


Respiratory Protection and PPE Regulations for Pesticide Use in Cannabis Cultivation

“There is another.” - Yoda, *The Empire Strikes Back*



California Department of
Pesticide Regulation
Worker Health and Safety Branch
Industrial Hygiene Services

PPE/Respiratory Regulations

OSHA vs. DPR

- DPR regulations apply to pesticide handlers and those potentially exposed to pesticides (e.g. harvesters). Cal/OSHA regulations apply to all other workers, including government employees.



The federal regulation changes of 1910.134 were not made to apply to agricultural pesticide workplaces. These are covered by the USEPA's Worker Protection Standard, adopted under authority of FIFRA. PPE/Respiratory protection requirements are controlled by the label.

PPE/Respiratory Regulations

What is FIFRA?

**Federal Insecticide, Fungicide and Rodenticide Act
(40 CFR 162.3)**

“(1) any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest [insect, rodent, nematode, fungus, weed, other forms of terrestrial or aquatic plant or animal life or viruses, bacteria, or other microorganisms, except viruses, bacteria, or other microorganisms on or in living man or other animals, which the Administrator declares to be a pest], and (2) any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant.”

Not for Extraterrestrial Use



PPE/Respiratory Regulations

What is FIFRA?

FIFRA (40 CFR 162.3)

“(1) any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest [insect, rodent, nematode, fungus, weed, other forms of terrestrial or aquatic plant or animal life or viruses, bacteria, or other microorganisms, except viruses, bacteria, or other microorganisms on or in living man or other animals, which the Administrator declares to be a pest], and (2) any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant.”

PPE/Respiratory Regulations

What about California?

CALIFORNIA defines pesticides:

FOOD & AG CODE SECTION 12751-12759

12753. "Pesticide" includes any of the following:

(a) Any spray adjuvant.

(b) Any substance, or mixture of substances which is intended to be used for defoliating plants, regulating plant growth, or for preventing, destroying, repelling, or mitigating any pest, as defined in Section 12754.5, which may infest or be detrimental to vegetation, man, animals, or households, or be present in any agricultural or nonagricultural environment whatsoever.

PPE/Respiratory Regulations

Cannabis cultivation is now considered (at least in California) a legitimate agricultural activity, and comes under normal regulatory authority. This includes the Department of Food and Agriculture and the Department of Pesticide Regulation.

All activities related to the use of pesticides (as defined in both FIFRA and the California Food and Ag Code) for the production of an agricultural commodity come under DPR jurisdiction.



PPE/Respiratory Regulations

These regulations apply to persons required (either by label, permit conditions, regulatory requirements or employer policy) to wear PPE/respiratory protection.

This includes, but is not limited to, mixer/loaders, applicators, field workers, fumigators, supervisors, foremen, and those whose work tasks place them in a pesticide-use environment.

Government employees (i.e. county ag commissioners) are generally covered under Cal/OSHA regulations.



Respiratory Protection

Title 3 California Code of
Regulations Section 6739

Parallels Title 8 CCR Section 5144

Organization of Section 6739

- (a) General Requirements
- (b) Voluntary Use
- (c) Selection of Respirators
- (d) Medical Evaluation
- (e) Fit Testing
- (f) Facepiece Seal Protection
- (g) IDLH
- (h) Cleaning and Disinfecting
- (i) Emergency Respirators
- (j) Inspection and Repair
- (k) Breathing Air Quality
- (l) Identification of filters, cartridges, and canisters
- (m) Training
- (n) Program Evaluation
- (o) End of Service Life
- (p) Recordkeeping
- (q) Medical Evaluation Form
- (r) Voluntary Use Information
- (s) Medical Recommendation

Respiratory Protection

Title 3 CCR 6739

(a) General Requirements:

Spells out what elements a respiratory protection program shall contain:

Selection

Medical evaluation

Fit testing

Proper use for routine and emergency

Program administrator

Continued

Definitions:

6000

Respirator Program Administrator

A person who has read and understood either:

The American National Standard for Respiratory Protection Publication (ANSI Z88.2),

The “Small Entity Compliance Guide for the Revised Respiratory Protection Standard” (U.S. Dept. of Labor)

OR has taken appropriate course work from either a recognized educational establishment (university, community college)

OR a respirator manufacturers authorized representative, or is an ABIH CIH,

OR can demonstrate appropriate knowledge necessary to administer a respiratory protection program.

