

Surviving the FDACS Inspection: Walking through an Inspection¹

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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) will examine during a routine agricultural establishment inspection.

Role of the Bureau of Inspection and Incident Response (BIIR)

The BIIR ensures consumer protection, worker safety and protection of the environment through inspections of entities that manufacture, sell or apply pesticides, fertilizer, feed, or seed. These inspections are conducted on a routine basis or in response to a complaint from a consumer.

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.

Inspector Identification

Inspectors will properly introduce and identify themselves once they arrive at a place of business by presenting their BIIR 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 establishment's contact information (Figure 1).

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

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: _____

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Figure 1. Page 1 of Pesticide Use Inspection Report.

Restricted Use Pesticide License Verification

During the early phase of the inspection, the inspector will determine whether restricted use pesticides are used at 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 (Figure 1). A secure storage area has a lock and is well-marked with signs (Figure 2).



Figure 2. Example of a secure, well-marked storage facility.
Credits: UF/IFAS

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
- keeping all materials up off of the floor

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* <https://edis.ifas.ufl.edu/publication/PI196>. An inventory list of the materials held in the facility will provide a record for the length of time they have been held. It is 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.

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 (Figure 3).

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
- location and description of the treated site
- target site or crop
- total size of treated area
- pesticide brand name
- product's EPA registration number
- total amount of product applied
- application method

A sample form for recordkeeping is shown in Figure 4 (Figure 4). 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 (<https://edis.ifas.ufl.edu/publication/WG051>).

Florida Department of Agriculture and Consumer Services
Division of Agricultural Environmental Services
SUGGESTED PESTICIDE RECORDKEEPING FORM
Telephone Number (850) 617-7880

FDACS recommends recordkeeping for all pesticide applications regulated by Chapter 487, F.S., using this form or similar format. When properly completed, this form meets the recordkeeping requirements for restricted use pesticides and the central posting requirements for the federal Worker Protection Standard.

Licensed Applicator (R) _____ License No. (R) _____ Property Owner Authorizing Application (R) _____

1. Date 2. Start Time 3. End Time	Actual applicator if different from above (include license no. if licensed) (R)	1. Location/Description of Treatment Site (RW) 2. Target Site or Crop (R)	Total Size of Treatment Area (R)	1. Pesticide Brand Name (R, W) 2. EPA Reg. No. (RW) 3. Active Ingredients (W)	Total Amt. of Pesticide Applied (R)	Application Method (R)	Restricted Entry Interval (W)

(R) = For Restricted Use Pesticides (W) = For Worker Protection Standard Requirement (Vea dorso para definición de términos en español)
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Figure 4. Suggested FDACS Pesticide Recordkeeping Form.

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 ☐ Chermigation ☐ 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 _____

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Original - Tallahassee Copy - Firm Copy - Department Representative

Figure 3. Page 2 of the Pesticide Use Inspection Report.

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

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.

Worker 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 WPS components are examined by FDACS inspectors (Figures 5–8):

- Duties for all employers, including:
 - Pesticide safety display
 - Pesticide safety training assurance and program
 - Employer information exchange
 - Emergency assistance
 - Decontamination supplies
- Additional duties for worker employers
 - Restrictions during applications
 - Worker early entry into treated sites
 - Notice of applications to workers
- Additional duties for handler employers and handlers
 - Application restrictions and monitoring
 - Specific instructions for handlers
 - Safe operation of equipment
 - Personal protective equipment requirements for handlers
 - Closed systems
 - Family establishments

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 BIIR is to serve an educational role, the inspection should be considered a two-way means of communication.

