

Worker Protection Standard Clarification

More Courses Affected than Reported Earlier

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The bad news is that more golf course operations than previously thought are covered by the new Worker Protection Standard (WPS) for Agricultural Pesticides. The good news is that President Clinton recently signed a bill delaying implementation of the standard until next year.

According to federal and regional EPA sources, any golf course that produces turfgrass or ornamental plants, even if they are produced for use exclusively on the golf course where they are produced, IS covered by WPS. If these product are purchased from an outside source and planted on the golf course by golf course personnel, the operation is NOT covered by WPS. Only the actual production end of the cycle is covered.

EPA earlier told *Briefing* that only golf course operations that produce turfgrass and ornamentals for general public consumption were covered by the standard. Golf courses that do not produce turfgrass or ornamentals are not affected by the standard.

The WPS requires employers to provide workers with personal protection equipment, safety training and warning signs to protect laborers from hazards stemming from exposure to pesticides.

The agency's logic is that the types of activities involved in golf course turf and ornamental production areas are the same as those targeted in the WPS. Thus, golf course personnel engaged in those activities are required to comply with the standard.

However, Congress has approved a bill to delay the April 15 implementation date of the standard to Jan. 1, 1995. The bill was drafted because those covered under the standard did not know how to comply with the regulation. The bill

also provides that by Sept. 23, 1994, pesticide safety training materials must be developed and distributed.

Also under the bill, specific worker protection requirements that appear directly on the label must be enforced. The label also will contain a restricted entry interval that must be observed. However, if a label states that no re-entry is allowed during the restricted entry interval, the bill provides an exemption to that requirement.

According to the bill, "a worker may enter an area treated with a pesticide during the restricted entry interval specified on the label of the pesticide to perform tasks related to the production of agricultural plants" as long as our conditions are met:

- No hand labor activity is performed;
- No such entry is allowed for the first four hours following the end of the application of the pesticide;
- No such entry is allowed until any inhalation exposure level on the product label has been reached, and
- The personal protective equipment specified on the product label for early entry is provided to the worker in a clean and operation condition.

The bill states that for irrigation work where the only contact with treated surfaces is to the feet, lower legs, hands and arms, protective equipment may consist of coveralls chemical resistant footwear rather than the equipment specified on the label.

The bill also clarifies definitions of "crop advisers," "hand labor," "agricultural employer" and "worker."

For more information about the standard, compliance and effective dates contact GCSAA's government relations program at 913/832-4470.

GREG BRODD
of North Star
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