STATE OF CALIFORNIA — DEPARTMENT OF FINANCE

ECONOMIC AND FISCAL IMPACT STATEMENT (REGULATIONS AND ORDERS)

STD. 399 (Rev. 10/2019)

ECONOMIC IMPACT STATEMENT

DEPARTMENT NAME	CONTACT PERSON	EMAIL ADDRESS	TELEPHONE NUMBER
Department of Pesticide Regulation (DPR)	Sam Raburn	Samuel.Raburn@cdpr.ca.gov	916-445-7230

DESCRIPTIVE TITLE FROM NOTICE REGISTER OR FORM 400	NOTICE FILE NUMBER
Pesticide Decontamination Sites	Z

A. ESTIMATED PRIVATE SECTOR COST IMPACTS *Include calculations and assumptions in the rulemaking record.*

1. Check the appropriate box(es) below to indicate whether this regulation:

- [X] a. Impacts business and/or employees
- [X] b. Impacts small businesses
- [ ] c. Impacts jobs or occupations
- [ ] d. Impacts California competitiveness
- [ ] e. Imposes reporting requirements
- [ ] f. Imposes prescriptive instead of performance
- [ ] g. Impacts individuals
- [ ] h. None of the above (Explain below):

If any box in Items 1 a through g is checked, complete this Economic Impact Statement.
If box in Item 1.h. is checked, complete the Fiscal Impact Statement as appropriate.

2. The Department of Pesticide Regulation (Agency/Department) estimates that the economic impact of this regulation (which includes the fiscal impact) is:

- [ ] Below $10 million
- [ ] Between $10 and $25 million
- [X] Between $25 and $50 million
- [ ] Over $50 million *[If the economic impact is over $50 million, agencies are required to submit a Standardized Regulatory Impact Assessment as specified in Government Code Section 11346.3(c)]*

3. Enter the total number of businesses impacted: 21,765

Describe the types of businesses (Include nonprofits): See addendum.

Enter the number or percentage of total businesses impacted that are small businesses: 94.3%

4. Enter the number of businesses that will be created: 0 eliminated: 0

Explain: N/A

5. Indicate the geographic extent of impacts: [X] Statewide

[ ] Local or regional (List areas):

6. Enter the number of jobs created: 0 and eliminated: 0

Describe the types of jobs or occupations impacted: N/A

7. Will the regulation affect the ability of California businesses to compete with other states by making it more costly to produce goods or services here? [X] YES [ ] NO

If YES, explain briefly: This proposed regulation will require certain pesticide applicators to purchase additional workplace safety equipment which will marginally increase operation costs.

ECONOMIC IMPACT STATEMENT (CONTINUED)

B. ESTIMATED COSTS *Include calculations and assumptions in the rulemaking record.*

1. What are the total statewide dollar costs that businesses and individuals may incur to comply with this regulation over its lifetime? $ 44,543,998

a. Initial costs for a small business: $ 469-557 Annual ongoing costs: $ 57-205 Years: 5

b. Initial costs for a typical business: $ 469-557 Annual ongoing costs: $ 57-205 Years: 5

c. Initial costs for an individual: $ N/A Annual ongoing costs: $ N/A Years: N/A

d. Describe other economic costs that may occur: N/A

2. If multiple industries are impacted, enter the share of total costs for each industry: 68.8% Agriculture, 31.2% Non-Agriculture

3. If the regulation imposes reporting requirements, enter the annual costs a typical business may incur to comply with these requirements. *Include the dollar costs to do programming, record keeping, reporting, and other paperwork, whether or not the paperwork must be submitted.* $ N/A

4. Will this regulation directly impact housing costs? ☐ YES ☒ NO

If YES, enter the annual dollar cost per housing unit: $

Number of units:

5. Are there comparable Federal regulations? ☐ YES ☒ NO

Explain the need for State regulation given the existence or absence of Federal regulations: See addendum.

Enter any additional costs to businesses and/or individuals that may be due to State - Federal differences: $ N/A

C. ESTIMATED BENEFITS *Estimation of the dollar value of benefits is not specifically required by rulemaking law, but encouraged.*

1. Briefly summarize the benefits of the regulation, which may include among others, the health and welfare of California residents, worker safety and the State's environment: This proposal will result in more worker protection from potential exposure to pesticides.

2. Are the benefits the result of: ☐ specific statutory requirements, or ☒ goals developed by the agency based on broad statutory authority?

Explain: See addendum.

3. What are the total statewide benefits from this regulation over its lifetime? $ Unquantifiable

4. Briefly describe any expansion of businesses currently doing business within the State of California that would result from this regulation: N/A

D. ALTERNATIVES TO THE REGULATION *Include calculations and assumptions in the rulemaking record. Estimation of the dollar value of benefits is not specifically required by rulemaking law, but encouraged.*

1. List alternatives considered and describe them below. If no alternatives were considered, explain why not: Two alternatives were considered.

Please see attached memo.

ECONOMIC IMPACT STATEMENT (CONTINUED)

2. Summarize the total statewide costs and benefits from this regulation and each alternative considered:

Regulation: Benefit: $ Unquantifiable Cost: $ 44,543,998

Alternative 1: Benefit: $ Unquantifiable Cost: $ 83,852,210

Alternative 2: Benefit: $ Unquantifiable Cost: $ 287,341,056

3. Briefly discuss any quantification issues that are relevant to a comparison of estimated costs and benefits for this regulation or alternatives: The monetized value of reduced workplace injuries cannot feasibly be calculated within the required timeline.

4. Rulemaking law requires agencies to consider performance standards as an alternative, if a regulation mandates the use of specific technologies or equipment, or prescribes specific actions or procedures. Were performance standards considered to lower compliance costs? ☒ YES ☐ NO

Explain: This regulation includes a performance standard that brings the current regulations into compliance with other performance standards seen in other similar industries.

E. MAJOR REGULATIONS *Include calculations and assumptions in the rulemaking record.*

California Environmental Protection Agency (Cal/EPA) boards, offices and departments are required to submit the following (per Health and Safety Code section 57005). Otherwise, skip to E4.

1. Will the estimated costs of this regulation to California business enterprises **exceed $10 million**? ☒ YES ☐ NO

If YES, complete E2. and E3
If NO, skip to E4

2. Briefly describe each alternative, or combination of alternatives, for which a cost-effectiveness analysis was performed:

Alternative 1: Please see attached memo.

Alternative 2: Please see attached memo.

(Attach additional pages for other alternatives)

3. For the regulation, and each alternative just described, enter the estimated total cost and overall cost-effectiveness ratio:

Regulation: Total Cost $ 44,543,998 Cost-effectiveness ratio: $ N/A

Alternative 1: Total Cost $ 83,852,210 Cost-effectiveness ratio: $ N/A

Alternative 2: Total Cost $ 287,341,056 Cost-effectiveness ratio: $ N/A

4. Will the regulation subject to OAL review have an estimated economic impact to business enterprises and individuals located in or doing business in California exceeding $50 million in any 12-month period between the date the major regulation is estimated to be filed with the Secretary of State through12 months after the major regulation is estimated to be fully implemented?