References

- American Association of Poison Control Centers, Toxic Exposure Surveillance System, 1996. <https://poisoncenters.org>
- Fishel, F.M. 2006. *Worker Protection Standard: Decontamination Supplies*. PI-116. Gainesville: University of Florida Institute of Food and Agricultural Sciences. <https://doi.org/10.32473/edis-pi153-2006>
- Fishel, F.M. 2006. *Worker Protection Standard: Employer Information Exchange*. PI-115. Gainesville: University of Florida Institute of Food and Agricultural Sciences. <https://doi.org/10.32473/edis-pi152-2006>
- Fishel, F.M. 2006. *Worker Protection Standard: Information at a Central Location*. PI-112. Gainesville: University of Florida Institute of Food and Agricultural Sciences. <https://doi.org/10.32473/edis-pi149-2006>
- Fishel, F.M. 2006. *Worker Protection Standard: Notice about Applications*. PI-107. Gainesville: University of Florida Institute of Food and Agricultural Sciences. <https://doi.org/10.32473/edis-pi144-2006>
- Fishel, F.M. 2006. *Worker Protection Standard: Training Workers and Handlers*. PI-113. Gainesville: University of Florida Institute of Food and Agricultural Sciences. <https://doi.org/10.32473/edis-pi150-2006>
- Florida Department of Agriculture and Consumer Services Bureau of Inspection and Incident Response. <http://www.freshfromflorida.com/Divisions-Offices/Agricultural-Environmental-Services/Bureaus-and-Sections2/Bureau-of-Inspection-and-Incident-Response>



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

WORKER PROTECTION STANDARD INSPECTION FORM

Respond to:

Bureau of Inspection and
Incident Response
3125 Conner Blvd, Suite N
Tallahassee, FL 32399-1650

NICOLE "NIKKI" FRIED
COMMISSIONER

Rule 5E-2.041, F.A.C.
(850) 617-7996

Inspection Type: Tier 1 ☐ Tier 2 ☐		FILE #:	DATE:
☐ Farm ☐ Forest ☐ Commercial Handler ☐ Nursery ☐ Enclosed Space Production ☐ Family Establishment (also check one of the others)		FIRM NAME:	
		COUNTY:	
# present at this inspection:	Workers	Handlers	Inspection: ☐ Unannounced ☐ Appointment

DUTIES FOR ALL EMPLOYERS

DISPLAY REQUIREMENTS FOR PESTICIDE SAFETY INFORMATION AND PESTICIDE APPLICATION & HAZARD INFORMATION

	40 CFR	
a. Is the required pesticide safety information displayed?	170.311	☐ Yes ☐ No ☐ N/A
b. Is the emergency medical contact information displayed (medical care facility name, address and telephone number)?	170.311	☐ Yes ☐ No ☐ N/A
c. Are the name, address, and telephone number of the state pesticide regulatory agency displayed?	170.311	☐ Yes ☐ No ☐ N/A
d. Can site location(s) be readily seen and read by workers and handlers (where workers and handlers congregate, permanent decontamination sites, or decontamination sites which accommodate 11 or more workers or handlers)?	170.311	☐ Yes ☐ No ☐ N/A
e. Are workers and handlers informed of the location(s) and are they allowed access to the site(s)?	170.311	☐ Yes ☐ No ☐ N/A
f. Does the required pesticide safety information remain legible while posted?	170.311	☐ Yes ☐ No ☐ N/A
g. Is the following pesticide application and hazard information displayed: crop or site treated and location and description of treated area; product name, EPA Reg. #, active ingredient(s) of the pesticide(s); date(s) and times the application started and ended; duration of applicable restricted-entry interval (REI); safety data sheet(s)?	170.311	☐ Yes ☐ No ☐ N/A
h. Is the pesticide application and hazard information posted within 24 hours after the end of the application and maintained for at least 30 days after the end of the last applicable REI?	170.311	☐ Yes ☐ No ☐ N/A
i. Are the pesticide application and hazard information records maintained on the establishment for two years after the date/time of expiration of the last REI applicable to the pesticide application conducted?	170.311	☐ Yes ☐ No ☐ N/A

Comments:

PESTICIDE SAFETY TRAINING ASSURANCE

WORKERS AND HANDLERS: (Applies to workers and handlers who are NOT certified applicators)

a. Does the agricultural or handler employer ensure that workers and handlers have been trained within the last 12 months?	170.401 & 170.501	☐ Yes ☐ No ☐ N/A
b. Does the agricultural or handler employer maintain the following records for two years from the date of training: worker's/handler's printed name and signature, the date of training, information identifying which EPA-approved training materials were used, trainer's name and documentation showing qualifications, agricultural or handler employer's name?	170.401 & 170.501	☐ Yes ☐ No ☐ N/A
c. Does the agricultural or handler employer ensure that workers and handlers are informed (in a manner the workers and handlers can understand) of the following establishment-specific information: location of pesticide safety information, pesticide application and hazard information, and decontamination supplies?	170.403 & 170.503	☐ Yes ☐ No ☐ N/A

