

US EPA ARCHIVE DOCUMENT

Worker Protection
Farmworker/Public Health Perspective

PPDC

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Hierarchy of Controls

Occupational Health

- Eliminate the hazard at its source
- Substitute for something less hazardous
- Isolate the hazard by total containment of the process
- Engineering controls
- Safe work procedures and administrative controls
- Personal Protective Equipment (PPE)

Farmworker Focus

- **Expanded Training**
- **Hazard Communication**
- **Training Administration**
- **Remaining Issues**

Post Application Worker EXPAND SAFETY TRAINING

- **Prevent exposure on the job (expand)**
- **Workers' rights**
- **Protect families and children**
- **Reporting suspected pesticide illnesses**
- **Hazard Communication**

Making Hazard Communication Part of the WPS

- OSHA's Hazard Communication Standard covers almost all workers exposed to hazardous chemicals, except farmworkers exposed to pesticides
- OSHA requires: (i) training before workers are exposed to the chemical; (ii) access to a Material Safety Data Sheet (MSDS) provided by the chemical manufacturer; and (iii) labeling
- In 1992 EPA proposed a hazard communication requirement, but it never became final
- The GAO found that implementation of the HCS led to a reduction in the use of hazardous chemicals and an increase in safety awareness

Providing Farmworkers with Meaningful Hazard Communication

- **Most post-application workers and many handlers are immigrants with limited English proficiency.**
 - **For most agricultural workers and handlers, MSDSs would not provide information in a readily understandable format**
 - **Convey hazard information using pictures with few words; in multiple languages**
- **For fieldworkers, information should cover short- and long- term health effects; REI, when pesticide is used**
- **EPA can develop the format for a pictorial hazard information sheet**
- **Pictorial hazard information sheets should be produced by registrants and be provided with products labeled for agricultural use with reference to WPS**
- **Employers should provide these simple sheets to workers**

Post Application Worker

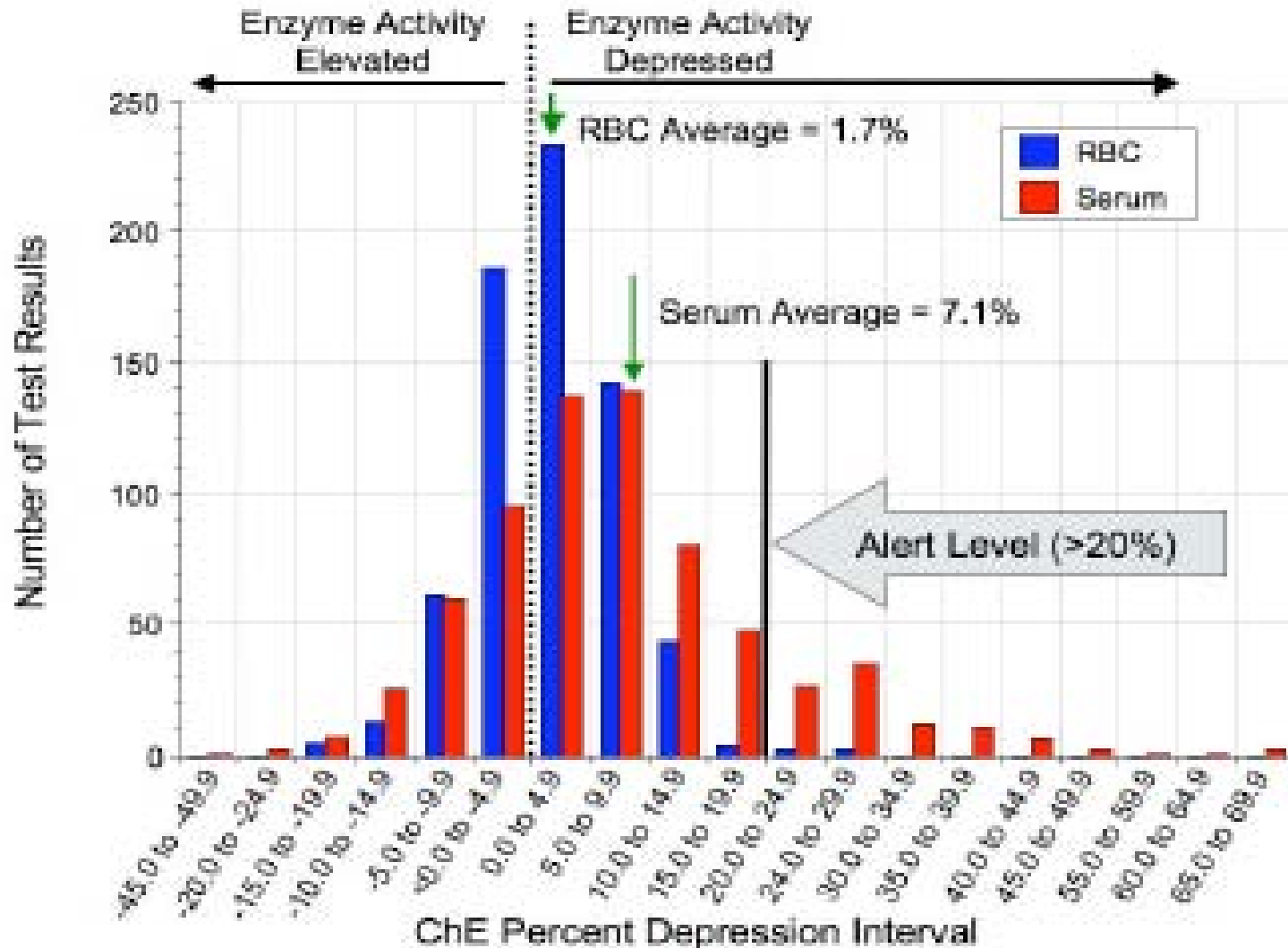
IMPROVE TRAINING ADMINISTRATION

- **Annual Training. No Grace Period.**
- **Training of Trainers**
- **Training Verification**
 - **Cards**
 - **SLA, grower, trainer retain verification of training**

What's Missing?

- National ChE monitoring program
 - Washington, California
- Employers cover cost
- SLA investigates a 20% or more ChE depression

Change in ChE in 600 WA Handlers, 2006



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- Safe work procedures and administrative controls (training goes here)
- Personal Protective Equipment (PPE)