

Florida Department of Agriculture and Consumer Services
Division of Agricultural Environmental Services

Agricultural Workers Safety Program



WPS Train-The-Trainer

Training Criteria &

Curriculum

July 21, 2016

TABLE OF CONTENTS

Overview:.....	1
Rationale:	2
<u>TTT Training Curriculum Outline</u>	
I. BASIC PESTICIDE INFORMATION AND REGULATIONS.....	2
II. THE WORKER PROTECTION STANDARD (WPS).....	2-4
III. WPS AGRICULTURAL WORKER AND PESTICIDE HANDLER TRAINING	4-8
IV. HOW TO CONDUCT TRAINING	8-10
V. FDACS WPS INSPECTION- ENFORCEMENT PERSPECTIVE.....	10-11
VI. RESOURCES.....	11
VII. HELPFUL WEBSITES	12
VIII. CONTACT INFORMATION	12



**FLORIDA AGRICULTURAL WORKERS
SAFETY PROGRAM**

**WPS Train-the-Trainer
Training Criteria & Curriculum**

Overview:

The United States Environmental Protection Agency (EPA) established the Worker Protection Standard regulation (WPS), under Code of Federal Regulations (CFR) 40, part 170 in 1992. In 2004, the Florida Department of Agriculture and Consumer Services (FDACS) incorporated references to the WPS into Chapter 487 Part II, Florida Statutes, the Florida Agricultural Worker Safety Act (FAWSA), and adopted 40 CFR, Part 170 in Rule 5E-2.039, Florida Administrative Code. Under FAWSA, agricultural employers must ensure that agricultural workers employed in the state of Florida receive protection from agricultural pesticides and are provided information concerning pesticides. Consequently, FDACS is obligated to assure that the Train-the-Trainer (TTT) curriculum for trainers comprises complete and accurate pesticide safety information that can be delivered effectively to agricultural workers (workers) and pesticide handlers (handlers) during their training sessions.

EPA completed revisions to the existing WPS in 2015, to further reduce potential occupational pesticide exposure and incidents of related illness among workers and handlers covered by the rule, and to protect bystanders and others from exposure to agricultural pesticides. The new rule specifies in Parts 170.401 and 170.501, of 40 CFR, training information that is to be covered and the criteria required to qualify a trainer to train workers and handlers. According to the revised requirements, persons who conduct the training must either be designated as a trainer of certified applicators, handlers, or workers by EPA or the State or Tribal agency responsible for pesticide enforcement; or have completed an EPA-approved pesticide safety train-the-trainer program for trainers of workers or handlers; or be currently certified as an applicator of restricted use pesticides (RUPs). EPA's revised WPS was published as a final rule on November 2, 2015 and the requirement to complete an EPA-approved TTT program for persons other than licensed RUP applicators who are seeking to become trainers of workers and handlers became effective on January 2, 2017. Program curricula must follow the guidance material developed by EPA in order to meet requirements for EPA approval. The following training criteria conform to the guidance developed by EPA and summarize basic WPS provisions, elements of FAWSA, training requirements, general training techniques, information on training preparation, and relevant WPS enforcement topics. The Florida Agricultural Worker Safety program maintains records and issues Certificates of Completion to trainees who have completed an EPA approved TTT program satisfying these criteria. Updating TTT courses with the revised information is important in maintaining trainers' skills and knowledge, and ensuring the continued quality of trainings provided to safeguard Florida's agricultural workers.

Rationale:

It is the mission of the Florida Department of Agriculture and Consumer Services to promote pesticide safety in order to prevent and reduce pesticide exposure and related illness.

TTT Training Curriculum Outline

I. BASIC PESTICIDE INFORMATION AND REGULATIONS

Objective: To provide general information on pesticide toxicity and hazards, and WPS and FAWSA regulations.

- a) *What is a pesticide?*
- b) *Pesticide toxicity*
- c) *Hazards associated with pesticide use. Acute effects. Chronic effects. Delayed effects. Sensitization*
- d) *Pesticide labels - Agricultural Use Requirements*

II. Overview of applicable federal and state regulations (Worker Protection Standard and Florida Agricultural Worker Safety Act). What are WPS and FAWSA? Pesticide Labels. Safety Data Sheets.