Workers: (Applies to workers who are NOT certified applicators or certified crop advisors)

d. Does the agricultural employer ensure that the required training was provided to workers before entry into any area on an agricultural establishment where WPS pesticides have been applied within the last 30 days?	170.401	☐ Yes ☐ No ☐ N/A
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Handlers: (Applies to handlers who are NOT certified applicators or certified crop advisors)

e. Does the handler employer ensure that the required training was provided to handlers before performing any handling task?	170.501	☐ Yes ☐ No ☐ N/A
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Comments:

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

a. Workers and Handlers: Is the information presented in a manner the workers and handlers can understand, such as through a translator?	170.401 & 170.501	☐ Yes ☐ No ☐ N/A
b. Is the trainer qualified to train workers and handlers (has completed an approved Train-the-Trainer program or is certified as an applicator of restricted use pesticides)?	170.401 & 170.501	☐ Yes ☐ No ☐ N/A
c. Was the trainer present during the entire training program and available to respond to questions?	170.401 & 170.501	☐ Yes ☐ No ☐ N/A
d. Workers: Does the content of the training materials meet the criteria listed in 170.401(c)(2)?	170.401	☐ Yes ☐ No ☐ N/A
e. Handlers: Does the content of the training materials meet the criteria listed in 170.501(c)(2)?	170.501	☐ Yes ☐ No ☐ N/A

Comments:

Figure 5. Page 1 of the WPS Inspection Form.

EMPLOYER INFORMATION EXCHANGE			
a. Does the agricultural employer notify the commercial handler employer regarding the specific location and description of any treated areas on an agricultural establishment where an REI is in effect that the handler may be in (or may walk within 1/4 mile of), and any restrictions on entering those areas?	170.309		☐ Yes ☐ No ☐ N/A
b. Does the commercial handler employer provide the agricultural employer all of the following information prior to the application of any pesticide on an agricultural establishment: specific location(s) and description(s) of areas to be treated; date, start time, and estimated end time of application; product name(s), EPA Reg. #(s), active ingredient(s); REI; posting/notification requirements; product-specific restrictions or use directions required to protect workers, handlers, or other persons during or after the application?	170.313		☐ Yes ☐ No ☐ N/A
Comments: _____			
EMERGENCY ASSISTANCE			
a. Is prompt transportation to an emergency medical facility available for workers or handlers who have experienced a potential pesticide exposure on the agricultural establishment?	170.309 & 170.313		☐ Yes ☐ No ☐ N/A
b. Does information provided to medical personnel regarding the pesticide(s) to which employees may have been exposed include product Safety Data Sheet(s), product name(s), EPA Reg. #(s), active ingredient(s), circumstances of pesticide use, and circumstances that could have resulted in exposure?	170.309 & 170.313		☐ Yes ☐ No ☐ N/A
Comments: _____			
DECONTAMINATION SUPPLIES			
The employer must follow the following decontamination requirements for WORKERS and HANDLERS:			
a. Do the decontamination supplies include soap, single-use towels, and enough water for washing and emergency eye flushing?	170.411 & 170.509		☐ Yes ☐ No ☐ N/A
b. Is the decontamination water of a quality and temperature that will not cause illness or injury when it contacts the skin or eyes or if it is swallowed?	170.411 & 170.509		☐ Yes ☐ No ☐ N/A
