



# COLORADO ENVIRONMENTAL PESTICIDE EDUCATION PROGRAM

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## FEDERAL WORKER PROTECTION STANDARD

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This fact sheet explains the definition of early-entry and describes the situations in which early-entry workers may enter treated areas under the Worker Protection Standard (WPS).

This fact sheet was developed as part of the Comprehensive Worker Protection Standard Awareness Project for Colorado.

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## WPS Regulations for Early-Entry Work

The [Worker Protection Standard](#) (WPS) was revised and expanded in 1992 by the [U.S. Environmental Protection Agency](#) (EPA). This regulation applies where pesticides are used in production of agricultural plants for commercial or research purposes on farms, forests, nurseries, greenhouses, and related structures. It covers pesticide applicators, mixer/loaders, disposers of pesticide containers, and those who may be exposed to a pesticide residue on the job. Both general-use and restricted-use pesticides are covered by WPS. The regulations have exposure reduction measures that will reduce the risk of pesticide poisonings and injuries among agricultural workers and pesticide handlers.

### Early-Entry Tasks

Agricultural workers may not enter pesticide treated areas during the Restricted Entry Interval (see Factsheet [WPS Restricted Entry Interval](#)) unless agricultural establishments provide special protections to those workers. An early-entry worker performs special tasks involving anything that has been treated with a pesticide including soil, air, water and the surface of plants where pesticide residues may be found. Agricultural activities involving early-entry workers should be avoided at all costs. However, there are special instances where early-entry workers are essential for the continuance of agricultural production. WPS identifies these instances and requires employers to provide early-entry workers with proper training, personal protective equipment and decontamination sites.

There are only three work situations early-entry workers may enter a pesticide treated area during the REI listed on the pesticide label.

### Short-term Tasks

Workers may enter a pesticide treated area during the REI if short term tasks that DO NOT include hand labor. Hand labor defined by EPA is any agricultural activity performed by hand, or with hand tools, that might cause a worker to have substantial contact with surfaces such as plants, plant parts, or soil that may contain pesticide residues. Early-entry workers performing short term tasks must spend no more than one (1) hour in a 24 hour period within the pesticide treated area. Examples of tasks that do not include hand labor are operating, moving, or repairing irrigation equipment not used to apply pesticides.

- **Emergency Tasks**

Workers may enter a pesticide treated area during the REI for tasks necessary due to an agricultural emergency. The workers must be provided the appropriate PPE according to the

pesticide label for early-entry workers and WPS training with specific instructions regarding PPE, label information and decontamination sites (see [WPS Decontamination Sites Fact Sheet #421](#)). Examples of an agricultural emergency include flooding, hail, high winds, tornados, freeze or frost (see [40 CFR parts 170](#) for information about determining agricultural emergencies).

- **Specific Tasks**

Additional early-entry worker tasks may be performed upon acceptance of EPA through a formal exception process. Check with EPA for an updated list of approved activities for early-entry workers within REI's.

### **Pesticide Safety Training for Early-Entry Workers**

Each early-entry worker must be trained in basic pesticide safety as an agricultural worker (see [Fact Sheet #125 on WPS Pesticide Safety Training](#)). In addition to basic pesticide training, early-entry workers must receive specific information and instructions about how to put on and take off early-entry PPE correctly, about the importance of washing thoroughly after removing PPE, and how to prevent, recognize and give correct first aid for heat illness.

Early-entry workers must also receive training on reading and understanding the label. The label identifies the REI of the pesticide, human and hazard statements and precautions, appropriate first aid, signs and symptoms of poisoning, PPE required for early-entry and any other precautions or instructions related to safe use or early-entry. Finally, early-entry workers must be provided decontamination sites (see Factsheet [WPS Decontamination Sites](#)).

### **Personal Protective Equipment (PPE) for Early-Entry Workers**

PPE for early-entry workers is listed on the pesticide label in the Directions for Use section under the heading Agricultural Use Requirements. Employers must provide their early-entry workers with early-entry PPE required by the pesticide labeling, make sure early-entry workers wear the PPE provided if they enter a pesticide treated area during REI and make sure they use the PPE correctly. There are specific duties employers must perform in accordance with WPS early-entry PPE. Below is a list of the necessary steps ag establishments must employ for pesticide safety of early-entry workers.

- Provide the appropriate PPE in clean and operating condition
- Inspect PPE before each day of use for leaks, holes, tears, or worn places
- Repair or discard any damaged equipment
- Provide early-entry workers a clean area to change into and out of PPE and a clean place to store personal clothing not in use
- Do not allow early-entry workers to wear or take home pesticide contaminated PPE
- Prevent heat illness by taking the necessary precautionary steps while wearing PPE (see Factsheet [Heat Stress](#)).
- Maintain and clean PPE

**Disclaimer:** The Worker Protection Standard is a very complex regulation that will require considerable study. This fact sheet is just an introduction and should not be used as a final interpretation. Refer to the complete WPS regulations in the [Code of Federal Register 40 Part 170](#).

## **References and Resources**

EPA's Agriculture Compliance Center. June 2005. [www.epa.gov/agriculture](http://www.epa.gov/agriculture)

*The Worker Protection Standard for Agricultural Pesticides - How to Comply, What Employers Need to Know.* July 1993. U.S. Environmental Protection Agency, EPA 735-B-93-001, Washington, D.C.

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