
Appendix D Inspection Checklists

Inspection Checklist Instructions

The worker protection checklists have been divided into separate checklists, each one addressing a different type of worker protection inspection. These checklist types are as follows:

- Registrant/producer Establishment Inspections
- Marketplace/Dealer Inspections
- Farms/Forests Use inspections
- Nurseries Use inspections
- Greenhouse Use Inspections

These checklists are designed to reflect the order of activities the inspector will engage in while on site. In addition, for use inspection checklists the "**CORE**" questions have been identified for the inspector to ask the employer during the opening interview. The **CORE** questions should be addressed in every **Routine** use inspection. The remaining questions on the use checklists should be addressed if the inspector is conducting a **Comprehensive** worker protection inspection. If a pesticide application is ongoing during the inspector's visit, he/she should immediately proceed to the application site. The checklists are also divided into separate sections which address specific handler, early-entry worker, and the field worker questions. The page numbers on the checklists refer to the Worker Protection Field Pocket Guide.

Inspectors are encouraged to make multiple copies of each checklists, since inspections may involve more than one application site, or more than 4 pesticides. Please ensure that the establishment name, specific application site, and date of inspection are included on each checklist.

Inspectors are also requested to sign each checklist. For all responses which may be in violation of WPS regulations, explain in comment section and attach documentary evidence from the records of pesticide applications at site.



WORKER PROTECTION REGISTRANT/PRODUCER/MARKETPLACE/ DEALER ESTABLISHMENT CHECKLIST

REMINDER FOR INSPECTORS: Present Credentials, Issue Notice of Inspection. All Pesticide Products being sold or distributed by registrants/producers must bear revised WPS labels or in compliance with labeling options provided in PR Notice 93-11 that comply with PR Notice 93-7 after April 21, 1994.

Note: If more than 4 pesticides are sold or distributed by the establishment, copy additional sheets. Page numbers in parentheses refer to Worker Protection Field Inspection Pocket Guide.

Type of Inspection (circle one) Registrant Producer Marketplace Dealer	Firm Inspected (Name and Address): Person Interviewed:	Date of Inspection											
Inspection Tasks	Names of Pesticides and EPA Registration Number												
	1) _____ _____	2) _____ _____	3) _____ _____	4) _____ _____									
	Y	N	N/A	Y	N	N/A	Y	N	N/A	Y	N	N/A	
Label Review: Requirements based on 40 CFR part 156, subpart K (Labeling Statements, P. 11-16)													
VERIFY EACH OF THE FOLLOWING WPS STATEMENTS PRESENT													
1. Application restriction statements (P. 11)													
2. 40 CFR Part 170 reference statements (P. 12)													
3. Product-type ID statements (P. 12)													
4. State restrictions (P. 13)													
5. Spanish warning statements (toxicity I or II P. 13-14)													
6. Restricted-entry statements (P. 14-15)													
7. Notification-to-worker statements (P. 16)													
8. PPE statements (P. 16)													

Enforcement Official Signature: _____ Date: _____



WORKER PROTECTION FARMS/GREENHOUSES/NURSERIES/FORESTS CORE CHECKLIST FOR ROUTINE INSPECTIONS

REMINDER FOR INSPECTORS: Present Credentials, Issue Notice of Inspection

NAME/ADDRESS OF THE ESTABLISHMENT _____	DATE OF INSPECTION:
	SITE: _____ SIZE IN ACRES: _____ FARM NURSERY _____ GREENHOUSE _____ FOREST

* **NOTE: Page numbers in parentheses refer to Worker Protection Field Inspection Pocket Guide.**
Some questions have multiple answers, please check appropriate boxes.

DETERMINATION OF WPS COVERAGE

Name of the agricultural employer/manager/responsible individual(s) interviewed.

Are pesticides with labeling that refers the WPS, used on the establishment for the production of agricultural plants?

YES NO

Does the establishment hire or contract workers to do tasks related to the commercial production of agricultural plants?

YES NO

How many workers are employed? Workers _____ Family Members

Does the establishment hire or contract pesticide handlers or family members to do tasks related to the commercial production of agricultural plants?

YES NO

If the answer to either one or more questions is yes, the employer must comply with the Worker Protection Standard. Request to see Pesticide storage area and record pesticides with WPS label on a separate form/sheet.

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RESPONSIBILITIES OF COVERED EMPLOYERS OF WORKERS AND HANDLERS

(Verify by asking questions or by observations)

1. Where are the EPA WPS safety poster, emergency medical care information (name, address and telephone number of nearest medical facility) and facts about recent pesticide application displayed? Ask to see the location and observe if the information is: **Legible** Yes No
Provided at an **accessible central location**? Yes No
Up-to date? Yes No (p. 43-45)

a. How are workers/handlers informed about the location of this information? (p.42)

b. Is the pesticide safety poster the EPA safety poster? (p. 43-44) Yes No

If answer is no, than take a photograph of the poster and later compare it with EPA safety poster for any WPS required information.

