

Chapter 3: Field Worker Safety Inspection Report (PR-ENF-103)

Purpose	Field Worker Safety (FWS) Inspections are performed to determine that fieldworker employers are protecting their workers. Protection of fieldworkers is mandated by the federal Worker Protection Standard and includes properly training workers, providing required notifications and information and assuring that workers have suitable protective clothing and equipment and adequate means of decontamination. Employers must also manage their workers and fields in a manner that prevents exposure to pesticide residues and drift. Interview workers, managers and, when appropriate, property operators thoroughly to determine if adequate communication has been established and maintained.
Fieldworkers	Employees who perform cultural activities in a treated field for any kind of compensation are fieldworkers. This includes, but is not limited to, irrigators, harvesters, thinners and planters. Persons performing tasks as a crop adviser and government officials performing inspection, sampling, or other similar official duties are not fieldworkers.
Treated field	A treated field is any area upon which one or more agricultural plant commodities, including forest and nursery products, are grown for commercial or research production that has been treated with a pesticide or had a restricted entry interval (REI) in effect within the last 30 days. A treated field includes associated roads, paths, ditches, borders, and headlands, if the pesticide was also directed to those areas. A treated field does not include areas inadvertently contaminated by drift or over-spray. See the definition of treated field in 3CCR § 6000.
Inspection criteria	Only complete Field Worker Safety Inspections conducted on fieldworker(s) working in a treated field may be counted on the PRAMR. The requirements listed in this inspection apply only to treated fields.
Identifying treated fields	Determining whether the work area constitutes a treated field can be done in a number of ways, such as: <ul style="list-style-type: none">• Interviewing the supervisor (or person in charge) of the fieldworker(s). Information provided by the property operator (or representative) via phone, fax, past work orders, completion notices, etc.

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Identifying treated fields (continued)

- Visiting the property operator’s central location, as identified by the on-site display of the completed PSIS A-9, and examining the application specific information display, completion notices, work orders, use reports, or other documents.
- Asking someone else to visit the property operator’s central location, when it is located outside your county, such as a CAC inspector from that county.
- Examining records in your office such as Notices of Intent, and PURs.

Determining if a field was treated is often determined “after the fact”, that is, after the inspection has been performed. Inspections on fields that have not had a pesticide application or the last application is longer than 30 days plus the REI cannot be counted as a Field Worker Safety Inspection.

Conducting interviews

A critical part of conducting a fieldworker safety inspection involves talking with (interviewing) a supervisor or crew foreman representing the employer, and one or more of the fieldworkers. Document any violations or problems uncovered from the interviews in the "Remarks" section of the inspection form. Examples: “The supervisor does not know what or where the application specific information display is located.”; “The supervisor is not sure what to do or where to go in case of an emergency.”; “The supervisor has not been told when the field was last treated and does not know if the REI had expired.” Fieldworker(s) response(s) should be documented in the same manner.

It is not necessary to speak with all of the fieldworkers. Your objective in speaking with fieldworkers is to determine the crew’s level of knowledge, and understanding of safety procedures, and notification information. When possible do not interview fieldworkers with the supervisor or management personnel present. See Appendix 2 for information on required interview topics.

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Requirements where the operator of the property is responsible

The following requirements are specifically the responsibility of property operators. If you are inspecting a farm labor contractor (FLC), custom harvester, or packer/shipper (“Other”) these requirements will always be checked “N/A”.

- Requirement number 11 - 3CCR § 6766 Posting Compliance
- Requirement number 12 - 3CCR § 6769 Enclosed Space Ventilation Criteria

Use the steps below if inspecting a FLC, custom harvester, or packer/shipper and you find a violation of requirements 11 or 12.

