

## Surviving the FDACS Bureau of Compliance Monitoring Inspection: Walking through an Inspection<sup>1</sup>

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### Introduction

How well would your agricultural production facility meet the regulations of Florida's pesticide law? This article will assist agricultural producers in preparing for the day when the inspector arrives at their operation. It reviews the elements that an inspector for the Florida Department of Agriculture and Consumer Services (FDACS) Bureau of Compliance Monitoring (BCM) will examine during a routine agricultural establishment inspection.

### Role of the Bureau of Compliance Monitoring

FDACS' BCM is the state licensing agency in Florida for agricultural pesticide applicators who must be licensed to use EPA registered, restricted-use pesticides.

They perform routine inspections of facilities and operations of all types of private and commercial pesticide applicators, as well as of government agencies that are using pesticides. Inspections include a review of application records and an evaluation of product labels to ensure that use, storage, disposal

and safety requirements of pesticides are being followed.

Inspections are necessary to ensure the safety of workers, to protect the environment and natural resources and to maintain the secure use and storage of agrichemicals.

### The Basic Components

A compliance inspection of an agricultural facility is very comprehensive. Besides completing all official documentation forms, inspectors may take photographs for future evidence. The inspector will cover the components included on the Pesticide Use Inspection report and the Worker Protection Standard (WPS) inspection form. Records pertaining to pesticide applications and Florida rules regarding pesticides should also be made available to inspectors. The following sections will discuss each component in greater detail with links to the individual inspection forms. A pdf of the entire set of inspection forms is also available (<http://edis.ifas.ufl.edu/pdf/PI/PI19500FDACSInspectionForms.pdf>)

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## Inspector Identification

Inspectors will properly introduce and identify themselves once they arrive at a place of business by presenting their BCM licenses and explaining the reason for the visit. They can arrive at any establishment without a prior appointment, so an establishment manager may already be engaged in some work activity. However, the inspection will go more smoothly with a manager's full cooperation

## Pesticide Use Inspection Report

Following introductions, the inspector will fill out sections I and II on page 1 of the Pesticide Use Inspection Report for the agricultural establishments contact information (page 8).

## Restricted Use Pesticide License Verification

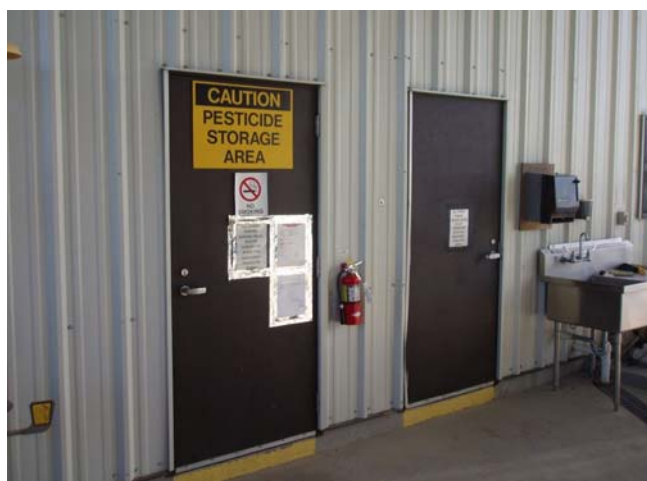
During the early phase of the inspection, the inspector will determine whether restricted used pesticides are used on the establishment and verify that the appropriate license is held.

## Pesticide Storage

Ideally, storage would not be an issue if all products could be used within a single season. But, the reality for most Florida producers is that pest management is a year-round concern because of the nature of cropping systems and environmental conditions. The main check points the inspector will look for at the storage area are whether the facility appears to be secure, whether pesticides are held according to label directions, and what the overall condition of the facility is, each listed in section III (Page 8). A secure storage area has a lock and is well-marked with signs (Figure 2).

Although not required by law, the inspector may make a few suggestions including:

- having a spill kit on hand;
- keeping an inventory list;
- keeping liquid and dry materials apart;
- not keeping personal protective equipment (PPE) inside with chemicals;



**Figure 2.** Example of a secure, well-marked storage facility.

- keeping all materials up, off of the floor; and
- describing the benefits of Operation Cleansweep for pesticide waste disposal.

