

DEPARTMENT OF PESTICIDE REGULATION

James W. Wells, Director



1020 N Street, Room 300
Sacramento, California 95814-5624

ENF 95-033

June 8, 1995

TO: County Agricultural Commissioners

SUBJECT: INSTRUCTOR TRAINING PROGRAMS TO CARRY OUT THE FEDERAL
WORKER PROTECTION STANDARD TRAINING REQUIREMENTS IN
CALIFORNIA - UPDATE

Enforcement Letter 95-019 (ENF 95-019), dated March 24, 1995, explains that the University of California's "Instructor Training Program" course was the only program authorized by the Department of Pesticide Regulation (DPR) to qualify trainers of pesticide handlers and field workers under the federal Worker Protection Standard (WPS). Attached is a copy of DPR's criteria for evaluating instructor training programs established to qualify pesticide handler and field worker trainers. This policy will allow other persons to conduct Instructor Training programs, thereby expanding the number of qualified trainers available in California.

The criteria will provide guidance to persons interested in becoming "trainers of trainers." They will also establish minimum standards that meet federal and State requirements for instructors of pesticide handler and field worker trainers.

Persons interested in conducting programs for trainers of pesticide handlers or field workers will need to demonstrate their knowledge of California pesticide laws and regulations, and their knowledge of instruction techniques/principles of teaching. Interested persons will need to provide information on their qualifications as a trainer of trainers, including education, related professional experience, special skills, and areas of expertise; a copy of all course materials including trainee manuals, audiovisual aids, and handouts; and a detailed description of the program content (course outline).

Persons interested in requesting approval of their instructor training program should submit their request in writing to Mr. Charles M. Andrews, Chief, Department of Pesticide Regulation, Pesticide Enforcement Branch, 1020 N Street, Room 300, Sacramento, California 95814-5624.



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Note: County agricultural commissioners' staff who possess a license in "Pesticide Use Enforcement" issued by California Department of Food and Agriculture (CDFA) may qualify to conduct instructor training for trainers of field workers and pesticide handlers, provided their program request is approved.

If you have any questions on the criteria, please contact Mr. Bob Chavez, of my staff, at (916) 445-3886.

Sincerely,



Charles M. Andrews, Chief
Pesticide Enforcement Branch
(916) 445-3920

BC:st

Attachment

cc: Mr. Bob Chavez

**California Department of Pesticide Regulation
Pesticide Enforcement Branch**

**Criteria for Instructor Training ("Training of Trainers") Programs
for Trainers of Pesticide Handlers and Field Workers
Under the Federal Worker Protection Standard**

The purpose of this document is to provide guidance to persons interested in becoming "trainers of trainers" for pesticide handlers and field workers, and to establish minimum criteria for an approved "Instructor Trainer" program that meets federal and State requirements.

Introduction

On August 21, 1992, the U.S. Environmental Protection Agency (U.S. EPA) expanded the scope of the federal Worker Protection Standard (WPS) to include not only pesticides used on farms, but also in forests, nurseries, and greenhouses. Among the changes to the WPS are new requirements for pesticide safety training. The WPS and California Worker Safety Regulations require pesticide safety training be provided to pesticide handlers and field workers. Also, the WPS requires that persons providing training to handlers and field workers involved in commercial or research production of plant commodities must meet minimum qualifications before acting as a trainer.

Who is qualified to train?

Trainers of Pesticide Handlers and Field Workers:

California regulations will be amended to specify that certified private applicators be qualified to provide handler and field worker training to their employees. Other persons considered qualified would include qualified applicator licensees and certificate holders, journeyman pilots, agricultural pest control advisors, registered professional foresters, county biologists with a license in pesticide use enforcement, U.C. Farm Advisors, and those who have completed an "Instructor trainer" program approved by the Department of Pesticide Regulation (DPR).

Trainers of Trainers / Instructor-Trainers:

Currently, in California, the "Instructor Training Program" course given by the University of California, Statewide Integrated Pest Management Project is the only program authorized by the Department of Pesticide Regulation to qualify the trainers of pesticide

handlers and field workers who do not otherwise meet the requirement. However, because of the increased demand for qualified instructor-trainers, the Department will begin evaluating other trainer programs that meet the criteria discussed below. The WPS provides that a person having "completed a pesticide safety train-the-trainer program approved by a State..." is qualified to conduct the training for handlers and field workers.

What are the minimum standards that "instructor training programs" must meet?

Core Criteria for Instructor Training Programs

1. Persons conducting a program for trainers of **pesticide handlers** must possess the following minimum qualifications:

a. Demonstration of knowledge of pesticide handling activities and regulatory requirements; and,

Note: DPR will consider the following qualifications as meeting this requirement: county biologists with a license in pesticide use enforcement issued by the California Department of Food and Agriculture; possession of a qualified applicator certificate, qualified applicator license, agricultural pest control advisor license; or completion of training program courses for pesticide handlers; or professional experience in providing instruction to persons handling pesticides or other chemicals.

b. Demonstration of knowledge of instruction techniques and principles of teaching, or professional experience in providing instruction to persons using teaching techniques.

