Are you ready for an OSHA inspection in your pesticide department...?

-Fifth in a series

We all do our best to comply with the regulations, but it can be challenging to keep up with these regulations. A thorough check of our pesticide departments may be one of the most challenging areas within our nurseries, because there are a lot of potential hazards hidden before our eyes! In a 2007 report by OSHA of all industries, nine of the top 25 citations given by OSHA occur in hazard communication & training or failure to use/provide/maintain personal protection equipment. We all know that these violations can be a costly mistake for our companies. The following are some important guidelines that we should focus on to improve our pesticide safety programs.

Training of pesticide handlers: It is important that those training employees who are pesticide handlers are qualified trainers themselves. A qualified trainer should meet one of the following criteria:

1) A certified pesticide applicator;
2) A person who has completed Worker Protection Standard handler training;
3) A person who has attended an approved “Train-the-Trainer” program.

This training should occur for all employees prior to handling chemicals and should be repeated every five years. Training can either be oral, written or audio-visual, however you should ensure that all training be in the employees’ preferred language. A key element to this training is documentation that training has occurred being maintained by the employer.

The following checklist is an excerpt from the OSHA Worker Protection Standard (40 CFR 170.230) listing the requirements for topics covered during pesticide safety training:

- Format and meaning of information contained on pesticide labels, including safety information such as precautionary statements about human health hazards.
- Hazards of pesticides resulting from toxicity and exposure, including acute and chronic effects, delayed effects and sensitization.
- Routes where pesticides can enter the body.
- Signs and symptoms of common types of pesticide poisoning.
- Emergency first aid for pesticide injuries or poisonings.
- How to obtain emergency medical care.
- Routine and emergency decontamination procedures.
- Need for and appropriate use of personal protective equipment.
- Prevention, recognition, and first aid treatment of heat-related illness.
- Safety requirements for handling, transporting, storing, and disposing of pesticides, including general procedures for spill cleanup.
- Environmental concerns such as drift, runoff, and wildlife hazards.
- Warnings about taking pesticides or pesticide containers home.

Signage: Notification of pesticide applications is another important aspect to any spray program. This notification should be located in a central location of your facility prior to pesticide applications. The employer should ensure that the notice is accessible to all employees and information should be clearly stated in a language understood by employees. Check the pesticide label for specific guidelines since some chemical applications require both written and oral notification.

All employees should have access to the following information regarding pesticide applications: location of treatment, product being used, active ingredients of the chemical, time and date of applications, restricted-entry interval (REI) and EPA registration number. In addition to this notification, it is also important to post signs at normal worker points of entry to any treated area. There are specific guidelines for proper signage, including signage being posted in both English and Spanish. These signs should be posted no more than 24 hours prior to pesticide application and must be removed within three days after the end of the required REI.

Equipment: Training of pesticide handlers should include the safe operation of any equipment they use for mixing, loading, transferring or applying pesticides. This training should include chemigation safety and information regarding pesticide drift avoidance.
It is also important that they perform a routine check of the equipment to check for leaks, clogging and worn or damaged parts. If the equipment requires repair or adjustments by a person other than the trained handler, pesticides should be cleaned prior to repairs. It is important that any person repairing pesticide equipment be trained as a pesticide handler and provided with proper personal protective equipment. This training should include the correct way to handle contaminated equipment to ensure their safety. They should also be notified that the equipment is contaminated and be warned of the potential harmful effects of these pesticides.

**Personal protective equipment:** Any person handling and applying pesticides should be provided appropriate personal protective equipment (PPE) as required by the product label. The employer is responsible for ensuring that PPE is used correctly for its intended purpose and according to the manufacturer’s instructions. PPE includes chemical resistant suits, aprons, gloves, eyewear, footwear and respirator. Also, it is the employer’s responsibility to assure that all PPE is kept clean and in good condition. Any damaged equipment should be repaired or discarded. If cleaning is necessary, care should be used to follow the manufacturer’s instructions or pesticide label instructions for proper cleaning. If no guidelines are provided by either source, then equipment should be washed thoroughly in hot water and detergent. Contaminated PPE should be stored separately and washed separately from other clothing or laundry. Any person who cleans or launders PPE shall be informed that this equipment may be contaminated with pesticides, as well as information about the potential harmful effects of pesticide exposure.

Employer’s should assure that pesticide handlers have a clean place separate from pesticide storage areas for storing personal clothing and for changing into or out of PPE. PPE should also be kept separate from personal clothing and pesticide storage areas. Employers should prevent handlers from taking home contaminated PPE.

If respirators are required by product labels, they should meet or exceed the requirement for the applications. The employer is responsible for ensuring correctly fitting respirator equipment. It is important that respirator equipment be kept clean and in proper working order. Follow manufacturer’s recommendations for cleaning and length of use guidelines for respirators.

In the next flier we will address Access to Labels and Pesticide reports.

Respectfully,

Laurie Rogers-Roach  
Fisher Farms  
OAN Safety Committee Member

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The OAN safety committee is looking for new committee members. The committee is a great way for people to learn new OSHA rules, new ideas on safety training and to network with other nursery people involved with safety programs. The committee meets 6 times per year at the OAN office in Wilsonville. If you or anyone else at your nursery is interested in becoming involved, please contact Krista Jeli at the OAN at 503-682-5089 or email kjeli@oan.org.