

Cotton

Cotton Producers Facing The Worker Protection Standard

Winter 1999

Information Sheet 5

NOTIFICATION: ORAL/POSTING

Notification of Workers on a Cotton Farm

Farm employers must insure that workers who will be within one-quarter mile of a treated area **must know all areas** on a farm where pesticide applications are taking place and where the restricted entry intervals (REIs) are in effect. This is known as “**Notification.**” Oral warnings and/or posting of warning signs at entrances to fields are methods of notification.

A pesticide label will specify if **oral** or both **oral and posting of a warning sign** are required. If the pesticide label is silent on notification, then you have the choice of oral or posting notification. Notification information is found on the pesticide label under the **Agricultural Use Requirements.**

Warning by Oral Notification

What information.....The worker must be informed of the location and description of the treated area, the time during which entry is restricted and instructions not to enter the treated areas until the REI has expired.

When.....A worker on a cotton farming establishment must be warned orally and/or posting of warning signs **before the application takes place.** If the worker is NOT on the farm when the pesticide application begins, then the worker must be orally warned **at the beginning of the first work period** if the application is still taking place or the restricted-entry interval for the pesticide is in effect.

How.....Before beginning the oral and/or posting warnings, refer to the pesticide label(s) of the products intended to be used. The pesticide label will specify under the “Agricultural Use Requirements” the specific warnings which are required. After specific warnings are known, then consider assembling your workers and handlers each morning, probably near the Central Location Display Site, and discuss work activities for the day along with warnings and other information regarding the pesticide(s) to be used. Pesticide labeling can be provided to handlers as well as mixing and application instructions. Personal Protective Equipment requirements and information which will need to be posted at the central location should be reviewed. Posting field sites can be discussed and where decontamination materials may be found.



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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When Early Entry is unavoidable.... workers may enter treated areas before the restricted entry interval is over to do short-term jobs (ex. irrigation equipment repair) that **do not involve hand labor**.

There are three work situations where a worker is permitted to enter a field under an REI. These are **short-term tasks, emergency tasks and specific tasks approved by EPA**. These tasks have time limitations in the treated area and limitations on the parts of the body exposed. Pesticide labeling may prohibit even early entry. Special protection, such as special training and instructions, personal protective equipment, decontamination materials, information at a central location, emergency assistance, notification about applications and other restrictions regarding the application, must be provided.

Warning by Posting

What information....The design of the sign used in posting was developed by the EPA and cannot be altered. Additional information can be added, such as the name of the pesticide, date of application or if the REI additional information does not alter the impact or meaning of the required information displayed on the sign. Suppliers provide signs with space for additional information as well as signs for permanent mounting at sites when the REI is not in effect.

Some states, such as California, have received approval through the EPA to use different signs than those specified in the Worker Protection Standard. Therefore, consult your Department of Pesticide Regulations, State Department of Agriculture, or other regulatory agency in your state which is responsible for implementation of the WPS.

When....Posting of signs must be completed **not more than 24 hours before the application and by the time of the application** of the pesticide. Sign must be retained during the application and throughout the restricted entry interval. The sign must be removed within **3 days (72 hours)** following the REI or end of the application if the REI is not specified.

How....In order to improve timing and insure proper placement of sign at treated sites, instruct handlers to place sign before beginning the pesticide application. Signs should be posted at all points or field corners where workers usually enter the treated area, which may include the access road and established walking routes.

Exceptions

Sign number....The WPS does not specify the number of signs which should be posted. A field may require only one sign, depending on the number of entrances into a field. The only specific requirement is that workers must be advised of a field that is treated. There may be a requirement for one sign or several, depending on the number of entrances into a field and the direction of entry by workers.

No requirement for posting.... Consider scheduling work activities where workers will not walk within one-quarter mile of the treated area during the pesticide application or while the field is under an REI. If worker do not work within one-quarter mile of the treated area, then posting is NOT required.

Interpretation

Q. In some areas, fields are so large that it may take days to treat the entire field. What is the "treated area" then, the whole field, or just the part treated each day?

A. The treated area is the portion of the field where the pesticide is directed. Employers may choose to designate only the areas being treated that day or previously treated as the treated area. Areas designated

as treated and still under the REI requirements need to be posted if posting is required by the product labeling or the agricultural employer chooses to use posting as the means of notifying workers working within a quarter mile of the treated area. The whole field may be posted, but the field must remain posted until the REI expires for every section of it or specific posting is done for the sections remaining under the REI.



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