The spill kit contains items such as absorbent material and containment snakes to clean up liquid spills. More information about assembling and using a spill kit can be found in UF/IFAS EDIS document PI-159, Pesticide Spill Kits <http://edis.ifas.ufl.edu/PI196>. An inventory list of the materials held in the facility will provide a record for the length of time they've been held. It's always a good idea to store dry and liquid materials apart. If a liquid spills on a dry material, both materials will have to be disposed of. All materials, regardless of formulation, should be stored up off the floor so that they are protected from water leakage and flooding..

Expired materials should have been disposed of safely. Operation Cleansweep is a publicly-funded disposal program that targets agricultural establishments. For more information, see UF/IFAS EDIS Document PI-48, Operation Cleansweep for Pesticides <http://edis.ifas.ufl.edu/PI085>.

## Application Information

After examining the products held in the storage facility, the inspector will select a label from one of the containers which will serve as the basis for the questions asked in section IV, page 2 of the Pesticide Use Inspection Report (page 9).

The information that the inspector will verify pertains to the following aspects of the product labeling:

- labeled sites/crops for the application
- proper rates, methods, and equipment used
- pre-harvest intervals followed
- whether supplemental labeling was on-hand, if needed
- whether PPE was available and worn
- whether restricted entry intervals (REIs) were observed where applicable
- whether containers, rinsates, and excess pesticide have been properly disposed of
- whether state specifically-regulated pesticides were used properly
- any other specific restrictions that would apply
- location and description of the treated site
- target site or crop
- total size of treated area
- pesticide brand name
- products EPA registration number
- total amount of product applied
- application method.

A sample form for recordkeeping is shown in Figure 4 (page 10). However, managers may choose to use software programs or any other recordkeeping system deemed appropriate for their establishment so long as the required elements are included.

When applicable, inspectors will also need to see records pertaining to Florida rules such as the Organo-Auxin herbicide rule (<http://edis.ifas.ufl.edu/WG051>) and the Aldicarb rule (<http://edis.ifas.ufl.edu/PI111>).

### **Workers Protection Standard (WPS) Inspection**

The inspector will conduct worker and handler interviews to verify the components of the WPS for establishments that employ workers outside immediate family. The following sections discuss the components of the WPS inspection.

#### **WPS Inspection: Central Information Display**

The inspector will ask to see the central information display which must include the EPA-approved safety poster, emergency medical information, and pesticide application information. These points for inspection can be found on Page 1 of the WPS inspection form (page 11).

The display can be placed anywhere that is available to all workers on the establishment and is a convenient, visible place. Application information must be posted from the date of the application until 30 days following the product's REI. The elements required for this WPS central information display

This particular section will also cover the condition of the mix/load/wash down site at the facility. The inspector will determine whether an anti-siphon device is installed in the plumbing used for filling tanks to hold diluted pesticides for application, or at least whether an air gap was present at the time of filling.

### **Recordkeeping of Restricted Use Pesticides**

This is the point of the inspection when a manager will be asked to provide application records of restricted use pesticides. Records must be complete and must include these elements:

- licensed applicators' names and license numbers
- actual applicators' names if not the licensed applicators
- date of application
- start and end times of application

posting are designated by a “W” on the form listed in page 10. As with the restricted use record, there is no required format for the form so long as the necessary elements are present. An example of a central information display is provided (Figure 6). More detailed information is contained in UF/IFAS EDIS Document PI-112, Worker Protection Standard: Information at a Central Location <http://edis.ifas.ufl.edu/PI149>.



**Figure 6.** Example of a central information display.

### **WPS Inspection: Pesticide Safety Training Assurance**

If workers and handlers are certified and licensed as restricted use pesticide applicators, they are considered trained. If not, training for handlers needs to be conducted before they participate in any pesticide handling task. If they are workers who don't handle any pesticides, they must be trained within their first 5 days on the job. Handling tasks include such activities as mixing/loading, repairing application equipment, making applications, adjusting tarps used during fumigations, and any task that involves direct contact with a pesticide. Some inspectors will suggest training everyone as handlers. A person who is trained as a handler can conduct training on the establishment. There are several approved methods of training, but most establishments use the EPA-approved WPS video which is available from FDACS by calling (386) 418-5525.