2. How are workers **informed about pesticide applications** and restricted-entry intervals? (p.21-24)

Oral warning? Posted signs? Both?

a. If warning signs used, where are the signs posted? All entrances? Some entrances? None

b. When are the signs put up? 24 hours before the application? After the application?
All the time?

c. When are they removed? Within 3 days after the application? After REI expires?

d. How are warnings given to workers who are unable to understand English? (p. 24)

3. Who is allowed in the treated area during the pesticide application? What steps are taken to ensure that the treated area is vacated by unprotected persons during the application? (p. 24-25)

4. How do you ensure that all workers and handlers who enter a treated area for which a REI is in effect or had expired within 30 days, received **pesticide safety training**? (p. 38-42)

a. Who provides training?

Certified applicator? Trainer of certified applicators? Pesticide handler?
Employer? Others? No training provided?

b. What materials are used for workers? For handlers?

WPS Training material developed by EPA? Equivalent material? Other?

WPS CORE CHECKLIST PAGE 3

5. Is the handler/worker **decontamination site** easily accessible to the workers/handlers? (p. 45-47)
- Is it less than 1/4 mile from where they are working? More than 1/4 mile?*
In the area being treated with pesticides?
- b. Contents of site? (p. 46) *Sufficient water Yes No Soap? Yes No*
Single use towels? Yes No Clean change of clothes (at handler site) Yes No
6. What is the procedure in case of worker/handler injury or illness due to agricultural pesticides? (p. 48)
- a. Who provides **transportation to the emergency medical facility** for worker/handler? Who is responsible for providing information about the pesticide product to medical personnel/victim? (p. 48)
7. Have any WPS pesticide product's poisoning incidents occurred on this establishment?
- Yes No
- If yes, briefly describe the incident.
8. Ask employer to show you **Personal Protective Equipment (PPE)** that is available for use on site by handlers and early entry workers. (p. 32-37)
- a. Who instructs workers/handlers in the proper use of PPE and ensures that PPE is correctly worn by workers/handlers for its intended use? (p. 32-33)
- b. How is PPE cleaned and dried? Is PPE cleaned according to the manufacturer's instructions?
- c. Who cleans and maintains it? What information is given to the person responsible for cleaning the PPE? Does the employer inform them that:
- PPE may be contaminated with pesticides? Harmful effects of exposure to pesticides?*
How to clean PPE correctly?
- e. Who inspects PPE for leaks, holes and any damage? (p. 33)
- f. How often are respirator filters replaced? (p. 34)
9. Where do workers/handlers place their personal clothing when not in use?
- a. Where do they change into and out of PPE? Are they away from pesticide storage and use areas?

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10. Are workers/handlers restricted from wearing home or taking home PPE? (p. 34)
Yes No If yes, explain briefly.
11. What steps are taken to ensure that the mixing, loading, and application equipment is in working order and safe before each use? (p. 37-38)
- a. Who repairs, adjusts, or maintains it? (p. 38)
12. How are early entry workers/handlers **informed about product label requirements** related to human related hazards, first aid and other labeling requirements related to safe use? (p. 31)
13. When does the commercial handler employer provide WPS required information to the site employer about pesticide application? (p. 24)
- a. What information is exchanged? (p. 24-25)

(We recommend that if an application is ongoing during an inspection, use WPS comprehensive checklist.)

REMINDER FOR INSPECTOR: Compliance Assistance may be provided at the end of or during the inspection.

COMMENTS:

**Print Name and Title of Enforcement Official:
Enforcement Official Signature:**



WORKER PROTECTION FARMS/FORESTS/GREENHOUSES/NURSERIES CHECKLIST FOR COMPREHENSIVE INSPECTIONS

REMINDER FOR INSPECTORS: Present Credentials, Issue Notice of Inspection. For Comprehensive inspection use Worker Protection Core Checklist in addition to this checklist.

NAME/ADDRESS OF AGRICULTURAL ESTABLISHMENT TYPE OF ESTABLISHMENT (Circle one) FARM NURSERY GREENHOUSE FOREST	DATE OF INSPECTION: <hr/> NAME OF PESTICIDE/ EPA REG. NO. <hr/> CROP: <hr/> NUMBER OF WORKERS ON THE ESTABLISHMENT <hr/> LOCATION OF WORKERS ON THE ESTABLISHMENT:
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*** NOTE: Page numbers in parentheses refer to Worker Protection Field Inspection Pocket Guide.**

One or more activities may be ongoing on an establishment, inspectors should use the appropriate section of the checklist and check mark appropriate boxes. List pesticides in the storage shed with WPS label on a separate sheet.

