Worker Protection Standard Inspection Checklist

Commercial Pesticide Handling Establishment

DATE	INSPECTION NUMBER
OWNER/OPERATOR APPLICATOR	FIRM OR PREMISE NAME

Inspector Credentials Presented	☐ Yes ☐ No	**Routine Inspection**	☐
Notice of Inspection Provided	☐ Yes ☐ No	**For Cause Inspection**	☐

A. RECORDS REVIEW 170.501 and 170.507(b)(10)

	WPS Requirement	Reference Page in How To Comply	Regulatory Citation
Handler Pesticide Safety Training Records 170.501			
☐Yes ☐No	Current handlers trained in past 12 months?	28	170.501(a)
☐Yes ☐No	Records retained on the establishment for 2 years? (Handler name, signature, date of training, EPA-approved materials, trainer's name, trainer's qualifications, name of commercial pesticide handler employer)	28	170.501(d)
Respirator Records 170.507(b)(10)			
☐Yes ☐No ☐N/A	Are Respirator Records retained on establishment for 2 years?	72 & 73	170.507(b)(10)
☐Yes ☐No ☐N/A	Have handlers received medical evaluation, fit testing, and training for required respirator?	72 & 73	170.507(b)(10)

B. MINIMUM AGE FOR HANDLERS 170.313(c)

	WPS Requirement	Reference Page in How To Comply	Regulatory Citation
☐Yes ☐No	Are all handlers at least 18 years of age?	20	170.313(c)

C. WPS PESTICIDE APPLICATIONS

Identify recent WPS pesticide applications through a record review, interview and/or visual inspection of products in storage and record as appropriate to facilitate the inspection: Product name/#, Date applied, Method of application, Special requirements, weather conditions during application, PPE required, REI (record and attach)

D. INFORMATION EXCHANGE 170.309(k) & 170.313 (h)-(j)

	WPS Requirement	Reference Page in How To Comply	Regulatory Citation
☐Yes ☐No ☐N/A	Where applicable, does the agricultural employer give the location and description of treated areas or REIs and restrictions near (within 1/4 mile) those areas where applications are or will be made on their establishment to the commercial pesticide handler employer?	31 & 32	170.309(k)
☐Yes ☐No ☐N/A	Does the commercial pesticide handler employer provide this information about the areas with entry restrictions to the handler who worked on the agricultural establishment?	31 & 32	170.313(h)
☐Yes ☐No ☐N/A	Does the commercial pesticide handler employer inform the agricultural employer of: the location and description of areas to be treated, date and time of application, product name, registration number, active ingredient, REI, requirement for oral or written notification, and any other restrictions?	31 & 32	170.313(i)

☐Yes ☐No ☐N/A	If there are changes to the location or description of the area to be treated, the REI, the notification requirements, restrictions or use directions, or if the start time will be earlier than scheduled, was updated information provided before the application? If there were changes to any other information, was updated information provided to the agricultural employer within 2 hours after completing the application?	31 & 32	170.313(j)

E. KNOWLEDGE OF LABELING AND APPLICATION SPECIFIC INFORMATION 170.503

	WPS Requirement	Reference Page in How To Comply	Regulatory Citation
☐Yes ☐No	Before a handler performed any handler activity, did the commercial pesticide handler employer ensure the handler read applicable portions of the label on safe use or was informed in a manner the handler can understand?	59	170.503(a)
☐Yes ☐No	Did the handler have access to the label at all times, and was the handler aware of any entry restrictions, AEZ and REIs?	59	170.503(a)

