



EPA WORKER PROTECTION STANDARD (WPS) COUNTDOWN TO COMPLIANCE ...

AUGUST
✓ SEPTEMBER
OCTOBER
NOVEMBER
DECEMBER

1994 Versus 1995 WPS Compliance Requirements

Congress recently enacted legislation which delays implementation of some but not all of the WPS until January 1, 1995. The new law provides the agricultural community with more time to learn about the WPS and to prepare for implementation. Table (1) is a summary of the key WPS provisions, including those that are required to be implemented in 1994, and those that are deferred until January 1, 1995. Most of WPS requirements appear on the labels of the pesticides used on agricultural establishments (farms, forests, nurseries, greenhouses). There are two types of WPS provisions on the label: those that are **fully spelled out**, and those that are **referenced** but not thoroughly described on the label.

During 1994, you must comply with the WPS requirements that are **spelled out** on the label. These include the label requirements for personal protective equipment (PPE), the restricted-entry interval (REI), and the requirement for "double notification," if this requirement is on the label. Double notification requires both oral warning and posting warning signs at entrances to treated areas.

You need not comply with the WPS requirements only **referenced** on the label until January 1, 1995. These include pesticide safety training for agricultural workers and handlers, decontamination sites, notification of workers about pesticide applications (except the "double notification" requirement described above), display of information about pesticide applications, emergency assistance, and display of the pesticide safety poster.

Restricted-Entry Interval Requirements

Under the WPS, each agricultural pesticide label will specify a **restricted-entry interval (REI)**, usually ranging from 12 to 72 hours. Some labels may specify a longer REI. The REI begins immediately after pesticide application. **You must keep workers out of a treated area during the REI, except in the following situations.**

(1) **No contact early entry.** After any applicable inhalation exposure level or ventilation criteria has been met, you may permit workers to enter a treated area during an REI if they will not touch or be touched by any pesticide residues on plants, in soil, in water, or in the air. If there is no contact, there are no PPE requirements and no time limitations. **The exception to early-entry limitations for no contact early entry applies in 1994 and beyond.**

(2) **Non-hand labor early entry.** You may allow workers to enter treated areas before the REI is over to perform **non-hand labor jobs** that will involve contact with pesticide residues. These tasks include operating, moving or repairing irrigation or watering equipment, but does not include such tasks as harvesting, weeding, pruning, cultivating, etc., which are considered hand labor tasks. You must make sure that non-hand labor early-entry workers do all of the following:

(a) Wear the early-entry PPE specified on the label. In 1994, you must provide the early-entry PPE to the worker and it must be in clean and operating condition. Starting January 1, 1995,

TABLE (1) SUMMARY OF KEY 1994/95 WORKER PROTECTION STANDARD REQUIREMENTS

Requirement	Applies in 1994	Applies after 1/1/95	Notes (Page numbers listed reference EPA's WPS How To Comply Manual)
Restricted Entry Interval (REI)	Yes	Yes	The REI is specified on the label. (pgs 45-47)
Early Entry Activities involving contact w/treated surfaces	Yes - no time limits	Yes - time limits	No entry for first four hours after application & inhalation levels/ventilation criteria met. PPE required. No hand labor. Until 1/1/95, no limit on worker time in treated area. After 1/1/95, one hour/day. (pg 137)
Personal Protective Equipment (PPE) for Handlers	Yes	Yes	PPE specified in Precautionary Statements portion of the label must be used. Additional employer duties for providing, cleaning, maintaining PPE after 1/1/95. (pgs 79-81, 139)
PPE for Early Entry Workers involving contact with treated surfaces	Yes	Yes	PPE must be provided by the employer and must be in clean and operating condition. Additional employer duties for providing, cleaning, maintaining PPE after 1/1/95. (pgs 65, 69-70, 139)
Early Entry Irrigation Workers Choice of PPE	Yes	No	Until 1/1/95, early entry PPE or coveralls plus chemical-resistant gloves and chemical-resistant footwear if there is pesticide contact only to the feet, lower legs, hands, arms. After 1/1/95, use PPE on label for early entry.
Notification of Agricultural Workers about Applications	No	Yes	Required after 1/1/95. In most cases, employer can choose oral notification or posting, unless both are required by the label. Greenhouse uses: posting required. (pg 139)
Double Notification, Oral & Posted Warnings, as req'd on labels for most toxic products	Yes	Yes	In 1994, employer must post and warn. After 1/1/95, must use the WPS field warning sign and follow WPS specifications for posting or for oral notification. (pgs 20, 33, 41, 139)
Protections for Crop Advisors	No	Yes	Until 1/1/95, WPS does not apply. (pg 136)
Pesticide Safety Training for Handlers and Agric. Workers	No	Yes	WPS requires basic safety training for workers and more detailed training for handlers. (pg 141 & other EPA training handbooks)
Additional WPS Protections: - Display of a Safety Poster - Pesticide Application Display - Decontamination Sites - Emergency Assistance - Monitoring Handlers - Employer Info. Exchange	No	Yes	These and other WPS requirements are delayed until 1/1/95. This delay gives employers an opportunity to learn about the requirements and integrate them into work operations:

there are additional employer duties for providing, cleaning, and maintaining the PPE.

(b) Wait at least four hours after the pesticide application is completed before entering the area.

(c) Wait at least until any inhalation exposure level listed on the label has been reached.

During 1994, there are no time limitations to non-hand labor early entry. Starting 1-1-95, early-entry work under this exception is limited to short-term tasks and usually not allowed to exceed one hour per worker each day.

"Countdown To Compliance" is a cooperative educational effort of the PA Department of Agriculture, Penn State Office of Pesticide Education, Penn State Cooperative Extension Service, PA Farm Bureau, PA Farmers Union, PA State Grange, PA Vegetable Growers Assoc., PA Christmas Tree Growers Assoc., Adams County Fruit Growers Assoc., PA Farmer Magazine, and Lancaster Farming Newspaper. Copies are available by contacting PA Farm Bureau Division.

✓ September Compliance Checklist:

___ Review WPS requirements for 1994 in Table 1 above and all appropriate portions of WPS How To Comply Manual.

___ Review your chemical handling/use practices for REI's, early entry, PPE, and double notification to determine if they meet WPS label requirements.

Grain Wagon Added To Line



GIBSON CITY, ILL. — M&W Gear Company announces the addition of a new Model 4250 Grain Wagon to the Little Red Wagon Line.

The 4250 features an all-steel, 425-bushel capacity box with a reinforced side panel for rigidity and strength on a proven 12-ton heavy-duty running gear with a 108 inch wheel base. A 20 inch x 30 inch side opening rack and pinion controlled door with over-center locks and a fold-down chute with a built-in deflector allow quick unloading. For more information, contact M&W Gear Company, 1020 South Sangamon Avenue, Gibson City, IL 60936.

Register For Pa. Plowing Contests

NEW YORK, N.Y. — Ardshiel, Inc. announced that it has concluded the transaction for the purchase of American Breeders Service (ABS) and the Caribbean Fertilizer businesses owned by

W.R. Grace & Co., for a combined purchase price of approximately \$39 million in cash, as previously indicated in June 1994.

Ardshiel, Inc. formed a new company to acquire the two busi-

nesses, registered as Protein Genetics, Inc. Jack Shelton, previous president of ABS, was named president and CEO and will serve as a member of the board of directors of the new company.