☐ YES ☒ NO

If YES, agencies are required to submit a Standardized Regulatory Impact Assessment (SRIA) as specified in Government Code Section 11346.3(c) and to include the SRIA in the Initial Statement of Reasons.

5. Briefly describe the following:

The increase or decrease of investment in the State: DPR does not anticipate any change to investment in the State.

The incentive for innovation in products, materials or processes: DPR does not anticipate any change to incentives.

The benefits of the regulations, including, but not limited to, benefits to the health, safety, and welfare of California residents, worker safety, and the state's environment and quality of life, among any other benefits identified by the agency: See C.1.

STATE OF CALIFORNIA — DEPARTMENT OF FINANCE

ECONOMIC AND FISCAL IMPACT STATEMENT (REGULATIONS AND ORDERS)

STD. 399 (Rev. 10/2019)

FISCAL IMPACT STATEMENT

A. FISCAL EFFECT ON LOCAL GOVERNMENT *Indicate appropriate boxes 1 through 6 and attach calculations and assumptions of fiscal impact for the current year and two subsequent Fiscal Years.*

☐ 1. Additional expenditures in the current State Fiscal Year which are reimbursable by the State. (Approximate) (Pursuant to Section 6 of Article XIII B of the California Constitution and Sections 17500 et seq. of the Government Code).

$ ____________

☐ a. Funding provided in ____________

Budget Act of ____________ or Chapter ____________ , Statutes of ____________

☐ b. Funding will be requested in the Governor's Budget Act of ____________

Fiscal Year: ____________

☐ 2. Additional expenditures in the current State Fiscal Year which are NOT reimbursable by the State. (Approximate) (Pursuant to Section 6 of Article XIII B of the California Constitution and Sections 17500 et seq. of the Government Code).

$ ____________

Check reason(s) this regulation is not reimbursable and provide the appropriate information:

☐ a. Implements the Federal mandate contained in ____________

☐ b. Implements the court mandate set forth by the ____________ Court.

Case of: ____________ vs. ____________

☐ c. Implements a mandate of the people of this State expressed in their approval of Proposition No. ____________

Date of Election: ____________

☐ d. Issued only in response to a specific request from affected local entity(s).

Local entity(s) affected: ____________

☐ e. Will be fully financed from the fees, revenue, etc. from: ____________

Authorized by Section: ____________ of the ____________ Code;

☐ f. Provides for savings to each affected unit of local government which will, at a minimum, offset any additional costs to each;

☐ g. Creates, eliminates, or changes the penalty for a new crime or infraction contained in ____________

☐ 3. Annual Savings. (approximate)

$ ____________

☐ 4. No additional costs or savings. This regulation makes only technical, non-substantive or clarifying changes to current law regulations.

☐ 5. No fiscal impact exists. This regulation does not affect any local entity or program.

☒ 6. Other. Explain Please see attached memo.

STATE OF CALIFORNIA — DEPARTMENT OF FINANCE

ECONOMIC AND FISCAL IMPACT STATEMENT (REGULATIONS AND ORDERS)

STD. 399 (Rev. 10/2019)

FISCAL IMPACT STATEMENT (CONTINUED)

B. FISCAL EFFECT ON STATE GOVERNMENT *Indicate appropriate boxes 1 through 4 and attach calculations and assumptions of fiscal impact for the current year and two subsequent Fiscal Years.*

☐ 1. Additional expenditures in the current State Fiscal Year. (Approximate)

$ ______________________

It is anticipated that State agencies will:

☐ a. Absorb these additional costs within their existing budgets and resources.

☐ b. Increase the currently authorized budget level for the ______________ Fiscal Year

☐ 2. Savings in the current State Fiscal Year. (Approximate)

$ ______________________

☐ 3. No fiscal impact exists. This regulation does not affect any State agency or program.

☒ 4. Other. Explain Please see attached memo.

C. FISCAL EFFECT ON FEDERAL FUNDING OF STATE PROGRAMS *Indicate appropriate boxes 1 through 4 and attach calculations and assumptions of fiscal impact for the current year and two subsequent Fiscal Years.*

☐ 1. Additional expenditures in the current State Fiscal Year. (Approximate)

$ ______________________

☐ 2. Savings in the current State Fiscal Year. (Approximate)

$ ______________________

☒ 3. No fiscal impact exists. This regulation does not affect any federally funded State agency or program.

☐ 4. Other. Explain ______________________

FISCAL OFFICER SIGNATURE	DATE
Jenni Mantis	07/28/2026

The signature attests that the agency has completed the STD. 399 according to the instructions in SAM sections 6601-6616, and understands the impacts of the proposed rulemaking. State boards, offices, or departments not under an Agency Secretary must have the form signed by the highest ranking official in the organization.

AGENCY SECRETARY	DATE
Brandy Hunt	9/2/26

Finance approval and signature is required when SAM sections 6601-6616 require completion of Fiscal Impact Statement in the STD. 399.

DEPARTMENT OF FINANCE PROGRAM BUDGET MANAGER	DATE

Economic and Fiscal Impact Statement Addendum to Std. 399

Eyewash and Decontamination Sites

__**Summary of Economic Impact Statement**__

A.3. ESTIMATED PRIVATE SECTOR COST IMPACTS

We estimate 21,765 agricultural and non-agricultural businesses will be impacted by the proposed rulemaking. The types of businesses we anticipate being impacted include agricultural and non-agricultural applicators of pesticides, and/or businesses employing workers that handle pesticides.

B.1. ESTIMATED COSTS

The potential economic impact of this rulemaking ranges. Using CDFA's base analysis, the initial (i.e., first year) direct impact is $12,609,207. This is the sum of CDFA's base analysis ($8.8 million) and DPR's private sector analysis ($3.8 million). Subsequent annual costs across the two analyses total $2,415,698. Using the Department of Finance's 2x multiplier to account for indirect costs, the total initial cost to businesses is estimated to be $25,218,414. Assuming a lifespan of five years, the total direct economic impact of this rulemaking is $22,271,999. Using the Department of Finance's 2x multiplier to account for indirect costs, this totals $44,543,998.

B.1.a,b.

Per-business costs are presented as ranges. Costs were estimated by using industry-specific business counts and estimated totals. CDFA's analysis for agricultural businesses has an initial cost per business of $469. DPR's analysis for non-agricultural businesses has an initial cost per business of $577. CDFA's analysis for agricultural businesses has an annual cost per business of $57. DPR's analysis for non-agricultural businesses has an annual cost per business of $205.

B.5.

U.S. EPA has granted California the authority to implement state regulations that are equivalent to the federal worker protection standard. In order to maintain equivalency with federal regulations, California regulations must be at least as protective as the federal standards. In 2017, California regulations were updated to reflect the changes in the federal worker protection standard. The new proposed changes will supplement the worker protection regulations that are already in place in California and will result in more worker protection from potential exposure to pesticides.