Contracting out the technical elements of program administration (training, fit testing, maintenance) is allowed under this definition.

Respiratory Protection

Title 3 CCR 6739

(a) General Requirements:

Spells out what elements a respiratory protection program shall contain:

Maintenance, cleaning and care

Ensure breathing air quality

Training in respiratory hazards (IDLH if applicable)

Training in donning, doffing, limitations

Program evaluation

Generic Guidelines for Development of a Respiratory Protection Program in Accordance with Department of Pesticide Regulation Requirements

by

Harvard R. Fong, Senior Industrial Hygienist

HS-1513 August 3, 1989

Revision No. 1 February 19, 1997

Revision No. 2 February 26, 2002

Revision No. 3 July 9, 2007*

California Environmental Protection Agency
Department of Pesticide Regulation
Worker Health and Safety Branch
1001 I Street
Sacramento, CA 95814

This outline serves as a guide for companies (“**ORGANIZATION**”) to develop a written respiratory protection program (“**WRITTEN PROGRAM**”) with work-site specific procedures for respirator selection, medical clearance, fit-testing, maintenance and use. Companies are directed to insert the appropriate name(s) in the (**BOLDFACE**) sections and to customize this document to their specific **WRITTEN PROGRAM**. Suggestions and explanations are given in (*italic bold*). It is to be used in conjunction with the Pesticide Safety Information Series A-5 (HS-632). This is a guideline. Some of the suggested procedures may exceed the minimum requirements of the regulations. Other sections of this document require you to develop procedures specific to your company. Your company’s **WRITTEN PROGRAM**, based on this document, may benefit from review by the Department of Industrial Relations’ Division of Occupational Safety and Health (Cal/OSHA), the Department of Pesticide Regulation, Worker Health and Safety Branch (DPR/WH&S), or your insurance company’s loss prevention agent.

Once again, it is required that you customize this document to reflect your actual program. There are portions that require you to develop procedures specific to your company and its WRITTEN PROGRAM. You will be held responsible for all elements of your WRITTEN PROGRAM. Make sure it reflects what you are actually doing.

* This document has been modified to conform with the amended respiratory protection regulations that will take effect January 1, 2008. Major changes in the regulations required extensive changes in this guideline to properly assist program administrators in developing a program in compliance with the new regulations.

Respiratory Protection

Title 3 CCR 6739

(b) Voluntary Respirator Provision:

Provides guidance for employers whose employees bring their own respirators or who provide respirators when none are legally required (i.e. label, regulation, permit condition or employer policy).

Requires “subsection (r)” posting.

Appendix Four

Voluntary Respirator Use Posting [Subsection (r) posting]

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

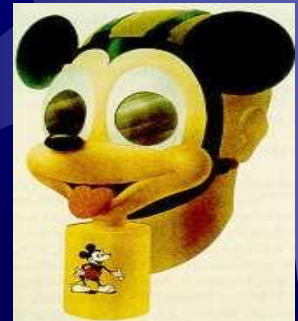
1. Read and follow all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.
2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designated to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors or very small solid particles of fumes or smoke.
4. Keep track of your respirator so that you do not mistakenly use someone else's respirator.
5. Air filtering respirators DO NOT SUPPLY OXYGEN. Do not use in situations where the oxygen levels are questionable or unknown.

Respiratory Protection

Title 3 CCR 6739

(c) Selection of Respirators:

Specifies the use of NIOSH-approved respirators, that adequate numbers of sizes and styles are available, and compliance with label, permit condition or regulatory requirements. ***Label directions are appropriate guidance for selection of respirators***



Not NIOSH Approved



Don't even go there...



Respiratory Protection

Title 3 CCR 6739

(d) Medical Evaluation:

Requires the use of a comprehensive medical evaluation questionnaire, to be reviewed by a ***Physician or Other Licensed Health Care Professional*** (PLHCP). All workers required to wear respiratory protection must be evaluated.

This questionnaire is included in regulation as Section 6739 (q).