- Check “N/A” in the compliance block of the “Requirements” section because this regulation is not applicable to the Farm Labor Contractor.
 - Note in the “Remarks” section the details of the violation and that the violation was identified against the property operator.
 - On the FLC Fieldworker Safety Inspection form, in the “Violation Notice # field” designated “FLC” check the “NO” box. In the “Violation Notice # field” designated “Operator of the Property” Check the “YES” box and provide a number. If a VN form is used you may use the serial number from that form, otherwise use another number. Do not use the serial number from the FLC inspection form.
 - Issue a compliance action to the property operator (Violation Notice, separate inspection, or other). You may use the FLC inspection form to notice the property operator of the violation.
 - Prosecute the violation against the operator of the property according to 3CCR § 6128 and § 6130.
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Information Blocks Specific to the FWS Inspection

Firm / Person Inspected

Write the name of the firm or person who is providing the day-to-day instructions and guidance to the fieldworker(s) being inspected (see “Employer” in 3CCR § 6000). Check the box that appropriately designates the “Employer” based on the following:

- FLC = Farm Labor Contractor
- Grower = Property Operator
- Other = Other entities, such as a packer/shipper, or custom harvester

Employer designation is important to know because pertinent laws and regulations apply differently based on that designation, and will affect the way you note compliances on your inspection report.

Supervisor Interviewed

Record the name of the person in charge, (e.g. supervisor, crew foreman) in the “Supervisor” block. You may need to ask a fieldworker for the name, if the designated person in charge is not at the site at the time of your visit, print “Unknown”. Indicate whether or not you spoke to the supervisor by checking the “YES” or “NO” box in the “Supervisor Interviewed” block.

Date of Application/ REI Expired

This information is critical in determining whether the area in which the fieldworkers are working is a treated field, and if the REI has expired or not. Enter the date of application numerically in this format: month/day/year Example: 03/17/07. Compare the date of application, and the labeling and/or regulatory REI. Document if the REI has expired by checking the “YES” or “NO” box.

Approximate Number of Fieldworkers

Count the number of fieldworkers inspected. When inspecting large crews you can estimate the number of fieldworkers you include in your FWS inspection by such means as:

- Ask a supervisor or fieldworker.
 - Break the larger area into smaller units, count the number of workers in the smaller area and multiply by the number of units.
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Information Blocks Specific to the FWS Inspection, Continued

Approximate Field Size	<p>You can estimate the size of the area (list the unit of measure, such as acres) you are including in your FWS inspection by such means as:</p> <ul style="list-style-type: none">• Ask a supervisor or fieldworker.• Check the permit or operator identification form for information.• Review information available at the property operator’s central location such as completion notice, permit, etc. or check with someone there.• Calculate size based on odometer or measuring wheel readings.• Look up the site id in CalAgPermit or CalPEATS
Fieldworker Activity	<p>List all types of activity being performed at the time and location of your inspection. Use the “Remarks” section if more space is needed. Examples: harvesting, thinning, irrigating, pruning. If it is an early entry activity, also determine and document the type of activity.</p>
Number of Fieldworkers Interviewed	<p>Record the number of fieldworkers you spoke with in this block. Names of fieldworkers interviewed are not needed. If you did not speak to any fieldworkers, write the number zero, and explain why in “Remarks”.</p>
Pesticide Name/ Manufacturer	<p>Print the <u>entire</u> pesticide name(s) (trade name) from the most <u>accurate</u> source of information available (i.e., property operator, application specific information display, pesticide use report, PCA recommendation, or work order). Include the manufacturer or registrant’s name. Example: Di-Syston 15G / Bayer. This information is required.</p>
Labeling Registration Number	<p>Print the U.S. EPA or California registration number for the above listed pesticide(s) from the most accurate source of information available (i.e. property operator, application specific information display, pesticide use report, PCA recommendation, or work order). This information is required. If the subject pesticide does not require registration, print, “Not required” and explain in the “Remarks” section.</p>
Signal Word	<p>Write the signal word if you know the signal word for the pesticide(s) listed.. If the information is not available, write “Unknown” in this block. If the pesticide has no signal word on the labeling, print “None” and explain in the “Remarks” section.</p>

Information Blocks Specific to the FWS Inspection, Continued

**Restricted
Entry
Interval**

Write in the restricted entry interval as stated on the pesticide labeling or in regulation. If there is a regulatory and a labeling REI, document the longer of the two. This information is required. Regulations that establish REI's include 3CCR § 6772, and 6774

**Early Entry
PPE Worn**

If this block does not apply, check "N/A" in the box provided at the upper left corner of this section. If you check "YES" or "NO" to requirement numbers 9, 10, or 11 you must check the appropriate box(s) in the Dermal, Hands, Eyes and Inhalation columns. If you check the "Other" box under "Dermal" or "Hands" columns, list the specific item worn.