INFORMATION THAT MUST BE DISPLAYED AT A CENTRAL LOCATION (The inspectors, should respond to the questions in this section by observing the central location.)

1. What required information is displayed at the Central Location? (p. 43-45)

Application List? Yes No
Safety Poster? Yes No
Emergency information? Yes No

Is it Legible? Yes No
Accessible to Workers/handlers? Yes No
Up-to-date? Yes No

 (In the forest, this location may be near the forest where workers and handlers gather or pass by.)

2. Does the Application list include (p. 45):

The location and description of area? Yes No

Product name, EPA Reg. No., and active ingredient(s) of the pesticide? Yes No

Time and date the pesticide is scheduled to be applied? Yes No

Restricted-entry (REI) for the pesticide? Yes No

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3. Is the pesticide safety poster the EPA safety poster? Yes No

IF the answer is no, than check if any WPS required information is missing. If possible take a photograph of the poster and compare it with EPA safety poster. (p. 43-44)

4. Does the **emergency information**, include, the name, telephone number and address of the nearest medical facility. (P. 45)

Yes No

5. Does the location and description of the treated area allow workers/handlers to distinguish the area from other areas on the establishment? (p. 24)

Yes No

IF APPLICATION IS ONGOING, INSPECTORS SHOULD VERIFY THE FOLLOWING HANDLER ACTIVITY THROUGH QUESTIONS OR OBSERVATIONS

6. Is the handler an employee of: The agricultural establishment? Commercial handling establishment?

List name, address and telephone no. of commercial handler establishment

7. Has the handler(s) been trained: Within the last 5 years as a WPS handler? Yes No
Is currently a certified applicator of restricted-use pesticides? Yes No
Has completed an approved pesticide train-the- trainer program? (p. 40-42) Yes No

State whether handlers have, A certification card? WPS-handler card? Other card?

a. Is card current? Yes No

b. When did training occur, and by whom? _____

c. What training materials were used for handlers? (p. 42)

WPS training materials developed by EPA? Equivalent material? Other?

8. If commercial pesticide handlers are applying the pesticide(s), how and when do they or their employers convey information to the agricultural employer? (p. 24)

Did the commercial handler informed the agricultural employer about:

The specific location and area(s) that are to be treated? Yes No

Time and date of application? Yes No

Product name, EPA Reg. No., active ingredients, restricted-entry interval for the pesticide? Yes No

Whether the pesticide labeling requires both oral warnings and treated-area posting? Yes No

Any other specific requirements on the labeling requirements? Yes No

WPS COMPREHENSIVE CHECKLIST PAGE 3

9. Did the handler receive information about the labeling requirements by the agricultural employer and have access to the pesticide labeling during the entire handling task? (P. 32) Yes No or
- a. Did the handler read the label? Yes No
10. How is the handler instructed on how to safely and correctly use all pesticide handling equipment? (P. 37)

INSPECTOR SHOULD VERIFY THE FOLLOWING THROUGH OBSERVATIONS OR QUESTIONS (Handlers)

11. Ask, what precautions does the agricultural employer/handler take during pesticide applications so as not to contact anyone directly or through drift?
- a. Was everyone except appropriately trained and equipped handlers kept out of areas being treated with pesticides? Yes No If anyone exposed, list names and designation. (P. 25)
- In **nurseries and greenhouses**, were the workers prohibited from entering the treated area and any required border area. (p. 26-28) Yes No
12. When handling a highly toxic pesticide or a **pesticide bearing the skull and crossbones** symbol on the label, how is the handler monitored: Once every 2 hours by sight? By voice communication? Not monitored? (P. 32)
13. **GREENHOUSE:** Did employer make sure that the ventilation criteria was met (when required by the label) before handlers/workers were allowed to enter the treated area? (p. 28-29) Yes No If answer is no, describe the incident.
14. **GREENHOUSE:** If a fumigant is being applied, is the handler monitored: By another handler By a worker Was it by: Constant visual contact? Voice contact? Not monitored?
15. According to the label of the pesticide being applied what PPE, if any, was the handler required to wear during application? (List PPE handler wore. P. 32-34)
- a. Ask, who cleans and maintains the PPE? Handler Somebody else .
- b. Observe if the PPE is correctly worn by the handlers for its intended use. (p. 32) Yes No
16. If handlers are using (1) closed system, (2) enclosed cab, (3) open cockpit, or (4) closed cockpit, was less than the label-specified PPE worn? If so, list PPE worn. (P. 34-37)
17. If the handler is using a product that requires protective eyewear, does the handler have:
- Immediate access to water for eye flushing?*
- One pint of emergency eyeflush water in dispenser?*
- Eyeflush water at a decontamination site?* (P. 46)