Objective: To cover general WPS provisions, emphasizing the Standard's major goals; protection of agricultural workers, providing information, and mitigation practices.

- a) *Relationship between WPS and the Occupational Safety and Hazard Agency (OSHA)*
- b) *WPS scope and purpose*
- c) *Who is an Agricultural Employer? - Applicability*
- d) *Who is an Agricultural Worker or Pesticide Handler?*
- e) *Definitions. Key definitions:*
 - 1) *Enclosed space production and outdoor production*
 - 2) *Designated representative*
 - 3) *Enclosed cab*
 - 4) *Closed System*
 - 5) *Crop Advisor*
 - 6) *Employ*
- f) *Agricultural employer duties*
- g) *Agricultural worker duties*
- h) *Commercial pesticide handler employer duties*

i) *WPS Framework. (3) major goals:*

1) *Goal Number 1: Protect Agricultural Workers and Pesticide Handlers*

- i. *Application exclusion zones (AEZs):* Key concepts: Establishes AEZs based on distance from the application equipment for farms, forests, and nurseries. During an application, an agricultural employer must keep workers and other persons out of the treated area or AEZ that is within the boundary of the agricultural establishment owner's property.
- ii. *Handlers must temporarily suspend the application.* Key concepts: Handlers must temporarily suspend application if a worker or other person is in the AEZ. Application can continue when persons move out of the AEZ. Not limited to boundaries of an agricultural establishment.
- iii. *Restrictions during and after applications (Re-entry Intervals or REIs):* Key concepts: restrictions during and after applications - special application restrictions on enclosed space production and outdoor production, re-entry intervals, Early-Entry workers, early-entry restrictions, short term tasks, limited-contact tasks, emergency tasks, and other specific tasks. PPE for early-entry activities.
- iv. *Further Requirements for Employers of Pesticide Handlers:* Key concepts: handlers using highly toxic pesticides, monitoring handlers, specific instructions for handlers, equipment safety, Personal Protective Equipment (PPE). Use of respirators, training, fit testing and medical evaluation. Exceptions to PPE requirements. Minimum age requirements.

2) *Goal Number 2: Provide Information*

- i. *Information at a Central Display Location:* Key concepts: Display of Pesticide Safety Information, content, emergency information and retention of pesticide application records. Keeping and displaying pesticide application and hazard information (Safety Data Sheets or SDS).
- ii. *Pesticide Safety Training:* Key concepts: General requirements, exceptions, training programs, trainer qualifications and recordkeeping.
- iii. *Notification of applications:* Key concepts: Oral and posted notification according to label direction. General requirements, warning sign requirements, timing, enclosed space production and outdoor production specific instructions. Exceptions.
- iv. *Information Exchange:* Key concepts: Commercial pesticide handler employer duties. Commercial pesticide handlers, information for agricultural establishment operators, and information for commercial handler employers.

3) Goal Number 3: Mitigation

- i. Decontamination supplies for workers and handlers: Key concepts: Requirements. General conditions, water, soap, single use paper towels, eyewash (one pint), clean change of clothing, location, immediately accessible, within ¼ mile, for 30 days after REI.
- ii. Emergency eye-flushing: Key concepts: Mixing or loading pesticide products with labeling that requires protective eyewear or using a closed system operating under pressure. System capable of delivering gently running water for at least 15 minutes.
- iii. Emergency Assistance: Key concepts: Making transportation promptly available to an operating emergency medical care facility. Providing emergency information to the treating medical personnel including: copies of safety data sheets (SDS), pesticide product name(s), EPA registration number(s) and active ingredient(s), the circumstances of application or use of the pesticide, and the circumstances that could have resulted in exposure.
- iv. Heat related illness: How to recognize, prevent, and provide first aid treatment for heat-related illness.

j) Exemptions

- 1) Owner and immediate family exemption.
 - i. Immediate family members covered. Definition
 - ii. Establishments covered. Majority ownership versus wholly owned.
- 2) Certified crop advisor exemptions

III. WPS AGRICULTURAL WORKER AND PESTICIDE HANDLER TRAINING

Objective: To cover qualifications for trainers, and required content of training information to be provided for workers and handlers. Training administration requirements. Recordkeeping.