You can only use this block to describe one set of early entry PPE. If there is more than one early entry worker and all early entry workers are wearing the same early entry PPE, check the appropriate boxes in each column and print "all workers" in the area under the "Hands" column.

If there is more than one early entry worker and they are wearing different early entry PPE, use the boxes to document one worker or one group of workers. Print the number of workers represented by the boxes under the "Hands" column. Document your observations of other fieldworkers and the PPE being worn in either the "Remarks" section, or on the Inspection Report Supplement.

If there is a violation relating to the early entry PPE, document the names of the workers in violation in the "Remarks" section or on the Inspection Report Supplement. Clearly describe the nature of the violations and the number of workers in violation. Document if the PPE is available on site.

Requirements

1. FLC Registered # _____ Labor Code § 1695

Scope: Farm Labor Contractors (FLCs) licensed in California who are working in the county. A FLC is any person who, for a fee, employs workers to provide services connected with the production of farm products to, for, or under the direction of a third person. A person who recruits, solicits, supplies, or hires workers on behalf of an agricultural employer, and furnishes board, lodging, or transportation for those workers; supervises, directs or measures their work; or disburses wage payments to these persons is also considered a farm labor contractor. See Labor Code § 1682.

California licensed FLCs must register annually with the Agricultural Commissioner of the county of the grower client. FLCs must also carry their license and proof of registration with them at all times when acting in the capacity of a FLC [See Labor Code § 1695(a)(1)]. Document the FLC's Registration number in the blank. If the licensed FLCs is not registered, check "NO". If the FLC is unlicensed, check "N/A" and address in the "Remarks" section. Unlicensed FLCs should be reported to the Labor Board or your EBL.

Exemptions:

- Packers/shippers who purchase the crop and then harvest it. (guidance)
- Commercial packinghouses engaged in the harvesting and the packing of citrus or soft fruit. (Labor Code § 1682.4)
- Custom harvesters. (DIR guidance)

2. Notice of Applications within ¼ Mile 3CCR § 6618(a)

Scope: Use of any pesticide(s).

Any person performing pest control shall assure that the operator of the property receives notice of the scheduled application. The notice must be made prior to the use of a pesticide and in ample time for all subsequent notices to be made and for the persons notified to take appropriate action. A notice of completion (3CCR § 6619) is also required for applications made for the **production of an agricultural plant commodity**.

- The operator of the property shall assure notice is given to employees as specified in 3CCR § 6700 which includes field workers and their employers working on the operator's property who may enter or walk within ¼ mile of the field to be treated.
- The operator of the property, shall assure notice is given to persons, other than those who apply or supervise the application, who may enter a treated area during an application or while the REI is in effect.

During your interviews with the crew supervisor and workers, ask how they are notified about fields near where they are working where pesticide applications will be taking place or REIs are in effect.

- Who provides the notification?
- Are they aware of any of the fields within a ¼ mile of where they are working that are under a REI?
- Were they notified not to enter any fields under an REI?
- Have they been trained about the concept of restricted entry intervals?

Check this requirement “YES” or “NO” based on the responses received from the supervisor and fieldworkers. Check “N/A” only if the workers inspected will not walk within a ¼ mile of any application or field under an REI that belongs to the property operator of the field in which they are working.

Exemptions:

- Persons who applied or supervised the application.
- The notice is not required when a field is posted as specified in 3CCR § 6776 (b-f), unless the pesticide product labeling requires dual notification. **(This exemption applies only to employee notification, not to the notice from the applicator to the operator of the property).**
- Public agencies in compliance with FAC § 12978 (check “YES” if in compliance).
- Public agencies or their contractors operating under a cooperative agreement with the Department of Public Health pursuant to section 116180 of the Health and Safety Code. (3CCR § 6620)
- Structural PCB exemption not applicable to this inspection, structural PCBs are in compliance with Business and Professions Code § 8538.

3. Decontamination Facility 3CCR § 6768

Scope: All field workers engaged in activities involving contact with treated surfaces in a treated field. This regulation applies to all pesticides.