c. Are the decontamination supplies located together within 1/4 mile of the work site, outside any treated area or area subject to an REI, and reasonably accessible?	170.411 & 170.509		☐ Yes ☐ No ☐ N/A
Comments: _____			
The employer must follow the following additional decontamination requirements for WORKERS:			
a. Are decontamination sites provided to workers 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 following expiration)	170.411		☐ Yes ☐ No ☐ N/A
b. Is a minimum of 1 gallon of water available for each worker at the beginning of each work period?	170.411		☐ Yes ☐ No ☐ N/A
Comments: _____			
The employer must follow the following additional decontamination requirements for HANDLERS:			
a. Is a minimum of 3 gallons of water available for each handler and early entry worker at the beginning of each work period?	170.509		☐ Yes ☐ No ☐ N/A
b. Is one clean change of clothing provided to handlers for use in an emergency?	170.509		☐ Yes ☐ No ☐ N/A
c. Are decontamination supplies located at the mix/load site?	170.509		☐ Yes ☐ No ☐ N/A
d. Are decontamination supplies for pilots kept in the airplane or at the aircraft loading site?	170.509		☐ Yes ☐ No ☐ N/A
e. Are handler decontamination supplies located outside any treated area or area subject to an REI, unless they are kept in enclosed containers?	170.509		☐ Yes ☐ No ☐ N/A
f. Are decontamination supplies located where handlers remove personal protective equipment (PPE) for washing thoroughly after handling activities?	170.509		☐ Yes ☐ No ☐ N/A
g. For mixing and loading a pesticide product which requires protective eyewear, or mixing/loading any pesticide using a closed system under pressure, is there a system capable of delivering gently running water at 0.4 gallons per minute for 15 minutes, or at least six gallons of water in containers suitable for providing a gentle eye-flush for about 15 minutes?	170.509		☐ Yes ☐ No ☐ N/A
h. Is at least 1 pint of water in portable containers, immediately available for each handler applying a pesticide which requires protective eyewear?	170.509		☐ Yes ☐ No ☐ N/A
Comments: _____			
ADDITIONAL DUTIES FOR WORKER EMPLOYERS			
RESTRICTIONS DURING APPLICATIONS			
a. Are workers prohibited in treated areas during application and until REI(s) have expired and all treated area warning signs have been removed or covered?	170.407		☐ Yes ☐ No ☐ N/A
b. Are workers and other persons prohibited in treated areas plus the additional exclusion zones depending on the application method for outdoor production applications?	170.405		☐ Yes ☐ No ☐ N/A
c. Are workers prohibited in enclosed space production areas during the application and until ventilation criteria are met?	170.405		☐ Yes ☐ No ☐ N/A
Comments: _____			
WORKER EARLY ENTRY DURING REI			
The employer must ENSURE the following for workers who perform early entry activities:			
a. Are early entry workers prohibited in treated areas during the first 4 hours after application and until any required ventilation criteria has been met?	170.603		☐ Yes ☐ No ☐ N/A
b. Are early entry workers performing short-term activities that do not involve hand labor limited to 1 hour of work in a 24-hour period?	170.603		☐ Yes ☐ No ☐ N/A
c. Are early entry workers who perform limited contact and irrigation activities limited to 8 hours of work in a 24-hour period?	170.603		☐ Yes ☐ No ☐ N/A
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Figure 6. Page 2 of the WPS Inspection Form.