This proposal is likely to result in more worker protection from potential exposure to pesticides, including pesticides that could cause eye injury. The 2015 federal WPS requirements for eye decontamination that were incorporated into 3 CCR in 2017 will be enhanced by requiring equipment that meets the ANSI Z358.1-2014 standard. This equipment provides additional worker protection measures including continuous performance of the equipment with no further worker activity. Additionally, standardizing eyewash equipment will help enforce the safety and welfare of pesticide workers.

Employees who mix and load pesticides labeled with the signal word “CAUTION” or with no signal word for uses other than the commercial or research production of an agricultural plant commodity will benefit from this regulation by having access to a decontamination site. The ability to routinely decontaminate and change clothes after handling pesticides serves to minimize potential exposure. Additionally, the ability to decontaminate in the event of an emergency or accidental exposure should decrease the severity of injuries and illnesses for these workers.

C.2. ESTIMATED BENEFITS

DPR has broad authority to adopt regulations to provide a safe work environment for employees working with and around pesticides.

D.2. ALTERNATIVES TO THE REGULATION

The costs in this section are presented as estimates for the total (i.e., direct and indirect) lifetime economic impact of each proposal. As previously mentioned, the proposed rulemaking has a total lifetime economic impact of $44,543,998. The two alternatives identified by DPR are estimated to have lifetime direct impacts of $41,926,105 and $143,670,528. Using the Department of Finance’s 2x multiplier to account for indirect costs, these total $83,852,210 and $287,341,056, respectively. Additional information on these alternatives are presented in the document titled “Eyewash Decon Economic and Alternatives Analysis”.

Karen Morrison
Director

Department of Pesticide Regulation

Gavin Newsom
Governor

Yana Garcia
Secretary.for.
Environmental.
Protection

MEMORANDUM

TO: Lauren Otani, Senior Environmental Scientist (Specialist)

FROM: Sam Raburn, Economist

DATE: 7/24/2026

SUBJECT: An Economic and Fiscal Impact Analysis on Employers in Non-Agricultural Settings Amending Title 3, California Code of Regulations Sections 6720, 6724, 6732, 6734, 6738.4, 6771, and 6793 (Pesticide Decontamination Site and Eyewash Rulemaking)

1. Executive Summary:

The Department of Pesticide Regulation (DPR) proposes to amend Title 3, California Code of Regulations (3 CCR) sections 6720, 6724, 6732, 6734, 6738.4, 6771, and 6793. This memo analyzes the economic and fiscal impacts of the proposed changes on employers with employees handling pesticides in non-agricultural settings; the California Department of Food and Agriculture (CDFA) separately analyzed the agricultural economic impact. DPR estimates the first year's direct non-agricultural economic impact (henceforth initial economic impact) to be $3.81 million, with subsequent annual costs of $1.35 million. Assuming a regulatory lifetime of 5 years, the proposed regulation would have a lifelong economic impact of $9.20 million. Of the total initial cost, 59.0% can be attributed to requiring decontamination sites for businesses handling Category III and IV pesticides. Table 1 presents the initial economic impact divided by category and business type.

Table 1. Initial Economic Impact by Cost Category and Business Type

Cost Category	Number of Impacted Businesses	Total Cost
Administrative Learning	6,593	$603,457
Decontamination Sites	3,118	$2,245,165
Soap & Single-Use Towels	870	$64,389
Eyewash Stations	1,482	$640,521
Personal Eyewash Units	3,847	$252,284
Total	**6,593**	**$3,805,816**

DPR estimates the initial fiscal impact to be $877,069 with subsequent years incurring an annual cost of $276,737. Assuming a regulatory lifetime of 5 years, the proposed regulation would have a lifelong fiscal impact of $2.0 million. Of the total initial cost, 53.6% can be attributed to requiring decontamination sites for agencies handling Category III and IV pesticides. Table 2 presents the initial fiscal impact divided by category and business type.

Table 2. Initial Fiscal Impact by Cost Category and Agency Type

Cost Category	**Number of Impacted Agencies**	**Total Cost**
Administrative Learning	1,838	$246,090
Decontamination Sites	900	$469,903
Soap & Single-Use Towels	236	$15,132
Eyewash Stations	211	$91,194
Personal Eyewash Units	1,178	$54,750
Total	**1,838**	**$877,069**

The remainder of this memo is structured as follows. First, we provide the proposed changes to regulatory text and anecdotal assumptions used in our analyses. We then present our economic impact analysis, which is divided into 5 categories of initial costs: administrative learning, decontamination sites, soap and paper towels, ANSI-compliant eyewash stations, and personal eyewash units; annual replacement costs are included afterwards. We then present our fiscal impact analysis, which is similarly divided into 5 categories of initial cost with a separate table for annual costs. Finally, we analyze two potential alternatives. In the Appendix, we present individual supply costs and references.

2. Proposed Changes to 3 CCR Section 6734 and Impacts:

Subsection (a) is proposed to be restructured and amended as follows: The first sentence of the subsection is being repealed and replaced with new text in paragraph (a)(1).

The requirement for the employer to notify employees handling pesticides of the location of the decontamination site is a current requirement for employees handling pesticides for the commercial or research production of an agricultural commodity. The proposed amendment will make it apply to all employees covered by 3 CCR section 6734. The additional time for these employers to notify employees of the location of the decontamination site is not anticipated to have economic or fiscal impacts because the employer can change their current procedures to include the additional required information in the instructions employers currently routinely provided to employees handling pesticides.

The requirement for decontamination supplies to be located together at the decontamination site is an existing federal Worker Protection Standard requirement, enforced in California through 3 CCR section 6701. For employers of employees handling pesticides for the commercial or research production of an agricultural commodity, this change will not create an economic impact because they already must comply with this requirement. For all other employees covered by 3 CCR section 6734, the requirement to have the supplies located together (as opposed to in various separate locations around the mixing and loading site) some employers may incur one-time costs to purchase new supplies to comply with these requirements. Thus, this proposed change may have economic and fiscal impacts.

Former paragraph (a)(1) is being renumbered to be subparagraph (a)(1)(A) and amended. Sufficient water for routine washing and for emergency decontamination is an existing requirement in current section 6734(a); moving the requirement here is for clarity and will not have an economic or fiscal impact.

New subparagraph (a)(1)(B) is a renumbering of former paragraph (a)(2). The text "shall be available at each decontamination site" is proposed to be removed as the requirement is proposed to be included in new paragraph (a)(1). This is a technical change for clarity and to reduce duplicative requirements. It is not expected to have economic or fiscal impacts.

New subparagraph (a)(1)(C) is proposed to be added.

Having sufficient soap and single use towels at the decontamination site is an existing requirement in current section 6734(a); moving the requirement to subparagraph (a)(1)(C) is a non-substantive change for clarity and will not have economic or fiscal impacts.

The clarification that hand sanitizing gels and liquids and wet towelettes are not considered soap and single use towels is an existing requirement in current section 6434(b)(2) for employers with employees handling pesticides for the commercial or research production of an agricultural commodity. It is anticipated that most employers in other situations already comply with this requirement, however there may be some employers who may incur one-time costs to purchase new supplies to comply with these requirements and maintain those supplies in the following years. Thus, this proposed change may have economic and fiscal impacts.

