

Revised Summary of Hazard Communication Regulation Concepts

3 CCR Section	Current	Proposed
6618 Notice of Applications	<p>Agricultural pest control business provides notification of the scheduled application to the operator of the property (<i>date and time</i>). This notice shall include location and description of the area to be treated, REI, product name, EPA registration, active ingredient, and posting requirements</p> <p>Operator of the property provides notification to contractors, crew supervisors and/or employees.</p> <ul style="list-style-type: none"> • Addresses notification for both pending and completed applications • Unclear as to who is ultimately responsible for notifying employees (especially employees of labor contractors) 	<p>Agricultural pest control business provides notification of the scheduled application to the operator of the property (<i>date only</i>). If there is a change in the date of the scheduled application, the applicator must assure that the operator of the property receives notice of the changed schedule before commencing the application.</p> <ul style="list-style-type: none"> • Clarifies that the pest control business is responsible for making sure the operator of the property is notified both before the application, and of any changes in the scheduled application • Ensures the operator receives notification and establishes a date to make an application. The operator manages activities based on the application schedule <p>The operator of the property is responsible for notifying all employees (including the employees of any contractor hired by him) who may enter or walk within ¼ mile of the field scheduled to be treated. The information in the notice remains the same as currently required.</p> <ul style="list-style-type: none"> • Addresses notifications for pending applications only • Clarifies that the operator of the property is ultimately responsible for notifying any employees who may enter or walk within ¼ mile of area scheduled to be treated <p>The operator of the property is responsible for notifying any other persons that he would have reason to know would be likely to <i>enter</i> the field scheduled to be treated (does not include those who might walk within ¼ mile).</p> <ul style="list-style-type: none"> • Re-instates the protection provided under pre-WPS regulations to persons other than employees whom the operator of the property would know would be likely to enter the area scheduled to be treated.

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6619 Pesticide Application Completion Notice	Agricultural pest control business has up to 24 hours to notify operator of the property of completed application.	<p>Agricultural pest control business must notify the operator of the property either at the time the application is completed or before the start of the next business day. This notice shall include the following information:</p> <ol style="list-style-type: none"> (1) The location of the property, (2) The pesticide(s) applied; (3) The date and hour the application was completed; and (4) The applicable pre-harvest intervals <ul style="list-style-type: none"> • Ensures the operator receives the notice and establishes the time when the application was completed. The operator manages work activities based on the application completion time and the expiration of the REI <p>The operator of the property is responsible for notifying all employees (including the employees of any contractor hired by him) who may enter or walk within ¼ mile of the field during the restricted entry interval. The information in the notice remains the same as currently required. The employees will be notified with the following exception: when the field is posted (unless the posting is for a pesticide product requiring dual notification). The notice shall include:</p> <ol style="list-style-type: none"> (1) The location and description of the area for which the notice was intended; (2) The longest time during which entry is restricted for that site; and (3) Instructions not to enter that site, except as provided in section 6770, until the restricted entry interval or other restrictions on entry have expired. <ul style="list-style-type: none"> • Addresses notifications for completed applications only <p>The operator of the property is responsible for notifying any other persons that he would have reason to know would be likely to <i>enter</i> the field during the REI (does not include those who might walk within ¼ mile).</p> <ul style="list-style-type: none"> • Re-instates the protection provided under pre-WPS regulations to persons other than employees whom the operator of the property would know would be likely to enter the field during the REI.