2. Persons conducting a training program for trainers of **field workers** must possess the following minimum qualifications:

a. Demonstration of knowledge of pesticide regulatory requirements in field worker safety, and

Note: DPR will consider the following qualifications as meeting the requirement: county biologists with a license in pesticide use enforcement issued by the California Department of Food and Agriculture; possession of a qualified applicator certificate, qualified applicator license, agricultural pest control advisor license; or completion of training program courses related to regulatory requirements in field worker safety; or professional experience in providing instruction to persons handling pesticides or other chemicals using teaching techniques.

- b. Demonstration of knowledge of instruction techniques/principles, or professional experience in providing instruction to persons using teaching techniques.

Also, **all** instructor training programs must include the following:

3. Provide 'how-to-train' information. The 'how-to-train' content of these programs is just as important as the information on the pesticide safety topics that must be covered when training pesticide handlers and field workers. Prospective trainers must know how to most effectively communicate the information to pesticide handlers and field workers so that they understand how to work safely.
4. Stress that basic safety training presented to pesticide handlers and field workers be done either orally or from written materials or from audiovisual materials. The information must be presented so that it can be understood by the field workers or pesticide handlers even if a translator is required. Training for field workers must be presented using non-technical terms and the presenter must respond to questions.
5. Provide a trainer's manual as part of their program. This manual should incorporate information on training methods and development of training programs and in-depth information on the required concepts.
6. Inform participants that if they participate in the Voluntary Training Verification Program for **field workers** they must also:
 - a. Use training materials developed or approved by the U.S. EPA. Approved training materials are available from several sources. For more information, contact U.S. EPA, Region 9, Pesticides and Toxics Section, 75 Hawthorne Street, San Francisco, California, 94105.
 - b. Submit an application to the DPR to enter into an agreement that outlines inventory control and record requirements.
 - c. Issue only U.S. EPA cards to field workers who receive training.
7. Maintain a list of participants' name, affiliation, street address or post office box number, City, State, Zip Code, telephone number, and the date and location where the training occurred. This information should be made available to the Department of Pesticide Regulation, Pesticide Enforcement Branch upon request.
8. Limit the class size to 25 students to provide for more effective student participation.

10. Safety requirements and procedures, including engineering controls (such as closed systems and enclosed cabs) for handling, transporting, storing, and disposing of pesticides.
11. Environmental concerns such as drift, runoff, and wildlife hazards.
12. Warnings about taking pesticide containers home.
13. Applicable laws and regulations, Material Safety Data Sheets, Pesticide Safety Information Series leaflets.
14. The purposes and requirements of medical supervision if organophosphate or carbamate (esters of N-methyl carbamic acid) pesticides with the signal word "DANGER" or "WARNING" on the labeling.
15. The location of the written Hazard Communication Information For Employees Handling Pesticides (Pesticide Safety Information Series leaflet A-8), other Pesticide Safety Information Series leaflets, and Material Safety Data Sheets.
16. The employee's rights, including the right;
 - a. To personally receive information about pesticides to which he or she may be exposed; and
 - b. For his or her physician or employee representative to receive information about pesticides to which he or she may be exposed; and
 - c. To be protected against retaliatory action due to the exercise of any of his or her rights.

What records must be kept?

Trainers of trainers:

Persons who train trainers must document certain information on all trainers who attend their training programs. The attendee's name, business name or affiliation, street address or post office box number, City, State, Zip Code, telephone number, and the date and location where the training occurred. This information must be made available to the Department of Pesticide Regulation, Pesticide Enforcement Branch.

Trainers of pesticide handlers:

California regulations require that the date and extent of initial and annually required training be recorded for each employee and the job to be assigned. The record must be signed by the employee. When training is provided by persons other than the pesticide

handler-employer, trainers must be informed of the importance of providing the employer with a copy of the training record for each employee trained. Employers are required to retain this record for each employee assigned to handle pesticides for two years, at a central location at the work place so that employees may have access to the information. These records are required to be made promptly available to DPR or the county agricultural commissioner enforcement staff upon request.

Field Worker Pesticide Safety Training Requirements

The federal WPS requires pesticide safety training of all field workers working in treated fields. "Field worker" is defined as any person who is employed to perform cultural practices in a treated field. The definition does not include persons performing tasks as a pest control adviser, field checker, or scout, nor does it include local, state, or federal officials performing inspections, sampling, or other similar official duties. Currently, California regulations require only 'field crew leaders' to be trained in what posting means, the activities that may be performed during a restricted entry interval, where to obtain emergency medical care, and the usual symptoms of organophosphate and carbamate poisoning. When state regulations are amended, these concepts will be expanded to include additional information that field workers must receive. These are discussed in detail below.

