



Department of Pesticide Regulation



Paul E. Helliker
Director

MEMORANDUM

Gray Davis
Governor
Winston H. Hickox
Secretary, California
Environmental
Protection Agency

TO: Sue Edmiston **HSM-01013**
Senior Environmental Research Scientist
Worker Health and Safety Branch

FROM: Bernardo Z. Hernandez [**original signed by B. Hernandez**]
Associate Environmental Research Scientist
445-4203

DATE: September 20, 2001

SUBJECT: Field Posting Observations during Foliar Restricted Entry Data study

WH&S dislodgeable foliar residue (DFR) sampling activities are guided by HS-1600, Guidance for Determination of Dislodgeable Foliar Residue of the Worker Health and Safety Branch. Collection of these samples is at expiration of the restricted entry interval (REI). Employers must make sure that workers are notified about areas where pesticide applications are taking place or where restricted-entry intervals are in effect. One of the ways this is accomplished is with warning signs posted at entrances to the treated area.

During the DFR sampling associated with Project 9505 (DFR found at expiration of the REI) and Project 0102 (Carbofuran DFR on cotton foliage) staff took observations of field postings of more than 100 fields. In many instances, field postings were taken down at the expiration of the REI. Either the grower or the foreman had removed warning signs. This typically was done very early in the A.M. (note: posting was seen 24-hours prior the expiration of REI when scouting out treated field). Those fields were still posted because the person removing the signs had not reached that particular area of the field or ranch yet. The majority of fields observed prior to expiration of the REI were posted. Many signs include the pesticide applied, date of reentry, grower name, field identification and other signs listed only the pesticide and reentry date. Some REI postings appeared to be left up for use as "keep out/do not trespass" signs until crop could be harvested or they were just forgotten about. For example, the posting in Picture 1 is 33 days past the REI expiration. A few postings appeared to be filled out incorrectly as shown in Picture 2 and its corresponding Notice of Intent (NOI) in Picture 3. Picture 4 shows spray dates instead of reentry dates, the documentation for this field is shown in Picture 5.

On one occasion staff talked to the farm manager and learned the actual REI would not expire for two more days. Upon locating the treated area, no posting of the field was noticed at which point the manager indicated the signs "blew down".