Documentation of training must be kept on file. Workers and handlers should sign a roster of the training including the date and method of training that was used. The inspector will ask for this documentation and will check the date that the training was conducted (Figure 5). Training must be done at least once every 5 years, should be a standard part of hiring a new employee and should be done immediately before assigning work. Based on FDACS inspection records, training concerns are the most common WPS violations in Florida. More detailed information is contained in UF/IFAS EDIS Document PI-113, Worker Protection Standard: Training Workers and Handlers <http://edis.ifas.ufl.edu/PI150>.

### **Worker Protection Standard: Employer Information Exchange**

Commercial handlers are required to notify the establishment of application information before making the application (page 11). The purpose of this is so that the establishment owner can, in turn, notify his employees of the application. Likewise, if a commercial handler will be on the establishment and within 1/4 mile of an area that is under a restricted entry interval (REI), then the owner should notify the commercial handler. More detailed information is contained in UF/IFAS EDIS Document PI-115, Worker Protection Standard: Employer Information Exchange <http://edis.ifas.ufl.edu/PI152>.

### **Worker Protection Standard: Emergency Assistance**

The inspector will ask the following regarding emergency assistance: “is prompt transportation to an emergency facility available for employees who become sick or injured by pesticides,” and “is information provided to medical personnel regarding the pesticide to which employees may have been exposed?” (page 11).

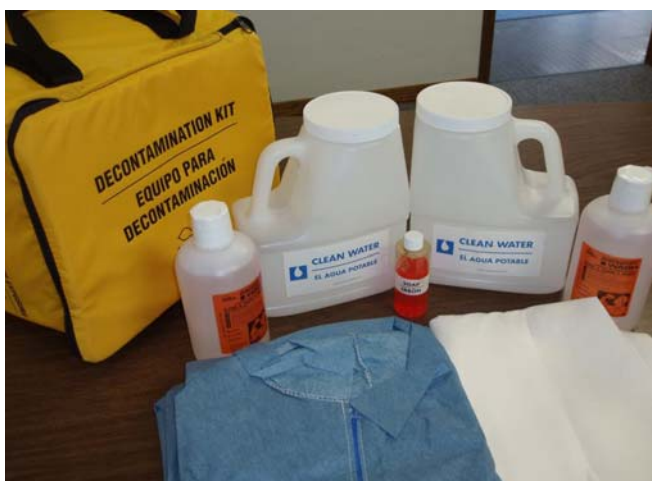
### **Worker Protection Standard: Decontamination Sites**

The inspector will check to see whether the necessary items for the decontamination site are present (page 12). Some decontamination sites are portable and can easily be transported from site to

site where workers and handlers are present (Figure 8) Many establishments make portable kits containing the decontamination supplies and keep them on the equipment or vehicle that is near or used by workers (Figure 9). Decontamination supplies should be provided to workers entering treating areas until 30 days following the REI's expiration and they should also be provided for early entry workers during and after early entry. More detailed information is contained in UF/IFAS EDIS Document PI-116, Worker Protection Standard: Decontamination Supplies  
<http://edis.ifas.ufl.edu/PI153>.



**Figure 8.** Portable decontamination site that can be transported.



**Figure 9.** Decontamination kit that contains the necessary items.

## Worker Protection Standard: Restrictions during Applications

Inspectors will inquire about workers in or around treated areas while an REI is in effect (page 12 and page 13). If there is early entry of workers into an area that is under an REI, the inspector will ask about the PPE that was worn, the applicator training, and time limitations. The necessary PPE can be found in the Agricultural Use Requirement box of each pesticide's label (Figure 11).

### 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) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI). REI Summary: apple, cotton, grapefruit, lemon, nectarines, oranges, tangelo, tangerine = 3 day REI; peaches = 4 day REI; grapes = 7 day REI; all other WPS uses = 48 hour REI.

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.
- Chemical-resistant gloves, such as barrier laminate or butyl rubber.
- Shoes plus socks.
- Protective eyewear.

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

Notify workers of the application to grapes by warning them orally and by posting warning signs at entrances to treated areas.

**Figure 11.** Agricultural Use requirement box of a pesticide that is under the WPS.

## Worker Protection Standard: Notice of Applications to Workers

The inspector will ask questions about worker notification of pesticide applications of greenhouse and fumigant pesticides. (page 13). This information is pesticide-specific and is found in the Agricultural Use Requirement box of the product's label. If a greenhouse is being inspected, the inspector will specifically ask whether warning signs were posted. If a fumigant was used, the specific fumigant

use sign should be posted (Figure 12). With most pesticides, however, only an oral warning is required. If posting signs are used, the inspector will ask when the signs were put into place and taken down. The WPS requires that signs for posting applications should be put in place 24 hours prior to the application and taken down within 3 days after the end of the REI. Failing to remove the signs is a common mistake. If an inspector notices workers in an area that is posted, they will assume that the workers are in an area that has been treated and is within an REI. Therefore, it is important to remove the signs as soon as the REI expires if workers will be within the site. More detailed information is contained in UF/IFAS EDIS Document PI-107, Worker Protection Standard: Notice about Applications <http://edis.ifas.ufl.edu/PI144>.



**Figure 12.** Posting sign for a fumigant application.

### **Workers Protection Standard: Application Restrictions and Monitoring**

The inspector will ask if the person who handled the product was monitored visually or verbally at least once every 2 hours when handling a pesticide whose label contains the skull and crossbones symbol (Figure 13). If a fumigant is used in a greenhouse, the handler must have continuous visual or voice contact with another trained and PPE-equipped handler (Figure 10).

**KEEP OUT OF REACH OF CHILDREN**



**Figure 13.** Skull and crossbones seen on some pesticide labels.

### **Worker Protection Standard: Specific Instructions for Handlers**

The inspector will ask about specific instructions for handlers (page 13). These questions will include verifying that a manager assures handlers read the label or are informed about the label requirements for safe use before performing any handling activity, that the handler has access to the product's labeling during handling activities, and that -- if a commercial handler is contracted -- the handler be informed of any treated areas, REIs, and entry restrictions on the establishment that may be within 1/4 mile.

### **Worker Protection Standard: Safe Operation of Equipment**

The inspector will interview handlers employed at an establishment and ask them (Figure 10):

- whether they have been instructed in the safe operation of any handling equipment before it is used;
- whether the equipment is inspected and repaired before each day of use; and
- whether the employer assures that only trained and PPE-equipped handlers repair, clean, or adjust any handling equipment that contains pesticides or pesticide residues.

### **Worker Protection Standard: Personal Protective Equipment Requirement for Handlers**

The inspector will ask (page 13):

- whether the handler is provided with the appropriate PPE;
- whether it is clean and good working order;

- whether the applicator wears the PPE and uses it correctly;
- whether filters are replaced on respirators when required;
- whether there is a clean place to store PPE, put on, and remove PPE; and
- whether the handler employer takes appropriate measures to prevent heat-related illness for handlers using PPE.

### **Worker Protection Standard: Family Establishments**

Owners of agricultural establishments and members of their immediate families are exempt from many WPS provisions; however, they must comply with these sections:

- employer information exchange,
- restrictions during applications,
- restrictions during handling tasks, and
- restrictions during REI's.

A checklist of these issues can be found in the final portion of the inspection sheet in Figure 10.

### **Conclusion**

The inspection is not necessarily a one-way street for the inspector. Operators and employees have an opportunity to ask questions regarding the facility, pesticide laws, and making compliance more efficient in the operation. Because a major objective of the BCM is to serve an educational role, the inspection should be considered a two-way means of communication.

### **References**

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Florida Department of Agriculture and Consumer Services Bureau of Compliance Monitoring. <http://www.flaes.org/complimonitoring/index.html>



Florida Department of Agriculture & Consumer Services  
Division of Agricultural Environmental Services

CHARLES H. BRONSON  
COMMISSIONER

**PESTICIDE USE INSPECTION REPORT**

Section 487.071, F.S.