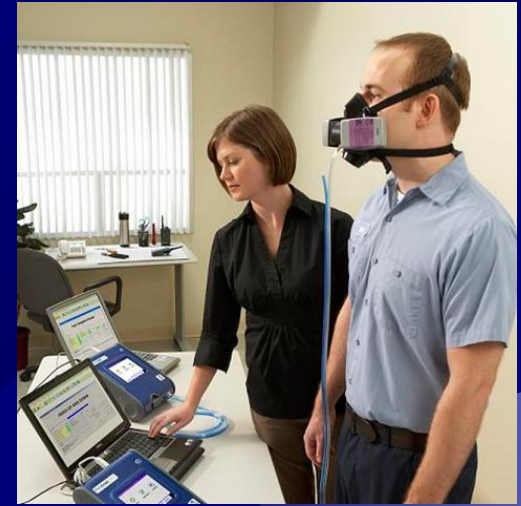
Respiratory Protection

Title 3 CCR 6739

(e) Fit Testing:

Defines acceptable fit testing and their procedures, including QLFT and QNTF. References Cal/OSHA protocols.

QLFT will be acceptable for all negative-pressure tight fitting HF or FF respiratory protection used in the application of pesticides.



Old School



Respiratory Protection

Title 3 CCR 6739

(f) Facepiece Seal Protection:

Requires seal check (negative or positive pressure check) when donning.

Changing conditions trigger program reevaluation.

There can be no interference with facepiece sealing surfaces.

User Seal Check



A Beard You Can Have and Still Wear a Respirator...



Respiratory Protection

Title 3 CCR 6739

(g) IDLH Atmospheres:

Defines IDLH conditions applicable to ag/pesticide situations (chambers, silos, bins, structural). Specifies procedures for working in IDLH conditions, requiring a monitor (“watchman”) for employees entering IDLH conditions and requiring some kind of rescue/retrieval system in place. SCBA must be available.



Respiratory Protection

Title 3 CCR 6739

(h) Cleaning and Disinfecting:

Requires respirators to be kept clean, and if necessary, to be sanitized. Also requires proper storage to protect against damage, contamination, dust, sunlight, temperature/moisture extremes, and deformation.

Sanitizer **must be registered** for that use. OSHA requirements are technically in violation.



Use Registered Materials!

FIFRA (40 CFR 162.3)

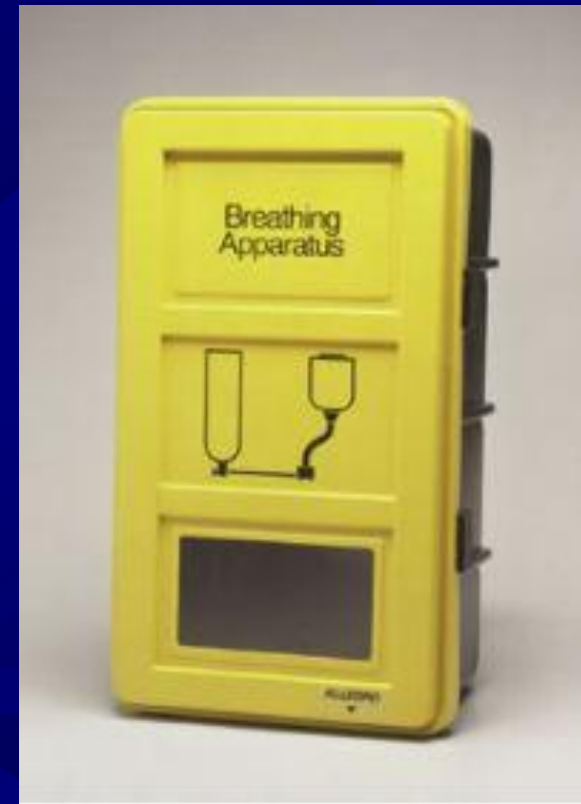
“(1) any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest [insect, rodent, nematode, fungus, weed, other forms of terrestrial or aquatic plant or animal life or **viruses, bacteria, or other microorganisms**, except viruses, bacteria, or other microorganisms on or in living man or other animals, which the Administrator declares to be a pest], and (2) any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant.”

Respiratory Protection

Title 3 CCR 6739

(i) Emergency Respirators:

Defines storage of these emergency-use respirators.



Respiratory Protection

Title 3 CCR 6739

(j) Inspection and Repair:

Employers must inspect and repair, as necessary, all respiratory protection equipment.

Requires only the use of NIOSH-approved parts for repair of respirators.

Defines the recharge level of SCBA, both routine (80%) and emergency (100%) use.



