

# GROWERTALKS

## Pest Management

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### Training Your Team to Safely Work With Pesticides

*Zach Bruce*



If you're a horticultural industry veteran, you already know to take special care when using pesticides. A cornerstone of many growers' success, these important chemicals require safe handling, storage and appropriate management to keep your site safe and crop flourishing. Though these precautions may seem like common sense, don't allow complacency to stand in the way of safety. Remember, your company's safety program is only as effective as your employees make it. Those in charge of workplace safety and operations have an important duty to ensure that anyone on your jobsite receives adequate training if they're responsible

for mixing, loading or applying pesticides.

In 2017, the EPA updated the Workers Protection Standard (WPS) for Agricultural Pesticides guidance to require annual training for workers and handlers, replacing the previous five-year requirement. The agency also eliminated the worker training grace period, stating that workers must be trained before they're permitted to work in an area where a pesticide has been used—or a restricted-entry interval (REI) has been in effect—within the past 30 days.

Updates like these illustrate the importance of staying up-to-date on training protocols—and implementing high-quality training programs—to help protect your team and avoid pesticide-related EPA violations.

As a safety services manager, part of my job is helping growers like you remain aware of best practices related to pesticide management. I've compiled the following tips and EPA requirements to help you assess your operation's pesticide training program. With a proactive approach, you can help your team stay safe and keep your crops growing.

#### **Identify all trainees**

Because pesticides are commonplace, it's easy to forget that using a pesticide product in a manner inconsistent with its labeling is, in fact, a violation of federal law. If you use WPS-labeled products, you must comply with the latest WPS requirements. Ensure individuals have received WPS-approved training within the past 12 months before:

- Any worker enters a treated area on an agricultural establishment where, within the last 30 days, a WPS-labeled pesticide product has been used or an REI for such pesticide has been in effect
- Any handler conducts any handling task

Workers and handlers are exempt from WPS training if they're currently:

- Certified as an applicator of restricted-use pesticides
- Certified as a crop advisor by a program acknowledged as appropriate in writing by the EPA, or a state or tribal agency responsible for pesticide enforcement

## **Conduct annual training**

Once you've identified which team members should receive training, you'll need to determine who's qualified to train them. Only qualified WPS trainers may provide WPS training and must present training using EPA-approved materials. Different standards designate who's qualified to conduct WPS training for workers or handlers.

According to the EPA manual, an individual who conducts worker or handler training must meet at least one of the following requirements:

- Currently be a certified applicator of restricted-use pesticides
- Currently be designated as a trainer of certified pesticide applicators, handlers (if training handlers) or workers by the EPA or the state or tribal agency having jurisdiction
- Complete an EPA-approved pesticide safety "train-the-trainer program" for individuals who train workers and/or handlers, depending on the intended audience

Trainers also are responsible for completing training records for each worker and handler on your team. Be sure your trainer includes the following information for each worker and/or handler they train:

- The worker's or handler's printed name and signature
- The date of training
- Trainer's name
- Evidence of the trainer's qualification
- Employer's name
- The EPA document numbers or approval numbers for the materials used during the training

Your business is required to keep training records on file for at least two years from the training date. While trainers aren't required to provide each trainee with a copy of the training record, you must be able to provide the record if the employee requests it.

## **Make training meaningful**

As critical as it is to identify a qualified trainer, it's just as important to ensure that training sessions actually provide valuable information that help keep your trainees safe when working with pesticides.

The topics your trainer needs to cover are broad and differ depending on whether you're training workers or handlers. Within the past several years, the EPA added training requirements regarding several topics, including:

- The risk of pesticide exposure to children and pregnant women

- How to avoid bringing pesticide residues home
- How to build a routine that reduces their exposure

You can find the full list of EPA-required topics in the current EPA manual. Direct your trainer to use EPA-approved training materials, which are available online through the Pesticides Educational Resources Collaborative. Using these training resources helps ensure that the topics your trainer covers are relevant and meet the latest EPA requirements. Of course, when it comes to meeting training requirements, you may want to consult with your local experts or attorney.

In addition to these EPA-required topics, your trainer should also cover facility-specific details, including where your employees can find and review pesticide safety information, application and hazard information and decontamination supplies.

## Keep safety information accessible

You're responsible for displaying relevant pesticide information in a central location so workers and handlers you employ can reference it. You need to display the following information for at least 30 days following the onsite application of any WPS-labeled pesticide or when an REI for the pesticide is in effect:

- Pesticide safety information—This can be an EPA poster or an equivalent resource that provides WPS safety protocols
- Pesticide application information—
  - The name of the pesticide
  - Its active ingredients and EPA registration number
  - The REI
  - The crop or site treated
  - The location and description of the treated area
  - The date(s) and times when the application began and ended
- Hazard information—Usually a copy of the OSHA-required safety data sheet (SDS) for each pesticide product, which includes in-depth details like its hazard classifications and chemical composition
- Informational postings—These should be up to date and remain legible; if details such as emergency medical facility information change, update your posters within 24 hours of obtaining that new information.

Pesticides are likely as common at your operation as water and soil, so keeping your team and the environment you operate in safe when using them is critical. Ensuring your pesticide training program remains up to date on the latest EPA and WPS guidelines can contribute to continued success and help keep your business growing. **GT**

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*Zach Bruce is a safety services manager for Hortica. He works with horticultural and floral businesses like yours to improve safety practices and reduce risks. Hortica is a brand of the Sentry Insurance Group. Hortica property and casualty coverages are underwritten, and loss control services are provided, by Florists' Mutual Insurance Company, Florists' Insurance Company, and Florists' Insurance Service, Inc., of Edwardsville, Illinois. Learn more at [hortica.com](http://hortica.com).*