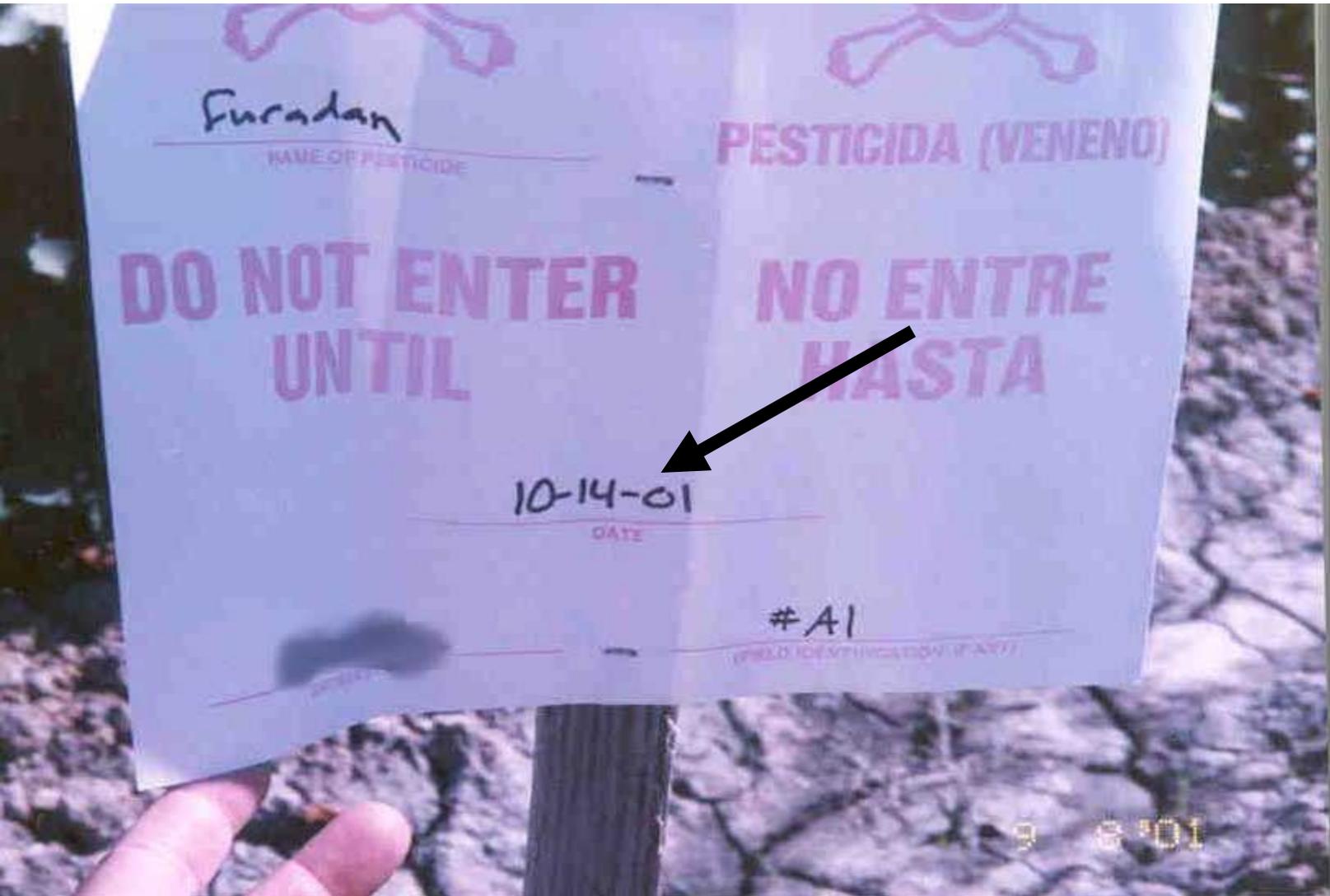


Picture 1. Posting observed August 12, 2001.



Sue Edmiston
October 4, 2001
Page 3

Picture 2. Posting incorrectly filled out, see Picture 3 NOI. (Or being used as a keep out sign?)



Sue Edmiston
 October 4, 2001
 Page 4

Picture 3. Notice of Intent for posting in Picture 2.

Sent By: _____ Jul-27-01 16:48 Page 2/2
 _____ Case: _____ 4:48:58PM Version: 1.8

STATE OF CALIFORNIA - ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF PESTICIDE REGULATION
NOTICE OF INTENT TO APPLY RESTRICTED MATERIALS (33-126X Rev 3/90) PMIS 0032

Rec.# 09470-1
 Nursery

County	Section	Towaship	Range	Base & Meridian	Method	Permits / Comment	Applicant Name & Address		
				M	A				
Operator Identification Number				Site Identification Number		Planted Area			
				A1A		38.00 ac			
Location						Block ID			
Date / Time Applied Proposed: 07/31/01						Area Treated Proposed	Commodity or Site Treated		
						38.00 ac	COTTON		
						Crop ID	29121-00		
Restricted Chemical Material	Number	Product and Manufacturer			Registration Number From Label	Rate Per ac	Dilution Volume	Treated Pest	
Y	1061	FURADAN 4F FMC			00779-02476-2C-00000	8.00 ea	10.00 gal	Cotton Aphid	
N	99006	HOOK ATLANTIC FACBI			1851864-50001-AA-000	0.2000 pt	10.00 gal	ECOMPT	
N	99006	BU-PH-ER RNA CORP.			1850994-59013-AA-000	3.20 ea	10.00 gal	ECOMPT	
Days Reentry	Days Preharvest	Application Supervised By					NW	N	NE
14 day	27 day								
Environmental Changes / Comments						W	Target Area	E	
						SW	S	SE	
Submitted By:	Date	Time	PCA Name						
	07/27/01	4:46PM							
Received By:	Box No.	Date	Time	Approved					
				Desired					

**Picture 4. Posting incorrectly filled out, spray dates are being used and not the reentry date.
See Picture 5 for documentation.**



Picture 5. Documentation for posting of field in Picture 4.

Fields: ~~000000~~

7184
 Date: 07-27-01
 Proposed: 08-03-01
 Expires: - -
 Casulated: - -

Crop: APPLLB
 Area: 241 Acres
 Del Tkt#: _____
 PO#: _____
 PCA: _____
 Pest: _____

Grower: _____

Accte: _____
 Appl: GROWER

SITE: 21193 FLD. 19-3 SW1/4 M10. OF BLK #4
 County#: _____ Section: _____ Township: _____
 Soil Texture: CLAY LOAM Soil pH: 7
 Soil % Organic Matter: _____

Recommendation#: 7184 Proposed Treatment: 40 Acres M10. OF BLK #4

Material	RES.#	RATE	/100 gal	Base	Mat. Req.	Target Pest
GUTHION SOLIDAK 500 WP	03125-00301-10-0000	2.00 lbs /Treated Ac	1.50	No	80.00 lb.	COOLING WORM
FC 6-8-2*	11656-50030-00-0000	2.00 pts / 100 Gal.	2.00	No	12.50 gal	*EXEMPT*
FIRST CHOICE 4440 SPREADER	11656-50030-10-0000	4.00 pts /Treated Ac	3.20	No	1.25 gal	*EXEMPT*

Apply by: GROUND Gallons of Diluent/Treated Acre: 125

SPECIAL INSTRUCTIONS

GUTHION: APPLICATION BY "FIXED-WING" AIRCRAFT IS PROHIBITED.
 Mix with: DO NOT ADD FIRST CHOICE 4440 AT A RATE WHICH EXCEEDS 5% OF THE FINISHED SPRAY VOLUME.

***** PRECAUTIONS *****

*Restricted: YES, CERTIFIED APPLR ONLY Days to Harvest: 14
 Permit Required Avoid Drift
 Notice of Intent Required Avoid Water Contamination
 Chemical Category: I DANGER Toxic to Bees *
 Posting Required Toxic to Fish
 Toxic to Birds

Non Re-entry Interval: 14.00 DAYS
 Feed/Graze Treated Area/Crop: YES Plantback Restriction: YES
 Days to Pasture: 21 *NOTIFY BEEKEEPERS AT LEAST 48 HRS BEFORE APPLICATION

Sue Edmiston
October 4, 2001
Page 7