label. An **example** is listed in the column on the left.

### Establishing a Central Location for Information

**Reminder** The WPS requires that certain information be "displayed" at a central location on a cotton farm. This location must be accessible to workers and handlers. Information required includes:

- Application list** The location and description of the area to be treated, product name, EPA registration number, active ingredient(s), time and date of scheduled application, restricted-entry interval

- Emergency Information** Name, telephone number and address of nearest emergency facility

- Pesticide Safety Poster** Must be either the WPS safety poster developed by EPA or an equivalent...can be purchased from local suppliers

**Good Idea!** Optimum management of a cotton farming operation involves maintaining records of farming activities,

especially where there are input costs. Cotton producers realize that good pesticide records are essential to evaluating returns above costs on individual fields and farms. The WPS just takes it one step further...*it's not that difficult....*the **Central Location** is nothing more than a timely display of the pesticide record at a location convenient to workers and handlers. The Central Location can be the.....*farm shop, farm office, equipment building, other farm structure or other point of assembly for workers and handlers each morning.*

**Time Saving** The Central Location is where employees are provided instructions regarding spraying pesticides and/or hand labor tasks, such as, placement of irrigation pipe, hoeing and cultivation. It's easy to incorporate additional information in the discussion, such as, early entry, posting, personal protective equipment needs, decontamination, and other appropriate information. This will save time and become a routine activity after a few days.

## Something You Should Know About Restricted Use Pesticides (RUP)

Agricultural chemicals used in control of pests (weeds, diseases, insects) are classified as restricted use pesticides (RUP) or general use pesticides based on their toxicity, capability of injury to the user or the environment or for other reasons. A **Restricted Use Pesticide** may have a longer REI, increased PPE requirements, notification statements, higher toxicity and other more restrictive requirements than found on general use pesticides. A RUP can be used only by a certified private or commercial pesticide applicator or person under their direct supervision.

**Reminder** Pesticides which require compliance with the WPS are RUPs, but there are many general use pesticides that have a WPS statement on the label. Some examples are Apron 50W, Dithane DF, Ridomil 2E (Fungicides); Banvel SGF, Cotoran 4L, Assure II (Herbicides). Some pesticides may have the signal word “DANGER” (*skull and cross-bones symbol*), but they may not be a RUP product, but will have a WPS statement because of special injury risks (eyes, other).

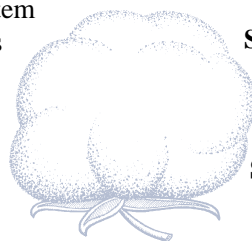
## Recordkeeping ....the Do's and Don'ts

**Liability Protection** Displaying pesticide records is required by the WPS. Recordkeeping has many benefits, such as, evaluation of effectiveness of control, resolve pesticide failures, improve purchasing, improve crop rotation decisions, help prepare for requirements of lending institutions and documentation of rates and product use according to labeling which could be the difference in winning and losing in court cases.

## WPS vs the Federal Pesticide Recordkeeping Regulation

**Tip** The emphasis in this document is the WPS, but the **Federal Pesticide Recordkeeping Regulation (FPRR)** which became effective on May 10, 1993 also requires recordkeeping for private applicators (cotton producers). *Don't think it's impossible to comply with both regulations because it's not that difficult and you are already doing the recordkeeping for both even though you may not have known it!* Under the FPRR only the use of *restricted use pesticides* has to be maintained as a record and NOT displayed as the WPS. Table 1 is offered as an easy way to compare the two regulations and to be in compliance with both regulations.

**Tip** There is **No** specific form or recordkeeping system required. The recordkeeping method is your choice as long as the required information is kept. This can be done with record books, ledgers, specially created forms, handbooks, or other methods.



**Table 1. Requirements for Record Display or Recordkeeping**

Record/other	Worker Protection Standard	Federal Pesticide Recordkeeping
Date (Month, Day, Year)	D	R
Time of Application	D	
Crop or Commodity		R
Location and description of area	D	R
Brand or Product Name	D	R
Active Ingredient	D	
EPA Registration Number	D	R
Acres Treated (number)		R
Total Amount of Product (not water volume)		R
Applicator Information (certificate, etc.)		R
Restricted Entry Interval		
Duration (hrs)	D	
Expiration (mo/da/time)	D	
Record displayed at central location by the time of application	D	
Record maintained at central location for 30 days*	D	
Record of RUP and/or general use pesticide	RUP & General	RUP
Maintain pesticide record for 2 years		R

D=display, R=required, RUP=restricted use pesticide  
\* After REI expire or after end of application if no REI stated

