

Florida Department of Agriculture and Consumer Services
Division of Environmental Services
Agricultural Workers Safety Program



WPS Train-The-Trainer
Training Criteria & Curriculum

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Florida Department of Agriculture and Consumer Services
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Bureau of Compliance Monitoring

FLORIDA AGRICULTURAL WORKERS SAFETY PROGRAM



WPS Train-the-Trainer Training Criteria & Curriculum

Overview:

The United States Environmental Protection Agency established the Worker Protection Standard Regulation (WPS), Code of Federal Regulations 40 Part 170 in 1992. In 40 C.F.R. Parts 170.130 and 170.230, of the regulation states what training information is to be covered and what criteria is accepted to qualify a trainer to train agricultural workers and handlers. In 2004, the Florida Department of Agriculture and Consumer Services (FDACS) adopted by rule The Environmental Protection Agency's WPS regulations into the Florida Pesticide Law and Rules, Chapter 487 Part II (FAWSA). This regulation states *that a trainer means any person who is qualified to train workers under the pesticide safety training requirements of the United States Environmental Protection Agency Worker Protection Standard, 40 C.F.R.s.170.130*. Under FAWSA agriculture employers must ensure that agricultural workers employed in the state of Florida receive protection from agricultural pesticides and information concerning pesticides. As a result FDACS is obligated to ensure that the Train-the-Trainer (TTT) criteria and curriculum for Trainers addresses accurate pesticide safety information that will be delivered to the agricultural workers and pesticide handler in their training sessions.

The WPS TTT basic criteria has been adopted from the NASDAF (National Association of State Departments of Agriculture Foundation) National Worker Safety Trainer Handbook and the EPA How to Comply Manual with the Worker Protection Standard for Agricultural Pesticides, Revised September 2005.

The following criterion summarizes basic WPS provisions, FAWSA requirements, training requirements, general training techniques, information on training preparation and briefly discusses some WPS enforcement hot topics. The Florida Agricultural Worker Safety program shall keep records and issue Certificates of Completion of trainees who have completed a TTT training that meets these criteria.

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. Pesticide labels- Ag Use Requirements
- d. Overview of federal and state regulations (WPS and FAWSA) (Worker Protection Standard and Florida Agricultural Worker Safety Act) (What is WPS and FAWSA (MSDS availability, Safety Sheet)
- e. Hazards associated with pesticide use

II. THE WORKER PROTECTION STANDARD (WPS)

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

- f. What is WPS?
- g. Who is an Agricultural Employer?
- h. Who is an Agricultural Worker and a Pesticide Handler?– Definitions
- i. What Employers must do for both workers and handlers?
- j. WPS three (3) major goals:
 - i. Goal Number 1: Protect Agricultural Workers and Pesticide Handlers
 1. Notification of applications: (Key words: Oral Warnings, Treated Areas, Warning sign requirements, timing, and greenhouse and nursery specific instructions).
 2. Restrictions during and after applications: (Key words: restrictions during and after applications - special application restrictions in nurseries and greenhouses, REI, Early Entry workers, early entry restrictions, short term tasks, limited-contact tasks, emergency tasks and specific tasks).
 3. Further Requirements for Employers of Pesticide Handlers: (Key words: Restrictions during Applications and Monitoring Handlers, Specific Instructions for Handlers, Equipment Safety, Personal Protective Equipment (PPE) and Exception to PPE requirements).

ii. Goal Number 2: Provide Information

1. Information at a Central Location: (Key words: Pesticide Safety Information, emergency information and pesticide application records, post information for 30 days, before application takes place and no later than the beginning of workers first work period).
2. Pesticide Safety Training: (Key words: basic pesticide safety information, further Pesticide Safety training, for workers before the 5th day of entry at an area that has been treated with pesticides, and before any handling activity for pesticide handlers).

iii. Goal Number 3: Mitigation

1. Decontamination supplies: (Key points: Water, soap, single use paper towel, eyewash, clean change of clothing, immediately accessible, and ¼ mile, 30 days).
2. Employer Information Exchange: (Key points: Commercial pesticide handlers, information for establishment operators, and information for commercial handler employers).
3. Emergency Assistance: (Key points: Make transportation available, emergency information).
4. Protection against retaliation: (Key points: Retaliation, penalties for noncompliance).

