

MEMORANDUM

WHS 98-03

TO: County Agricultural Commissioners

FROM: John S. Sanders, Chief [Original signed by John S. Sanders]
Worker Health and Safety Branch
(916) 445-4222

DATE: June 23, 1998

SUBJECT: INFORMATION SENT TO AZINPHOS-METHYL PERMIT
HOLDERS

The attached information is being sent to all azinphos-methyl permit holders for which we received address information from you, either on disk or by printed labels. The mailing is being done in batches and should be completed by Tuesday, June 23, 1998. If there are azinphos-methyl permit holders which we were not able to contact, you are encouraged to forward a copy of this information to them.

If you have any questions, please contact your Liaison Senior, or you may contact Roy Rutz, by E-mail, at rrutz@cdpr.ca.gov, or by telephone, at (916) 445-4279.

Attachment

cc: Mr. Charles M. Andrews

cacazm.wpd



Fact Sheet

Emergency Restrictions for Azinphos-Methyl

The Department of Pesticide Regulation (DPR) implemented emergency regulations for azinphos-methyl (Guthion®) on June 1, 1998. To ensure worker safety, the new restrictions: 1) require employee applicators to wear personal protection equipment beyond the labeling requirements when using air-blast sprayers; and 2) impose longer restricted entry intervals (REI) for field workers. The new REI is 50 days, which can be reduced to 45 days for the first application, if one pound or less of active ingredient per acre is applied. The new restrictions are needed because DPR recently determined that these workers face an unacceptable margin of safety.

Applications must be made according to the emergency regulation, section 6486.7 of Title 3, California Code of Regulations (CCR). Early entry work during the REI must be done according to the requirements in sections 6770, 6771, and 6772 3CCR. In accordance with section 6776 3CCR, warning signs must remain posted for the duration of the REI even if early entry activities occur. The REI and early entry requirements apply to applications made before the emergency regulations were in place. Attached are two documents with detailed explanations of the requirements in the emergency regulations.

Emergency regulations are in effect for 120 days. By then, DPR expects to have permanent regulations in place. This will involve the standard regulatory process, including an economic analysis, scientific peer review of the risk assessment document, and opportunity for public comment. To avoid having these restrictions apply to California only, DPR is working with the U.S. Environmental Protection Agency to incorporate these requirements onto azinphos-methyl labels. For additional information about the regulations mentioned here, contact your county agricultural commissioner.

California Environmental Protection Agency
DEPARTMENT OF PESTICIDE REGULATION
Pesticide Enforcement Branch
1020 N Street, Sacramento 95814-5624
Phone: (916) 445-3920
<http://www.cdpr.ca.gov>

Application Restrictions for Azinphos-methyl (Guthion)

Background

The Department of Pesticide Regulation adopted § 6486.7 Title 3 of the California Code of Regulations (3CCR), which places restrictions on azinphos-methyl applications. The restrictions are detailed in this document.

Equipment

These requirements apply when **employee applicators** use:

- ✧ air blast sprayers; **and**
- ✧ any part of the spray solution carried by the airstream is directed upward at an angle above the horizon.

Maximum rate

The maximum rate per application;

- ✧ 1.0 pound of active ingredient.

NOTE: Employee applicators using an enclosed cab may apply label rates greater than 1.0 pound of active ingredient per acre.

Employee applicator personal protective equipment (PPE); apparel

In addition to wearing:

- ✧ chemical resistant gloves; **and**
- ✧ chemical resistant footwear plus socks

as required by labeling, employee applicators must wear a:

- ✧ a chemical-resistant hood that covers the head and neck; **and**
- ✧ chemical-resistant suit over a long-sleeved shirt and long-legged pants.

Employee applicator PPE; respiratory protection

Employee applicators must wear a:

- ✧ full-face respirator; **or**
- ✧ half-face respirator **together with** a face shield.

The respirator must meet labeling requirements.

Exemption #1

Applicators occupying an enclosed cab may substitute work clothing for the required:

- ✧ chemical resistant gloves;
- ✧ chemical resistant footwear plus socks; **and**
- ✧ a chemical-resistant hood that covers the head and neck; **and**
- ✧ chemical-resistant suit over a long-sleeved shirt and long-legged pants.

NOTE: See Enclosed cab requirement below for important information about keeping PPE in the enclosed cab.

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Application Restrictions for Azinphos-methyl (Guthion), continued

Definition

Enclosed cab (§ 6000 3CCR) means a chemical resistant barrier completely surrounding the occupant(s) of the cab that prevents contact with pesticides or treated surfaces outside the cab.

Exemption #2

Applicators occupying a enclosed cab **acceptable for respiratory protection** are exempted from wearing the required:

- ◇ chemical resistant gloves;
- ◇ chemical resistant footwear plus socks; **and**
- ◇ chemical-resistant hood that covers the head and neck; **and**
- ◇ chemical-resistant suit over a long-sleeved shirt and long-legged pants; **and**
- ◇ full-face respirator; **or**
- ◇ half-face respirator **together with** a face shield.

Work clothing may be substituted for the above listed PPE.

NOTE: See Enclosed cab requirement below for important information about keeping PPE in the enclosed cab.

Definition

Enclosed cab acceptable for respiratory protection (§ 6000 3CCR) means an enclosed cab equipped with an air purification system that:

- ◇ filters dust or mist; **or**
 - ◇ removes vapor or gas,
- as appropriate for the exposure situation.