F. HANDLER DECONTAMINATION AND EYEWASH SUPPLIES 170.509

Inspector observation ☐ Based on interview ☐

	WPS Requirement	Reference Page in How To Comply	Regulatory Citation
☐Yes ☐No ☐N/A	Are decontamination supplies located at mixing sites?	74 & 75	170.509(c)(1)
☐Yes ☐No ☐N/A	For all other handler tasks, are decontamination supplies located within 1/4 mile from handler or nearest place of vehicular access? Are the supplies located outside a treated area or area under a REI or in a closed container protected from pesticide contamination?	74 & 75	170.509(c)
☐Yes ☐No ☐N/A	Are the appropriate decontamination supplies provided? including 3 gallons of water provided for each handler (at the beginning of work period and replenished to maintain adequate supply), soap, single use towels, and a change of clothes?	74 & 75	170.509(b)
☐Yes ☐No ☐N/A	At each mixing/loading site for products requiring eye protection or using a closed system under pressure is there an appropriate eyewash system immediately available to a handler? (Either a system to deliver gently running water (at a rate of 0.4 gal/min) for 15 minutes or at least 6 gallons in containers suitable for providing a gentle eye-flush for about 15 minutes)	74 & 75	170.509(d)(1)
☐Yes ☐No ☐N/A	Does each applicator have at least one pint of water immediately available in a portable container when pesticide label requires eye protection?	74 & 75	170.509(d)(2)

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G. PERSONAL PROTECTIVE EQUIPMENT (PPE) 170.507(a)-(d)			
Inspector observation ☐ Based on interview ☐			
For pesticide products on site and/or recently applied:			
	WPS Requirement	Reference Page in How To Comply	Regulatory Citation
☐Yes ☐No ☐N/A	Did the handlers use the clothing and PPE specified on the product labeling?	62	170.507(a)
☐Yes ☐No ☐N/A	Did the commercial pesticide handler employer provide clean, operational PPE to the handler to meet label requirements?	62 & 63	170.507(b)
☐Yes ☐No ☐N/A	Before each day of use, did the commercial pesticide handler employer ensure all PPE was inspected and repaired or discarded as appropriate?	64	170.507(c)
☐Yes ☐No ☐N/A	Did the commercial pesticide handler employer assure that handler wears and uses PPE correctly?	64	170.507(c)
☐Yes ☐No ☐N/A	Is the PPE properly cleaned and thoroughly dried before storage? Is clean PPE stored separately from personal clothing and contaminated areas? Is there a clean place for putting on and removing PPE?	64	170.507(d)
☐Yes ☐No ☐N/A	Where labeling requires PPE for handler activities, did the commercial pesticide handler employer take sufficient measures to prevent heat-related illness and instruct each handler in the prevention, recognition and first aid treatment of heat-related illness?	65	170.507(e)
☐Yes ☐No ☐N/A	If respirators are required and handlers are present, did handlers receive medical evaluation, fit testing and training?	68	170.507(b)(10)
☐Yes ☐No ☐N/A	If using particulate filtering facepiece respirators, are they replaced appropriately? (i.e., breathing resistance excessive; filter is damaged; according to respirator or product label; after 8 hours of use)	73	170.507(d)
☐Yes ☐No ☐N/A	If using vapor-removing canister/cartridge respirators, are they replaced appropriately? (based on odor, taste, irritation; breathing resistance excessive; according to respirator or pesticide product label; after 8 hours of use)	73	170.507(d)

H. PESTICIDE HANDLING EQUIPMENT 170.313(f), (g) and (l)			
Inspector observation ☐ Based on interview ☐			
	WPS Requirement	Reference Page in How To Comply	Regulatory Citation
☐Yes ☐No ☐N/A	Before use, did the commercial pesticide handler employer instruct handlers in the safe operation of application and mixing/loading equipment and inspect and repair application and mixing/loading equipment before each day of use?	79	170.313(f) & 170.313(g)
☐Yes ☐No ☐N/A	Has any person employed by the commercial pesticide handling establishment, who cleans, repairs, or adjusts the pesticide equipment, been trained as a handler?	79	170.313(l)

☐Yes ☐No ☐N/A	If persons not employed by the commercial pesticide handling establishment clean, repair, or adjust the pesticide equipment, are they provided with the following information: that the equipment may be contaminated; potential harmful effects of pesticide exposure; how to limit exposure; and how to wash to remove contamination?	79	170.313(l)