New paragraph (a)(2) is proposed to be added. This paragraph provides requirements employers must follow when an eyewash station or personal eyewash unit is required by section 6734.

In new subparagraph (A), the eyewash fluid must be stored separately from water used for mixing with pesticides and the fluid must "be of a quality and temperature that will not cause illness or injury when it contacts the skin or eyes." These are existing requirements in current subsection (a)(1). These changes are not estimated to have an economic or fiscal impact.

In new subparagraph (B), eyewash stations must bear compliance with the American National Standards Institute (ANSI) Z358.1 standard and that eyewash stations do not include water hoses, sink faucets, or showers. This change will not have a direct economic or fiscal impact because the employers covered by this memo are not currently required by section 6734 to have an eyewash station. Rather, the economic and fiscal impacts are included in the discussion of proposed paragraph (c)(2) (the requirement for employers to provide an ANSI Z358.1-compliant eyewash station in certain situations).

The proposed text of new subparagraph (C) specifies that personal eyewash units shall meet the requirements of section 6 of ANSI Z358.1-1981. These changes will not have a direct economic or fiscal impact because the employers covered by this memo are not currently required by section 6734 to have personal eyewash units immediately available to their employees. Rather, the economic and fiscal impacts are included in the discussion of proposed paragraph (c)(3) (the requirement for employers to provide a personal eyewash unit for employee use if the product labeling requires protective eyewear).

Subsection (b) is proposed to be restructured and amended as follows:

This subsection currently applies to employers with employees handling pesticides used for the commercial or research production of an agricultural commodity. The rulemaking proposes to expand applicability of this subsection to include employees handing pesticides used for commodity fumigation. Currently these employees are covered by the requirements of subsection (c), as the fumigants used are Category 1 pesticides. The economic impacts of this change are discussed in more detail below; there are no anticipated fiscal impacts.

Current paragraph (b)(1) is proposed to be amended. The changes are technical in nature to reflect proposed changes in subsection (a), and do not have an economic or fiscal impact.

Current paragraphs (b)(2) and (b)(4) are proposed to be repealed and the requirements placed in subsection (a) for them to apply to all employees handling pesticides. These changes were discussed in subsection (a) changes above. Current paragraph (b)(3) is proposed to be renumbered to then be paragraph (b)(2).

New paragraph (b)(3) is proposed to be added. Currently, paragraph (b)(6) requires agricultural employers to provide an eyewash station at the mixing/loading site if the product labeling requires protective eyewear or a closed mixing system is used. The rulemaking proposes to repeal paragraph (b)(6) in favor of new paragraph (b)(3) and add employees handling a liquid fumigant to the requirement for employers to have an eyewash station. The economic impacts of this change on employers of employees handing pesticides used for commodity fumigation are discussed in more detail below, there are no anticipated fiscal impacts.

Current paragraph (b)(5) is proposed to be renumbered to become (b)(4) and amended. This paragraph requires the employer to provide a personal eyewash unit as specified in (a)(2) if the pesticide product labeling requires employees to wear protective eyewear. The economic impacts on employers of employees handing pesticides used for commodity fumigation are discussed below, there are no anticipated fiscal impacts.

Subsection (c) is proposed to be restructured and amended as follows:

Subsection (c) currently applies to employers with employees using pesticides in settings other than for the commercial or research production of an agricultural commodity. A new introduction sentence is being added to indicate this subsection applies "for uses not covered by subsection (b)". This is an editorial clarification which takes the place of the longer phrase "for uses other than the commercial or research production of an agricultural plant commodity" currently used in this subsection. This change is not expected to have economic or fiscal impacts.

Under the current text of section 6734(c), these employers must have a decontamination site within 100 feet of the mixing and loading site, consisting of sufficient water, soap, single use towels and a clean change of coveralls, if employees are handling pesticides labeled with the signal word "Danger" or "Warning". The proposed reorganization moves this decontamination site requirement to paragraph (c)(1) and makes it applicable to all pesticides handled by employees in these settings, regardless of signal word. This change will have economic and fiscal impacts on employers who currently have employees who only handle "Caution" or no signal word pesticides and are discussed below.

Proposed paragraph (c)(2) will require employers to provide an ANSI Z358.1-compliant eyewash station at the mixing/loading site when pesticides with the signal words "Danger" or "Danger/Poison" are mixed or loaded by employees. This proposed change will have economic and fiscal impacts and are discussed below.

Proposed paragraph (c)(3) requires employers to have a personal eyewash unit, as specified in paragraph (a)(2), immediately available to each employee handling a pesticide if the pesticide product labeling requires protective eyewear. This change will have economic and fiscal impacts, which are discussed below.

3. Additional Proposed Changes:

Subsection (c) of 6720 contains a table that pairs Title 3 regulations that apply to antimicrobial pesticides used as sanitizers, disinfectants, medical disinfectants, or pool/spa chemicals with corresponding regulations in Title 8. If an employer of employees handling these types of materials complies with the applicable corresponding requirements in Title 8, the employer is exempt from complying with the specified provisions of Title 3. As part of this rulemaking, the table in 6720(c) is proposed to be updated to include Title 8 CCR Section 5162 (the California Department of Industrial Relations' Division of Occupational Safety and Health's (Cal/OSHA's) emergency eyewash requirements for general industries, including sanitizer handlers) to ensure that the appropriate code section corresponds to 3 CCR section 6734 and avoid duplicative requirements on these employers. It is assumed that employers with employees handling antimicrobial pesticides are already complying with 8 CCR section 5162, therefore, the change to 6720(c) is not anticipated to have economic or fiscal impacts.

Section 6724(b) lists the training topics that employees must be trained on before handling pesticides. Paragraph (13) is proposed to be amended to specify handler training topics on when and why eyewash stations and personal eyewash units are required, and for the employer to instruct the employee on their use if they are required by the employee. Additionally, paragraph (15) is proposed to be amended to include the indoor heat training required under 8 CCR section 3396. For paragraph (13), the new training requirements are for clarity with the existing broad training requirements. For paragraph (15), the new requirement is consistent with the indoor Heat Illness Prevention Cal/OSHA regulations employers have had to comply with since July 2024. The costs for employers to modify their existing employee training are expected to be minimal. As such, this change is not expected to have economic or fiscal impacts.

Section 6732 currently requires the change area for employers of employees in other settings who regularly handle pesticides with the signal words “Danger” or “Warning” to have a decontamination site at the employee change area which meets the requirements in section 6734(a), (b)(1), and (b)(2), including: sufficient water for routine washing and emergency decontamination, a clean pair of coveralls, soap, and single-use towels. Because section 6734 is being restructured under this proposed rulemaking, the references in section 6732 need to be updated to reflect the correct corresponding decontamination site supplies. The change in proposed subparagraph 6734(a)(1)(C) that sanitizing gels and liquids or wet towelettes do not qualify as soap and single-use towels may have economic and fiscal impacts on some employers.

