

PESTICIDE INSPECTION — ARE YOU IN VIOLATION?

Should your business, research center or departmental unit be inspected for compliance with the pesticide law and rules, would you receive a clean bill of health? To answer this question you may choose to run an internal inspection audit of your operation using the following inspection format:

Certification: Are all persons who apply restricted-use pesticides (RUP) certified applicators? Do they hold a valid license?

Pesticide Storage and Use: Are RUP's stored in a nonhazardous, orderly and secure fashion? Are any of the pesticides cancelled, suspended, (e.g. DDT, Aldrin, DBCP, EDB, etc.) or otherwise subject to special restrictions (e.g. Temik, Toxaphene, 2, 4-D etc.)? Are the pesticides labeled or registered for applications to targets to which they are being or were applied? Do you have shipping and use records for each product in storage?

Records: Do you have records relating to all applications of RUP's for the past two years? These records shall include for each operation—date and time of treatment, person authorizing treatment, location, crop or target area, total acreage treated, pest to be controlled, pesti-

cide used and application rate, type of application equipment used and name of applicator.

Worker Protection: Is the proper protective equipment available for the applicator(s) of each pesticide in storage or use? Is the equipment clean and in proper working condition? Are unlicensed workers mixing/loading and/or applying RUP's? If so, have they received adequate instructions and training for handling the pesticide? This shall include instructions in safety procedures and precautions, proper use and care of safety equipment and clothing required to be worn or used by the label, common symptoms of pesticide poisoning, dangers of eating, drinking smoking or toileting while handling or applying the pesticide, and the need to wash clothing worn and to bathe after working with pesticides and the name and location of nearby medical facilities at which emergency treatment for pesticide exposure may be obtained.

What is the number of noncertified applicators working under the direct supervision of a certified applicator at any one time? A certified applicator can only supervise 15 unlicensed applicators at any one time. Are medical examinations, including cholinesterase levels provided for applicators, mixer/loaders or other personnel handling pesticides?

Mixing and Loading: How are spray solutions measured, mixed and loaded? Is the applicator equipment (hoses, pumps, nozzles, etc.) in good operating condition and not leaking? Who mixes and loads the application equipment?

Application: What type of equipment is used? Is it suitable for the intended purpose? Do you have adequate control over pesticide drift? What are the normal operating routines, e.g. timing, maximum wind speed, placement, etc. in which applications are made? How is the equipment calibrated and what is its state of repair? Are nozzles replaced when needed?

Disposal: What is the normal treatment and handling procedures for disposal of bags, cans, drums, etc.? What is done with container rinsates? Have all used containers been triple rinsed or otherwise treated according to label directions? Can containers that are ready for disposal pass a swab test? Where do you dispose of containers—recycle, dump, burned, buried, etc.? What happens to excess spray solutions left over at the end of a daily spray operation? What happens to the washdown water generated from the cleaning of applicator equipment? Do you have excess concentrate or dilute pesticides being held for disposal or other disposition? How is the final disposition to be handled? Will the site pass a pesticide residue analysis? Is the site environmentally sensitive? Are there drainage problems? ■

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