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18. Is the handler decontamination site easily accessible to the handler? (p.45-46) Yes No
Is it: *Within 1/4 mile from where the handler is mixing/applying pesticides?* *More than 1/4 mile?*
In the area being treated with pesticides?
- a. Is each decontamination site equipped with:
Soap? *Single-use towels?*
A clean change of clothing? *Sufficient water for entire body wash? (Suggested amount 3 gal/handler/day.)*
Running tap water? *Water in container?* (P. 46-47)
19. Do the handlers have a clean place to remove their PPE? Yes No

IF ANY AREA IS UNDER RESTRICTED-ENTRY INTERVALS (REI), THEN VERIFY THE FOLLOWING EARLY-ENTRY ACTIVITIES THROUGH QUESTIONS

QUESTIONS FOR EARLY-ENTRY WORKERS

20. Were any workers other than trained and equipped handlers in the treated area during application or the REI, or in contact with any treated surface such as soil, water, plant? (Document worker exposure) (p. 24)
21. How were the early-entry workers informed about application of the pesticide and any restricted entry interval? (Depending on the labeling of the pesticide.) Oral warning? Posted signs? Both?
If the warning signs are used, where are the signs posted? **Farms:** All entrances where workers usually enter?
 Each access road? Each border with any labor camp, adjacent to treated area?
Greenhouses: Were signs visible at all usual points of worker entry to the treated area? Yes No
22. If oral warning, when was the warning given? *Before the application of pesticide?* *After the application of pesticides?* *No oral warning given?* (P. 24)
23. How soon after application did the worker enter treated area? *At least 4 hours?* *after any inhalation exposure level listed on the label was reached?* *2 hours after the application?* (p. 30)
a. How long had they been working in the field? *2 hours* *No more than 1hr/24 hr* (p. 30)
24. Was there early entry into a treated area by workers under the following exceptions: (p. 30)
a. If short-term tasks:
Last less than 1 hour and did not involve hand labor?
Last more than 1 hour?
Involves hand labor?
- b. If an Agricultural emergency exception, what agency (State, Tribal, Federal) declared that circumstances exist that might cause an emergency on the establishment?
- c. What was the emergency? (p. 30)

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25. How does the agricultural employer ensure that all workers who enter a treated area for which a REI is in effect or had expired within 30 days, received pesticide safety training? (p. 38-40)
- Do they have: *A certification card* *WPS worker card?* *Other card?* *No card?*
- a. Who provides training? (p. 38-39) *Certified applicator?* *Trainer of certified applicators?*
Pesticide Handler? *Employer?* *No training provided?*
- b. What materials are used? (P. 42) *WPS Training material developed by EPA?* *Equivalent material?*
26. How has each early-entry worker been informed about the safety information and instructions on the labeling of the pesticide to which the REI applies? (P. 30-31)
- a. Did the agricultural employer assure the early entry worker was informed in a manner in which they could understand the information? (p.38)
27. How were they instructed to prevent, recognize, and give first aid for heat illness? (P. 34)
28. How did early entry workers receive instructions on how to correctly put on, use and take off PPE? (p. 32-33)
- a. When and who instructed the workers? (p. 31)
29. Is the treated area posted? (p. 23) Yes No *Can the sign be seen at all entrances to treated areas?*
At the entrance from the labor camps? *Was the EPA sign used?*
Was it legible? *Was it 14"x 16" (unless area too small for such size sign)?*
Posted during application and entire REI?
30. Were the workers provided PPE required by the pesticide labeling for early entry tasks? (list PPE used)(p. 32)
31. Is a decontamination site accessible to the early-entry workers? (p. 46) Yes No
Is it within 1/4 mile from where they are working? *More than 1/4 mile?*
Located in the area that remains under an REI?
32. Is it equipped with: *Sufficient water for routine washing?* *Emergency eyeflushing water?*
Soap? *Single-use towels?* (p. 46-47)

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33. If pesticide labeling requires protective eyewear, do the workers have: *Immediate* access to eyeflush water?
- Running water?*
Eyeflush dispenser? (p. 46)
34. Do the workers have a clean place to remove their PPE? Is that place equipped with soap, clean towels and water for thorough washing? (P. 46-47) Yes No
35. Are workers aware of central location, which contains the safety poster, emergency information and notice of pesticide applications? (P. 43) Yes No
36. Did site employer took any action to prevent or discourage any worker from complying with worker protection requirements (Such as use of PPE, decontamination site, and asking for emergency assistance)? (p. 49)

REMINDER FOR INSPECTOR: Provide Compliance assistance information at end of or during inspection.

COMMENTS:

Print Name and Title of Enforcement Official:

Enforcement Official Signature: _____

Date: