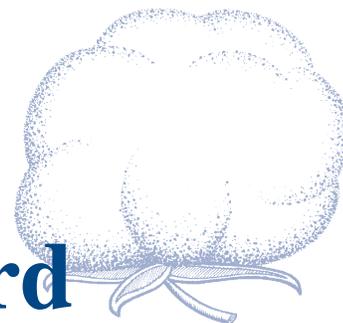


Cotton Producers Facing the Worker Protection Standard



A Practical Approach

Volume 1, Number 5

SAMPLE LABELING

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box apply to uses of this product that are within covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of ___ hours. The REI is 72 hours in outdoor areas where average annual rainfall is less than 25 inches a year.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- coveralls over long-sleeved shirt and long pants
- chemical-resistant gloves, such as barrier laminate or viton
- chemical-resistant footwear plus socks
- protective eyewear
- chemical-resistant headgear

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

*This Publication is Produced by
The Cotton Foundation in
Cooperation With EPA*



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Cotton Production: Post Season Activities

Pesticide use, harvest and irrigation activities ceased late in the fall. However, as the season ended, late-season insecticide, desiccants, plant growth regulators and diapause applications for boll weevils in non-eradication zones were applied. Irrigation pipe or equipment were removed and placed in storage or undergoing maintenance.

All of these activities at the end of the season required more frequent reporting at the central location, more notification, more time in the field for early entry workers, more PPE and readily available decontamination sites.

Preparing for the 1999 Season

Clean and Store PPE

Cost Saving This is a good time to assess needs for next season and to save materials that might otherwise be misplaced or disposed of, thus costing more money for replacement in 1999. This activity will take very little time, but will save time next season and money in establishing the 1999 WPS program.

The following checklist may be helpful:

- Evaluate the condition of all the personal protective equipment used by early entry workers and handlers employed by the farming operation. Look for cracks, deterioration, brittle appearance, chemical odor, expiration dates on respirator cartridges, excessive stains, drenched or heavily contaminated coverall (dispose of if product used had a "danger" or "warning" signal word) and other signs.

- Separate items to be disposed of and other items for further cleaning and storage. If equipment is contaminated, wear appropriate PPE when handling and during the cleaning process.

- Store items for disposal in an enclosed container (garbage bag or other heavy plastic bag) and dispose of containers based on the requirements of federal, state, tribal and other regulations in your state.

Cost Saving Contact your State Department of Agriculture for disposal information. This agency in many states is engaged in the disposal of pesticide containers and old pesticide waste that cannot be recycled back to the manufacturer. This is a **no-cost** service offered to you in some states and will aid you in pesticide container and product clean up around your farm.

Even through PPE which is being reused during the season must be cleaned each day before use....it's a good idea to do a "final" cleaning of all PPE before storage.

Cleaning ...two approaches:

- 1) Use commercial cleaning companies
- 2) Laundry PPE on the farm

In either case, advise the person doing the laundry to keep pesticide-contaminated PPE away from other clothing and wash separately. Advise the persons doing the laundry:

- that the PPE may be contaminated with pesticides;
- to protect themselves against the potential harmful effects of pesticides; and
- how to clean the PPE.

Quick Steps in Cleaning PPE

1. **Follow the manufacturer's cleaning instructions; if no instructions are available, use steps 2 through 10 below.**
2. **Rinse** in a washing machine or by hand.
3. **Wash in a washing machine...**use heavy duty detergent and hot water.
4. **Wash only a few items at a time...**improves agitation and water dilution at highest water level setting).
5. **Rinse twice.**
6. **Use two entire machine cycles.**
7. **Run the washer through at least one more entire cycle** without clothing, using detergent and hot water to clean the machine.
8. **Plastic or rubber items, such as, gloves, footwear, coveralls, boots, hats or helmets,** should be washed twice to clean outside and invert inside out for the second washing.
9. **Hang items to dry for about 24 hours** in fresh air and outdoors, if possible, not in living areas.
10. **Clothes dryers can be used, but will require cleaning due to possible contamination with pesticides.**

Storage of PPE

PPE should be thoroughly dry and placed in a well-ventilated place away from any personal clothing and pesticide-contaminated areas.