File Number: \_\_\_\_\_ Date: \_\_\_\_\_ County: \_\_\_\_\_

File Name: \_\_\_\_\_ File Type: \_\_\_\_\_

**I. FIRM OR INDIVIDUAL INSPECTED**

Name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

City: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Physical Address: \_\_\_\_\_ City: \_\_\_\_\_

Telephone Number: (\_\_\_\_\_) \_\_\_\_\_

**II. HISTORY OF BUSINESS**

Corporate/Company Officers Title and Responsibility

\_\_\_\_\_  
\_\_\_\_\_

Name and Address of Related Firms: \_\_\_\_\_

Persons Interviewed	Title
_____	_____
_____	_____

Number of Licensed Applicators at Firm: \_\_\_\_\_

**III. PESTICIDE STORAGE**

1. Are RUP's stored in a secure manner?  Yes  No  N/A
2. Are pesticides stored according to label directions?  Yes  No  N/A
3. Condition of storage area appears not to injure or endanger water/humans/wildlife/livestock/crops?  Yes  No  N/A

Comments: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

**IV. APPLICATION INFORMATION**

- 1. Are the crops/target sites at this firm listed on the product labeling?  Yes  No  N/A
- 2. Are application rates/methods/equipment consistent with label directions?  Yes  No  N/A
- 3. Are pre-harvest intervals consistent with label directions?  Yes  No  N/A
- 4. Does applicator have supplemental labeling in possession at time of application?  Yes  No  N/A
- 5. Is PPE available and used as required by the pesticide label?  Yes  No  N/A
- 6. Are REI's and posting requirements observed according to label directions?  Yes  No  N/A
- 7. Are specific label restrictions followed?  Yes  No  N/A
- 8. Are all pesticide containers/rinsates/excess chemical disposed of according to label directions?  Yes  No  N/A
- 9. Have conditions of mix/load and wash down sites been reviewed (obtained photos)?  Yes  No  N/A
- 10. Are products with special state regulations used properly?  Yes  No  N/A

Organo-auxin     Aldicarb     Methyl Bromide     Bromacil     Chemigation     TBT

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**V. RESTRICTED USE PESTICIDES & PESTICIDES REQUIRING LICENSURE**

- 1. Are USE records maintained according to Rule 5E-9.032?  Yes  No  N/A
- 2. Does the licensed applicator provide direct supervision according to Rule 5E-9.034?  Yes  No  N/A
- 3. Has aerial applicator maintained proof of financial responsibility per Rule 5E-9.036?  Yes  No  N/A

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**VI. BACKGROUND / OTHER RELEVANT INFORMATION**

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**VII. SIGNATURES**

To the best of my knowledge, the information recorded in this report accurately portrays the activities at this firm.

\_\_\_\_\_  
 Signature of Interviewee

\_\_\_\_\_  
 Signature of Department Representative





WORKER PROTECTION STANDARD INSPECTION FORM

CHARLES H. BRONSON
COMMISSIONER

Chapter 487.071(1), F.S.

Inspection Type: Tier I \_\_\_\_\_ Tier II \_\_\_\_\_
FILE # \_\_\_\_\_ DATE \_\_\_\_\_
AGRICULTURE ESTABLISHMENT
Farm Forest Commercial Handler
Nursery Greenhouse Nursery/Greenhouse
Family Establishment (Also check one of the others)
FIRM NAME
COUNTY
# present at this inspection: workers handlers
Inspection: Unannounced Appointment

DUTIES FOR ALL EMPLOYEES

INFORMATION AT A CENTRAL LOCATION

40 CFR 170

- Yes No N/A a. Is the approved SAFETY POSTER displayed? 135-b & 235-b
Yes No N/A b. Is EMERGENCY MEDICAL INFORMATION displayed? (name, address & telephone) 135-c & 235-c
Yes No N/A c. Is the site LOCATED where it can be readily seen and read by workers & handlers? 135-d & 235-d
Yes No N/A d. Are workers & handlers INFORMED of the location and are they allowed ACCESS to the site? 135-e & 235-e
Yes No N/A e. Does the information remain LEGIBLE while posted? 135-f & 235-f
Yes No N/A f. Is the following APPLICATION INFORMATION displayed? Location and description of the treated area; Product Name; EPA REG #; Active Ingredient(s) of the pesticide; Time & Date of application; REI (restricted entry interval) 122-c & 222-c

