

Cotton Producers Facing the Worker Protection Standard



A Practical Approach

Volume 1, Number 3

SAMPLE BOX

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.

*This Publication is Produced by
The Cotton Foundation in
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Cotton Production: Early Mid-Season

The early season cotton production activities, such as directed sprays for thrips, pin-head square insecticide applications for boll weevils (except in boll weevil eradication areas of the Cotton Belt) have been completed. Some of the early mid-season activities may include postemergence herbicide applications, cultivation and preparation or establishment of irrigation systems (pivot, border, furrow, other). Each of these activities may require handlers, early entry workers and workers to complete activities which relate to the WPS.

Notifying Your Workers

Worker employers must insure that workers who will be within one-quarter mile of the treated area must know all areas on a farm where pesticide applications are taking place and where the restricted-entry intervals (REI's) are in effect. This is known as "Notification." Oral warnings and 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.

Don't Overlook the "Details" of Oral and Posting Notification

Oral Warning.....simply states the location and description of the treated area, the time during which entry is restricted and instructions not to enter treated areas until the REI has expired.

Posting Warning Sign.....**Things to remember and helpful hints:**

- Post signs where workers enter the field.

Time and Cost Saving Only one sign may be needed depending on the number of entrances into a field. However, the number of signs per field is not specified in the WPS, but signs should be posted where employees normally enter a field.

- Post signs no more than 24 hours before and by the time of the application of the pesticide.

Time Saving Instruct the handler to install the signs before beginning the pesticide application.

Remove the sign within 3 days (72 hours) following the REI or end of application if the REI is not specified.

Liability Protection Don't leave the sign longer than 3 days after the REI has expired. Why? Because legally the field remains under the REI and workers must be kept out during the entire time the signs are posting the field.

Reminder

Early entry workers can enter a field under a REI if trained, equipped with PPE and do only approved tasks.

Tip

The best way to save time and eliminate the need for posting.....schedule your pesticide treatment and 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. You **do not** have to warn workers under these conditions. This will save your handler time and better utilize your workers.

The Sign

Buy the sign! You cannot create an approved sign very easily because the warning sign **MUST** have the same appearance as the one illustrated. You can add additional information on the sign if it does not deface the information on the sign.

Alert! Some states, such as California, have received approval through the EPA to use different signs from the sign specified in the WPS. 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.

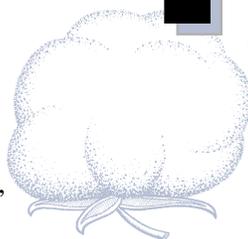


Signs can be purchased from local suppliers or national suppliers (such as Gempler's).

Cost Saving The plastic signs cost more, but last much longer and can tolerate more abuse on the farm. Signs can be purchased for permanent mounting at field entrances. These signs have a cover which can be placed over the sign or fold in half when the field is not under an REI.

Coping with the Restricted Entry Interval in Cotton Production

The **Restricted Entry Interval (REI)** triggers many actions in the WPS. It is usually expressed as 12, 24, 48 or 72 hours and generally speaking, the higher the REI hour interval, the more risk to the handler, early entry worker and worker. The REI is found on the pesticide label under the heading: **Agricultural Use Statement** "Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours."



Time Saving Each morning when employees are assembled, probably near the central location site, to assign work activities for the day, why not: have pesticide labeling for the handler and discuss the mixing and application of the pesticide; discuss PPE requirements; indicate what information will be displayed at the central location site; discuss where posting of the treated sites is to be done; where to pick up posting signs for the handler to install; when workers can reenter the treated sites; and identify where decontamination materials can be found and how used and other related information. This will contribute to oral and posting notification for your employees.

Tip If a tank mix of Guthion (48 hour REI) and Dipel (12 hour REI) is intended to be sprayed on a cotton field, what REI should be used for compliance with WPS? *The longer interval (Guthion) must be followed and PPE protection should be based on the pesticide label with the most comprehensive safety requirements, but include all provisions of both labels.*

Workers Can Enter Pesticide Treated Fields Under Some Exceptions

If workers on a cotton farm cannot avoid entering a field to install irrigation pipe, or cultivate a treated field on a tractor under an REI, this can be accomplished through **Early Entry exceptions** under the WPS. There are two types of early entry into a treated field:

- (1) with no contact
- (2) with contact

No Contact Early Entry Worker A worker who is cultivating on a tractor is a common practice of an early entry no contact worker. An early entry no contact worker cannot **have any contact with anything (plants, soil, water, air) that has been treated with a pesticide to which the REI applies.**

Examples:

Temik has been applied as an in-furrow treatment in a cotton field and is covered with soil. The worker can unload and place irrigation pipe, work on a pivot irrigation system or do other tasks that do not disrupt the soil surface or touch a treated surface in the treated field during the REI.