d. Does the employer provide the following information to each early-entry worker, orally (in a manner the worker can understand): location of the early entry area; pesticide(s) applied; dates and times that the REI begins and ends; reason for the early entry, description of tasks that may be performed, and other limitations; PPE required; location of the pesticide safety information and decontamination supplies?	170.605		☐ Yes ☐ No ☐ N/A
e. Does the employer ensure that each early entry worker has been informed (in a manner the worker can understand) of all applicable pesticide labeling requirements and statements related to human hazards or precautions, first aid, and user safety?	170.605		☐ Yes ☐ No ☐ N/A
f. Does the employer provide the correct PPE and ensure that workers use PPE properly during early entry?	170.605		☐ Yes ☐ No ☐ N/A
g. Does employer instruct each early entry worker on proper PPE use and removal, and as appropriate, cleaning, maintenance and disposal?	170.605		☐ Yes ☐ No ☐ N/A
h. Is contaminated PPE disposed of properly?	170.605		☐ Yes ☐ No ☐ N/A
i. Does employer ensure that no worker is allowed or directed to wear PPE without implementing measures sufficient to prevent heat-related illness?	170.605		☐ Yes ☐ No ☐ N/A
j. Does employer ensure that each worker is instructed in the prevention, recognition, and first aid treatment of heat-related illness?	170.605		☐ Yes ☐ No ☐ N/A
Comments: _____			
NOTICE OF APPLICATIONS TO WORKERS			
a. Are workers given both oral and posted notification when required by the pesticide label?	170.409		☐ Yes ☐ No ☐ N/A
b. Are outdoor production areas posted with warning signs for REI(s) greater than 48 hours?	170.409		☐ Yes ☐ No ☐ N/A
c. Are all enclosed space applications, (except for REI(s) of 4 hours or less) posted with WPS warning signs?	170.409		☐ Yes ☐ No ☐ N/A
d. Are workers given notification of applications (either orally or posted) for other applications?	170.409		☐ Yes ☐ No ☐ N/A
Posted Warning Signs			
a. Does the employer use the approved WPS warning signs for posted notification?	170.409		☐ Yes ☐ No ☐ N/A
b. Are the signs posted at all reasonable points of worker entry, including each access road, each border with any housing area within 100 feet of entry to the treated area and each footpath and other walking route that enters the treated area?	170.409		☐ Yes ☐ No ☐ N/A
c. Are the signs posted no sooner than 24 hours prior to application?	170.409		☐ Yes ☐ No ☐ N/A
d. Are the signs removed or covered within 3 days after the end of the REI?	170.409		☐ Yes ☐ No ☐ N/A
e. Does the employer ensure that workers do not enter the treated area while the signs remain posted?	170.409		☐ Yes ☐ No ☐ N/A
Oral Warnings			
a. Are oral warnings given before the application begins or at the beginning of the work period in manner that the workers can understand?	170.409		☐ Yes ☐ No ☐ N/A
b. Do oral warnings include the following: location and description of treated area; dates and times of REI; instructions not to enter treated area or an application exclusion zone during the application, REI, and until all treated area warning signs have been removed or covered?	170.409		☐ Yes ☐ No ☐ N/A
Comments: _____			
ADDITIONAL DUTIES FOR HANDLER EMPLOYERS AND HANDLERS			
APPLICATION RESTRICTIONS AND MONITORING			
a. Do both the handler employer and the handler ensure that no pesticide is applied (either directly or through drift) so as to contact anyone other than trained and PPE-equipped handlers involved in the application?	170.505		☐ Yes ☐ No ☐ N/A
b. Are handlers monitored visually or by voice every 2 hours when handling Skull & Crossbones pesticides?	170.505		☐ Yes ☐ No ☐ N/A
c. Does the handler have continuous visual or voice contact with another trained and PPE-equipped handler stationed immediately outside of the enclosed space when handling a fumigant in enclosed space production?	170.505		☐ Yes ☐ No ☐ N/A
d. Does the handler performing the application immediately suspend application if anyone, other than an appropriately trained and equipped handler is in the application exclusion zone?	170.505		☐ Yes ☐ No ☐ N/A
Comments: _____			
SPECIFIC INSTRUCTIONS FOR HANDLERS			
a. Does the handler employer ensure that handlers read the label or are informed (in a manner the handler can understand) about the label requirements for safe use before performing any handling activity?	170.503		☐ Yes ☐ No ☐ N/A
b. Does the handler have access to the product labeling during handling activities?	170.503		☐ Yes ☐ No ☐ N/A
c. Is the handler aware of requirements for any entry restrictions, application exclusion zones and restricted-entry intervals as that may apply based on the handler's activities?	170.503		☐ Yes ☐ No ☐ N/A
d. Does the handler employer ensure that the handler has been informed or is aware of the specific location of pesticide safety information, pesticide application and hazard information, decontamination supplies?	170.503		☐ Yes ☐ No ☐ N/A
Comments: _____			
SAFE OPERATION OF EQUIPMENT			
a. Does the handler employer ensure that the handler is instructed in the safe operation of any handling equipment before it is used?	170.313		☐ Yes ☐ No ☐ N/A
b. Does the handler employer ensure that handling equipment is inspected and repaired before each day of use?	170.313		☐ Yes ☐ No ☐ N/A
c. Does the handler employer ensure that any employees who repair, clean, or adjust any handling equipment that contains pesticides or pesticide residues are trained as handlers, and that non-employees who repair, clean, or adjust such handling equipment are informed that equipment may be contaminated and instructed about the potential effects of exposure, practices for preventing or limiting exposure, and decontamination procedures?	170.313		☐ Yes ☐ No ☐ N/A
Comments: _____			
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Figure 7. Page 3 of the WPS Inspection Form.