Comments: \_\_\_\_\_

PESTICIDE SAFETY TRAINING ASSURANCE

WORKERS: (Applies to workers who are NOT certified applicators or trained handlers)

130-b

- Yes No N/A a. Does Ag employer ASSURE that workers have been trained within the last 5 years? 130-a-1
Yes No N/A b. Does Ag employer ASSURE that workers have been trained before EARLY ENTRY activities during REI? 130-a-2
Yes No N/A c. Is the Ag employer able to VERIFY that the required PESTICIDE SAFETY INFORMATION was provided to workers before entry into any area on an Ag Establishment where WPS pesticides have been applied within the last 30 days? 130-a-3-i
Yes No N/A d. Does Ag employer ASSURE that workers have received the required ADDITIONAL TRAINING before the 6th day of entry into any area on a Ag Establishment where WPS pesticides have been applied within the last 30 days? 130-a-3-ii

HANDLERS: (Applies to handlers who are NOT certified applicators or certified crop advisors).

230-b

- Yes No N/A a. \*Does Ag employer ASSURE the handlers have been trained within the last 5 years? 230-a
Yes No N/A b. \*Does Ag employer ASSURE that handlers have been trained before performing any handling task? 230-a

Comments: \_\_\_\_\_

PESTICIDE SAFETY TRAINING PROGRAM : (Skip this section if training is NOT conducted by this firm)

- Yes No N/A a. \*WORKERS & HANDLERS: Is the information presented in a manner that the workers & handlers can understand? (Such as through a translator & using nontechnical terms & presenter answers questions) 130-d-1 & 230-c-1
Yes No N/A b. WORKERS: Does the PESTICIDE SAFETY INFORMATION meet the criteria listed in 170.130(c)? 130-c
Yes No N/A c. WORKERS: Does the content of the ADDITIONAL TRAINING materials meet the criteria listed in 170.130(d)(4)? 130-d-4
Yes No N/A d. Is trainer qualified to train WORKERS? (Certified applicator, completed train-the-trainer program or a trained handler) 130-d-2
Yes No N/A e. \*HANDLERS: Does the content of the training materials meet the criteria listed in 170.230(c)(4)? 230-c-4
Yes No N/A f. \*Is the trainer qualified to train HANDLERS? (Certified applicator or completed train-the-trainer program) 230-c-2

Comments: \_\_\_\_\_

EMPLOYER INFORMATION EXCHANGE

- Yes No N/A a. \*Does the Ag establishment notify the commercial handler regarding the location of treated areas and REI's? 124
Yes No N/A b. \*Does commercial handler notify the Ag establishment of required application information before the application? 224

Comments: \_\_\_\_\_

EMERGENCY ASSISTANCE

- Yes No N/A a. \*Is prompt transportation to emergency medical facility available for employees who become sick/injured by pesticide? 160-a & 260-a
Yes No N/A b. \*Is information provided to medical personal regarding the pesticide to which employees may have been exposed? 160-b & 260-b

Comments: \_\_\_\_\_

**DECONTAMINATION SITES****The employer must follow the following decontamination requirements of WORKERS & HANDLERS:**

- |                              |                             |                              |   |                   |
|------------------------------|-----------------------------|------------------------------|---|-------------------|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | a. *Do decontamination sites have soap, single-use towels, and enough water for washing & emergency eye flushing?   | 150-b & 250-b     |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | b. *Is the decontamination water of a quality & temperature as required?  | 150-b-1 & 250-b-1 |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | c. *Is 1 pint of eye flush water immediately available to <u>handlers</u> using pesticides requiring protective eye wear and to <u>early entry workers</u> when working in areas treated with pesticides requiring protective eye wear for early entry? | 150-b-4 & 250-b-4 |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | d. *Is the decontamination site within 1/4 mile of the work site?   | 150-c-1 & 250-c-1 |