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.

k. Qualifications for agricultural worker and pesticide handler trainers-

I. WPS trainers must meet at least one of the following criteria:

1. Licensed Applicator of Restricted- Use Pesticides
2. Trained pesticide handlers (can train workers)
3. Having completed a Train-the-Trainer Program that meets the State requirements

- I. Content of worker training (11 points) – Agricultural worker training must meet at a minimum the following criteria:
- i. *Where and in what form pesticides or pesticide residues may be encountered during work activities and at the worksite.*
 - ii. *Hazards of pesticides resulting from toxicity and exposure, including:*
 - 1. *Acute effects*
 - 2. *Chronic effects*
 - 3. *Delayed effects and*
 - 4. *Sensitization*
 - iii. *Routes through which pesticides can enter the body.*
 - iv. *Signs and symptoms of common types of pesticide poisonings.*
 - v. *Emergency first aid for pesticide injuries or poisonings.*
 - vi. *How to obtain medical care.*
 - vii. *Routine and emergency decontamination procedures, including emergency eye flushing techniques.*
 - viii. *Hazards from chemigation and drift.*
 - ix. *Hazards from pesticide residue on clothing.*
 - x. *Warnings about taking pesticides or pesticide containers home.*
 - xi. *An explanation of the WPS requirements designed to protect agricultural workers from risks of illness or injury resulting from occupational exposure to pesticides, including:*
 - 1. *Application and entry restrictions*
 - 2. *Design of the warning sign*
 - 3. *Posting of warning signs and verbal/ oral warnings*
 - 4. *The availability of specific information about applications and*
 - 5. *Protection against retaliatory acts.*
- m. Content of pesticide handler training (13 items) - Handler training must meet at minimum the following criteria:
- i. *Format and meaning of information contained on pesticide labels and in labeling, including safety information such as precautionary statements about human health hazards.*
 - ii. *Hazards of pesticides resulting from toxicity and exposure, including*

1. *Acute effects,*
 2. *Chronic effects,*
 3. *Delayed effects and*
 4. *Sensitization.*
- iii. *Routes by which pesticides can enter the body.*
 - iv. *Signs and symptoms of common types of pesticide poisonings.*
 - v. *How to obtain emergency medical care.*
 - vi. *Emergency first aid for pesticide injuries or poisonings. How to obtain medical care.*
 - vii. *Routine and emergency decontamination procedures.*
 - viii. *Need for and appropriate use of personal protective equipment.*
 - ix. *Prevention, recognition and first aid treatment of heat-related illness.*
 - x. *Safety requirements for handling, transporting, storing and disposing of pesticides, including general procedures for spill cleanup.*
 - xi. *Environmental concerns such as drift, runoff and wildlife hazards.*
 - xii. *Warnings about taking pesticides or pesticide containers home.*
 - xiii. *An explanation of the WPS requirements that handler employers must follow for the protection of handlers and others, including:*
 1. *Prohibition against applying pesticides in a manner that will cause contact with workers or others.*
 2. *The requirement to use Personal Protective Equipment*
 3. *The provisions for training and decontamination*
 4. *Protection against retaliatory acts.*

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.

- I. Preparing to train:

a. Realities of agricultural workers-

By knowing the realities of the agricultural workers the trainer has a better understanding of the worker's lives to identify possible training challenges.

b. 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 Agricultural Workers and Pesticide Handlers to be trained – The Agricultural Employer shall assure that agricultural workers are trained. Identify all untrained workers that need training before training is done.
- ii. Crops and Cropping Cycles- It is important to be familiar with cropping cycles, seasonal labor requirements and typical tasks of workers to be trained.
- iii. Profile of the Workforce - Know your audience!
- iv. Select and Review Training Materials - good training requires appropriate use of material for an effective presentation.
- v. Assess your audience - Trainers should obtain general information concerning their audience such as if the agricultural workers are migrant, seasonal workers or year round workers. This background information can help the trainer make training appropriate for them.
- vi. Schedule the training - When and Where? Scheduling training sessions may be challenging. Training may need to be scheduled at a time convenient for the worker and employer. Select a suitable training location that works for your training methods, and is comfortable for the Agricultural workers.

II. 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 agricultural workers can understand.

- i. Be prepared – Know your material! (Be confident is the best thing you can do for your audience and presentation).
- ii. Create a positive environment for learning - (Take control, arrange the room, show your face and help Agricultural workers feel comfortable).