**Table 2. WPS Supplies Checklist for Workers and Handlers**

Materials	Workers	Handlers	Early Entry Workers
PPE (Refer to each pesticide label for specific PPE requirements)			
<input type="checkbox"/> Approved Respirator		R	R
<input type="checkbox"/> Chemical Resistant Gloves		R	R
<input type="checkbox"/> Chemical Resistant Footwear		R	R
<input type="checkbox"/> Coveralls		R	R
<input type="checkbox"/> Chemical Resistant Suit		R	R
<input type="checkbox"/> Protective Eyewear		R	R
<input type="checkbox"/> Apron (chemical resistant)		R	R
<input type="checkbox"/> Chemical Resistant Headgear		R	R
<b>Decontamination</b>			
<input type="checkbox"/> Immediately accessible		R	R
<input type="checkbox"/> Available within 1/4 mile of work	R	R	R
<b>Notification</b>			
<input type="checkbox"/> Posting Signs	R		R
<b>Central Location</b>			
<input type="checkbox"/> Emergency Information Sheet	R	R	R
<input type="checkbox"/> Safety Poster	R	R	R
<input type="checkbox"/> Recordkeeping Forms, software, books, etc.	R	R	R
<input type="checkbox"/> Central Location Display	R	R	R

## It's Time to Get The Personal Protective Equipment Ready

**Time Saving** Personal protective equipment, decontamination and other supplies are required under the WPS for workers and handlers performing work related tasks on a cotton farm. In preparing for the 1998 season, take a few steps to insure supplies are available, thereby *reducing time* needed to do this after seasonal work activities have begun. Consider these steps:

**Step 1.** Identify all supplies needed for workers and handlers. Refer to Table 2 (check product label for PPE requirements).

**Step 2.** Evaluate the condition and need or replacement of existing PPE. Insure equipment is clean and in a condition acceptable for use (test handlers for respirator fit).

**Step 3.** Purchase supplies from local chemical distributors, farm co-op's, farm supply stores or nationally from companies, such as, Gempler's (1-800-382-8473).

## Planning Decontamination Sites on a Cotton Farm

**Good Idea!** Decontamination supplies are easy to provide, can be done inexpensively and considered a good idea. Decontamination has been practiced on cotton farms almost from the time of the first use of a pesticide. Everyone wants a place for decontamination, but there was no consistency in how to implement decontamination until the creation of the WPS. The most common location and methods of decontamination are:

**Handlers.....**(1) shop and mixing and loading site with water and decontamination supplies in sufficient quantities for use after mixing and applying pesticides. (2) spray equipment or tractor with spray tank with an additional designated tank located on equipment for water and supplies maintained in a protective container which must not be contaminated.

**Workers.....**water tank with PPE supplies contained in a pesticide resistant container usually found in a truck or tractor (cultivation) located near the work site (must be within 1/4 mile of workers).

### Reminder

**Handlers** must be provided decontamination sites for washing off pesticides and pesticide residue when they are doing handling tasks (ex...spraying, mixing, loading, handling open containers, working on application equipment, etc.).

**Workers** must be provided decontamination sites for washing off pesticide residues when working in a pesticide treated area and are doing hard labor tasks that involve contact with a treated surface (soil, water or plants) (ex...weeding, irrigating, hoeing, etc.).

**Checklist** Specific materials must be provided at decontamination sites as listed in Table 3.

**Cost Saving** Decontamination supplies can be very inexpensive. The site can be easily created by buying individual decontamination items and placing them in a pesticide resistant container holding water (not for drinking). Many 3-5 gallon water coolers have trays in the top which can be used to store the soap, single use paper towels and a light weight chemical resistant coverall. Water (quality and temperature which will not cause injury) is an eye flush.

Commercially prepared containers containing all required materials are also available with costs in the \$100-200 range. Larger tanks for mounting on a tractor or spray rig for use by handlers again range from a low cost to higher depending on the size and valve configuration. Tanks mounted on equipment must NOT be used for mixing pesticides, unless equipped with the proper valves to prevent backsiphoning of a pesticide into the water tank.

**Read This** Decontamination supplies must be available as follows:

**Handler.....**available during the handling task (spraying) and not more than 1/4 mile from the handling task (usually carried on equipment).

**Worker.....**not more than 1/4 mile from where the working task (cultivation, hoeing, irrigation equipment maintenance) is being done or the nearest access point if the distance is greater than 1/4 mile.

**Time Saving** If the time of 30 days (required to provide decontamination supplies) after the REI or the application has expired and there are no treated fields within 1/4 mile of work activities, then NO decontamination supplies are required. Decontamination supplies are required only when workers are present during the 30 day or 7 day (chemical with REI of 4 hours or less) period following the REI or application has expired.