In section 6738.4(a), paragraph (4) is proposed to be changed to clarify the scope of the exemption and remove unintentional ambiguity that could lead to misinterpretation. The proposed amendment to section 6738.4(a)(4) is for clarity purposes and is not anticipated to affect the applicability of the current regulation. The proposed change is not expected to have economic or fiscal impacts.

Section 6771 is being amended to align terms used within section 6771 to match those that are being updated in section 6734. The changes to 6771 are not expected to have economic or fiscal impacts on employers in other settings as these employers do not employ field workers.

Section 6793(b) currently requires washing (i.e., decontamination) facilities, as specified in section 6734, where minimal exposure pesticides are mixed or loaded, regardless of the toxicity category (i.e., the signal word) of the product used. The proposed changes to section 6734 will now require decontamination sites, which include washing facilities, for all employees handling pesticides regardless of toxicity category. Thus section 6793(b) is proposed to be removed to avoid duplicity. Under this proposed rulemaking the employers who are currently subject to section 6793(b) will still be required to have decontamination facilities for employees handling pesticides. Thus, the change is not anticipated to have economic or fiscal impacts.

4. Anecdotal Assumptions:

Signal words on the pesticide labeling and toxicity categories are based on acute toxicity data for the product as sold. The signal words "Danger," "Warning," and "Caution" are found on the pesticide product labeling. These words equate to Categories I, II, and III, respectively. Pesticides with the signal word "Danger/Poison" are also considered to be Category I pesticides. Pesticides lacking signal words are considered Category IV pesticides. Throughout this analysis the applicable category designations (e.g., "Category I or II pesticides") are used in place of the signal word designations.

Sections 6732 and 6734 of the proposed regulation apply to employers of employees handing pesticides. We assume employees handle all pesticides reported by pest control businesses (PCBs) licensed by DPR, structural pest control businesses (SPCBs) registered with the Structural Pest Control Board, and property owners. We also make this assumption for school districts, local government agencies, state agencies, Universities of California, and California State Universities. To estimate the number of impacted businesses and agencies, we rely on Monthly Summary Pesticide Use Reports (MSPURs) submitted to County Agricultural Commissioners (CACs) in 2023.

Impacted entities likely have multiple employees handling and mixing pesticides, but employment information is challenging to identify. For each business and agency, we assume an average number of employees to better estimate regulatory impact. Average employees per business/agency were estimated by DPR's Enforcement Branch and adjusted by DPR's economist to improve consistency. There is still potential for underestimating costs if the true number of employees exceeds our approximation.

5. Economic Impact Analysis:

In 2023, a total of 1,837 PCBs representing 1,502 DPR-licensed businesses, 3,061 SPCBs representing 2,741 Board-registered businesses, and 1,695 property operators with employees handling pesticides submitted MSPURs to CACs. We assume all 5,938 companies and 6,593 businesses will be affected by this rulemaking in some capacity. Of these businesses, we estimate 6,218 or 94.3% are small businesses, as defined by Government Code section 11346.3(b)(4)(B). Businesses will be impacted by five primary factors: 1) administrative learning, 2) decontamination sites, 3) soap and paper towels, 4) ANSI-compliant eyewash stations, and 5) personal eyewash units. DPR estimates the initial impact to be $3.81 million, with subsequent years incurring an annual cost of $1.35 million.

5.1. Administrative Learning:

Businesses will need to spend time understanding the new regulations and take corrective actions. DPR estimates business supervisors and managers will spend an average of 1.5 hours reviewing the final regulation text, comparing it to their existing program, and deciding if any corrective action is needed. We also anticipate businesses spending 1.5 hours researching products and making purchasing decisions. Thus, we estimate each person in a supervisory position at each location will incur a one-time cost of three (3) hours of administrative learning.

To estimate the learning cost, we assume a mean hourly wage of $30.51 which corresponds to First Line Supervisors of Landscaping, Lawn Service, and Groundskeeping Workers in California (Bureau of Labor Statistics, 2026a). We assume each business location has one supervisor that will perform these actions. The total one-time cost is estimated to be $603,457. Costs by business type are presented below.

Table 3. One-Time Administrative Learning Economic Costs by Business Type

Business Type	Number of Businesses	Cost
PCBs	1,837	$168,141
SPCBs	3,061	$280,173
Property Operators	1,695	$155,143
Total	**6,593**	**$603,457**

5.2. Decontamination Sites:

Businesses with employees who handle pesticides in "other" settings are currently only required to have decontamination sites for employees who handle Category I or II pesticides. The proposed changes to 6734(c)(1) expand this requirement to businesses with employees handling Category

III and IV pesticides. In 2023, 840 PCBs reported exclusively using Category III or IV pesticides in 2023 and would be impacted by the proposed change. Similarly, 1,853 SPCBs and 425 property operators would be impacted.

Supply costs for all sections of this report are taken from products available for purchase online and include 8.85% sales tax. Required supplies for a decontamination site were identified by the Enforcement Branch and consist of one five-gallon water dispenser ($87), one pair of disposable coveralls ($14), one bottle of soap ($6), one roll of paper towels ($12), and one five-gallon bucket with a lid in which to store the materials ($12). Individual supply costs and references are provided in Appendix A. To ensure sufficient supply of consumable products, we assume two sets of coveralls, soap, and paper towels per decontamination site per year.

Employees may work independently and/or at remote locations. To account for this, we estimate business types will require varying numbers of decontamination sites. We assume each PCB will purchase and stock three (3) decontamination sites for a total of 2,520 sites. This allows for one site at each business location and two sites for vehicles. SPCBs have an average of 5.29 registered employees, for a total of 9,803 employees, rounded up. To remain conservative, we assume each registered employee receives a stocked decontamination site for a total of 9,803 sites. For each property operator, we assume three (3) decontamination sites for a total of 1,275. Together, we estimate 13,598 new decontamination sites will be required statewide, at a cost of $2.25 million. These costs by business type are presented below.

Table 4. Initial Economic Cost - Decontamination Sites for Category III or IV Pesticides

Business Type	Number of Businesses	Number of Units	Cost
PCBs	840	2,520	$416,077
SPCBs	1,853	9,803	$1,618,573
Property Operators	425	1,275	$210,515
Total	**3,118**	**13,598**	**$2,245,165**

5.3. Requiring Employers to Stock Soap and Single-Use Towels:

DPR anticipates that most employers in applicable settings already comply with the requirements in this portion of the regulation. We assume 25% of businesses handling Category I or II pesticides are not yet compliant and will need to stock soap and single-use paper towels to comply with this portion of the rulemaking. The increased cost reflects the marginal cost of switching from hand sanitizer ($8) to soap and single-use towels ($18 total). Costs for individual supplies are presented in Appendix A, with the net increase in cost being $9.75. Following previous assumptions, we assume two instances of soap and paper towels, such that the annual cost per decontamination site is $19.50. Total first year costs are estimated to be $64,389 and are presented below.

