



August 2008

Pesticide & WPS Employer Checklist *-Seventh in a series*

When an inspector comes calling even the most well prepared nursery may wonder what questions will be asked. Many of you might worry what you may have forgotten to do. The OAN Safety Committee has put together a questionnaire that covers the main topics that an inspector will cover. An excerpt from the questionnaire appears below:

PESTICIDE & WPS EMPLOYER CHECKLIST

DOES THE NURSERY HAVE THE FOLLOWING?

- | | | | |
|--|-----|----|---------------------|
| 1. Hazard Communication Written Plan: | Yes | No | 437-004-9800 (4)(a) |
| 2. MSDS Sheets and/or Chemical Labels List | Yes | No | 437-004-9800 (6)(g) |

RESTRICTED ENTRY INTERVAL (REI) EARLY ENTRY WORKERS (40 CFR 170.112)

1. Does the employer have **workers** enter during REIs?
2. Are **workers** prohibited from entry into areas under REIs?
3. Do early-entry **workers** with limited contact with treated surface remain in the treated area more than 1 hour in a 24 hour period?
4. How soon after the application did the worker enter the treated area?
5. How long do workers work in the treated area?
6. PPE required by label for early entry workers?
7. PPE provided and worn for that pesticide?

TRAINING VERIFICATION 40 CFR 170.112, 130, 230, 232

1. Are all **handlers** Certified Pesticide Applicators (CPA exempt from WPS training) or have WPS handler training?
2. Do **handlers** and **early entry** workers receive training before performing pesticide?
3. Are **handlers** informed of labeling and have access to labels?
4. How were **handlers/early entry workers/workers** instructed to prevent, recognize and give first aid for heat stress?
5. When are early entry workers trained? By whom?
6. Does the employer use an approved **worker/handler** training program?
7. Do trainers have proper qualifications to train (Certified Pesticide Applicator, WPS Handler training, or attended approved train the trainer program)?
8. Is the training repeated every 5 years?
9. Is the training presented (EPA approved) as audio/visual or verbally (flipchart)?
10. Is the training presented in a language the workers can understand?
11. Does the employer have copies of **worker** training records on file?
12. Are all **workers** certified applicators, OR have received WPS worker training?
13. Do **workers** receive training before the 5th day of entry into treated areas?

The full questionnaire can be downloaded from the OAN website in both English and Spanish. Go to www.oan.org, and click on Programs & Services>Safety>Safety Alerts.

One thing to remember besides the policies and training is the importance of organization. An employer who can easily pull together the documents requested and show that they are organized and thorough will give an inspector more confidence in your program.

Having all the policies in place is only half the battle. Nothing beats having knowledgeable employees who actually know what the policies are and can answer an inspector's questions.

Respectfully,

Andres Acosta
Monrovia
OAN Safety Committee Member

Jeanette Hubbard
Oisinn Ltd.
OAN Safety Committee Chair

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.

Additional Resources:

- OAN online safety resources: <http://www.oan.org/displaycommon.cfm?an=1&subarticlenbr=69>
- Your workers compensation insurance provider and/or broker
- Oregon OSHA: <http://www.orosha.org/> or at (503) 378-3272