I. APPLICATION RESTRICTIONS AND HANDLER PROTECTIONS 170.313(c) & 170.505 (a)-(d)

Inspector observation ☐ Based on interview ☐

	WPS Requirement	Reference Page in How To Comply	Regulatory Citation
☐Yes ☐No ☐N/A	Do all handlers observed by the inspector appear to be over 18?	20	170.313(c)
☐Yes ☐No ☐N/A	Did the handler suspend application because someone was in the AEZ? (for enclosed space, in area in column B in Table in 170.405(b)(4) and was the application continued properly?	60	170.505(b)
☐Yes ☐No ☐N/A	Was each pesticide applied so that it did not contact, either directly or through drift, anyone except appropriately trained and equipped handlers?	60	170.505(a)
☐Yes ☐No ☐N/A	If toxic product with skull & crossbones symbol was used, was contact made at least every 2 hours by voice, sight or another appropriate method?	61	170.505(c)
☐Yes ☐No ☐N/A	If a fumigant was applied in an enclosed space, was continuous visual or voice contact with another handler equipped with PPE maintained? Did the handler outside the enclosed space have immediate access to required PPE in case a rescue is required?	61	170.505(d)

J. EMERGENCY ASSISTANCE 170.313(k)

	WPS Requirement	Reference Page in How To Comply	Regulatory Citation
☐Yes ☐No	Has a handler experienced potential pesticide exposure during or within 72 hours after employment? If so, was transportation to an emergency medical care facility provided and information (SDS, circumstances of application and exposure) provided to medical personnel?	80	170.313(k)

K. ANTI-RETALIATION 170.315

	WPS Requirement	Reference Page in How To Comply	Regulatory Citation
☐Yes ☐No	Based on information available, no person was threatened, intimidated, coerced, discriminated against or experienced retaliation for complying with or attempting to comply with WPS requirements, or for providing information regarding violative behavior. Check yes if correct.	85	170.315

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DISPOSITION OF INSPECTION	
Describe any observations made during the inspection that may require additional attention. Attach any relevant documentation .	
Inspector Signature:	Date:

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WPS Pesticide Products							
Product Name	**Product #**	**Date Applied**	**Method of Application**	**Special Requirements/ Restrictions ***	**Weather Conditions**	**PPE Required**	**REI**

*Note special requirements and restrictions such as if dual notification (oral and posting) is required to workers, if the label has the skull and crossbones symbol and any special protections during application or related to decontamination.

Table —Entry Restrictions During Enclosed Space Production Pesticide Applications 170.405(b)(4)

A. When a pesticide is applied:	B. Workers and other persons, other than appropriately trained and equipped handlers, are prohibited in:	C. Until:	D. After the expiration of time specified in column C, the area subject to the restricted-entry interval is:
(1) As a fumigant	Entire enclosed space plus any adjacent structure or area that cannot be sealed off from the treated area	The ventilation criteria of paragraph (b)(3)[a] of this section are met	No post-application entry restrictions required by §170.407 after criteria in column C are met.
(2) As a (i) Smoke, or (ii) Mist, or (iii) Fog, or (iv) As a spray using a spray quality (droplet spectrum) of smaller than medium	Entire enclosed space	The ventilation criteria of paragraph (b)(3)[a] of this section are met	Entire enclosed space.
(3) Not as in (1) or (2), and for which a respiratory protection device is required for application by the pesticide product labeling	Entire enclosed space	The ventilation criteria of paragraph (b)(3)[a] of this section are met	Treated area.
(4) Not as in (1), (2) or (3), and: (i) From a height of greater than 12 inches from the planting medium, or (ii) As a spray using a spray quality (droplet spectrum) of medium or larger	Treated area plus 25 feet in all directions of the treated area, but not outside the enclosed space	Application is complete	Treated area.
5) Otherwise	Treated area	Application is complete	Treated area.

[a] When Column C of the Table under paragraph (b)(4) of this section specifies that ventilation criteria must be met, ventilation must continue until the air concentration is measured to be equal to or less than the inhalation exposure level required by the labeling. If no inhalation exposure level is listed on the labeling, ventilation must continue until after one of the following conditions is met:

(i) Ten air exchanges are completed.
(ii) Two hours of ventilation using fans or other mechanical ventilating systems.
(iii) Four hours of ventilation using vents, windows, or other passive ventilation.
(iv) Eleven hours with no ventilation followed by one hour of mechanical ventilation.
(v) Eleven hours with no ventilation followed by two hours of passive ventilation.
(vi) Twenty-four hours with no ventilation.