- a) Qualifications for agricultural worker and pesticide handler trainers - WPS trainers must meet at least one of the following criteria:
 - 1) Certified as an applicator of Restricted Use Pesticides.
 - 2) Have completed a Train-the-Trainer Program that meets the State requirements (i.e., EPA-approved TTT course).
 - 3) Be designated as a trainer by EPA or the State or Tribal agency responsible for pesticide enforcement.
- b) Training and retraining intervals and grace period for workers.
 - 1) Annual training for workers and handlers.
 - 2) No grace period.

- 3) *Workers must be trained before they enter an area that has been treated with a pesticide or where an REI has been in effect within the last 30 days.*
- 4) *Handlers must be trained before they perform any handling task.*
- c) *Training administration requirements. The materials to be presented must follow, for workers (40 CFR 170.401(c)(1)), and/or for handlers, (40 CFR 170.501(c)(1)), in order to meet the WPS requirements for these trainings.*
 - 1) *Training must be provided either orally from written materials or audio-visually.*
 - 2) *Training must be provided in a manner the worker or handler can understand.*
 - 3) *The following training administration requirements apply starting January 2, 2017:*
 - i. *Training materials for workers or handlers must be approved by EPA.*
 - ii. *Workers must be trained before they enter an area that has been treated with a pesticide or where an REI has been in effect within the last 30 days. Handlers must be trained before they perform any handling task.*
 - iii. *A qualified trainer must be present during the training session to respond to any questions.*
- d) *Recordkeeping requirements. Agricultural employers must keep training records for their workers and handlers to verify training. These can help keep track of training and expiration dates, and who has been trained. In addition, these records can be reviewed during a WPS inspection. There are several recordkeeping examples created by Federal and State agencies that can be used to illustrate training recordkeeping.*
 - 1) *Employers must provide a copy of the training record to each worker or handler upon his or her request.*
 - 2) *The record must include:*
 - i. *The trained handler's or worker's printed name and signature.*
 - ii. *Date of the training.*
 - iii. *Information identifying which EPA-approved training materials were used.*
 - iv. *Trainer's name and qualification to train (e.g., certified applicator license number, TTT course information).*
 - v. *Worker or handler employer's name.*
- e) *Content of worker training (23 points) – Agricultural worker training must meet at a minimum, the following criteria:*
 - 1) *The responsibility of agricultural employers to provide workers and handlers with information and protections designed to reduce work-related pesticide exposures and illnesses. This includes ensuring that workers and handlers have been trained on pesticide safety; providing pesticide safety, application, and hazard information; decontamination*

supplies; emergency medical assistance; and notifying workers of restrictions during applications and on entering pesticide treated areas. A worker or handler may designate, in writing, a representative to request access to pesticide application and hazard information.

- 2) How to recognize and understand the meaning of the posted warning signs used for notifying workers of restrictions on entering pesticide treated areas on the establishment.*
- 3) How to follow directions and/or signs about keeping out of pesticide treated areas subject to a restricted-entry interval and about application exclusion zones.*
- 4) Where and in what forms pesticides may be encountered during work activities, and potential sources of pesticide exposure on the agricultural establishment. This includes exposure to pesticide residues that may be on or in plants, soil, tractors, application and chemigation equipment, or used personal protective equipment, and that pesticides may drift through the air from nearby applications or be present in irrigation water.*
- 5) Potential hazards from toxicity and exposure that pesticides present to workers and their families, including acute and chronic effects, delayed effects, and sensitization.*
- 6) Routes through which pesticides can enter the body.*
- 7) Signs and symptoms of common types of pesticide poisoning.*
- 8) Emergency first aid for pesticide injuries or poisonings.*
- 9) Routine and emergency decontamination procedures, including emergency eye flushing techniques. In the event that pesticides are spilled or sprayed on the body, the use of decontamination supplies to wash immediately or rinse off in the nearest clean water. The use of springs, streams, lakes or other sources for decontamination purposes if more readily available than decontamination supplies. The need to follow decontamination procedures, and as soon as possible to wash or shower with soap and water, shampoo hair, and change into clean clothes.*
- 10) How and when to obtain emergency medical care.*
- 11) When working in pesticide treated areas, the need to wear work clothing that protects the body from pesticide residues and wash hands before eating, drinking, using chewing gum or tobacco, or using the toilet.*
- 12) Wash or shower with soap and water, shampoo hair, and change into clean clothes as soon as possible after working in pesticide treated areas.*
- 13) Potential hazards from pesticide residues on clothing.*
- 14) Wash work clothes before wearing them again and wash them separately from other clothes.*
- 15) Do not take pesticides or pesticide containers used at work, to your home. Risks associated with the use of agricultural pesticides at home.*