Thinking Back A Few Moments:

Defoliation and diapause applications signaled the end of the 1998 season.....but actions taken during late season production carry over into off season months.

Reminder Even though the season has ended, recordkeeping is essential. The Federal Pesticide Recordkeeping Regulation and some state laws require the maintenance of specific records for 2 years when restricted use pesticides (RUP's) are used. Products such as, Dropp Ultra, Harvade, Pix and others used in preparation for picking may have oral warning only and are not RUP's, but check all labels of products which were used for accuracy in your recordkeeping. Malathion, Guthion and methyl parathion are commonly used for boll weevil diapause applications. In contrast to the desiccants and plant growth regulators previously mentioned, these products are more toxic and generally have more WPS requirements.

TIP There is some good news! Defoliation of cotton plants is usually done by commercial application. Diapause applications may be done commercially or on a farm by a handler. In both instances, there are not many activities as the season ends that require reentry into the fields until the REI has expired. If no adjacent field work is done within 1/4 mile of the fields treated, then many of the notification and other WPS requirements may be reduced or not required.

Spot Applications

Spot treatment of weed clusters and insects in only isolated pockets in or around cotton fields is a very cost-effective method of management and may improve picking efficiency and quality.

Federal and state laws may require special record-keeping requirements, therefore, if you spot treated in fields during 1998 and are unsure regarding record-keeping requirements then contact personnel with the State Department of Agriculture for the state in which pesticide practices were implemented.

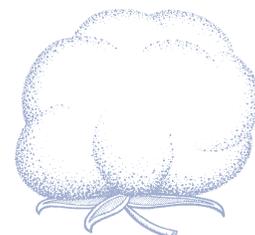
Did You Find Ways to Maximize the Time in a Field Under a REI for Early Entry Workers During the 1998 Season?

Reminder Changes in the WPS regulation have increased the time allowed in a field for irrigation workers when working on irrigation equipment, moving pipes, repairing pipes, trenching and other activities.

The time has been extended to not to exceed **8 hours in a 24 hour period** during the REI.

However, there are some CONDITIONS.....*Contact with the treated surface is minimal and limited to the feet, lower legs, hands and forearms; the pesticide does not have a double notification; PPE is used according to the label of the product used on the field to be entered or use at least coveralls, chemical resistant gloves, socks, chemical resistant footwear, and eyewear (if required on product labeling); no hand labor is done (hoeing, etc.); cannot enter during the first 4 hours after treatment; and the employer explains the exemption to the early entry worker.*

Note: This exception to the REI can only be used if necessary. When there is a conflict between irrigation and REI which is unavoidable, mis-management is not an excuse for use of the exception.



Did You Fail to Consider Your PPE Exceptions?

Time Saver In order to reduce heat stress, handlers may omit some of the PPE listed on a pesticide label if they are using a **closed system of pesticide handling or performing handling tasks in an enclosed cab.**

When using closed systems and enclosed cab equipment, handlers need not wear all the PPE listed on the pesticide labeling, but must wear **at least** the PPE listed in Table 1.

Table 1. Reduced Requirement For PPE

Closed System	Pesticide Signal Word	PPE
mix or load	Danger/Warning	long-sleeved shirt and long pants shoes and socks a chemical-resistant apron protective gloves (see pesticide label for type)
mix and load	Caution	long-sleeved shirt and long pants shoes and socks
handling task other than mix and load		long-sleeved shirt and long pants shoes and socks
system under pressure		long-sleeved shirt and long pants shoes and socks protective eyewear
Enclosed Cab		PPE
Tractor or Spray Equipment		long-sleeved shirt and long pants shoes and socks Respirator (if required)

Something to think about...when handlers are using enclosed cab equipment and reduced PPE they must....