In the same field described above, if a worker chooses to check the seed depth and will make contact with a Temik treated surface as soil is removed, then the worker is considered an early entry **CONTACT** worker and must follow all provisions of the WPS, which specify when to

enter the field, how long to remain, PPE must be worn based on the Temik label and follow other requirement under the WPS.

■ A NO CONTACT early entry worker can enter a treated field when cultivating in an open or closed cab tractor, truck or other vehicle as long as no treated surface is contacted.

■ If a worker is cultivating with a closed cab tractor, but the cultivation equipment becomes entangled with weeds and vines which must be removed, and the field has been treated with a postemergence herbicide and is under an REI ... can he remove the obstruction as a no contact early entry worker? No, he becomes an early entry CONTACT worker and must comply with PPE and other requirements of the pesticide label and the WPS.

Contact Early Entry Worker

There are limited work situations where workers can enter treated areas under a REI. There are only three ... **short-term, emergency and specific tasks**. Under most situations, the **short-term entry** is the more likely method of early entry.

Short-Term Tasks ... consider the following:

Entrance into a field requires the approved protections and PPE specified by the pesticide label of the product(s) applied to the field.

Short-term tasks do NOT allow hand labor tasks while in the field (such as hoeing).

Workers must wait at least 4 hours after the application before entering the field.

Workers must not spend over 1 hour in a 24-hour period in the treated field under the REI. However, **Exceptions for Limited Contact Activities** allow 8 hours in a 24-hour period for non-hand labor tasks with contact with treated surfaces minimal and limited to the feet, lower legs, hands and forearms. The exception is not allowed if there is a double notification (oral and posting warning signs) requirement on the label.

Some low risk pesticides (such as BT products ... such as Dipel ES) have the REI's lowered from 12 to 4 hours. Check pesticide labels for details. Again, only if this conflict of application REI and irrigation was impossible to avoid!

Irrigation Workers ... Irrigation activities can be conducted for 8 hours in 24 hours during the REI under limited contact provisions with unavoidable situations such as conflict of application timing, irrigation and REI. The limited contact provision **only** applies if contact is limited to forearms, hands, lower-legs and feet. The employer must provide PPE equivalent to label requirements or provide at least coveralls, chemical resistant gloves, socks, chemical resistant footwear and eye protection if required on the pesticide labeling. Read the product labeling for more details.

Tip Keep in mind ... if a non-treated zone along the edge of fields is planned for the location of irrigation pipe and the worker will not contact a treated surface, then he is considered a worker and requires decontamination notification and other protection supplies offered to workers.



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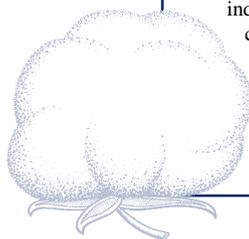
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QUICK PESTICIDE CHECK
Cotton Postemergence Herbicides/Other Herbicides++