Respiratory Protection

Title 3 CCR 6739

Three Tank Rule



At start of day:

- 1 Tank at 80%
- 1 Tank at 100%
- 1 Tank in harness

Continued

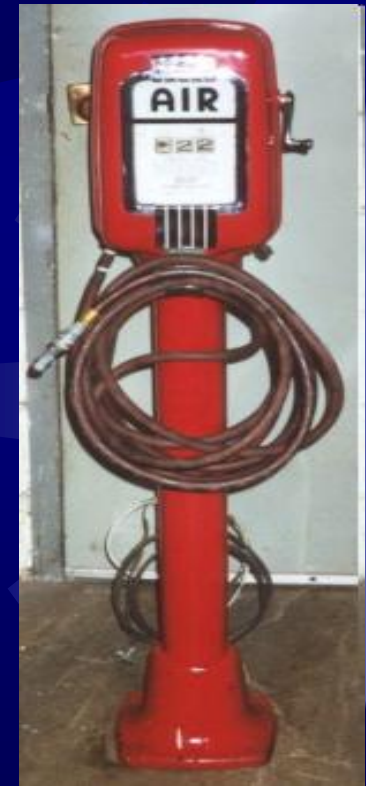
Respiratory Protection

Title 3 CCR 6739

(k) Breathing Air Quality and Use:

Must use CGA "Commodity Specification for Air, G-7.1-1997" and have a Certificate of Analysis (original or copy) from the supplier.

Compressor supplied air must meet Cal/OSHA Title 7, Section 5144.



Respiratory Protection

Title 3 CCR 6739

(I) Identification of Filters and Cartridges:

The identification codes and coding-colors must remain legible.



Respiratory Protection

Title 3 CCR 6739

(m) Training and Information:

Employees required to wear respiratory protection must know:

- Why they are wearing a respirator
 - How it can be compromised
 - Limitations
- How to inspect/don/doff/maintain/store
- Conditions that interfere with wearing

Continued...

Respiratory Protection

Title 3 CCR 6739

(m) Training and Information:

Employers are required to:

- Train in a way the employee understands
- Train before requiring worker to wear respirator
 - Retrain annually or when conditions change
- Provide *subsection (r)* information to voluntary wearers

Why is training so important?

Non-optimal fit and non-NIOSH approved cartridges:



No longer with the show...

Respiratory Protection

Title 3 CCR 6739

(n) Program Evaluation:

Employers need to review (at least annually) their programs and consult with employees concerning the effectiveness of the program and assess factors such as fit, selection, use conditions and maintenance.



CHANGES MUST BE REFLECTED IN WRITTEN PROGRAM WITHIN 30 DAYS!

Respiratory Protection

Title 3 CCR 6739

(o) End of Service Life

Hierarchy of replacement:

1. Odor, taste or irritation (element failure/saturation)
2. ESLI triggered
3. All disposable filtering facepiece, at the end of the workday[⌘]
4. According to pesticide-specific label directions
5. According to pesticide-specific respirator manufacturer directions[‡]
6. Absent any pesticide-specific directions, at the end of the workday



[⌘] or, as according to manufacturer, on excessive breathing resistance.

[‡] see "Compliance Documentation for Section 6739 (o)(5) End-of-Service Life"

Respiratory Protection

Title 3 CCR 6739

(p) Recordkeeping:

- A record of fit tests must be established and retained.
- A written copy of the current and previous program must be retained (three year requirement).
- Medical recommendation must be retained.
- Records must be retained during employment conditions that require respiratory protection and for three years after such conditions end.



Respiratory Protection

Title 3 CCR 6739

(q) Medical Evaluation Questionnaire:

Comprehensive evaluation of workers fitness and ability to wear respiratory protection.

The evaluation not exactly the same as the OSHA form. DPR will accept an OSHA medical, but DPR's medical cannot be used for OSHA purposes.



Respiratory Protection

Title 3 CCR 6739

(r) Voluntary Respirator Provision Posting:

Information that must be provided workers who supply their own respirators when no respiratory protection is required by label, permit conditions, regulations or employer policy.

Pretty much exactly the same as OSHA's, but unlike the poets at DOL, ("read and heed"), DPR is more prosaic ("read and follow").

Appendix Four

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You should do the following:

1. Read and follow all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.
2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designated to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors or very small solid particles of fumes or smoke.
4. Keep track of your respirator so that you do not mistakenly use someone else's respirator.
5. Air filtering respirators **DO NOT SUPPLY OXYGEN**. Do not use in situations where the oxygen levels are questionable or unknown.