Table 5. Initial Economic Cost - Soap and Single-Use Towels for Category I or II Pesticides

Business Type	Number of Businesses	Number of Units	Cost
PCBs	250	750	$14,625
SPCBs	302	1,598	$31,161
Property Operators	318	954	$18,603
Total	**870**	**3,302**	**$64,389**

5.4. Requiring an Eyewash Station When Category I Pesticides are Mixed or Loaded:

Proposed paragraph (c)(2) would require employers to provide an eyewash station at the mixing/loading site where employees mix or load Category I. If the employer already has a plumbed eyewash station at the mixing or loading site that complies with Cal/OSHA requirements, the employer will not need to purchase a new eyewash station to comply with this portion of the rulemaking. DPR assumes all qualifying businesses will need to purchase an ANSI Z358.1-compliant eyewash station, which may overestimate the economic impact.

Eyewash stations are intended for emergency use. After using a personal eyewash unit, the impacted handler should make their way to an eyewash station to further flush their eye(s). Therefore, we assume one station per business (likely to be installed at the main location). The cost of ANSI Z358.1-compliant eyewash stations can range from a few hundred to several thousand dollars.[1] We assume employers purchase an economical, gravity-fed, 9-gallon capacity ANSI Z358.1-compliant eyewash stations at a cost of $338. Under the proposed rulemaking, eyewash stations can be filled with potable water, preserved buffered saline solution, or another medically acceptable solution. We assume employers fill stations with potable water, at negligible cost, and treat said water with an additive solution. Despite eyewash stations being used infrequently, stations must be retreated every 3 months to ensure proper availability in case of emergency. We estimate annual water and water treatment per eyewash station to cost $94 annually. Initial costs are estimated to be $640,521 and are presented in Table 6.

[1] ANSI-compliant eyewash stations range in price from $215 to $2500+.

Table 6. Initial Economic Cost – ANSI-Compliant Eyewash Stations for Category I Pesticides

Business Type	Number of Businesses	Number of Units	Cost
PCBs	504	504	$217,829
SPCBs	405	405	$175,041
Property Operators	573	573	$247,651
Total	**1,482**	**1,482**	**$640,521**

5.5. Requiring a Personal Eyewash Unit When the Pesticide Product Labeling Requires Employees to Wear Protective Eyewear:

Proposed paragraph (a)(2) states that the personal eyewash unit personal eyewash unit must meet the requirements of section 6 of ANSI Z358.1-1981. Many PCBs and property operators apply pesticides in agricultural settings, which currently require personal eyewash units. Therefore, we assume 50% of these businesses are already compliant and do not need to purchase additional eyewash units. We assume all SPCBs will need to purchase personal eyewash units.

Employers have several options to comply with this portion of the rulemaking. For example, employers could simply purchase bottled water at a trivial cost. Alternatively, they could purchase a personal ANSI-compliant eyewash unit filled with buffered saline solution, which costs approximately $14. We assume all applicable businesses purchase the latter option. Initial costs are estimated to be $252,284 and are presented below.

Table 7. Initial Economic Cost - Personal Eyewash Units

Business Type	Number of Businesses	Number of Units	Cost
PCBs	543	1,629	$23,360
SPCBs	2,643	13,982	$200,502
Property Operators	661	1,982	$28,422
Total	**3,847**	**17,593**	**$252,284**

5.6. Annual Costs:

DPR additionally anticipates recurring annual costs related to the proposed changes. We estimate an annual economic impact of $1.35 million and present the annual costs in Table 8 on the following page.

Table 8. Annual Economic Costs by Category and Business Type

Category	Business Type	Number of Units	Cost per Unit	Total Cost
Decontamination Sites				**$893,117**
	PCBs	2,520	$65.68	$165,514
	SPCBs	9,803		$643,861
	Property Operators	1,275		$83,742
Soap & Single-Use Towels				**$64,389**
	PCBs	750	$19.50	$14,625
	SPCBs	1,598		$31,161
	Property Operators	954		$18,603
ANSI-Compliant Eyewash Stations				**$139,990**
	PCBs	504	$94.46	$47,608
	SPCBs	405		$38,256
	Property Operators	573		$54,126
Personal Eyewash Units				**$252,284**
	PCBs	1,629	$14.34	$23,360
	SPCBs	13,982		$200,502
	Property Operators	1,982		$28,422
Total				**$1,349,778**

6. Fiscal Impact Analysis:

In 2023, 615 local agencies or districts, 12 State departments, the University of California, and California State University submitted MSPURs to CACs. Additionally, 785 school districts reported pesticide use directly to DPR in 2021 under the Healthy Schools Act. DPR presumes that if a local agency, district, or unit of State government reported pesticide use to the CAC or DPR, they had employees apply those pesticides. DPR estimates all these state and local agencies or districts will be affected by one or more portions of this rulemaking. The state will be impacted by five primary factors: 1) administrative learning, 2) decontamination sites, 3) soap and paper towels, 4) ANSI-compliant eyewash stations, and 5) personal eyewash units. DPR estimates the first year of costs to be $877,069 with subsequent years incurring an annual cost of $276,737.

6.1. Caveats:

Not all pesticide use is reported to CACs, which can create difficulties when attempting to use MSPUR data to calculate fiscal impacts. This is especially true when local, city, county, district, and state agency employees apply pesticides because only some pesticides require the agency to obtain a Restricted Material Permit (RMP) or Operator Identification Number (OIN). While all pesticides used in "non-production agricultural use" settings (e.g., cemeteries, parks, rights-of-way) must be recorded and reported to the CAC, only certain pesticides used in "non-agricultural" settings must be recorded and reported to the CAC.

To avoid underestimating the fiscal impact on local agencies, districts (except K-12 school districts, more on that below) and state departments/agencies, we take the following steps:

1. The number of RMPs and OINs that local agencies or districts (except schools) and state departments/agencies received from CACs in 2023 were used to calculate costs rather than the number of agencies affected.
2. For state agencies and local agencies, the estimated numbers of employees handling pesticides or required decontamination sites in the field per RMP and OIN were inflated. For local agencies, we estimate three (3) employees handling pesticides per agency and for state agencies we estimate five (5) employees handling pesticides per agency.

For school districts, most pesticides used are exempt from pesticide use reporting due to the use being classified as "institutional use" within the "non-agricultural use" category. However, many aspects of this rulemaking would still apply to these applications. Under State law, the Healthy Schools Act requires public schools to annually report to DPR most pesticide applications made by school site employees. According to DPR's *2021 California School & Child Care Pesticide Use Report Summary*, 785 school districts reported pesticide use to DPR. Of the 785 school districts, only 59 K-12 school districts reported pesticide use to CACs in 2023. Using 59 school districts would underestimate the fiscal impact of this rulemaking on school districts. Due to limited data, we assume the 59 school districts are representative of the total 785 school districts by breakdown of which pesticide categories are applied. For each portion of the proposed regulation, we proportionally scale up the number of school districts estimated to be impacted.[2] We further assume each school district has three (3) employees handling pesticides.

Additionally, based on 2023 MSPUR data, 675 local agencies received 846 non-school-district RMPs and OINs from CACs. UC, CSU, and State agencies obtained 207 unique RMPs and OINs from CACs. In the following sections, we refer to each individual RMP/OIN as their own "agency" since we consider them to be unique entities.