- 16) *Safety data sheets that provide hazard, emergency medical treatment, and other information about the pesticides used on the establishment that they may come in contact with. The responsibility of agricultural employers to do all of the following:*
 - i. *Display safety data sheets for all pesticides used on the establishment.*
 - ii. *Provide workers and handlers information about the location of the safety data sheets on the establishment.*
 - iii. *Provide workers and handlers unimpeded access to safety data sheets during normal work hours.*
 - 17) *The rule prohibits agricultural employers from allowing or directing any worker to mix, load, or apply pesticides, or assist in the application of pesticides unless the worker has been trained as a handler.*
 - 18) *The responsibility of agricultural employers to provide specific information to workers before directing them to perform early-entry activities. Workers must be at least 18 years old to perform early-entry activities.*
 - 19) *Potential hazards to children and pregnant women from pesticide exposure.*
 - 20) *Keep children and non-working family members away from pesticide treated areas.*
 - 21) *After working in pesticide treated areas, remove work boots or shoes before entering your home, and remove work clothes and wash or shower before any physical contact with children or family members.*
 - 22) *How to report suspected pesticide use violations to the State or Tribal agency responsible for pesticide enforcement.*
 - 23) *The rule prohibits agricultural employers from intimidating, threatening, coercing, or discriminating against any worker or handler for complying with, or attempting to comply with the requirements of this rule. No retaliatory action can be taken because the worker or handler provided, caused to be provided, or is about to provide information to the employer or the EPA or its agents regarding conduct that the employee reasonably believes violates this rule, and/or because the worker or handler made a complaint, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing concerning compliance with this rule.*
- f) *Content of pesticide handler training (23 previous topics + 13 additional items)*
– *Pesticide handler training must meet at a minimum, the following criteria:*
- 1) *All the topics required in worker's training (23 topics).*
 - 2) *Information on proper application and use of pesticides.*
 - 3) *Handlers must follow the portions of the labeling applicable to the safe use of the pesticide.*
 - 4) *Format and meaning of information contained on pesticide labels and in labeling applicable to the safe use of the pesticide.*

- 5) *Need for, and appropriate use and removal of all personal protective equipment.*
- 6) *How to recognize, prevent, and provide first aid treatment for heat-related illness.*
- 7) *Safety requirements for handling, transporting, storing, and disposing of pesticides, including general procedures for spill cleanup.*
- 8) *Environmental concerns, such as drift, runoff, and wildlife hazards.*
- 9) *Handlers must not apply pesticides in a manner that results in contact with workers or other persons.*
- 10) *The responsibility of handler employers to provide handlers with information and protections designed to reduce work-related pesticide exposures and illnesses. This includes providing, cleaning, maintaining, storing, and ensuring proper use of all required personal protective equipment; providing decontamination supplies; and providing specific information about pesticide use and labeling information.*
- 11) *Handlers must suspend a pesticide application if workers or other persons are in the application exclusion zone.*
- 12) *Handlers must be at least 18 years old.*
- 13) *The responsibility of handler employers to ensure that handlers have received respirator fit-testing, training, and a medical evaluation if they are required to wear a respirator by the product labeling.*
- 14) *The responsibility of agricultural employers to post treated areas, as required by the rule.*

IV. HOW TO CONDUCT TRAINING

Objectives: To provide information on how to prepare for a training session and provide some useful tools that can contribute to the success of the WPS Training activity.

a) Preparing to train:

- 1) *Realities of agricultural workers. By understanding the realities of the agricultural workers' lives, the trainer will be better able to identify possible training challenges.*
- 2) *Steps to prepare for training.*

Training preparation includes many steps and takes time, but proper preparation leads to more effective and successful training sessions.