The enclosed cab acceptable for respiratory protection must meet the Director's criteria:

- ◇ the cab shall provide equivalent respiratory protection as the type of respirator listed on the pesticide product labeling; **and**
 - ◇ during use, the interior of the cab shall provide for positive pressure compared to the outside environment.
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Enclosed cab requirement

Applicators using the:

- ◇ enclosed cab; **or**
 - ◇ enclosed cab acceptable for respiratory protection **must** have all labeling-required PPE immediately available and stored in a chemical resistant container, such as a plastic bag. Labeling-required PPE shall be worn if it is necessary to work outside the cab and contact pesticide treated surfaces in the treated area. Once PPE is worn in the treated area, it shall be removed and stored in a chemical resistant container, such as a plastic bag, before reentering the cab.
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Early Entry Restrictions for Azinphos-methyl (Guthion)

Background

The Department of Pesticide Regulation amended § 6772(b) Title 3 of the California Code of Regulations (3CCR). These amendments change the restricted entry intervals (REI) for certain crops treated with azinphos-methyl. These REI changes, along with the early entry restrictions for treated areas in § 6770 3CCR, are detailed in this document. **For additional early entry requirements in § 6771 3CCR, contact your county agricultural commissioner.**

Definitions

Early entry (§ 6000 3CCR) means entry into a field or other area after a pesticide application is complete, but before expiration of the restricted entry interval (REI) or other entry restrictions.

Restricted Entry Interval (REI) (§ 6000 3CCR) means the period after a pesticide application during which entry restrictions are in effect to protect persons from potential exposure to hazardous residue levels. An REI may be found on pesticide product labeling or in regulation.

Label REI

The REI is 3 days in outdoor areas where the average annual rainfall is less than 25 inches.

NOTE: See § 6774(e) 3CCR.

Regulatory REI, 6772(b) 3CCR

The REI is 50 days for applications made to the following crops:

- ◇ pome fruits - apples, crabapples, pears, and quinces;
- ◇ citrus fruits - calamondin, citrus citron, citrus hybrids including chironja, tangelo, tangor, grapefruit, kumquat, lemon, lime, mandarin (tangerine), orange (sweet and sour), pummelo, satsuma mandarin;
- ◇ grapes;
- ◇ stone fruits - apricots, cherries, nectarines, peaches, plums, and prunes.

NOTE: Does not include almonds or other nuts.

Exemption

The REI may be reduced to **45 days** when:

- ◇ only one application takes place during the growing season; and
- ◇ the rate is 1.0 pound or less of active ingredient per acre.

NOTE: Subsequent applications may occur, but result in the 50-day REI.

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Early Entry Restrictions for Azinphos-methyl (Guthion), continued

Definition

Growing season means, for:

- ◇ deciduous crops, from bud break through leaf fall; **and**
 - ◇ citrus crops, no longer than one calendar year.
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3-day REI activities

During the 3-day REI, in accordance with § 6770 3CCR, employees are limited to the following types of activities:

- ◇ **pesticide handling;**
 - ◇ **no contact** with anything that has been treated;
 - ◇ **necessary and unforeseen limited contact**, including limited contact irrigation; **and**
 - ◇ **non-hand labor activities.**
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Pesticide handling (3-day REI)

Employees may conduct pesticide handling activities while wearing the personal protective equipment (PPE) for handlers as required by labeling.

No contact activities (3-day REI)

Employees may conduct **no contact activities**, where they have **no contact** with anything that has been treated, including soil, water, air, equipment, or plant surfaces. Operating equipment where an employee is prevented from contacting anything that has been treated is considered to be a "no contact" activity.

Limited contact activities (3-day REI)

Employees may conduct **necessary and unforeseen limited contact activities** provided that:

- ◇ at least four hours have elapsed since the end of the application;
 - ◇ minimal exposure is limited to below the knees and below the elbows;
 - ◇ employees wear the PPE specified on pesticide product labeling for early entry **or** coveralls, socks, chemical resistant footwear, chemical resistant gloves, and protective eye wear, if required by the pesticide product labeling;
 - ◇ each employee is limited to eight hours in any 24-hour period;
 - ◇ each employee is informed orally or by posted notice that this exception is being used; **and**
 - ◇ each employee is informed about the provisions in §6770 (d) 3CCR.
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Early Entry Restrictions for Azinphos-methyl (Guthion), continued

Non-hand labor activities (3-day REI)

Employees may enter to conduct **non-hand labor activities** provided that:

- ◇ at least four hours have elapsed since the end of the application;
- ◇ each employee wears the PPE specified in labeling for early entry; **and**
- ◇ each employee is limited to one hour in any 24-hour period.

This includes:

- ◇ scheduled irrigation; and
- ◇ other scheduled, short-term non-hand labor activities.

Note: See § 6000 3CCR definition of hand labor.

Activities after label REI (days 4 - 14 of REI)

After expiration of the 3-day labeling REI through day 14 of the REI, an employee may enter a treated field to conduct **non-hand labor activities**, with no time limits.

These employees must wear:

- ◇ work clothing with long sleeves and legs;
 - ◇ shoes with socks; **and**
 - ◇ gloves.
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Hand labor activities (days 15 - 45 or 50 of REI)

Between day 15 and through the end of the 45- or 50-day REI, employees may conduct hand labor activities provided they wear:

- ◇ long-sleeved PPE over short-sleeved shirt;
- ◇ long-legged pants;
- ◇ shoes with socks; **and**
- ◇ gloves.

These activities include harvesting, thinning, propping limbs, pruning, scouting, irrigating, and fire blight cutting.

Posting

As required by § 6776 3CCR, the appropriate warning sign must be posted:

- ◇ no longer than 24 hours before the application; **and**
- ◇ remain posted until expiration of the 45- or 50-day REI.

The warning sign must be removed within three days after the REI expires. The signs must be removed before workers can enter the treated area at the end of the 45- or 50-day REI.
