

Module 11 — Worker Protection Standard, REI & Notification Duties

CORE exam · 8 practice questions · What the WPS requires of you when you spray someone else's farm: REIs, posting and oral notification, decontamination supplies, the application exclusion zone, and the paperwork.

Key numbers & facts to memorise

Rule	Worker Protection Standard, 40 CFR Part 170
REI	Keep workers out for the labelled interval
Double notification	Posted signs AND oral notification when the label requires it
AEZ	Application exclusion zone — stop if anyone untrained enters
Information display	30 days after the REI expires; handler training annual, records 2 years

Who the WPS covers and why it applies to custom applicators

The **Worker Protection Standard (WPS)**, at 40 CFR Part 170, is the federal rule that protects **agricultural workers** (people performing hand labour in treated crops) and **pesticide handlers** (people who mix, load, apply, clean equipment or handle open containers). It applies to agricultural pesticides used in the production of agricultural plants on farms, forests, nurseries and greenhouses. If you spray other people's crops for hire, WPS obligations attach to the work you do and to the site you leave behind.

The rule allocates duties between the **agricultural employer** (usually the farm) and the **handler employer** (often you, the application business). Both sets exist simultaneously, and the common failure is assuming the other party handled something. Sort it out contractually before the season: who posts the field, who tells the farm crew about the REI, who supplies decontamination water at the mix site, and who keeps the application information available for the required period.

Exam questions here are usually definitional — who is a worker, who is a handler, what the employer must provide — because the rule is prescriptive. The practical value is different: WPS obligations are the single most common source of avoidable enforcement exposure for custom applicators, because they occur after the spray is finished and the applicator has driven away.

REI, posting and oral notification

The **restricted-entry interval (REI)** is the period after application during which entry into the treated area is limited. It is product- and crop-specific, printed on the label, and enforceable — 4 hours, 12 hours, 24 hours and 48 hours are common, with longer intervals for some products and some crops. Do not confuse it with the **pre-harvest interval (PHI)**, which protects the consumer from residues at harvest; REI protects the person walking into the field.

Workers must be kept out during the REI, with narrow exceptions for specified short-term and early-entry tasks that carry their own PPE requirements. Employers must notify workers about treated areas either by **posting warning signs** at the usual points of entry, by **oral notification**, or by both when the label requires "double notification." The label controls: some products explicitly require both posting and oral warning, and that instruction is enforceable.

Posted signs must use the standard WPS design and be in place before the application and removed within three days after the end of the REI. Oral notification must be in a manner the worker can understand and must cover the location, the description of the treated area, the dates and times of the REI, and the instruction not to enter. As the applicator, the useful discipline is to hand the farm a written summary at the end of the job: product, EPA registration number, area, time finished, REI expiry time. It takes two minutes and removes the ambiguity entirely.

Application exclusion zone, decontamination and information access

The **application exclusion zone (AEZ)** is the area surrounding the application equipment that must be free of people other than trained, properly equipped handlers during application. Its size depends on the application method and droplet size — larger for aerial and air-blast applications and fine sprays, smaller or not applicable for certain ground and low-drift methods. For aerial application the AEZ is substantial, and as a drone operator you must both establish it and stop application if anyone enters it.

Handler employers must provide **decontamination supplies**: enough water for routine and emergency washing, soap, single-use towels, and a clean change of clothing, located within a reasonable distance of the handler's work area. For eye-flush situations, additional water capacity is required where the label mandates protective eyewear. This is one of the requirements most often missing on real jobs, and it is trivially cheap to satisfy — a jug, soap and towels in the truck.

Employers must also make **application-specific information** accessible to workers and handlers — product name, EPA registration number, active ingredient, application date and time, treated area, and REI — along with the label's safety data sheet, displayed at a central location for **30 days** after the REI expires. Handlers must be trained before performing handler tasks and retrained annually, and the employer must keep training records for two years. Anyone applying a **restricted-use pesticide** must be a certified applicator or work under the direct supervision of one.

Practice questions

Answer these closed-book, then check against the answer key that follows. Ohio requires 70% to pass.

1. The Worker Protection Standard primarily protects:

- A) Retail customers
- B) Agricultural workers and pesticide handlers
- C) Airline passengers
- D) Product manufacturers

2. The restricted-entry interval (REI) is:

- A) The time before harvest
- B) The time workers must stay out of the treated area after application
- C) The shelf life of the product
- D) The time between tank loads

3. "Double notification" on a label means workers must be warned:

- A) Twice orally
- B) By both posted signs and oral notification
- C) Two days in advance
- D) By mail

4. The application exclusion zone must be free of:

- A) All equipment
- B) Everyone except trained, properly equipped handlers involved in the application
- C) Only children
- D) Nothing

5. Application-specific information and the safety data sheet must remain accessible to workers for:

- A) 24 hours
- B) 7 days
- C) 30 days after the REI expires
- D) 3 years

6. Decontamination supplies for handlers must include:

- A) Only a first-aid kit
- B) Water, soap, single-use towels and a clean change of clothing
- C) A fire extinguisher only
- D) Nothing if PPE is worn

7. Handler training under WPS must be provided:

- A) Once in a career
- B) Before performing handler tasks and annually thereafter
- C) Only for restricted-use products
- D) Only for aerial application

8. A person applying a restricted-use pesticide must be:

- A) Over 21
- B) A certified applicator or under the direct supervision of one
- C) A landowner
- D) A licensed pilot

Answer key & explanations

1. B) Agricultural workers and pesticide handlers — WPS (40 CFR Part 170) protects agricultural workers and handlers through REIs, PPE, training, decontamination and notification.

2. B) The time workers must stay out of the treated area after application — REI protects people entering the field; PHI protects the consumer by controlling residues at harvest.

- 3. **B)** By both posted signs and oral notification — When the label requires double notification, both posting and oral notification are mandatory.
- 4. **B)** Everyone except trained, properly equipped handlers involved in the application — Application must stop if anyone other than a trained, equipped handler enters the AEZ.
- 5. **C)** 30 days after the REI expires — WPS requires display at a central location for 30 days after the REI expires.
- 6. **B)** Water, soap, single-use towels and a clean change of clothing — Water for routine and emergency washing, soap, single-use towels and clean clothing must be reasonably accessible.
- 7. **B)** Before performing handler tasks and annually thereafter — Handlers must be trained before doing handler tasks and retrained annually; records are kept for two years.
- 8. **B)** A certified applicator or under the direct supervision of one — RUP application requires certification or direct supervision by a certified applicator, with additional recordkeeping.