Contents:

- Water (one gallon per employee, or three gallons for early entry workers)
- Soap
- Single use towels

Location:

- Within 1/4 mile of each fieldworker or at the closest point of vehicular access.

Decontamination materials shall be located together at the decontamination site and are accessible for washing of hands and face, and emergency eye flushing to all fieldworkers in treated fields. Water must be provided at the start of each work day and be of a quality and temperature that will not cause illness or injury when it contacts the skin, eyes, or if swallowed. Water that contains debris or algae is not acceptable.

Decontamination facilities shall not be in an area under a REI unless the fieldworkers are performing early entry activities.

Waterless hand cleaners may be substituted for soap but water and single use towels must still be provided and used for decontamination. Hand sanitizer products or wet towelettes are not acceptable. The employer cannot substitute air dryers for single use towels.

Exemptions:

- Granular baits, attractants, or repellants in traps applied in a field. (3CCR § 6760)
- Algaecides used to treat the irrigation system. (3CCR § 6760)
- Pesticides injected into plants. (3CCR § 6760)
- PCAs or professional foresters performing crop adviser tasks. (3CCR § 6720)
- Consumer products see 3CCR § 6720(e).

4. Hazard Communication A-9 3CCR § 6761

Scope: Employee working as fieldworkers when working in treated fields.

Employers shall display at the worksite and all permanent decontamination facilities and decontamination facilities servicing 11 or more workers a completed Pesticide Safety Information Series (PSIS) A-9. Any changes to the name, address, or telephone number of the facility providing emergency medical care must be updated on the Pesticide Information Series leaflet A-9 within 24 hours of the change.

"Display" means to make information available to the employee so that the employee may readily see and read the document, during normal business hours, without having to make a specific request of any person. An employee shall not be hindered or impeded from examining documents that are required to be displayed. 3CCR § 6000

Employers can use a binder, or other method to contain documents for display, as long as the employees have unimpeded access to the information. A PSIS A-9 inside of a vehicle does not meet the standard for display unless the employee(s) have knowledge of, and unimpeded access to, the required documents.

You need to determine if the presentation of the PSIS A-9 meets the definition of display. Ask fieldworkers if they are aware of the PSIS A-9. Where is the PSIS A-9 displayed? Has the information been conveyed to the fieldworkers in a language the workers understand? Do they have unimpeded access to it? If it is in a binder, it should be in plain sight and not buried under personal items or documents. Ask workers if they feel comfortable going to look at it any time during the workday.

Exemptions: Consumer products see 3CCR § 6720(e).

5. Emergency Medical Care Knowledge 3CCR § 6766(b)

Scope: Employers of fieldworkers who enter treated fields with any pesticide.

The employees, or the supervisor in the field, shall be informed of what to do and where to go in a medical emergency. They shall be informed of the name and location of a physician or medical facility that can provide emergency medical care; and procedures they should follow if the facility is not reasonably accessible. If there is no one on site that knows where to go to obtain medical attention, the employer is in violation of this regulation. This information does not have to be posted, although the PSIS A-9 does have a space where the information must be recorded and displayed. (If the information is not recorded on PSIS A-9, it is a violation of 3CCR § 6761. See Requirement 3).

The employer shall provide the following information to medical personnel treating an employee for a suspected pesticide exposure in the production of an agricultural commodity:

- Copies of the applicable Safety Data Sheet(s) and
- Product name(s), EPA reg. number(s) and
- Active ingredient(s) for each pesticide which the person may have been exposed
- Circumstances of application or pesticide use.
- Circumstances that could have resulted in exposure to the pesticide.

Exemptions:

- Granular baits, attractants, or repellants in traps applied in a field. (3CCR § 6760)
- Algaecides used to treat the irrigation system. (3CCR § 6760)
- Pesticides injected into plants. (3CCR § 6760)
- Applications by Vector Control Agencies. (3CCR § 6760)
- PCAs or professional foresters performing crop adviser tasks. (3CCR § 6720) Consumer products see 3CCR § 6720(e).

6. Field Worker Training 3CCR § 6764

Scope: Field workers working in treated fields with any pesticide.