- i. *Identify workers and handlers to be trained. The agricultural employer must identify all untrained workers and handlers that need training before the training has begun. The agricultural employer must assure that workers and handlers receive the proper training annually.*
- ii. *Crops and Cropping Cycles - It is important to be familiar with cropping cycles, seasonal labor requirements, and typical tasks of the workers and handlers to be trained.*

- iii. *Profile of the Workforce - Know your audience. Be prepared to provide information to low literacy audiences. Use easily readable text in the language known by the participants, frequent repetition, revision, and use simple terms that are familiar to the audience. Encourage participation. Also be ready to spend more time and go over important topics.*
- iv. *Select and Review Training Materials - Successful training requires appropriate use of material for an effective presentation. Select the appropriate language and use a translator if necessary.*
- v. *Assess your audience - Trainers should obtain general information concerning their audience, such as if participants are migrant, seasonal, or year-round workers or handlers. This background information can help the trainer make training more appropriate for them.*
- vi. *Schedule the training - When and Where? Scheduling training sessions may be challenging. Training should be scheduled at a time convenient for the workers and handlers and the employer.*
- vii. *Location - Select a suitable training location that works for your training methods and is comfortable for the workers and handlers. The location must be reasonably free from distraction and conducive to training. If possible the location should have shade and adequate seating. The training location will influence the training method to be used.*
- viii. *Recognize and respond to cultural differences or sensitivities. Manifest empathy for other cultures, recognize and accept differences. Also be objective and don't hold preconceptions about other cultures. This will allow you to recognize similarities and differences, and respond with empathy.*

b) *Training Techniques:*

Objectives: To provide general information to prepare for a training session including training techniques that can help the trainer deliver their presentation in a manner workers and handlers can understand.

- 1) *Be prepared - Know your material! (Being confident is the best thing you can do for your audience and presentation).*
- 2) *Create a positive environment for learning - (Take control, arrange the room, and show your face. Help agricultural workers feel comfortable. Qualified trainers must be present during the entire training program to answer questions).*
- 3) *Effective public speaking - (Part of your ability to be a good trainer depends on your public speaking techniques).*
- 4) *Understand how adults learn - (Adult learning is most effective when realistic problems and problem solving are used as training techniques).*

- 5) *Design your training sessions - (You can only be effective if your training session holds the attention of the workers and handlers. The more interactive you make it, the more interesting and effective it will be!)*
- 6) *Provide Interactive Training*
 - i. *Use visuals*
 - ii. *Ask questions*
 - iii. *Stay Focused*
 - iv. *Encourage participation*
 - v. *Practical, relevant, and useful training*
- 7) *Examples of training techniques: There are a variety of training techniques and resources that can help you provide an effective WPS training session for agricultural workers. There are advantages and disadvantages of each that must be discussed in the TTT session.*
 - i. *Discussion*
 - ii. *Illustrations*
 - iii. *Case Studies*
 - iv. *WPS Flip Chart*
 - v. *Role-Playing*
 - vi. *Audiovisual Presentations*
 - vii. *Relating to personal experiences*
 - viii. *Educational Games*
- 8) *Approved training materials - WPS materials must be approved by EPA. These materials are available from EPA, FDACS, and other private commercial entities.*
- 9) *Inclusion of pre- and post-training test-survey of the training to assess knowledge gained and for course improvement.*
 - i. *Allocate sufficient time for questions and answers*
 - ii. *Review essential concepts*
 - iii. *Review pesticide safety procedures, taking into consideration the particularities of each location.*

V. FDACS WPS INSPECTION - ENFORCEMENT PERSPECTIVE

Objectives: To provide information on the state and federal enforcement of the WPS regulation, most common violations, and possible actions taken by FDACS concerning violations. Trainees should understand how to conduct a WPS compliance self-evaluation for the agricultural employer.

- a) *FDACS has the authority to conduct inspections, under Chapter 487, Florida Statutes.*
 - 1) *WPS qualification/determination as to when to conduct an inspection:*
 - i. *When a pesticide has been applied on an agricultural establishment and the label contains an Agricultural Use Requirements section.*