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6761.1 Application-Specific Information for Fieldworkers	<p>Requires that pesticide application information for all treated fields within ¼ mile of where employees may be working must be displayed* at a central location as long as workers are on the establishment or until the area no longer meets the definition of treated field (whichever is earlier)</p> <p>Location of display is noted in PSIS A-9</p>	<p><i>Option 1:</i> On a ranch that consists of contiguous property (to be defined), application-specific information for all treated fields within ¼ mile of where employees will be working may be displayed at a central location or where workers meet and gather. When an operator is responsible for properties that are not contiguous, application-specific information must be displayed either <i>within the same township as the work site or within a township that is adjacent to the worksite.</i></p> <p><i>Option 2:</i> On a ranch that consists of contiguous property (to be defined), application-specific information for all treated fields within ¼ mile of where employees will be working may be displayed at a central location or where workers meet and gather. When an operator is responsible for properties that are not contiguous, application-specific information must be displayed <i>within 20 miles of the work site.</i> (Twenty miles was chosen as a distance that would both be feasible for workers to travel and would not pose an undue burden on growers).</p> <p><i>Option 3:</i> On a ranch that consists of contiguous property (to be defined), application-specific information for all treated fields within ¼ mile of where employees will be working may be displayed at a central location or where workers meet and gather. When an operator is responsible for properties that are not contiguous, application-specific information must be displayed <i>at the work site.</i> Exceptions: 1. employees perform field work for a period of less than two hours or, 2. fewer than five employees will enter or walk within ¼ mile of the treated field. <i>(These exceptions are similar to exceptions in 8CCR, Section 3457(c)(2)(A,) dealing with requirements for toilet and handwashing facilities).</i></p> <p>Before entering a treated field, workers must be orally informed of the location where the application-specific information is displayed.</p>

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6770 Field Reentry after Pesticide Application	<p>“The employer shall not allow or direct any employee to enter or remain in a treated field before the restricted entry interval . . .has expired”</p> <p>All hand labor activities are prohibited.</p>	<p>Amend to include that the operator of the property also shall not allow or direct any employee (including the employees of any contractor hired by him) to enter or remain in the field that was scheduled to be treated until he has received the notice of completion.</p> <ul style="list-style-type: none"> • Clarifies that the operator of the property is responsible for assuring that workers will not enter the field during an application or during an REI. <p>Establishes an exemption in regulation for workers to perform early entry activities (e.g., hand labor) during an REI that are allowed by product labeling.</p> <ul style="list-style-type: none"> • Addresses federal labeling guidance for re-registration
6771. Requirements for Early Entry Workers	<p>“The employer shall assure that early entry workers are informed of pesticide product labeling requirements related to human hazards or precautions, first aid, symptoms of poisoning, use and care of personal protective equipment required for early entry into treated fields, the prevention, recognition, and first aid for heat-related illness, and the importance of washing thoroughly at the end of the exposure period.”</p>	<p>Requires the employer to inform fieldworkers who will be conducting early entry activities of the following:</p> <ol style="list-style-type: none"> (1) Specific information and conditions about the work activities that can and cannot be performed, including whether hand labor is allowed during the restricted-entry interval, and other entry restrictions required by product labeling during or after a restricted-entry interval; (2) Pesticide product labeling requirements related to human hazards or precautions; (3) Symptoms of poisoning; (4) Emergency first aid and decontamination procedures for pesticide injuries or poisonings, including emergency eye flushing techniques; (5) How to obtain emergency medical care; (6) The prevention, recognition, and first aid for heat-related illness if personal protective equipment is used; (7) The need for, use, and care of personal protective equipment required for early entry into treated fields; (8) That clothing and personal protective equipment may be contaminated with pesticide residues; (9) Instructions for removing and storing such clothing and equipment, and laundering such equipment; and (10) The importance of washing thoroughly at the end of the exposure period. <ul style="list-style-type: none"> • Expands and clarifies information that an employer is required to transmit to employees prior to employees entering the field during an REI (early entry requirements)

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6776. Field Postings	REI expiration date required on signs only when REI exceeds 7 days.	<p>Requires the operator of the property to include the date(s) for unrestricted entry on signs when posting is required by pesticide product labeling or regulation.</p> <ul style="list-style-type: none"> • Provides additional information to inform the crew supervisor, fieldworkers and CAC when the REI or other entry restrictions expire.