Employees assigned to work in treated fields must be trained within the last 12 months before beginning work. The training shall be documented and retained by the employer for two years at a central location at the workplace accessible to employees. The record must be provided to the employee upon request. Training must be in a manner the employee(s) understand, orally from written materials or audio visually and include the topics outlined in this regulation.

Interview several of the workers and ask them about the training they received. Who trained them? When and where did the training occur? Do they know what field posting means? How they can be exposed to pesticides? Can they tell you some of the signs and symptoms of pesticide poisoning? Can they tell you how to get emergency medical care?

Verify that the trainer was qualified as described in 3CCR § 6764(f).

Exemptions:

- Granular baits, attractants, or repellants in traps applied in a field. (3CCR § 6760)
- Algaecides used to treat the irrigation system. (3CCR § 6760)
- Pesticides injected into plants. (3CCR § 6760)
- Applications by Vector Control Agencies. (3CCR § 6760)
- Consumer products see 3CCR § 6720(e).

7. Application Specific Information 3CCR § 6761.1

Scope: For all pesticides used for the commercial or research production of an agricultural commodity.

- The operator of the property used for the commercial or research production of an agricultural commodity shall display at a central location application specific information (ASID) when fieldworkers (including contractor employees) will be working in treated fields on the operator's property. The ASID must remain displayed while there are treated fields and fieldworkers on the property
- The employer of fieldworkers in a treated field must provide a description of the location of the ASID at the worksite (in conjunction with the PSIS A-9) or at a central location where all fieldworkers gather before entering a field.

Determine the location of the ASID from the PSIS A-9 on site, by interviewing the workers and field supervisor, or by contacting the property operator. If the location description is not on site (or at a central location where all fieldworkers gather before entering a field) or the description is not adequate to allow you to find the ASID, mark this requirement, "NO". Use your follow-up procedures to locate and evaluate the ASID.

Inspect the ASID and determine if it is in compliance. Check this requirement "YES" or "NO" based on your evaluation of the display. The ASID shall have the following:

- Crop or site treated
- Time(s) and Date(s) the application started and ended
- Restricted Entry Interval
- Product name(s), U.S. EPA registration number(s), and active ingredient(s)
- Copy of Safety Data Sheet(s)
- Spray adjuvant product name(s) and CA registration number

Possible reasons for not directly observing the application specific information display may include:

- Problems relating to the distance between the inspection site and the ASID.
- The ASID is located in another county.
- The inspector is unable to locate the ASID.

When the inspector is unable to inspect the ASID due to the reasons listed above, the inspector must verify compliance status through interviews with a representative number of fieldworkers and with the property operator (via phone if necessary). Whenever compliance or non-compliance is determined without direct observation of the display, the fact that the display was not observed and the details of how the status of compliance was determined must be explained in the "Remarks" section. Use this method of determining compliance only when direct observation of the ASID is unfeasible.

DPR encourages the CACs to work with property operators and adjacent CACs to minimize the number of fieldworker safety inspections that do not include direct observation of the application specific information display.

When evaluating the application specific information display, determine if the information is: **Displayed** – The information should be available to fieldworkers to review with unimpeded access. It can be posted, in a binder, in a file cabinet or available in another manner. It must be made available in a place normally frequented by workers. The information is not displayed if workers must ask someone to see it. See 3CCR § 6000.

Exemptions: Consumer products see 3CCR § 6720(e).

8. Field Work During Pesticide Application 3CCR § 6762

Scope: Any person not involved in the application, in an area being treated with any pesticide.

No employer shall direct or allow any person, other than the persons making the application to enter or remain in an application exclusion zone (AEZ) or a treated field during the application. See the chart at the end of this chapter for specific requirements for applications made to outdoor and enclosed space production agriculture.

The applicator must also be in compliance with any labeling directions relative to drift or exposing workers and with 3CCR § 6614.

This inspection requirement would only be applicable if a pesticide application is taking place in the field you are inspecting.

The following examples are provided to clarify the appropriate compliance documentation for this requirement:

- If there is no pesticide application occurring in the field being inspected, check the “N/A” box.
- If a pesticide application involving granular baits, attractants, or repellants in traps is being made, or if algaecides are being used to treat the irrigation system, or if pesticides are being injected into plants, and person(s) are present, check the “NA” box.
- If a pesticide application is being made to the area you are inspecting, and person(s), other than the applicator, are present in the treated area, check the “NO” box.