**Table 3. Decontamination Supplies Recommended for Employees**

Materials	Workers	Handlers	Early Entry Workers
Water*			
1 gal	R		R
2 gal		R	
3 gal (Enough to wash body)		R	
Eye Flush (1 pt)		R	R
Soap	R	R	R
Single Use Paper Towels	R	R	R
Pesticide Resistant Container (only if inside treated area)		R	R
Coveralls (change of clothing)		R	R
End of task - enough water to wash thoroughly		R	R

R= recommended

\*= more water than stated if needed. Water quality is per employee who will use that decontamination station.

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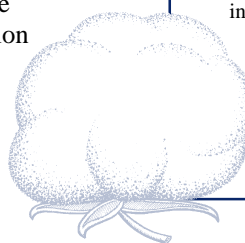
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**QUICK PESTICIDE CHECK**  
Cotton PrePlant/Preemergence Herbicides++

Product	EPA Number	Active Ingredient	RUP	Signal Word	REI	Noti-fication	PPE	Early Entry PPE	Seasonal Use	Company
Banvel SGF	55947-28	dicamba	no	warning	12	oral	agj	begj	PPL,PPE	Sandoz
Bladex 4L	352-470	cyanazine	yes	warning	12	oral	afhjk	bfgj	PPL,PRE	DuPont
Bladex 90 DF	352-495	cyanazine	yes	warning	12	oral	aehjk	begj	PPL,PPE	DuPont
Cobra	59639-34	lactofen	no	danger	12	oral	dfhjkl	dfhjl	PPE	Valent
Command 3 ME	279-3158	clomazone	no	caution	12+	oral	afg	bfg	PRE	FMC
Dacthal W-75	50534-1	DCPA	no	caution	12+	oral	aeg	beg	PRE	Isk Biociences
DSMA L	50534-27	DSMA	no	caution	12	oral	aegjkm	begj	PPL	Isk Biociences
Dual	100-673	metolachlor	no	warning	12	oral	cfgj	cfhj	PPL, PRE	Ciba
Dual II	100-711	metolachlor	no	caution	12	oral	afg	bfg	PPL, PRE	Ciba
Goal 2XL	707-243	oxyfluorfen	no	warning	24	oral	cfhjkl	cfhjl	PPL, PRE	Rohm and Haas
Karmex DF	352-508	diuron	no	warning	12	oral	aegj	begj	PRE	DuPont
Kerb 50-W	707-159	pronamide	yes	caution	24	oral	cehjdk	cehjl	PRE	Rohm and Haas
Pentagon DG	241-268	pendimethalin	no	caution	12	oral	aeg	beg	PPL, PRE	Cyanamid
Prowl 3.3 EC	241-337	pendimethalin	no	caution	12	oral	afg	bfg	PPL, PRE	Cyanamid
Roundup Ultra RT	524-475	glyphosate	no	caution	4	oral	ag	beg	PPL, PRE	Monsanto
Treflan 5	62719-118	trifluralin	no	caution	12+	oral	afgj	bfgj	PPL, PRE	Dow Elanco
Treflan EC	62719-93	trifluralin	no	warning	12+	oral	afgj	bfgj	PRE	Dow Elanco
Treflan HFP	62719-250	trifluralin	no	warning	12+	oral	afgj	bfgj	PPL, PRE	Dow Elanco
Treflan TR-10	62719-131	trifluralin	no	caution	12+	oral	aegj	begj	PPL, PRE	Dow Elanco
Tri-4 HF	241-343	trifluralin	no	warning	12	oral	cfhjkl	cfhjl	PPL, PRE	Cyanamid
Trifluralin 4 EC	9779-303	trifluralin	no	caution	12	oral	afgj	bfgj	PRE	Riverside/Terra
Trifluralin 4 EC	34704-242	trifluralin	no	caution	12	oral	afg	bfg	PPL, PRE	UAP
Zorial Rapid 80	55947-77	norflurazon	no	caution	12+	oral	aeg	beg	PPL, PRE	Sandoz

++Check product labels for approval for use in California. +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:	Personal Protective Equipment (PPE):	a...Long-sleeved-shirt and long pants	h...Chemical- resistant footwear plus socks
		b...Coveralls	j...Protective eyewear
PPL...PrePlant		c...Coveralls over short-sleeved shirt and long pants	k...Chemcial- resistant apron when cleaning equipment, mixing or loading
PRE..PreEmergence		e...Waterproof gloves	l...Chemical-resistant headgear for overhead exposure
		f...Chemical-resistant gloves	m...Approved respirator
		g...Shoes plus socks	n....Chemical-resistant protective suit
			o...Face shield

Information presented in this table is for planning purposes 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.



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