Respiratory Protection

Title 3 CCR 6739

(s) Medical Recommendation Form:

Suggested form for reporting results of PLHCP's medical evaluation, a copy of which must also be provided to the employee.



Organization of Section 6739

- (a) General Requirements
- (b) Voluntary Use
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- (s) Medical Recommendation



Personal Protective Equipment

Title 3 California Code of Regulations Section 6738

Parallels Title 8 CCR Sections 3381, 3382, 3383, 3384, and 3385

PPE (Care)

DPR Regulation, 3 CCR 6738

EMPLOYERS shall provide all necessary PPE, as required by label, permit condition and regulation, keeping it clean and in good repair. Equipment must be inspected daily.

Heavily contaminated PPE shall be replaced.

Store clean PPE in a specifically designated, pesticide-free area.

Leather gloves used with phosphides shall be aerated for a minimum of 12 hours for cleaning.

PPE (Care)

DPR Regulation, 3 CCR 6738

Make sure PPE is used properly.

Store and wash used PPE separate from other laundry.

Dry PPE properly.

Never allow contaminated PPE to be taken into worker homes. If worker does not return to headquarters, provide sealable container for worker to store contaminated equipment outside of home.

Make sure the personnel maintaining/cleaning PPE know what they're doing (i.e. pesticide contaminated clothes).

Sealable containers



PPE (Use)

DPR Regulation, 3 CCR 6738.1

EMPLOYERS shall assure that employees wear:

[c] Chemical-resistant footwear (boots, shoes or coverings) when required.





PPE (Use)

DPR Regulation, 3 CCR 6738.1

EMPLOYERS shall assure that employees wear:

[d] Chemical-resistant hood or wide-brim hat when chemical-resistant head protection is required.



SOU'WESTER



RASH MAKER



BUMPCAP



Model SG2



PPE (Use)

DPR Regulation, 3 CCR 6738.1

EMPLOYERS shall assure that employees wear:

[e] Coveralls when handling Category I (**Danger**) or Category II (**Warning**) pesticides. This does **NOT** apply to fumigants unless otherwise required by label.



PPE (Use)

DPR Regulation, 3 CCR 6738.1

EMPLOYERS shall assure that employees wear:

[f] Chemical resistant apron when required

[g] Chemical resistant coveralls when required

[1] Note that 80°/85° heat stress regulation (separate from Cal/OSHA Heat Illness Standard*) applies when wearing chemical-resistant coveralls. Exemption for closed systems, enclosed cabs or other engineering thermal controls or cooled PPE.

*Title 8 CCR 3395 also applies.



Aprons

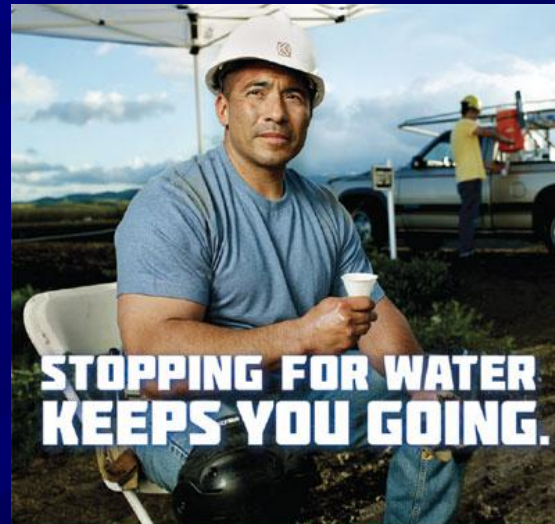


Chemical resistant coveralls/suits





Note: Compliance with **Cal/OSHA Heat Illness Regulations** now required in DPR training requirements for handlers, field workers and early reentry field workers.



	<p>WATER. REST. SHADE.</p>	 <p>OSHA Occupational Safety and Health Administration www.osha.gov</p> <p>1-800-321-OSHA (6742) TTY 1-877-689-5027</p>
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OSHA QUICK CARD™

Protect Yourself Heat Stress



When the body is unable to cool itself by sweating, several heat-induced illnesses such as heat stress or heat exhaustion and the more severe heat stroke can occur, and can result in death.

Factors Leading to Heat Stress

High temperature and humidity; direct sun or heat; limited air movement; physical exertion; poor physical condition; some medicines; and inadequate tolerance for hot workplaces.