Field Transplant Workers

Some agricultural practices involve transplants being planted concurrent with an at-plant pesticide application. These transplant operations usually are accomplished using one of the following two methods.

- Manual transplanting where the employees plant the seedlings in advance of the spray rig, with the spray rig following behind and applying the pesticide. This method is permissible if:
 - The fieldworkers stay outside of the application exclusion zone and do not come in contact with pesticide treated surfaces (directly or through drift).
 - The employer complies with all field worker requirements including notification requirements.

Check “YES” for this requirement if the field workers do not come in contact with the pesticide or any treated surfaces and the operation complies with all fieldworker requirements. Check “NO” if the fieldworkers are exposed to the pesticide.

Mechanical transplant/application where the equipment is a combination planting apparatus and application rig (transplant rig) employees feed seedlings onto a planting arm or wheel that mechanically sets plants or set plants manually while at the same time a pesticide is applied. Field workers cannot be in the treated area until the REI has expired.

In scenarios of this sort DPR considers the entire operation to be part of a “pesticide application process”. The workers are handlers and must be trained and equipped as handlers. The employer must comply with all handler requirements. It would be appropriate to perform a Pesticide Use Monitoring inspection but not a Fieldworker Safety inspection on this type of operation.

Exemptions:

- Granular baits, attractants, or repellants in traps applied in the field. (3CCR § 6760)
- Algaecides used to treat the irrigation system. (3CCR § 6760)
- Pesticides injected into plants. (3CCR § 6760)
- Applications by Vector Control Agencies. (3CCR § 6760)
- Consumer products see 3CCR § 6720(e).

9. Field Entry after Pesticide Application 3CCR § 6770

Scope: Fieldworkers or their employers who enter fields on the date of a scheduled application of any pesticide or during the REI.

The operator of the property must not allow or direct any employee(s) or their employer(s) to enter or remain in a treated field before the labeling and regulatory REI has expired except under the condition listed in this regulation. See the regulation specific exceptions and prohibitions. The operator must have received the completion notice (3CCR § 6619) prior to allowing workers to enter a treated field.

The operator of the property must not allow or direct any employee(s) or their employer(s) to enter a treated field on the date of the scheduled application unless they can assure that the application has not occurred and will not occur when workers are in the field.

When labeling contains multiple activity-based REIs, the longest REI applies to the standards required in 3CCR § 6770. See also regulations that establish REIs including 3CCR § 6772, and 6774, and

Ask early-entry fieldworkers how long they have worked in the REI field. Employees may not work more than 8 hours per day performing limited contact activities or more than one hour per day performing high contact activities, and at least four hours have elapsed since the end of the application

- Are workers wearing the required PPE? The minimum regulatory required PPE for employees listed in 3CCR § 6770(d)(3) and (4) will usually be more protective than labeling required PPE.

Note: When an REI is on the pesticide product labeling, owners and their immediate family members (see Volume 8, Section 6.18 of the Compendium) must follow the early entry time restrictions specified in this regulation for early entry activities. They must also wear the labeling required early entry PPE, and follow any other restrictions specified in pesticide labeling for early entry.

40CFR § 170.305 Definitions: Immediate family is limited to the spouse, parents, stepparents, foster parents, father-in-law, mother-in-law, children, stepchildren, foster children, sons-in-law, daughters-in-law, grandparents, grandchildren, brothers, sisters, brothers-in-law, sisters-in-law, aunts, uncles, nieces, nephews, and first cousins. “First cousin” means the child of a parent's sibling, i.e., the child of an aunt or uncle.

In case of a violation by an owner, property operator or family member check “N/A” for this regulation but check “NO” for Requirement 13, FAC § 12973 and explain in “Remarks”. See Application of standards on page 6.

When labeling REI has expired an extended REI may be in effect per 3CCR § 6772. When propargite has been applied to a cotton field, 3CCR § 6772(G) requires the employer to assure that workers, from the end of the REI until harvest employees wear work clothing with long-sleeves, long-legs, gloves.