PERSONAL PROTECTIVE EQUIPMENT REQUIREMENTS FOR HANDLERS			
a. Does the handler employer provide the handler with the appropriate PPE in clean and proper operating condition?	170.507	☐ Yes ☐ No ☐ N/A	
b. Does the handler employer ensure that PPE is cleaned, inspected, and repaired or replaced before each day of use?	170.507	☐ Yes ☐ No ☐ N/A	
c. Does the handler employer ensure that PPE that cannot be cleaned properly is made unusable and disposed of properly?	170.507	☐ Yes ☐ No ☐ N/A	
d. Does the handler employer ensure that handlers have received respirator fit testing, training, and medical evaluation if they are required wear a respirator?	170.507	☐ Yes ☐ No ☐ N/A	
e. Does the handler employer maintain records on the establishment, for those handlers requiring fit testing, respirator training, and medical evaluation for two years?	170.507	☐ Yes ☐ No ☐ N/A	
f. Does the handler employer ensure that respirators and respirator filters are replaced when required?	170.507	☐ Yes ☐ No ☐ N/A	
g. Do handlers have a clean place to store personal clothing, put on PPE, and remove PPE after application?	170.507	☐ Yes ☐ No ☐ N/A	
h. Does the handler employer take appropriate measures to prevent heat-related illness for handlers using PPE?	170.507	☐ Yes ☐ No ☐ N/A	
i. Does the handler employer ensure that PPE is used correctly for its intended purpose and is used according to the manufacturer's instructions?	170.507	☐ Yes ☐ No ☐ N/A	
j. Does the handler use the clothing and PPE specified on the pesticide product labeling?	170.507	☐ Yes ☐ No ☐ N/A	
Comments: _____			
CLOSED SYSTEMS			
a. Are written instructions for the closed system available at the mix/load site, and made available to any handlers who use the system?	170.607	☐ Yes ☐ No ☐ N/A	
b. Handlers operating the closed system are trained in its use and operate, clean, and maintain the system in accordance with its written operating instructions?	170.607	☐ Yes ☐ No ☐ N/A	
c. Is all PPE specified in the product labeling immediately available to the handler for use in an emergency?	170.607	☐ Yes ☐ No ☐ N/A	
d. Is protective eyewear worn when using closed systems operating under pressure?	170.607	☐ Yes ☐ No ☐ N/A	
e. If a handler applies a pesticide from an enclosed cab, is all PPE immediately available inside a sealed container?	170.607	☐ Yes ☐ No ☐ N/A	
f. If required by the label, is a respirator worn inside the enclosed cab (other than a dust/mist filtering respirator)?	170.607	☐ Yes ☐ No ☐ N/A	
Comments: _____			
FAMILY ESTABLISHMENTS			
a. Are employees only immediate family limited to spouse, parents, stepparents, foster parents, father-in-law, mother-in-law, children, stepchildren, foster children, sons-in-law, daughters-in-law, grandparents, grandchildren, brothers, sisters, brothers-in-law, sisters-in-law, aunts, uncles, nieces, nephews, and first cousins?	170.601	☐ Yes ☐ No ☐ N/A	
b. Are non-handlers prohibited in treated areas during application and until REI has expired?	170.407	☐ Yes ☐ No ☐ N/A	
c. Does the handler employer maintain records on the establishment, for those handlers requiring fit testing, respirator training, and medical evaluation for two years?	170.507	☐ Yes ☐ No ☐ N/A	
d. Are non-handlers prohibited in enclosed space production areas during application and until ventilation criteria are met?	170.405	☐ Yes ☐ No ☐ N/A	
e. Are early entry workers prohibited in treated areas during the first 4 hours after application and until any required ventilation criteria has been met?	170.603	☐ Yes ☐ No ☐ N/A	
f. Are early entry workers performing short-term activities that do not involve hand labor limited to 1 hour of work in a 24-hour period?	170.603	☐ Yes ☐ No ☐ N/A	
g. Are early entry workers who perform limited contact and irrigation activities limited to 8 hours of work in a 24-hour period?	170.603	☐ Yes ☐ No ☐ N/A	
h. Is the correct PPE for early entry provided for early entry activities at this firm?	170.603	☐ Yes ☐ No ☐ N/A	
i. Does the handler at this firm wear the label-specified PPE during handling tasks?	170.603	☐ Yes ☐ No ☐ N/A	
j. Is the label-specified PPE for handling activities at this firm provided in clean and operating condition?	170.507	☐ Yes ☐ No ☐ N/A	
k. Does this establishment notify commercial handlers regarding the location of treated areas and REI(s) in effect on the establishment?	170.313	☐ Yes ☐ No ☐ N/A	
Comments: _____			
Other Comments: _____			
Name of Authorized Representative: _____ Title: _____			
Signature: _____ Date: _____			
Specialist Name: _____ Specialist Signature: _____			
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Figure 8. Page 4 of the WPS Inspection Form.