- have PPE specified on the pesticide labeling immediately available;
- wear the PPE when leaving the enclosed cab where contact with treated surfaces will be made;
- take off contaminated PPE before reentering equipment; and
- store all PPE in a chemical-resistant container.

Comments from the Cotton Foundation

It has been a pleasure to provide newsletters to aid you in your application of the WPS to your farming operation. We hope the information has been helpful and welcome comments regarding future newsletters or other materials that are needed for the 1999 cotton production season.

A series of information sheets is being developed to provide more in-depth information on all aspects of the WPS with illustrations and examples which will be easy to follow. The information sheets will be available during the 1999 season.

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A Practical Approach

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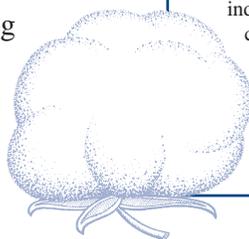
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**QUICK PESTICIDE CHECK
Cotton Insecticides**

Product	EPA Number	Active Ingredient	RUP	Signal Word	REI	Noti-fication	PPE	Early Entry PPE	Seasonal Use	Company
Nemacur 15%	3125-236	fenamiphos	yes	danger	48	oral	ehjlmn	ehjln	LN	Bayer
Nemacur 3	3125-283	fenamiphos	yes	danger	48	oral	fhjlmn	fhjln	LN	Bayer
Orthene 75 WSP	59639-89	acephate	no	caution	24	oral	agl	begl	I	Valent
Orthene 75S	59639-26	acephate	no	caution	24	oral	agl	begl	I	Valent
Orthene 80 WSP	59639-85	acephate	no	caution	24	oral	afg	begl	I	Valent
Orthene 90 WSP	59639-86	acephate	no	caution	24	oral	aegl	begl	I	Valent
Orthene 90S	59639-33	acephate	no	caution	24	oral	aegl	begl	I	Valent
Ovasyn	45639-146	amithraz	no	danger	24	oral	dehjdkl	dfhjl	I,M	AgreEvo
Payload 15G	59639-75	acephate	no	caution	12	oral	aeg	beg	I	Valent
Pencap	M4581-292	methyl parathion	no	warning	48	oral.post	dehjl	dehjl	I	Elf Atochem
Phaser 3 EC	45639-169	endosulfan	no	danger-poison	24	oral	cfhjkl	cfhjl	I	AgreEvo
Phaser 50 WP	45639-194	endosulfan	no	danger-poison	24	oral	cehjkl	cehjl	I	AgreEvo
Phaser 50WSB	45639-194	endosulfan	no	danger-poison	24	oral	cehjklm	cehjl	I	AgreEvo
Phorate 20G	34704-259	phorate	yes	danger-poison	48	oral.post	aejhklm	aejhj	I,M	UAP
Pounce 3.2 EC	279-3014	permethrin	yes	caution	12	oral	afg	bfg	I	FMC
Pounce WSB	279-3083	permethrin	yes	warning	12	oral	aeg	beg	I	FMC
Provado 1.6 F	3125-457	imidacloprid	no	caution	12	oral	aeg	beg	I	Bayer
Scout X-Tra	34147-3-45639	tralomethrin	yes	danger	24	oral	afgj	bfgj	I	AgreEvo
Sevin 4F	264-349	carbaryl	no	caution	12	oral	afgl	bfgl	I	Rhone-Poulenc
Sevin 50W	264-314	carbaryl	no	warning	12	oral	aegl	begl	I	Rhone-Poulenc
Sevin 80 WSP	264-526	carbaryl	no	warning	12	oral	aegf	begl	I	Rhone-Poulenc
Sevin 80S	264-316	carbaryl	no	warning	12	oral	aegl	begl	I	Rhone-Poulenc
Sevin XLR Plus	264-333	carbaryl	no	caution	12	oral	afgl	bfgl	I	Rhone-Poulenc
