



WPS Inspection Manual

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WPS Inspection Manual

- WPS Inspection Manual last revised in 2012
- First draft of revised manual shared with Regions, States
- Comments worked through AAPCO/SFIREG's WPS Workgroup
- Revised manual issued January 2017
- Living document to be updated and revised



Definitions

- WPS inspection
 - Covers all applicable requirements
 - Includes worker and handler interviews if possible
- Types of WPS inspections
 - Routine
 - For Cause
 - *No “focused” inspection at this time*
- Timing
 - Tier I -- within the time frame that begins when pesticides are applied and extends to 30 days after the expiration of the REI for the last pesticide used
 - Tier II – any other time



Structure of WPS Inspection Manual

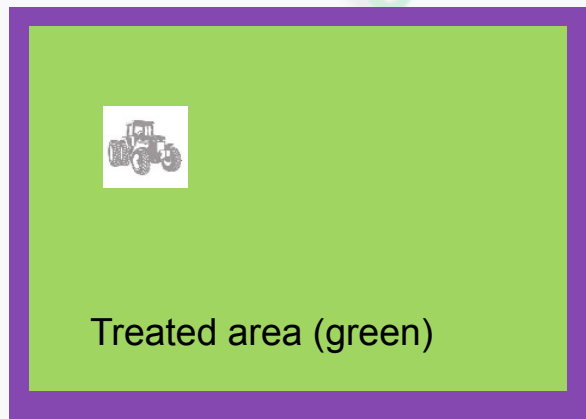
- Opening Conference
- Review Pesticide Labels
- Record Review (Application and SDSs, Safety Training, Respirator Records)
- Employer/Supervisor Interviews
- Worker, Handler Interviews
- Exit Conference
- Post Inspection Activities

- Appendices:
 - Sample checklists
 - OSHA requirements adopted through WPS
 - AEZ information (includes interpretive policy statement)



AEZs in Outdoor Production

OLD Regs



Existing (nurseries) & proposal: Entry-restricted area (ERA) is in purple

NEW Regs



Final: Application exclusion zone (AEZ) is in purple



Application Exclusion Zone (AEZ)

“I can’t determine compliance unless I actually witness the application”

Gather right information and establish facts

- Application details (product, spray equipment, spray quality, crop, weather conditions)
- Ask Handler, “Was anyone nearby during the application? Where?”
- Ask Worker, “Where were you during the application? Were you directed to stay there?”
- Witness statements “Where were you during application?”



Respirators

"I'm not an OSHA inspector, or a respirator expert!"

- OSHA regs ARE the EPA regs
- Gather application information – such as what respirator was required for the application?
- Compare to respirator records – do any handlers have medical clearance for this respirator? Has the handler been fit tested successfully? Has the handler been trained in the use of the respirator?
- Interview handler on use and care of the respirator



Minimum Age

“What about privacy concerns?”

“I can’t ask for PII! Do I ask everyone for their age?”

- Ask for age where there clearly appears to be an under age handler or early entry worker
- Handler or worker do not need to provide proof of age to inspector
- Employers are ALL required to have documented employees’ age and how age was verified (I-9 Form)



WPS 5700 Reporting Template

Enforcement Accomplishments This Reporting Year	WPS Tier I		WPS Tier II		Total
	Use	For Cause	Use	For Cause	
Total Inspections Conducted					0
Samples Collected	Physical				0
	Documentary				0
Civil Complaints Issued					
Criminal Actions Referred					
Administrative Hearings Conducted					
License/Certificate Suspension					
License/Certificate Revocation					
License/Certificate Conditioning or Modification					
Number of Warnings Issued					
Stop-Sale, Seizure, Quarantine or Embargo					
Cases Forwarded to EPA for Action					
Other Enforcement Actions					
Number of Cases Assessed Fines					



WPS 5700 Reporting Template

Violations During WPS Inspections	# of Violations
1 Pesticide Safety Training	
2 Central Posting	
3 Notice of Application	
4 Entry Restrictions	
5 Personal Protective Equipment	
6 Mix/Loading, Application Equip & Applications	
7 Decontamination	
8 Emergency Assistance	
9 Information Exchange	
10 Retaliation	
Total Violations	

Record keeping

Respirator req's

Minimum age

Designated rep's



Questions?

**Contact the SFIREG WPS
Workgroup and raise questions/
issues to the WPS contact(s) at your
EPA regional office.**