Product	EPA Number	Active Ingredient	RUP	Signal Word	REI	Noti-fication+++	PPE	Early Entry PPE	Seasonal Use	Company
Ansar 6.6	50534-16	MSMA	no	caution	12	oral	afhjkm	begj	Post, H	ISK Biosciences
Ansar 8100	50534-46	DSMA	no	caution	12	oral	aegjkm	begj	Post, H	ISK Biosciences
Arsonate L	50534-16	MSMA	no	caution	12	oral	afhjkm	begj	Post, H	ISK Biosciences
Assure II	352-541	quizalofop-P-ethyl	no	danger	12	oral	afgj	bfgj	Post, H	Du Pont
Bladex 4L	352-470	cyazazine	yes	warning	12	oral	afhjk	bfgj	Post, H	Du Pont
Bladex 90 DF	352-495	cyazazine	yes	warning	12	oral	afhjk	begj	Post, H	Du Pont
Buctril 4 EC	264-540	bromoxynil	no	warning	12	oral	dfhjkl	dfhjl	Post, H	Rhone-Poulenc
Bueno 6	50534-6	MSMA	no	caution	12	oral	aegjkm	begj	Post, H	ISK Biosciences
Caparol 4 L	100-620	prometryn	no	caution	12	oral	ag	beg	H	Ciba (Norvartis)
Cobra	59639-34	lactofen	no	danger	12	oral	dfhjk	dfhjl	Post, H	Valent
Command 3 ME	279-3158	clomazone	no	caution	12	oral	afg	bfg	H	FMC
Command 4 EC	279-3053	clomazone	no	warning	12+	oral	afgj	bfgj	H	FMC
Cotoran 4 L	100-642	fluometuron	no	caution	24	oral	afg	bfg	H	Ciba (Norvartis)
Cooran DF	100-704	fluometuron	no	warning	24	oral	aegj	begj	H	Ciba (Norvartis)
Cyclone	10182-111	paraquat dichloride	yes	danger-poison	12/48+	oral/post	aegjk	begj	Post, H	Zeneca
Cyclone Conc.	10182-372	paraquat dichloride	yes	danger-poison	12/48+	oral/post	aegkmo	ahel	Post, H	Zeneca
Dacthal W-75	50534-1	DCPA	no	caution	12+	oral	aeg	beg	H	ISK Biosciences
DSMA L	50534-27	DSMA	no	caution	12	oral	aegjkm	begj	Post, H	ISK Biosciences
Eptam 7-E	10182-220	EPTC	no	caution	12+	oral	afgj	bfgj	H	Zeneca
Fusilade DX	10182-367	fluzifop-P-butyl	no	caution	12	oral	afgjk	bfg	H	Zeneca
Fusion	10182-343	fluzifop-P-butyl+	no	caution	24	oral	afg	bfg	Post, H	Zeneca
Goal 2XL	707-243	oxyfluorfen	no	warning	24	oral	cfhjkl	cfhjl	Post, H	Rhom and Haas
Gramoxone Extra	1082-280	paraquat dichloride	yes	danger-poison	12/24+	oral/post	dehjkml	dehjl	Post, H	Zeneca
Karmex DF	352-508	diuron	no	warning	12	oral	aegj	begj	Post, H	Du Pont
Kerb 50-W	707-159	pronamide	yes	caution	24	oral	cehjkl	cehjl	Post, H	Rohm and Haas
Poast	7969-58	sethoxydim	no	warning	12	oral	cfhjkl	cfhjl	Post, H	BASF
Poast Plus	7969-88	sethoxydim	no	caution	12	oral	afg	bfg	Post, H	BASF
Prism	59639-78	clethodim	no	warning	12	oral	cfhjkl	cfhjl	Post, H	Valent
Roundup Ultra	524-475	glyphosate	no	caution	4	oral	ag	beg	Post, H	Monsanto
Roundup Ultra RT	524-475	glyphosate	no	caution	4	oral	ag	beg	Post, H	Monsanto
Select 2 EC	59639-3	clethodim	no	warning	12	oral	afgj	bfgj	Post, H	Valent
Staple	352-567	pyrithiobac-sodium	no	warning	24	oral	aegj	begj	Post, H	DuPont
Staple (CA)	352-576	pyrithiobac-sodium	no	warning	24	oral	aegj	begj	Post, H	DuPont
Starfire	1082-103	paraquat dichloride	yes	danger-poison	12/24+	oral/post	dehjkml	dehjl	H	Zeneca
Treflan MTF	62719-116	trifluralin	no	caution	12+	oral	afgj	bfgj	H	DowElanco

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

Seasonal Use: Post...Postemergence herbicide H.....Herbicide	Personal Protective Equipment (PPE):	a...Long-sleeved shirt and long pants b...Coveralls c...Coveralls over short sleeved shirt and short pants d...Coveralls over long sleeved shirt and long pants e...Waterproof gloves f...Chemical resistant gloves g...Shoes and socks h...Chemical resistant footwear plus socks	j...Protective eyewear k...Chemical resistant apron when cleaning equipment, mixing or loading l...Chemical resistant headgear for overhead exposure m...Approved respirator n...Chemical resistant protective suit o...Face shield
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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.

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