Comments: \_\_\_\_\_

**The employer must follow the following additional decontamination requirements for WORKERS:**

- |                              |                             |                              |  |                    |
|------------------------------|-----------------------------|------------------------------|--|--------------------|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | a. Are decontamination sites provided to <u>workers</u> entering treated areas until 30 days following expiration of the REI? (Exception: Pesticides with a 4 hour REI require decontamination site for only 7 days) | 150-a-1<br>150-A-2 |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | b. Are decontamination sites provided for <u>early entry workers</u> during and after early entry?   | 112-c-8 & 150-d    |

Comments: \_\_\_\_\_

**The employer must follow the following additional decontamination requirements for HANDLERS:**

- |                              |                             |                              |  |         |
|------------------------------|-----------------------------|------------------------------|--|---------|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | a. *Is enough water provided to <u>handlers</u> for washing the entire body in case of an emergency?                 | 250-b-1 |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | b. *Is one clean change of clothing provided to <u>handlers</u> for use in an emergency?                             | 250-b-4 |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | c. *Are decontamination supplies located at the mix/load site?   | 250-c-1 |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | d. *Are decontamination supplies for <u>PILOTS</u> kept in the airplane or at the aircraft loading site?             | 250-c-2 |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | e. *Are handler decontamination supplies kept out of treated areas unless they are in enclosed containers?           | 250-c-4 |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | f. *Are decontamination supplies located where handlers remove PPE for washing thoroughly after handling activities? | 250-e   |

Comments: \_\_\_\_\_

**ADDITIONAL DUTIES FOR WORKER EMPLOYERS****RESTRICTIONS DURING APPLICATIONS**

- |                              |                             |                              |  |               |
|------------------------------|-----------------------------|------------------------------|--|---------------|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | a. Are <u>workers</u> prohibited in treated areas during application and until REI's have expired?                 | 110-a & 112-a |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | b. Are <u>workers</u> prohibited in treated areas plus the additional buffer area during application in NURSERIES? | 110-b         |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | c. Are <u>workers</u> prohibited in a GREENHOUSE during application and until ventilation criteria are met?        | 110-c         |

Comments: \_\_\_\_\_

**WORKER EARLY ENTRY DURING REI**

- |                              |                             |                              |   |                   |
|------------------------------|-----------------------------|------------------------------|---|-------------------|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | a. Does the employer PROVIDE the correct PPE and ASSURE that <u>workers</u> wear PPE for early entry?                                 | 112-a-4 & 112-c-4 |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | b. Does the employer ASSURE that early entry <u>workers</u> receive human hazard and safe use information before early entry?         | 112-c-5           |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | c. Are early entry <u>workers</u> prohibited in treated areas during the first 4 hours after application?                             | 112-c-3           |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | d. Are early entry <u>workers</u> limited to 1 hour of work in a 24 hour period in treated areas during the REI?                      | 112-c-2           |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | e. Are early entry <u>workers</u> who perform irrigation & limited contact activities limited to 8 hours of work in a 24 hour period? | 112-e-7, ii, iii  |

**Does the employer ASSURE the following for workers who wear PPE during early entry:**

- |                              |                             |                              |   |                      |
|------------------------------|-----------------------------|------------------------------|---|----------------------|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | a. Is PPE worn correctly, inspected, cleaned, maintained and stored properly?                     | 112-c-6-i, ii, iv, v |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | b. Is contaminated PPE disposed of properly?  | 112-c-6-iii          |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | c. Do workers receive instructions on using & cleaning PPE?                                       | 112-c-6-ix           |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | d. Does employer have measures to prevent HEAT-RELATED ILLNESS for early entry workers using PPE? | 112-c-7              |

Comments: \_\_\_\_\_

**NOTICE OF APPLICATIONS TO WORKERS**

- |                              |                             |                              |  |         |
|------------------------------|-----------------------------|------------------------------|--|---------|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | a. Are all GREENHOUSE applications posted with WPS warning signs?  | 120-a   |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | b. Are <u>workers</u> given BOTH oral and posted notification when required by the pesticide label?        | 120-b-1 |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | c. Are <u>workers</u> given notification of applications (EITHER orally or posted) for other applications? | 120-b-2 |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | d. Are <u>workers</u> told which method will be routinely used at this firm (oral or posted notification)? | 120-b-2 |