Symptoms of Heat Exhaustion

- Headaches, dizziness, lightheadedness or fainting.
- Weakness and moist skin.
- Mood changes such as irritability or confusion.
- Upset stomach or vomiting.

Symptoms of Heat Stroke

- Dry, hot skin with no sweating.
- Mental confusion or losing consciousness.
- Seizures or convulsions.

Preventing Heat Stress

- Know signs/symptoms of heat-related illnesses; monitor yourself and coworkers.
- Block out direct sun or other heat sources.
- Use cooling fans/air-conditioning; rest regularly.
- Drink lots of water; about 1 cup every 15 minutes.
- Wear lightweight, light colored, loose-fitting clothes.
- Avoid alcohol, caffeinated drinks, or heavy meals.

What to Do for Heat-Related Illness

- Call 911 (or local emergency number) at once.

While waiting for help to arrive:

- Move the worker to a cool, shaded area.
- Loosen or remove heavy clothing.
- Provide cool drinking water.
- Fan and mist the person with water.

For more complete information:

OSHA Occupational Safety and Health Administration
U.S. Department of Labor
www.osha.gov (800) 321-OSHA

Cooling systems



This is NOT what Cal/OSHA means when it talks about providing shade.



PPE (Eye Protection)

DPR Regulation, 3 CCR 6738.2

EMPLOYERS shall assure that employees wear protective eyewear that provides brow and temple protection, conforming to the curvature of the face.

[a] Must be ANSI Z87.1-2010 compliant.

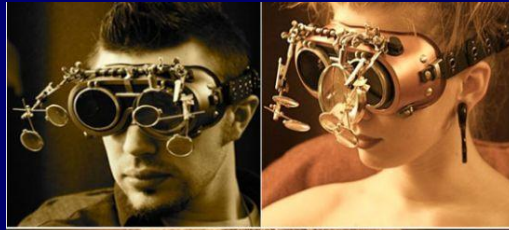
American National Standard for Occupational and
Educational Personal Eye and Face Protection Devices



1. Safety Glasses
2. Goggles
3. Face Shield



Not exactly what we had in mind.



Nor these.



This is more like it...

PPE (Eye Protection)

DPR Regulation, 3 CCR 6738.2

EMPLOYERS shall assure that employees wear protective eyewear that provides brow and temple protection, conforming to the curvature of the face.

[b] If the label identifies specific protective eyewear, that eyewear or more protective must be worn.

Ultimately what this means is if it says **goggles, goggles** must be worn (not safety glasses).



PPE (Eye Protection)

DPR Regulation, 3 CCR 6738.2

EMPLOYERS shall assure that employees wear protective eyewear that provides brow and temple protection, conforming to the curvature of the face.

[c] NIOSH-approved fullface respirator satisfies eye protection requirement

[d] Prescription eyewear may not interfere with fit/function of protective eyewear



PPE (Hand Protection)

DPR Regulation, 3 CCR 6738.3

EMPLOYERS shall assure that employees wear appropriate chemical-resistant gloves when required

[a] If the barrier material is specified by a glove category, that material must be used.

The DPR **GLOVE CATEGORY SELECTION KEY** card or the USEPA website on PPE may be consulted for appropriate glove material

PPE (Hand Protection)

DPR Regulation, 3 CCR 6738.3

EMPLOYERS shall assure that employees wear appropriate chemical-resistant gloves when required

[b] If there is no specific glove material specified on the label (“use chemical-resistant gloves”) then any of the gloves listed in the DPR **GLOVE CATEGORY SELECTION KEY** card may be used

PPE

Glove Category Selection Key Based on USEPA Label Codes

 **Glove Category Selection Key**

Label Code	Materials Required by Law	Material Code
A	1,2,3,4,5,6,7,8	1: Laminate
B	1,2	2: Butyl
C	1,2,3,4,7,8	3: Nitrile
D	1,2	4: Neoprene
E	1,3,4,8	5: Natural
F	1,2,3,8	6: Polyethylene
G	1,8	7: PVC
H	1,8	8: Viton

All but Laminate and Polyethylene must be 14 mils or thicker

PPE

Glove Category Selection Key Based on USEPA Label Codes Spanish Version (new for 2018)

dpr Clave para Selección de Categoría de Guante

Código en la Etiqueta	Materiales Requeridos Bajo la Ley	Código del Material*
A	1,2,3,4,5,6,7,8	1 Laminate
B	1,2	2 Butyl
C	1,2,3,4,7,8	3 Nitrile
D	1,2	4 Neoprene
E	1,3,4,8	5 Natural
F	1,2,3,8	6 Polyethylene
G	1,8	7 PVC
H	1,8	8 Viton

Todos, menos Laminate y Polyethylene deben ser de 14 mils o más gruesos.