[2] For example, if 37 of the 59 school districts that reported pesticide use to CACs would be impacted by the regulation, we assume the same share (62.7%) of the total number of school districts (785), or 493, would be impacted.

6.2. Administrative Learning:

Agencies will need to spend time understanding the new regulations and take corrective actions. Following the economic impact analysis, we estimate each person in a supervisory position will incur a one-time cost of three (3) hours of administrative learning. Unlike the previous analysis, we assume a mean hourly wage of $44.63, which corresponds to Compliance Officers in California (Bureau of Labor Statistics, 2026b). Assuming one supervisor per agency, the total one-time cost is estimated to be $246,090. Costs by agency type are presented below.

Table 9. One-Time Administrative Learning Fiscal Costs by Agency Type

Agency Type	Number of Agencies	Cost
School Districts	785	$105,104
Local Agencies	846	$113,271
State, UC, CSU	207	$27,715
Total	**1,838**	**$246,090**

6.3. Decontamination Sites:

Agencies with employees who handle pesticides in "other" settings will be impacted as mentioned in Section 5.2. Of the 59 school districts submitting MSPURS in 2023, 37 registered using Category III and IV pesticides. By scaling up, we approximate that 493 school districts applied Category III or IV pesticides in 2023 and would be impacted by the proposed change. Additionally, 334 local agencies and 73 UC, CSU, and State agencies reported exclusively applying Category III or IV pesticides.

Material costs are the same as in the economic impact analysis. Employees may work independently and/or at remote locations. To account for this, we assume agencies will require varying numbers of decontamination sites. School districts and local agencies will purchase and stock three (3) decontamination sites for a total of 1,479 and 1,002 sites, respectively. State agencies, UCs, and CSUs will each stock five (5) decontamination sites for a total of 365. Together, we estimate 2,846 new decontamination sites will be required statewide, at a cost of $469,903. Costs by agency type are presented below.

Table 10. Initial Fiscal Cost - Decontamination Sites for Category III or IV Pesticides

Agency Type	Number of Agencies	Number of Units	Cost
School Districts	493	1,479	$244,198
Local Agencies	334	1,002	$165,440
State, UC, CSU	73	365	$60,265
Total	**900**	**2,846**	**$469,903**

6.4. Requiring Employers to Stock Soap and Single-Use Towels:

As mentioned in Section 5.3, we assume 25 percent of agencies handling Category I or II pesticides are not compliant with the proposed regulations and will need to stock soap and single-use paper towels to comply. 22 school districts submitted MSPURs containing Category I or II pesticides in 2023. The scaled-up number of school districts would be 293, of which 25 percent is 74, rounded up. 25 percent of Local and State Agencies is 128 and 34, respectively. Following the economic impact section, we assume annual cost per site to be $19.50. Total first year costs are estimated to be $15,132 and are presented below.

Table 11. Initial Fiscal Cost - Soap and Single-Use Towels for Category I or II Pesticides

Agency Type	Number of Agencies	Number of Units	Cost
School Districts	74	222	$4,329
Local Agencies	128	384	$7,488
State, UC, CSU	34	170	$3,315
Total	**236**	**776**	**$15,132**

6.5. Requiring an Eyewash Station When Category I Pesticides are Mixed or Loaded:

Of the 22 school districts that submitted MSPURs containing Category I or II pesticides in 2023, only 3 reported mixing or loading Category I pesticides. Thus, we estimate 40 districts being impacted by this portion of the regulation. For Local and State Agencies, 151 and 20 reported mixing or loading Category I pesticides, respectively. Costs and assumptions in this section are identical to those in Section 5.4 of the economic impact analysis. Initial costs are estimated to be $91,194 and are presented in Table 12 on the following page.

Table 12. Initial Fiscal Cost – ANSI-Compliant Eyewash Stations for Category I Pesticides

Agency Type	Number of Agencies	Number of Units	Cost
School Districts	40	40	$17,288
Local Agencies	151	151	$65,262
State, UC, CSU	20	20	$8,644
Total	**211**	**211**	**$91,194**

6.6. Requiring a Personal Eyewash Unit When the Pesticide Product Labeling Requires Employees to Wear Protective Eyewear:

36 of the 59 school districts submitted reports with pesticides which require handlers to wear protective eyewear. Thus, we estimate 479 school districts will be impacted by this portion of the regulation. For Local and State Agencies, 557 and 142 will be impacted, respectively. We anticipate school districts and Local Agencies to procure three (3) personal eyewash units each, for a total of 3,108 units. We anticipate State Agencies, UCs, and CSUs to procure five (5) personal eyewash units each, for a total of 710. Statewide, we anticipate 3,818 personal eyewash units being purchased to satisfy this portion of the regulation. Assumptions and costs in this section are identical to those in Section 5.5 of the economic impact analysis. Initial costs are estimated to be $54,750 and are presented below.

Table 13. Initial Fiscal Cost - Personal Eyewash Units

Agency Type	Number of Agencies	Number of Units	Cost
School Districts	479	1,437	$20,607
Local Agencies	557	1,671	$23,962
State, UC, CSU	142	710	$10,181
Total	**1,178**	**3,818**	**$54,750**

6.7. Annual Costs:

DPR additionally anticipates recurring annual costs related to the proposed changes. We estimate an annual fiscal impact of $276,737 and present the annual costs in Table 14 on the following page.

Table 14. Annual Fiscal Costs by Category and Agency Type

Category	Agency Type	Number of Units	Cost per Unit	Total Cost
Decontamination Sites				**$186,925**
	School Districts	1,479	$65.68	$97,141
	Local Agencies	1,002		$65,811
	State, UC, CSU	365		$23,973
Soap & Single-Use Towels				**$15,132**
	School Districts	222	$19.50	$4,329
	Local Agencies	384		$7,488
	State, UC, CSU	170		$3,315
ANSI-Compliant Eyewash Stations				**$19,930**
	School Districts	40	$94.46	$3,778
	Local Agencies	151		$14,263
	State, UC, CSU	20		$1,889
Personal Eyewash Units				**$54,750**
	School Districts	1,437	$14.34	$20,607
	Local Agencies	1,671		$23,962
	State, UC, CSU	710		$10,181
Total				**$276,737**

7. Alternatives to the Proposed Regulation:

DPR identified two potential alternatives for the proposed regulation. These alternatives similarly address the intent of the proposed regulation but are estimated to have higher economic impacts. We present two brief analyses for the alternatives in the subsequent subsections. For these analyses, we incorporate findings from CDFA's analysis of the economic impact on agricultural operations. Namely, we use their estimated costs and counts for Qualified Applicator Licenses (QALs), Qualified Applicator Certificates (QACs), Private Applicators, Aircraft Operators, and CDFA Sites; we combine the latter category with "State, UC, CSU" for this section. The CDFA report titled "Economic analysis of proposed changes to regulations regarding eyewash stations" is a document relied upon and can be viewed for details on assumptions and findings.

