

The Worker Protection Standard in Cornell Greenhouses

The Worker Protection Standard (WPS) is a federal regulation intended to reduce the risk of pesticide poisonings and injuries among agricultural workers who are exposed to pesticide residues. At Cornell, the WPS applies to all employees, including undergraduate student employees and graduate students, who handle pesticide-treated plant materials.

The WPS requires Cornell to assure that untrained workers receive basic pesticide information before they work with treated agricultural plants. Any employee, including students, and students who handle agricultural plant materials as part of a research project must attend a training session 1) if those plant materials are treated with any type of pesticide, and 2) if the work with the plant material occurs within 30 days of the expiration of the restricted entry interval of the pesticide.

Employees must attend WPS training prior to beginning work with pesticide-treated plant material. Certified pesticide applicators do not need to attend.

All individuals who work in a greenhouse must be aware of:

- the location of the central posting board for their work area. The central posting board contains pesticide safety information, emergency numbers, and a pesticide application list for the facility.
- the need to attend and understand WPS training.
- the location of a decontamination site, equipped with clean water, soap and single-use towels, and a change of clothes (e.g., a coverall or Tyvek[®] suit).
- their right to receive emergency assistance should there be reason to believe that they have been poisoned or injured by a pesticide.
- the required posting of all greenhouse applications (the “Keep Out” sign).
- the application exclusion zone (AEZ) requirements
- the severe restrictions on access to treated areas during the restricted-entry interval (REI).

Untrained visitors (those not holding NYS pesticide applicator or WPS handler certification) must not enter the posted area during the REI.

All untrained visitors must receive training to enter a greenhouse when an REI is not in effect.

More about REIs

Access to greenhouses is severely restricted during a restricted-entry interval (REI) when the “Keep Out” sign is posted on the greenhouse door. The WPS allows entry into a treated area that remains under a REI only in three specific work situations:

- Short-term tasks that last less than 1 hour and do not involve hand labor,
- Emergency tasks that take place because of an agricultural emergency, and
- Specific tasks approved by EPA through a formal exception process.

Anyone that must perform an early entry task **must**:

- Wait at least 4 hours after the pesticide application is completed, **and**
- Wait at least until any inhalation exposure level listed on the product labeling has been reached or any WPS ventilation criteria have been met, **and**
- Spend no more than 1 hour in a 24-hour period on short-term early-entry tasks **or** do only those tasks relating to mitigating an emergency situation.

Anyone performing early-entry work **must** be provided with:

- Personal protective equipment
- Any protections required by the pesticide labeling for early-entry tasks
- Protections that are the same as for other workers:
 - Information at a central location
 - Emergency assistance
 - Restrictions during applications
 - Notice about applications
- Training and instructions
- Decontamination sites

Cornell strongly discourages any greenhouse entry during a restricted-entry interval.

More information about the Worker Protection Standard is available from the greenhouse supervisors or manager.

Entry Restrictions During Enclosed Space Production Pesticide Applications

A. When a pesticide is applied:	B. Workers and other persons, other than appropriately trained and equipped handlers, are prohibited in:	C. Until:	D. After the expiration of time specified in column C, the area subject to the restricted-entry interval is:
(1) As a fumigant	Entire enclosed space plus any adjacent structure or area that cannot be sealed off from the treated area	The ventilation criteria of paragraph (b)(3) of this section are met	No post-application entry restrictions required by 170.407** after criteria in column C are met
(2) As a (i) Smoke, or (ii) Mist, or (iii) Fog, or (iv) As a spray using a spray quality (droplet spectrum) of smaller than medium (volume median diameter of less than 294 microns)	Entire enclosed space	The ventilation criteria of paragraph (b)(3) of this section are met	Entire enclosed space
(3) Not as in (1) or (2), and for which a respiratory protection device is required for application by the pesticide product labeling	Entire enclosed space	The ventilation criteria of paragraph (b)(3) of this section are met	Treated area
(4) Not as in (1), (2) or (3), and: (i) From a height of greater than 12 inches from the planting medium, or (ii) As a spray using a spray quality (droplet spectrum) of medium or larger (volume median diameter of 294 microns or greater)	Treated area plus 25 feet in all directions of the treated area, but not outside the enclosed space	Application is complete	Treated area
(5) Otherwise	Treated area	Application is complete	Treated area