

Cotton

Cotton Producers Facing The Worker Protection Standard

Winter 1999

Information Sheet 4

PROTECTION OF IRRIGATION WORKERS ON A COTTON FARM

Who is an irrigation worker?

An irrigation worker is anyone who is employed on a cotton farm and is doing a specific short-term task of placement, repair or removal of irrigation equipment or entering into a field on equipment for the purpose of installation or repair of ditches (ex. border irrigation) for routing of water throughout a field being irrigated.

Irrigation activities are not defined as "hand labor," but only short-term entry is allowed. Why?

"Irrigation activities were excluded from the definition of 'hand labor' in order to create a short-term exception for such activities under the early entry provisions. Irrigation activities do pose exposure concerns, but the EPA recognized that these activities need to be done. The EPA requires protection from this exposure by limiting the amount of time a worker is allowed in the treated area and by requiring the worker to wear personal protective equipment (PPE)."

How can irrigation activities in and around a cotton field under an REI be conducted?

An irrigation worker may enter a field under an REI under **Early Entry Exceptions** under the Worker Protection Standard (WPS). There are two types of early entry:

Early Entry with No Contact

Early Entry with Contact

Taking the best approach to field entry

Of course, the best approach is to install, repair and remove irrigation equipment when the field is not treated and not under an REI. However, that cannot always be done. Pesticide applications and irrigation should be scheduled by the agricultural employer so that irrigation involving entry by workers is minimized. Where irrigation activities are essential during the time a cotton field is under an REI, early entry can occur following EPA restrictions.

*An irrigation worker can enter a field under the **Early Entry No Contact** exception during the REI. However, the worker must **not** have any contact with anything (plants, soil, water, air) that has been treated with a pesticide to which the REI applies.*

SAMPLE LABELING

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers and restricted entry interval. The requirements in this box apply to uses of this product that are within areas covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 48 hours. The REI is 72 hours in outdoor areas where average annual rainfall is less than 25 inches a year.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is:

- coveralls over long-sleeved shirt and long pants
- chemical-resistant gloves, such as barrier laminate or viton
- chemical-resistant footwear plus socks
- protective eyewear
- chemical-resistant headgear

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

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Field Edge Approach: Some irrigation tasks take place at the edges of fields, which may not be within the treated area (area to which the pesticide has been directed). One situation may be the installation or removal of pipe for furrow irrigation. As long as such activities do not cause workers to enter the treated area, they may take place without time limit or use of PPE during the REI.

Within Field Approach: Two common situations may exist....repairing or refueling equipment (center pivot irrigation) and establishment of water routing borders with a tractor (border irrigation). An irrigation worker may enter a treated field (in a vehicle) in order to repair and refuel as long as a treated surface (as previously described) is not contacted. Entry may also be made while driving a tractor as long as a treated surface is not contacted by exiting the tractor from the treated area under an REI.

Pesticide Incorporated in Soil: If a soil-incorporated or injected pesticide with WPS labeling has been applied as an in-furrow treatment in a cotton field and is covered with soil, the irrigation worker can unload and place irrigation pipe, work on a pivot irrigation system or do other tasks that do not disrupt the soil surface or touch a treated surface in the treated field during the REI.

Taking the worst approach to field entry... under an REI

Under this situation, an irrigation worker, as well as other worker activities, if unavoidable, must enter a field for limited work activities during the time the REI is in effect.

There are only three tasks permitted under the WPS:

1. Short-Term
2. Emergency
3. Specific Tasks

For Short-Term Tasks.....

- entrance into a field requires the employer to provide approved protections and PPE specified by the pesticide label of the product(s) applied to the field. The pesticide label will specify what PPE requirements must be met. Short-term tasks **do not** allow hand labor tasks while in the field (such as hoeing).
- workers must wait at least **4 hours** after the application before entering the field
- workers must not spend over **1 hour in a 24-hour** period in the treated field under the REI.
- early entry worker information and other applicable requirements under the WPS must be provided to the irrigation worker.

Exception for Limited Contact Irrigation Workers....

Irrigation workers are allowed **8 hours in a 24-hour period** for non-hand labor tasks with contact with treated surfaces minimal and **limited to the feet, lower legs, hands and forearms**. The exception is not allowed if there is a double notification (oral and posted warning signs) requirement on the label.

For Emergencies and Special Exceptions.....

- In the event of an emergency, the WPS permits early entry by irrigation workers while wearing early entry PPE and without time limits. Review the regulation to determine the definition of an emergency.
- The EPA will approve special exceptions through a special request made to the EPA. Specifics of the request will need to be communicated with EPA through the State WPS Lead Agency.

Sources for Obtaining More Information:

- Federal Register (Worker Protection Standard, 40 CFR Parts 156 & 170)
- The Office of the Environmental Protection Agency in your region
- Past newsletters published by the Cotton Foundation and National Cotton Council
- The "How to Comply Manual" published by the EPA
- State Department of Agricultures or State lead Regulatory Agencies
- The Pesticide Coordinators with State Cooperative Extension



Project Coordinator and Contributing Editor
Dr. Jim Hamer, Mississippi State University (Retired)
President, Professional Consulting Services, Inc.

Steering Committee
State Department of Agriculture

California - Paul Gosselin

Florida - Steven J. Rutz

Texas - Donnie Dipple

Mississippi - Robert McCarty

University

Arkansas - Ples Spradley

Florida - Norman Nesheim

Producers

South Carolina - Roy Baxley

Texas - Jimmy Dodson

Environmental Protection Agency

Kevin Keaney and Don Eckerman, Washington

Carlton Layne and Jane Horton, Region 4, Atlanta - (404-562-9012)

Karen Heisler, Region 9, San Francisco - (415-744-(1100) (1065)

Region 6 - (214-665-7564)

Washington, DC - 703-305-766

National Cotton Council

Frank Carter

Fred Middleton

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