7.1. Alternative 1. Requiring Eyewash Stations for All Businesses Regardless of Pesticide Class:

This alternative would require all employers of employees handling Categories I, II, and III pesticides to purchase ANSI-compliant eyewash stations. As defined in Section 4, pesticide classes are associated with their respective signal text (e.g., "Danger" equates to a Category I pesticide). The new regulation only requires ANSI eyewash stations if employees mix and load Category I pesticides with the signal word Danger/Poison. Compared to the tiered approach of the proposed regulation, this alternative would additionally include businesses handling pesticides with 'Warning' and 'Caution' labels (i.e., Categories II and III, respectively). For completeness, we include the economic impact on agricultural operations estimated by CDFA. Two categories of costs do not change under this alternative: administrative learning and personal eyewash units. These costs are taken directly from the main analysis and are summarized by a single combined cost. DPR estimates the total direct initial economic impact of this proposed alternative to be $24.1 million. We present the summarized results below.

Table 15. Initial Economic Impact: Alternative 1

Entity Type	Number of Entities	Cost
Administrative Learning	19,172	$2,010,380
Personal Eyewash Units	-	$307,034
QALs	2,795	$3,984,273
QACs	2,365	$815,925
Private Applicators	8,119	$2,801,055
Aircraft Operators	40	$13,800
PCBs	1,837	$2,381,854
SPCBs	3,061	$6,998,481
Property Operators	1,695	$2,197,737
School Districts	785	$1,017,831
Local Agencies	846	$1,096,924
State, UC, CSU	207	$447,327
Total	**21,765***	**$24,072,621**

*The total number of entities is not the sum of individual categories as there is overlap.

The above costs account for one year of eyewash station refills and only increase the impact on non-agricultural operations (i.e., the bottom six rows). Each non-agricultural entity is assumed to purchase the same number of units as in the main analysis. Initial costs reflect the same per-unit costs used in the main analysis.

Table 16. Annual Economic Impact: Alternative 1

Entity Type	**Number of Entities**	**Cost**
Businesses: Ag	13,334	$1,065,920
Personal Eyewash Units	-	$307,034
PCBs	1,837	$520,569
SPCBs	3,061	$1,529,561
Property Operators	1,695	$480,329
School Districts	785	$222,453
Local Agencies	846	$239,739
State, UC, CSU	207	$97,766
Total	**21,765**	**$4,463,371**

In addition to the initial cost, we estimate the ongoing annual costs for this proposed alternative. Annual costs use the same number of units as the main analysis and total $4.5 million per year. Assuming a lifespan of 5 years, this alternative would have an economic impact of $42.0 million.

Pest Control Operators (PCOs) previously expressed disagreement with this alternative, as it would require them to retrofit each truck to accommodate a complete ANSI-compliant eyewash station. They had concerns that there was insufficient space on the trucks for such modifications, and that the associated costs would be prohibitively high. Costs related to retrofitting trucks are not captured in this estimate. PCOs further argued that they did not transport significant amounts of pesticides to mix/load on their trucks, and the pesticides they did use were predominantly Categories II and III. These concerns, in addition to the higher economic impact, are reasons DPR rejected this alternative.

7.2. Alternative 2. Requiring Temperature-Controlled Eyewash Stations for All Businesses:

Similar to Alternative 1, this alternative would require all employers of employees handling pesticides to purchase ANSI-compliant eyewash stations. Moreover, these stations would need to maintain eyewash fluid within a specific temperature range (between 60 and 100 degrees Fahrenheit) to be considered of a “temperature which will not cause injury or illness” when it touches the employee’s eyes. To comply with this requirement, employers would likely need to purchase an ANSI Z358.1-compliant temperature-controlled portable eyewash. This proposed alternative is based on a supplemental analysis conducted by CDFA.

For the cost of temperature-controlled and ANSI-compliant eyewash stations, we use CDFA’s estimate of $2,426 for a pressure- and temperature-controlled unit. We also use CDFA’s estimate for the economic impact if all agricultural applicators purchase a pressure- and temperature-controlled eyewash station (Table 6 of the CDFA report); this may overestimate the economic impact. Combining the estimates for agricultural and non-agricultural operations, DPR estimates the total direct initial economic impact of this proposed alternative to be $125.8 million. We present the summarized results below.

Table 17. Initial Economic Impact: Alternative 2

Entity Type	**Number of Entities**	**Cost**
Administrative Learning	19,172	$2,010,380
Personal Eyewash Units	-	$307,034
QALs	2,795	$6,780,670
QACs	2,365	$5,737,490
Private Applicators	8,119	$31,513,740
Aircraft Operators	40	$97,040
PCBs	1,837	$13,369,686
SPCBs	3,061	$39,283,466
Property Operators	1,695	$12,336,210
School Districts	785	$5,713,230
Local Agencies	846	$6,157,188
State, UC, CSU	207	$2,510,910
Total	**21,765***	**$125,817,044**

*The total number of entities is not the sum of individual categories as there is overlap.

The above costs only account for the direct economic impact and does not account for the annual costs to maintain said stations. However, these annual costs are identical to those of Alternative 1 (see Table 16). These costs also do not reflect the additional enforcement burden associated with the alternative proposal (e.g., CACs inspecting temperature-controlled eyewash stations must determine/ensure that water is maintained within the specific temperature range). Assuming a lifespan of 5 years, this alternative would have an economic impact of $143.7 million. DPR rejected this alternative as it was not sufficiently tailored and placed excessive economic burden on the private sector.

References:

Bureau of Labor Statistics. 2026a. "First-Line Supervisors of Landscaping, Lawn Service, and Groundskeeping Workers." https://www.bls.gov/oes/2022/may/oes371012.htm.

Bureau of Labor Statistics. 2026b. "Compliance Officers." https://www.bls.gov/oes/2022/may/oes131041.htm.

Appendix A. Individual Supply Costs:

Table 18. Individual Supply Costs Including Sales Tax

Item	Cost	Citation
Water Dispenser	$87.21	https://www.grainger.com/product/Beverage-Dispenser-Red-38D839
Disposable Coveralls	$14.76	https://www.grainger.com/product/3M-Disposable-Coveralls-L-30Z029
Hand Soap*	$6.16	https://www.grainger.com/product/ECOS-PRO-Hand-Soap-Liquid-800WL6
Paper Towels*	$11.92	https://www.grainger.com/product/GRAINGER-Paper-Towel-Roll-White-60FG14
5 Gallon Bucket	$12.22	https://www.grainger.com/product/BASCO-Storage-Pail-5-gal-877Y75
ANSI Eyewash Station	$337.74	https://www.grainger.com/product/GUARDIAN-EQUIPMENT-Plumbed-Eyewash-Std-2LVH5
Water Additive	$94.46	https://www.grainger.com/product/HAWS-Eyewash-Preservative-8-oz-55HF82
Personal Eyewash Bottle	$14.34	https://www.grainger.com/product/FENDALL-Single-Use-Eyewash-Bottle-3ARE2

*Comes in 6 pack. Cost represents one (1) individual item.