- iii. Effective public speaking - Part of your ability to be a good trainer depends on your public speaking techniques.
- iv. Understand how adults learn - (Adult learning is most effective when realistic problems and problem solving are used as training techniques).
- v. Design your training sessions - (You can only be effective if your training session holds the attention of the agricultural workers. The more interactive, the more interesting you make it!)
- vi. Provide Interactive Training
 - 1. Use visuals
 - 2. Ask questions
 - 3. Stay Focused
 - 4. Encourage participation
 - 5. Practical, relevant and useful training
- vii. 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 on the TTT session.
 - 1. Discussion
 - 2. Illustrations
 - 3. Case Studies
 - 4. WPS Flip Chart
 - 5. Role-Playing
 - 6. Audiovisual Presentations
 - 7. Relating to personal experiences
 - 8. Educational Games
- viii. Approved training materials - WPS materials must be approved by EPA. These materials are available at EPA, FDACS and other commercial private entities.
- ix. WPS Training Record Keeping - Agricultural employers should keep training records for their agricultural workers and pesticide handlers, to acknowledge training. It can help keep track of training and expiration dates and who has been trained. In addition, these records can be inspected during a WPS inspection. There are several record keeping examples created by Federal and State agencies that can be used to illustrate training record keeping.

V. FDACS WPS INSPECTION- ENFORCEMENT PERSPECTIVE

Objectives: To provide information concerns the WPS state and federal enforcement of the WPS regulation, most common violations and possible actions taken by FDACS concerning violations . Trainee should learn how to conduct a WPS compliance self evaluation.

- a. FDACS has the authority to conduct Inspections, under Chapter 487, Florida Statues.
 - i. WPS qualification/determination as to when to conduct an inspection
 1. When a pesticide has been applied at an agricultural facility and
 2. The label contains an Agricultural Use Requirements section.
- b. How to prepare 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 Sonia Cotto-Febo).
 - ii. Keep Records readily available and updated to help expedite inspection.
 - iii. Review your How to Comply Manual to refresh WPS requirements.
- c. The Most Common WPS violations in the State of Florida and nationwide – Provide comparative information of the most common WPS violations as noted through FDACS inspections, to lead to an open discussion section. (Up to date information for national trends can be obtained by the link for *Worker Protection Standards Inspection and Enforcement Accomplishments Report*. For State information, contact Bureau of Compliance Monitoring, 850-617-7850 or Sonia Cotto-Febo, EPA Program Coordinator, Compliance Monitoring, 386-418-5523).
- d. There are four (3) first time violation situations that may result in a fine for the grower – This section gives an idea of the possible enforcement action that can be taken if an agricultural employer is found in violation.
 - i. Failure to comply with workers-handlers Restricted Entry Interval (REI)
 - ii. Failure to notify workers either by posting or by oral notification to prevent entry during a REI
 - iii. Failure to provide essential PPE
- e. Other first time violators most commonly receive a warning letter.

- f. Any optional enforcement related information that the Instructor would like to include.

VI. RESOURCES:

1. 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.
2. How to Comply with the Worker Protection Standard for Agricultural Pesticides Agricultural Employers Need To Know. EPA publication revised 2005.
3. Protect yourself from Pesticides: Guide for Pesticide Handlers, July 1993 (EPA 735-B-93-002)
4. Protect yourself from Pesticides: Guide for Pesticides Handlers, (EPA 735-B-93-003)
5. Florida Pesticide Law and Rules, Chapter 487, Florida Statutes, revised December 2006

VII. HELPFUL WEBSITES:

1. FDACS Agricultural Worker Safety Program-
www.flaes.org/complimonitoring/workersafety.html
2. UF IFAS Pesticide Information Office-
[HTTP://PESTED.IFAS.UFL.EDU/PEST_EDUC_TOPICS.HTML](http://PESTED.IFAS.UFL.EDU/PEST_EDUC_TOPICS.HTML)
<http://edis.ifas.ufl.edu/PI078>
3. Worker Protection Standards Inspection and Enforcement Accomplishments Report
<http://www.epa.gov/compliance/monitoring/programs/fifra/wpsreport.html>
4. Basic Principles of the Worker Protection Standard
<http://www.epa.gov/oppfead1/safety/workers/principl.html>

VIII. CONTACT INFORMATION:

*For more information or to request WPS Materials please contact the Agricultural Workers Safety Program Coordinator, **Sonia I. Cotto-Febo**, at one of the following locations:*

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