Who must be given pesticide safety training?

The federal WPS requires training of **all field workers** entering a field that has been treated with a pesticide, or had a restricted entry interval in effect, within the last 30 days. There is an additional requirement in the WPS for employers to inform early entry field workers of label specific information about hazards and precautions prior to entering a treated field.

When must training be given?

Currently, the federal WPS requires workers (field workers) to be trained before their 16th day of entry to any areas on the agricultural establishment where within the last 30 days a pesticide has been applied or a restricted entry interval is in effect. The WPS provides for an exception to this requirement until October 20, 1997, when the training must be given before a worker's 6th day of entry. Field workers must be retrained at least every 5 years.

Note: beginning January 1, 1995, the WPS will remove the 15-day "grace period" and, instead, require agricultural employers to assure that untrained field workers receive basic pesticide safety information (see below) before they enter a treated area on the establishment; and provide complete WPS pesticide safety training to all untrained field

workers no more than 5 days after their initial employment has commenced. The Department of Pesticide Regulation will provide more information on changes to the WPS requirements before the effective date.

What concepts must be covered in the field worker training program?

Training programs for agricultural field workers must include the following minimum information:

1. Where and in what form pesticide residues may be encountered.
2. Hazards of pesticides resulting from toxicity and exposure, including acute and chronic effects, delayed effects and sensitization.
3. Signs and symptoms of common types of pesticide overexposure.
4. Emergency first aid for pesticide overexposure.
5. How to obtain emergency medical care.
6. Routine and emergency decontamination procedures.
7. Hazards from chemigation and drift.
8. The hazards from pesticide residues on clothing and ways to avoid these hazards.
9. Warnings about taking pesticides or pesticide containers home.
10. Restricted entry intervals and the meaning of posting (warning signs - both state and federal sign formats).
11. The Hazard Communication Requirements of Title 3, California Code of Regulations, section 6761.
12. Workers' rights.

Early Entry Field Worker Training Requirements

Early entry field workers must receive the following specific information and instructions before entering a treated area on the agricultural establishment during a restricted entry interval:

1. Instructions related to personal protective equipment (PPE). They must receive instructions, in a manner they can understand, on how to put on, use, and take off early entry PPE; the importance of washing thoroughly after removing PPE, and how to prevent, recognize, and give correct first aid for heat illness.
2. Labeling information and instructions. They must be informed about the safety information and instructions on the labeling and the pesticide(s) to which the restricted entry interval applies, including human hazard statements and procedures; first aid; signs and symptoms of poisoning; PPE required for early entry, and any worker precautions or instructions related to safe use or early entry.

What records must be kept?

Trainers of trainers:

Record keeping requirements for trainers of trainers are as described under handlers.

Trainers of field workers:

There are no requirements for keeping records of training given to field workers unless you are participating in the Voluntary Training Verification Card Program. Trainers must be informed that if they are participating in this program, they must retain for five (5) years, a copy of a class roster, signed by the trainer and each trainee, indicating the card number issued to each trainee, and the date and address of the location where the training occurred. However, trainers should still provide employers with the necessary information to verify field worker-employees have received the necessary training.

U. S. Environmental Protection Agency Worker Protection Standard (Voluntary) Training Verification Program

The U. S. Environmental Protection Agency developed a program for issuing training verification cards to document that pesticide handlers and field workers received pesticide safety training that meets the WPS. It should reduce the need for new and future employers to retrain employees and to maximize the effective use of training resources. Participation in the verification card program is voluntary. DPR has carried out this voluntary verification program for field workers. DPR does not have any plans to carry out this program for pesticide handlers. Pesticide handler training verification is covered by existing record keeping requirements for training provided to pesticide handlers.

Qualified trainers electing to participate in the training verification program must submit an application to DPR to enter into a contract that outlines inventory control and record requirements. Upon approval of the application, a supply of serially numbered cards is issued to the trainer. The cards are issued to field workers who received training. These cards become the employee's property and may be used to verify to regulators and future employers that they have been trained. Trainers are not authorized to print their own version of the cards. Qualified trainers wanting to participate in this program may contact

their local county agricultural commissioner for an application, or they may contact the Department of Pesticide Regulation, Pesticide Enforcement Branch, Room 300, Sacramento, California, 95814-5624.

Qualified trainers participating in the Voluntary Training Verification Card Program, or in the Training-of-Trainers programs, must use training materials developed or approved by the U.S. EPA. Approved training materials are available from several sources. For more information, contact U.S. EPA, Region 9, Pesticides and Toxics Section, 75 Hawthorne Street, San Francisco, California, 94105.

Qualified trainers may choose not to participate in the verification program. However, employers and trainers of field workers who elect not to participate in this program must still meet the WPS requirements for training. In this instance, to simplify compliance with the WPS, employers and trainers of field workers may elect to retain for five years, a copy of a class roster, signed by the trainer and each trainee, showing the date and the address of the location where the training occurred.