

Chapter 23

PESTICIDE EXPOSURE CONTROL PLAN

A. References.

Pesticides - Worker Protection Standard WAC 16-233:

<http://apps.leg.wa.gov/wac/default.aspx?cite=16-233>

Pesticides Worker Protection Standard [WAC 296-307 Part I](#)

<http://apps.leg.wa.gov/wac/default.aspx?cite=296-307>

Cholinesterase Inhibiting Pesticide Monitoring Requirements

<https://www.lni.wa.gov/safety-health/safety-topics/industry/cholinesterase>

WSU SPPM S3.00 Shop and Agriculture Safety:

<https://policies.wsu.edu/prf/index/manuals/contents-chapter-3/>

WSU BPPM 45.65 Pesticide Policy Overview

http://public.wsu.edu/~forms/HTML/BPPM/45_Research/45.65_Pesticide_Policy_Overview.htm

B. Appendices:

Appendix 1 – WSU New Hire Checklist for employees working with pesticides

C. Purpose.

This plan intends to eliminate or reduce employee exposure to pesticides. Pesticides are any substance that is intended to prevent, destroy, control, repel or mitigate any pest organism whether it be plant, animal or virus (except viruses in or on humans or other animals). Pesticides may be used as a plant regulator, defoliant or desiccant and include spray adjuvants (e.g. surfactants, emulsifiers and anti-foaming agents). Examples of pesticides include herbicides, insecticides, fungicides, rodenticides, disinfectants, fumigants and animal repellents.

D. Scope.

This exposure control plan covers EHS employees designated by the department as having reasonably anticipated occupational exposure to pesticides.

E. Responsibilities.

Supervisors

- Identify work activities with potential exposure to pesticides, including pre-application activities.
- Require that employees engaged in the previously identified work familiarize themselves with this APP chapter.
- Offer employees cholinesterase monitoring and testing as required.
- Provide employees pesticide exposure control training prior to assignment to tasks with potential exposure.
- Provide employees Personal Protective Equipment (PPE), for PPE selection and training information, please see this APP's PPE chapter.
- Ensures decontamination supplies/facilities are available whenever a pesticide was applied or a restricted entry interval (REI) was in effect in the last 30 days.
- Ensures pesticide application notification requirements are met per label and [WAC 296-307-12025](#) and [WAC 296-307-12030](#) requirements.
- Ensures workers, other than appropriately trained and equipped pesticide handlers, do not enter restricted areas until the REI (refer to pesticide label and [WAC 296-307-1215](#) and [WAC 296-307-12020](#)) has terminated.
- Ensure pesticide use is consistent with label directions.
- Ensure no pesticide is applied such that any person other than the appropriately trained and equipped handler shall contact the pesticide either directly or through drift (see also [WAC 296-307-13010](#), Restrictions during applications).
- Evaluate employee adherence to pesticide exposure control policy and initiate corrective action when necessary e.g. additional training and/or disciplinary action.

Note: The Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) section 14 (b)(4) provides that a person is liable for a penalty under FIFRA if another person employed by or acting for that person violates any provision of FIFRA. The term "acting for" includes both employment *and contractual relationships*.

Employees

- Immediately inform their supervisor when (previously unidentified) tasks present potential pesticide exposure.
- Familiarize themselves with this APP chapter.
- Receive cholinesterase monitoring and testing as required.
- Attend and participate in pesticide exposure control training.
- Review available pesticide application information (e.g. notifications) and do not enter restricted areas until the REI (refer to pesticide label and [WAC 296-307-1215](#) and [WAC 296-307-12020](#)) has terminated, unless they are trained and equipped pesticide handlers.

- Use pesticides only if trained and per label directions.
- Ensure no pesticide is applied such that any person other than the appropriately trained and equipped handler shall contact the pesticide either directly or through drift (see also [WAC 296-307-13010](#), Restrictions during applications).
- Wear PPE and adhere to pesticide exposure control policies and procedures. Employees not conforming to pesticide exposure control policy may be subject to disciplinary action.

F. Training.

Employees that may be assigned to handle or use pesticides, or with a reasonable expectation of exposure must understand the contents of this APP chapter and receive pesticide exposure control training. Training is required upon initial employment (or within 10 days of assignment to tasks with exposure potential) and on an annual basis.

Employees must obtain the applicable Washington State Department of Agriculture (WSDA) applicator certification for the type of work and areas of pest control performed. Applicators must maintain their certifications through ongoing professional development course work as appropriate for their certification type.

Non-certified employees may perform certain pesticide applications only if under the direct supervision of a certified applicator. Certain pesticide labels may contain additional supervision requirements. Employees that will be expected to enter any field that has been sprayed with a labeled pesticide must receive pesticide safety information and hazard communication training prior to entry.