- b) *How to be prepared for a WPS Inspection in the state of Florida - self-evaluation is the best way! (Use the WPS Inspection Report Form as a resource, available from Ricardo Davalos, Florida Worker Safety Program Coordinator, Bureau of Scientific Evaluation and Technical Assistance, 850-528-5402).*
 - 1) *Keep records readily available and updated to help expedite the inspection process.*
 - 2) *Review your WPS requirements.*
- c) *The most common WPS violations in the state of Florida and nationwide – Provide comparative information on the most common WPS violations as noted through FDACS inspections, to lead to an open discussion. Provide up-to-date information regarding national trends that can be obtained through the link for the Worker Protection Standard Inspection and Enforcement Accomplishments Report and/or EPA Dashboard for WPS. For State information, contact the Bureau of Inspection and Incident Response, 850-617-7996 or Ricardo Davalos, Florida Worker Safety Program Coordinator, Bureau of Scientific Evaluation and Technical Assistance, 850-528-5402.*
- d) *First time violation situations that may result in a fine for the grower - This section gives an idea of the potential enforcement action that may be taken if an agricultural employer is found in violation.*
 - 1) *Failure to comply with the entry restrictions associated with pesticide applications*
 - 2) *Failure to provide oral and posted notification of worker entry restrictions*
 - 3) *Failure to provide label-required PPE*
- e) *Other first time violators may only receive a warning letter.*
- f) *Protections against retaliation*
- g) *Any optional enforcement related information that the instructor would like to include.*

VI. RESOURCES:

1. *Federal Register, Part II Environmental Protection Agency 40 CFR Part 170. Vol. 80 No. 211 November 2, 2015.*
2. *Florida Pesticide Law and Rules, Chapter 487, Florida Statutes.*
3. *WPS Train-The-Trainer Programs. Approval Process and Criteria. Environmental Protection Agency. May 25, 2016.*
4. *National Association of State Departments of Agriculture Foundation, (NASDAF). National Worker Safety Trainer Handbook Pesticide Safety for Agricultural Workers, EPA Cooperative Grant X8-83235401, year 2007.*
5. *Train The Trainer Manual, Pesticide Safety for Agricultural Workers. EPA/CAST pilot Training Project 2003*

VII. HELPFUL WEBSITES:

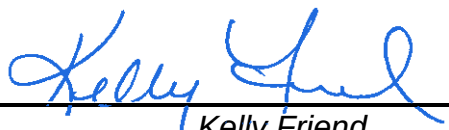
1. FDACS Agricultural Worker Safety Program.
<http://www.freshfromflorida.com/Business-Services/Agricultural-Worker-Safety-FAQ>
2. FDACS Agricultural Environmental Services.
<http://www.freshfromflorida.com/Divisions-Offices/Agricultural-Environmental-Services>
3. Environmental Protection Agency. Occupational Pesticide Safety and Health
<https://www.epa.gov/pesticide-worker-safety>
4. Florida Pesticide Law and Rules, Chapter 487
http://www.leg.state.fl.us/statutes/index.cfm?App_mode=Display_Statute&URL=0400-0499/0487/0487.html
5. University of Florida/ IFAS. Pesticide Information Office.
<https://pested.ifas.ufl.edu/>
6. Environmental Protection Agency, Enforcement and Compliance History Online (ECHO).
<https://echo.epa.gov/>
7. Pesticide Educational Resources Collaborative (PERC). Training Resources for the Worker Protection Standard 2016.
<http://www.pesticideresources.org/>

VIII. CONTACT INFORMATION:

For more information or to request WPS materials, please contact the Agricultural Workers Safety Program Coordinator, **Ricardo Davalos**, at the following:

Agricultural Workers Safety Program
7950 Dani Dr. Suite 140 PMB# 24
Fort Myers, FL 33966
Phone Number: (850) 528-5402
E-mail address: wps@freshfromflorida.com
Ricardo.Davalos@freshfromflorida.com

EPA has approved this train the trainer material for training trainers of agricultural workers and pesticide handlers in accordance with the expanded training requirements of the amended WPS rule published November 2, 2015 (40 CFR 170). The EPA approval number is **EPA WPS TTT W/H 00003**.



Kelly Friend
Assistant Division Director,
Division of Agricultural
Environmental Services



Davis Daiker
Bureau Chief, Scientific Evaluation and
Technical Assistance



Neil Richmond
Bureau Chief, Inspection and
Incident Response



Ricardo Davalos
Coordinator,
Worker Safety Program

Approved on: August 25, 2016

EPA Approved Train The Trainer No.: EPA WPS TTT W/H 00003

Effective on: September 1, 2016

Revised on: July 21, 2016