Exemptions:

- Granular baits, attractants, or repellants in traps applied in a field. (3CCR § 6760)
- Algaecides used to treat the irrigation system. (3CCR § 6760)
- Pesticides injected into plants. (3CCR § 6760)
- PCAs or professional foresters performing crop adviser tasks. (3CCR § 6720)
- Consumer products see 3CCR § 6720(e).

10. Early Entry Requirements 3CCR § 6771

Scope: Employees in fields treated with any pesticide during a restricted entry interval.

Before entering a field under a REI as permitted by section 6770, the employer shall assure that the employee has been informed orally of the following in a manner that he or she can understand:

- Location of early-entry area where work activities are to be performed.
- Pesticide(s) applied.
- Dates and times the REI begins and ends.
- Restrictions and conditions (see section 6770) about the work activity to be performed.
- Labeling precautionary statements related to human hazards.
- Symptoms of poisoning
- First aid and decontamination procedures for pesticide injuries or poisonings, including emergency eye flushing techniques.
- Prevention, recognition, and first aid for heat-related illness if PPE used in accordance with Title 8 of the California Code of Regulations, section 3395.
- Location of the Pesticide Safety Information Series A-8 and A-9 as required by sections 6723 and 6761.

- The need for, use, and care of PPE for early entry into treated fields.
- Clothing and PPE clothing and equipment, and laundering and cleaning such equipment
- The importance of washing thoroughly at the end of the exposure period

When labeling contains multiple activity-based REIs, the longest REI applies to the standards required in 3CCR § 6771

Ask fieldworkers if they are familiar with labeling requirements related to human hazards or precautions listed in section 6771(a)(1-14).

Exemptions:

- Granular baits, attractants, or repellants in traps applied in a field. (3CCR § 6760)
- Algaecides used to treat the irrigation system. (3CCR § 6760)
- Pesticides injected into plants. (3CCR § 6760)
- Consumer products see 3CCR § 6720(e).

11. Posting Compliance 3CCR § 6776

Scope: The operator of the property is responsible to post fields treated with any pesticide during the application and the REI when:

- Labeling requires posting, unless access to the field is controlled during the application and REI.
- Any application made in an entirely enclosed space (e.g. greenhouse) unless access is controlled during the application and the REI.
- Any application in a partially enclosed space resulting in an REI greater than 4 hours, unless access is controlled during the application and REI.
- An REI greater than 48 hours unless access to the field is controlled during the application and REI.
- Danger or minimal exposure pesticides are applied through an irrigation system.
- Any fumigant is applied to a field.

Posting signs and lettering must conform to the specification found in this regulation. Check signs for legibility, format, accuracy and proper placement. Signs shall have the following:

- Skull and Crossbones (near the center of the sign)
- Danger / Peligro and Pesticides / Pesticidas (upper portion of sign)
- Keep Out / No Entre (lower portion of sign)
- REI greater than 7 days will have the following (lower portion of sign);
 - Date REI of unrestricted entry
 - Name of property operator
 - Field I.D.
- Letters in contrasting colors

Refer to 3CCR § 6776(e) and (f) for specific sign content requirements for “Danger” or minimal exposure pesticides applied through an irrigation system, and fumigants.

Verify sign locations and posting duration:

- Field posting locations
 - Visible at all usual points of entry to the treated area;
 - At each border with any worker housing areas within a 100 feet of the treated field; and
 - Every 600 feet along the side of field if adjacent to an unfenced public right of way.
- Field posting duration
 - Post the field prior to the application, but not more than 24 hours before the application begins.
 - Leave signs in place throughout the application and REI
 - Remove signs within three (3) days after the end of the REI and before any entry which is prohibited during an REI.

Exemptions:

- Granular baits or attractants or repellants in traps applied in a field. (3CCR § 6760)
- Algaecides used to treat the irrigation system. (3CCR § 6760)
- Direct injection into plants. (3CCR § 6760)
- Applications by Vector Control Agencies. (3CCR § 6760)
- Consumer products see 3CCR § 6720(e).

12. Enclosed Space Ventilation Criteria 3CCR § 6769

Scope: The operator of the property is responsible to assure that no workers or other employees enter an enclosed space after any pesticide(s) whose labeling requires respiratory protection is applied; or after any pesticide is applied as a fumigant, smoke, mist, fog, or aerosol before the criteria have been met.

