

Handout distributed at March 9, 2006, meeting of Parlier Local Advisory Group

Department of Pesticide Regulation
Risk Management Options
March 9, 2006

The Department of Pesticide Regulation has several options available to put into place mitigation measures to protect people from pesticide exposures. These options include:

Option One: Adopt interim mitigation measures by issuing Suggested Permit Conditions

- Mitigation measures impacted by local conditions (e.g., weather, soil type, sensitive sites, application method)
- County agricultural commissioner evaluation generally required
- Short process to implement
- Revisions can be readily made based on new information

Option Two: Adopt mitigation measures through pesticide labeling changes

- Registrant must agree to label changes
- Requires U.S. EPA approval
- Lengthy process to implement
- Difficult to make changes based on new information

Option Three: Establish interim mitigation measures by adopting Emergency Regulations

- Risks require immediate attention
- Follow up rulemaking required
- Basis for emergency must be evaluated and approved by Office of Administrative Law

Option Four: Establish the mitigation measures in the Strategy by adopting pesticide regulations

- Usually a one-year process to complete
- Requires Office of Administrative Law approval
- 45-day comment period to obtain public input
- Difficult to make changes based on new information

Option Five: Cancellation of the Pesticide Product(s)

- Must demonstrate that the use results in serious uncontrollable adverse effects
- Registrant provided due process through a hearing
- Must manage products in the channels of trade
- Difficult to reinstate based on new information

Department of Pesticide Regulation Mitigation Measures

The Department of Pesticide Regulation considers a variety of mitigation measures to reduce pesticide exposures to people. The industrial hygiene hierarchy in priority order is considered when developing mitigation measures.

- **Engineering Controls. (Most Desirable)**
Whenever feasible, engineering controls are considered the optimum level of protection. Engineering controls protect workers using design specifications or by applying methods of substitution, isolation, or ventilation.
 - Closed mixing and loading systems
 - Enclosed cabs, enclosed cockpits
 - Recapturing and Ventilation systems
 - Isolation of chamber from workers
 - Substitution of a less toxic pesticide

- **Administrative Controls. (Desirable)**
Whenever feasible, administrative controls (e.g., restrictions on work time and specific work practices) provide an effective level of protection. Administrative controls also include training requirements to educate workers of hazards in the work place. Pesticide exposure to workers can be reduced if employees have a better understanding of work place hazards.
 - Work-hour/day restrictions
 - Restricted entry intervals
 - Buffer zones
 - Pesticide use restrictions (rate reduction, acreage limitation, limits on pounds applied per area)
 - Application restrictions (e.g., method type- aerial versus ground, field/commodity tarps, soil compaction, timing of application)
 - Certification and training requirements, including personal hygiene and conveniently located wash areas
 - Equipment maintenance

- **Personal Protective Equipment (PPE). (Least Desirable)**
When the above control measures are not feasible or do not provide total control, workers would be required to wear PPE (e.g., eye protection, gloves, chemical resistant clothing, respiratory protection) to minimize exposure to pesticides.
 - Safety glasses, goggles, face shield
 - Coveralls over work clothing
 - Chemical resistant gloves and boots
 - Chemical resistant clothing and head protection
 - Respiratory protection (e.g., self-contained breathing apparatus, half-face respirator, full-face respirator)