Sniper 2-E	34704-691	azinphos methyl	yes	danger	48(72)+	oral.post	dfhjklm	dfhl	I,M	UAP
Sniper 50 PVA	10163-180-34704	azinphos methyl	yes	danger-poison	48(72)+	oral	dehjklm	dehl	I,M	UAP
Supracide 25WP	100-754	methidathion	yes	warning	48	oral	aeg	beg	I	Ciba
Supracide 2E	100-501	methidathion	yes	danger	48	oral	afgj	bfgj	I,M	Ciba
Telone C-17	62719-12	dichloropropene+chloropicrin	yes	danger	72	oral	fhjlmn	fhjln	I,N,SF	DowElanco
Telone II	62719-34	dichloropropene	yes	warning	72	oral	fhjklmn	fhjmn	I,N,SF	DowElanco
Temik 15G	264-330	aldicarb	yes	danger-poison	48+	oral.post	cehjklm	cehil	I,M,N	Rhone-Poulenc
Temik 15G CP	264-417	aldicarb	yes	danger-poison	48+	oral.post	cehjklm	cehjl	I,M,N	Rhone-Poulenc
Temik 15G CA	264-426	aldicarb	yes	danger-poison	48+	oral.post	cehjklm	cehjl	I,M,N	Rhone-Poulenc
Terraclor 6.5% w/Thimet 6.5%	400-412	PCNB + phorate	yes	danger-poison	48	oral.post	cehjklm	cfhjl	I,M	Uniroyal
Terraclor 6.5% w/Di-Syston	400-411	PCNB + disulfoton	yes	danger-poison	48+	oral.post	cehjklm	cehjl	I,M	Uniroyal
Terraclor Super X w/Di-Syston	400-408	PCNB + disulfoton	yes	danger-poison	48+	oral.post	cehjklm	cfhjl	I,M	Uniroyal
Thimex 15G	241-145	phorate	yes	danger-poison	48	oral.post	dehjklm	dehjl	I,M	Cyanami
Thimet 20G	241-257	phorate	yes	danger-poison	48	oral.post	dehjklm	dehjl	I,M	Cyanamid
Thiodan 3 EC	279-2924	endosulfan	no	danger-poison	24	oral	dfhjklm	dfhjl	I	FMC
Thiodan 50 WP	279-1380	endosulfan	no	danger-poison	24	oral	aegjklm	begl	I	FMC
Thiodan Cottonseed Oil	279-2659	endosulfan	no	danger-poison	24	oral	cfhjklm	cfhl	I	FMC
Thiodan WSB	279-3129	endosulfan	no	danger-poison	24	oral	aegklm	begl	I	FMC
Thiolux DF	55947-78	sulfur	no	caution	24	oral	aegj	begj	M	Sand
VectoBac G	275-50	BT	no	caution	12	oral	ag	beg	I	Abbott
Vydate C-LV	352-532	oxamyl	yes	danger-poison	48	oral	cfhjkl	cfhjl	I	DuPont
Vydate L	352-372	oxamyl	yes	danger-poison	48	oral	cfhjkl	cfhjl	I,M,N	DuPont

++Check product labels for approval for use in California +REI may vary...refer to product label for detailed information

Seasonal Use:	I.... Insecticide	Personal Protective Equipment (PPE):	a...Long-sleeved shirt and long pants	h...Chemical resistant footwear plus socks
	M....Miticide		b...Coveralls	j...Protective eyewear
	N....Nematicide		c...Coveralls over short sleeved shirt and short pants	k...Chemical resistant apron when cleaning equipment, mixing or loading
	O....Other		d...Coveralls over long sleeved shirt and long pants	l...Chemical resistant headgear for overhead exposure
	SF...Soil Fumigant		e...Waterproof gloves	m...Approved respirator
			f...Chemical resistant gloves	n...Chemical resistant protective suit
			g...Shoes plus socks	o...Face shield

Information presented in this table is for preliminary planning only, since changes in pesticide labels and labeling may occur at anytime. Exclusive reliance must be placed on the pesticide label and labeling information, specifics in the WPS statement on the label and other information provided by the manufacturer.