- 1) When pesticides whose product labeling requires respiratory protection are applied by any method in an enclosed space, ventilation shall continue until the concentration is measured and found not to exceed any pesticide product labeling standard; or one of the following has occurred if there is no labeling standard. Ten complete air exchanges have occurred.
- 2) Two hours of mechanical ventilation, such as with fans.
- 3) Four hours of passive ventilation, such as opening vents, windows, or doors; or
- 4) Twenty-four hours with no ventilation. or
- 5) Any combination of percentage portions of (1-4), the sum of which equals 100%.

Ask the employer what method was used to comply with this requirement and to provide details on how and when the actions were performed.

Exemptions: Consumer products see 3CCR § 6720(e). Violation of labeling ventilation requirements should be addressed by FAC § 12973.

13. Labeling - Personal Protective Equipment FAC § 12973

Scope: All persons working in treated fields prior to the expiration of the REI when registered pesticide labeling requires PPE.

Pesticide labeling contains specific instructions and exemptions about REIs, PPE, and worker notification, under the heading "Agricultural Use Requirements". Both employees and employers are subject to labeling requirements.

Use the “Remarks” section to record the specific item(s) not worn as required by labeling, and the name of the fieldworker(s) not wearing the required PPE. If early entry workers are not wearing the required labeling PPE, check to see if their employer provided it. See Early Entry PPE Worn on page 52.

If a pesticide is highly toxic for acute dermal toxicity or skin irritation potential, the labeling will require users to notify workers by warning them orally and by posting. See § 6770(d) (3) (A)

Exemptions: Exemptions not applicable to this inspection.

Application Exclusion Zone for Outdoor Production

The following chart describes the entry restrictions for outdoor production pesticide applications during the application. (3CCR § 6762)

If A Pesticide Is Applied:	Workers and Other Persons are Prohibited In:
<p>6762(c)(1)(A)</p> <ul style="list-style-type: none"> • By aircraft; or • Air blast; or • As a fine mist using a spray; or • As a fumigant, smoke, mist, fog. 	<p>The area that extends 100 feet horizontally from the application equipment in all directions during the application when the pesticide is applied. The treated area of a field.</p>
<p>6762(c)(1)(B)</p> <p>When a pesticide is applied in a manner not specified in section 6762 (c)(1)(A) and as a:</p> <ul style="list-style-type: none"> • Spray from a height of greater than 12 inches from the soil or planting medium using at least a medium spray. 	<p>The area that extends 25 feet horizontally from the application equipment during the application when the pesticide is applied. The treated area of a field.</p>
<p>6762(c)(1)(C)</p> <p>There is no application exclusion zone when the a pesticide is applied in a manner other than those in subsections 6762 (c)(1)(A) and (1)(B).</p>	<p>The treated area of a field.</p>

Application Exclusion Zone for Enclosed Space Production -

The following chart describes the entry restrictions for enclosed space production applications during an application. (3CCR § 6762)

If A Pesticide Is Applied:	Workers and Other Persons are Prohibited In:
<ul style="list-style-type: none"> • 6762(c)(2)(A). <p>As a space treatment (fumigant, smoke, mist, fog, or aerosol); or</p> <ul style="list-style-type: none"> • That requires respiratory protection by the product labeling. 	<p>The entire enclosed space plus any adjacent area not sealed (sufficient to prevent pesticide transfer) from the treatment site when a pesticide is applied until ventilation criteria are met.</p>
<p>6762(c)(2)(B).</p> <ul style="list-style-type: none"> • As a fine spray 	<p>The entire enclosed space when the pesticide is applied until ventilation criteria have been met</p>
<p>6762(c)(2)(C). Applied as a:</p> <ul style="list-style-type: none"> • Spray from a height greater than 12 inches from the soil or other planting medium • Spray of medium or larger. 	<p>The treated area plus 25 feet within the enclosed space when the pesticide is applied.</p>
<p>6762(c)(3).</p> <p>There is no application exclusion zone.</p>	<p>When the pesticide is applied in a manner other than those in subsection (2)(A) and (2)(B)</p>

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