G. Requirements for Pesticide Handlers and Workers

A pesticide handler is any employee who mixes, transfers, loads, applies or disposes of pesticides. They may repair, adjust or clean pesticide equipment and may enter treated areas before the REI is met. The REI is the time after pesticide application during which entry to the treated area is restricted to properly trained and equipped employees. A pesticide handler must possess a WSDA pesticide certification.

A pesticide worker is any employee performing agricultural related work in an area where pesticides are or have been used in the past 30 days. Pesticide workers do not handle any pesticides or machinery with residues, do not have to possess a WSDA pesticide certification and may not enter treated areas (with limited exceptions) until the REI has been met.

Employers must ensure employees have access to:

- Restrictions during pesticide applications
- Restrictions after pesticide applications
- Notifications of pesticide applications (for agricultural and research applications, see [WAC 296-307-13015](#) for posting requirements)
- Specific information on individual pesticide applications
- Notifications of pesticide application to non-EH&S personnel
- Pesticide safety training
- Posted pesticide safety information
- Decontamination supplies, procedures and training
- Emergency exposure assistance

H. Cholinesterase Inhibiting Pesticides.

Cholinesterase inhibiting pesticides (CIP) interfere with an enzyme (cholinesterase) that regulates the activity of nerve impulses in humans and other animals. Employers must track employee handling (mixing, use, cleanup and disposal) of CIP and institute a monitoring program if any employee exceeds 30 hours of handling in any consecutive 30 day period. A list of CIP is found at the link in Section A of this Chapter.

Employers who use CIP must:

- Record the number of hours each employee handles CIP
- Implement a medical monitoring program for any employee who exceeds 30 hours handling in any consecutive 30 day period
- Identify a medical provider to provide medical monitoring services
- Make cholinesterase baseline and periodic testing available
- Investigate work practices when cholinesterase levels are depressed more than 20% of employees baseline
- Remove employees from CIP work areas when recommended by medical provider
- Provide training to covered employees
- Report employee handling hours to medical provider
- Maintain medical monitoring and other records for seven years

I. Pesticides Recordkeeping

Employers are to maintain pesticide related records and make them available to employees, their representatives and to regulatory agency personnel upon request. Employers are to maintain the following records for at least seven years:

- Specifics of each pesticide application, whether applied by the unit or by an outside contractor
- Annual inventory of stored pesticides
- Pesticide purchases

APPENDIX 1

WSU NEW HIRE CHECKLIST FOR EMPLOYEES WORKING WITH PESTICIDES



Pest Management Recommendations and Pesticide Testing



If you work with pesticides –organic or conventional- or make pesticide recommendations, you need to be aware of **your legal responsibilities and liability**. For example, in Washington State, anyone who provides a written or verbal recommendation, for other than a home and garden pesticide, must have a current Washington State Pesticide License.

“Recommendation” is defined as *any written or spoken statement which advises that a particular pesticide can be used to control a particular pest, or produce a particular result (such as a plant growth regulator or desiccant).*

“Pesticide” is defined as *any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest (not just insects), or acting as a plant growth regulator, defoliant, or desiccant.* (Source of the substance is irrelevant.)

Use the checklist below to guide you through the necessary educational and licensing steps.

BEFORE YOU APPLY OR TEST ANY PESTICIDE, OR MAKE A PESTICIDE RECOMMENDATION, VEBALLY OR IN WRITING:

- ☐ Access the WSU Employee Resources page at <http://ext100.wsu.edu/wsprs/employees/> to locate relevant training materials
- ☐ Read the WSU Pesticide Policy sections (BPPM 45.65-70) on that web site
- ☐ View the relevant training modules (A-C), after reading the policy
- ☐ If necessary, register for pre-license training at <http://pep.wsu.edu/>. Questions about license categories and endorsements should be directed to Carol Black at 509-335- 9222 or ramsay@wsu.edu
- ☐ Obtain a current Washington State Department of Agriculture pesticide license, and endorsements, appropriate to the work you will be doing

AFTER PASSING THE LICENSING EXAMS:

- ☐ Make sure those you supervise (e.g., staff, A/Ps, students and volunteers) are in compliance with the WSU Pesticide Policy
- ☐ Keep your license current and add more endorsements if your work changes
- ☐ Contact WSU Environmental Health & Safety (<http://ehs.wsu.edu/>) specialists for additional training in workplace safety, respirator fit tests, etc.
- ☐ Make sure to keep your pesticide application records current, and on hand, for the 7-year record retention requirement
- ☐ If you are working with Experimental Use Pesticides, either obtain an individual permit or use the WSU collective EUP recordkeeping system. Use the disclaimer provided in the BPPM 45.70 when reporting EUP results to end users.

Contact Gene Patterson in EHS for consultation or assistance with questions related to any work in this area, at 335-5510.