

Working in and around pesticides in field research: WPS and more

Some information from Chris DiFonzo and John Stone, published May 2018.

Before the field season begins, here is a quick reminder about employees using pesticide or working in or around pesticide-treated fields and research plots. The Worker Protection Standard (WPS) and reentry intervals apply to MSU research. **MSU faculty members and projects are not 'exempt' from WPS requirements. PIs are ultimately responsible for knowing which pesticides are sprayed in and around their research areas; understanding notification, reentry, and PPE requirements on these pesticide labels; and providing employees with the materials to meet WPS.**

Under WPS, a worker is anyone who:

- works for salary or other compensation
- enters a field or area treated within the past 30 days
- does tasks related to production of ag plants, such as planting, harvesting, weeding, thinning, pruning, cultivating, watering, picking.

For research involving ag field work, these and related tasks (collecting plant samples or insects, scouting for pests, or installing traps) are routine.

WPS Requires:

1) **Annual training.** Unfortunately WPS training is hard to come by currently on campus, because training materials must be approved by EPA. The easiest way to comply is through the MSU greenhouse training. If your employees work in the greenhouses, they already have this training.

2) **Decontamination supplies** with ¼ mile of the worksite. Supplies include soap, water, towels, and a change of clothes. If your employees work on an MSU farm, there is a restroom within a ¼ mile range. Otherwise, the easiest way to comply is to simply carry a box with a bar of soap, jug of water, towel, and a spray suit. This suffices for decontamination and a change of clothes, and is also useful just to clean up after field work.

3) **Transport to a medical facility** in case of an exposure. I suggest creating a small card to keep in a wallet or vehicle with the locations of nearest Urgent Care facilities in the places you work.

4) Understanding and using a **Central Notification**. All farms, MSU or commercial, should have a central notification site where pesticide applications are posted. The posting alerts workers to **reentry intervals** of sprayed products, so people do not enter a treated area before the interval expires. Workers should check the central notification before entering a field. If you work in commercial fields, it is also a good practice to coordinate with the owner to get in touch when a pesticide application is made.

5) Adhering to **reentry intervals**. University researchers are NOT exempt from following reentry intervals. REIs are in the 'Ag Use Requirements' box on pesticide labels. If an employee must visit a field during a reentry period, then the proper personal protective equipment (PPE) must be provided and worn. If your research is non-ag, and does not fall under WPS (for example, sampling on a golf course), there are likely still label requirements to reenter after sprays dry or a certain # of hours after application.

Even if your task or area of research is not covered by WPS (for example, research on a golf course, home invading insects, or mosquito control), following the 'spirit' of WPS requirements is still a good

practice. Carrying decontamination supplies, having a list of local medical facilities, or knowing an area was treated can improve safety and reduce pesticide exposure in any situation.

Pesticide Certification

MSU Employees **applying restricted or general use pesticides must be certified** (commercial certification plus one or more categories) by the state of Michigan through MDARD. Check the MDARD web site for details.

Although not necessarily required, **certification is recommended for:**

- 1) **PIs overseeing employees** doing research involving pesticides, or PIs making extension-related pesticide recommendations. PIs are responsible for the activities in their program, and should understand the basics of pesticide regulations and labeling.
- 2) **Employees assisting in any aspect of pesticide application** = handling containers, mixing, loading, or cleaning/ repairing spray equipment. Many programs already make it a practice to certify technicians, graduate students, and even undergraduates. We tend to do oddball tasks in research and use experimental products, so a higher level of training is warranted and increases lab safety.