**Posted Warning Signs**

- |                              |                             |                              |  |             |
|------------------------------|-----------------------------|------------------------------|--|-------------|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | a. Does the employer use the approved WPS warning signs for posted notification? | 120-c-1 & 2 |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | b. Are the signs posted at all entrances of worker entry to the treated area?    | 120-c-4     |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | c. Are the signs put up no sooner than 24 hours prior to application?            | 120-c-6-i   |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | d. Are the signs removed within 3 days after the end of the REI?                 | 120-c-6-iii |

**Oral Warnings**

- |                              |                             |                              |  |       |
|------------------------------|-----------------------------|------------------------------|--|-------|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | a. Are oral warnings given in manner the <u>workers</u> can understand?  | 120-d |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A | b. Do oral warnings include, 1. location & description of treated area; 2. REI; 3. instructions not to enter during the REI? | 120-d |

Comments: \_\_\_\_\_

APPLICATION RESTRICTIONS & MONITORING

- Yes No N/A a. \*Does both the employer & the handler assure that no pesticide is applied... 210-a
Yes No N/A b. \*Are handlers monitored visually or by voice every 2 hours... 210-b
Yes No N/A c. \*Does the handler have continuous visual or voice contact... 210-c

Comments:

SPECIFIC INSTRUCTIONS FOR HANDLERS

- Yes No N/A a. \*Does the employer assure that handlers read the label... 232-a-1
Yes No N/A b. \*Does the handler have access to the product labeling... 232-a-2
Yes No N/A c. \*Does the COMMERCIAL HANDLER EMPLOYER inform the commercial handler... 232-b

Comments:

SAFE OPERATION OF EQUIPMENT

- Yes No N/A a. \*Is the handler instructed in the safe operation of any handling equipment... 234-a
Yes No N/A b. \*Is handling equipment inspected and repaired before each day of use? 234-b
Yes No N/A c. \*Does the employer assure that only trained and PPE-equipped handlers... 234-c

Comments:

PERSONAL PROTECTIVE EQUIPMENT REQUIREMENTS FOR HANDLERS

- Yes No N/A a. \*Does the handler employer provide the handler with the appropriate PPE... 240-c
Yes No N/A b. \*Does the handler employer assure that PPE is worn and is used correctly? 240-a & 240-e-1
Yes No N/A c. \*Does the handler employer assure that PPE is cleaned, inspected, and repaired... 240-e-2 & 240-f-1
Yes No N/A d. \*Does the handler employer assure that filters are replaced on respirators... 240-f-6 & 7
Yes No N/A e. \*Do handlers have a clean place to store personal clothing... 240-f-9
Yes No N/A f. \*Does the handler employer take appropriate measures to prevent heat-related illness... 240-g

Comments:

FAMILY ESTABLISHMENTS

- Yes No N/A a. Are employees only spouse, children, stepchildren, foster children, parent... 170.104-a-1
Yes No N/A b. Are non-handlers prohibited in treated areas during application... 110-a & 112-a-1
Yes No N/A c. Are non-handlers prohibited in treated areas plus the additional buffer area... 110-b
Yes No N/A d. Are non-handlers prohibited in a GREENHOUSE during application... 110-c
Yes No N/A e. Are early entry workers prohibited in treated areas during the first 4 hours... 112-c-3
Yes No N/A f. Are early entry workers limited to 1 hour of work in a 24 hour period... 112-c-2
Yes No N/A g. Are early entry workers who perform irrigation and limited contact activities... 112-e-7, ii, iii
Yes No N/A h. Is the correct PPE for early entry PROVIDED for early entry activities... 112-a-4
Yes No N/A i. Does the handler at this firm wear the label-specified PPE during handling tasks? 240-a
Yes No N/A j. Is the label specified PPE for handling activities at this firm PROVIDED... 240-c
Yes No N/A k. Does this establishment notify commercial handlers regarding the location... 124
Yes No N/A l. Do commercial handlers notify this establishment of the required application... 224

Comments:

\*INDICATES DUTIES REQUIRED FOR COMMERCIAL HANDLER EMPLOYERS

OTHER COMMENTS:

Interviewee's Signature:

Inspector's Signature:

Inspector's No.