* El Material está en Inglés, cómo lo requiere la etiqueta.

Chemical Resistant



PPE (Hand Protection)

DPR Regulation, 3 CCR 6738.3

EMPLOYERS shall assure that employees wear appropriate chemical-resistant gloves when required

[c] Other than laminate and polyethylene, all gloves must be 14 mils or thicker

Exception: For tasks requiring fine motor skills and dexterity, thinner gloves of the same material may be substituted for a maximum of 15 minutes to accomplish the task, then discarded.



PPE (Hand Protection)

DPR Regulation, 3 CCR 6738.3

EMPLOYERS shall assure that employees wear appropriate chemical-resistant gloves when required

[d] Separable glove liners are allowed unless expressly forbidden by the label. Liners must not extend beyond cuff of glove. Contaminated liners must be removed immediately and all liners must be disposed of at the end of the day.

[1] No flocked gloves, ever.

Flocked for sure.

Not allowed



PPE (Hand Protection)

DPR Regulation, 3 CCR 6738.3

EMPLOYERS shall assure that employees wear appropriate chemical-resistant gloves when required

[e] Leather gloves may be worn over chemical-resistant gloves if required by work environment*. After such use, those leather gloves must always be worn over chemical-resistant gloves.

*Such as dealing with roses



PPE (Hand Protection)

DPR Regulation, 3 CCR 6738.3

EMPLOYERS shall assure that employees wear appropriate chemical-resistant gloves when required

[f] Pilots who bring contaminated gloves into the aircraft must store them in an enclosed chemical-resistant container (e.g. sealing plastic box/bag).



PPE (Exemptions)

DPR Regulation, 3 CCR 6738.4

EMPLOYERS shall assure that all necessary/required PPE is present and available at the worksite and stored to prevent contamination.

[a] Glove and eye protection exemptions:

- [1] Enclosed cab
- [2] Vehicle-mounted nozzles below employee and spraying downward
- [3] Long handled vertebrate pest control baiting devices
- [4] No contact with liquid fumigants
- [5] Application system, as determined by DPR, that provides equal or superior exposure protection as PPE

PPE (Exemptions)

DPR Regulation, 3 CCR 6738.4

EMPLOYERS shall assure that all necessary/required PPE is present and available at the worksite and stored to prevent contamination.

[b] Eye protection exemptions:

- [1] Applying non-insecticidal lures or baiting monitoring traps
- [2] Applying solid fumigants to vertebrate burrows
- [3] Applying vertebrate baits that are NOT propelled



PPE (Exemptions)

DPR Regulation, 3 CCR 6738.4

EMPLOYERS shall assure that all necessary/required PPE is present and available at the worksite and stored to prevent contamination.

[c] & [d] Closed system exemption*:

[1] **DANGER** and **WARNING** signal word materials can use protective eyewear, coveralls, chemical-resistant gloves and chemical-resistant apron in lieu of label requirements

[2] **CAUTION** signal word materials can use protective eyewear, and work clothing in lieu of label requirements

*Includes water-soluble bags

PPE (Exemptions)

DPR Regulation, 3 CCR 6738.4

EMPLOYERS shall assure that all necessary/required PPE is present and available at the worksite and stored to prevent contamination.

[e] Work clothing may be worn in lieu of dermal PPE (including label required) when applying from an enclosed cab, as defined in 3 CCR Section 6000.

Additionally, if the label requires the use of only a **particulate filter respirator**, then NO respirator is required when applying from such an enclosed cab with a functional air ventilation system. This does not apply to respirators with chemical cartridges.

PPE (Exemptions)

DPR Regulation, 3 CCR 6738.4

EMPLOYERS shall assure that all necessary/required PPE is present and available at the worksite and stored to prevent contamination.

[f] [g] [h] Pilot exemption:

[f] Work clothing, instead of PPE, may be worn while occupying aircraft; respiratory protection also not required in the aircraft.

[g] Helmets substitutes for head protection.



[h] Helmets equipped with face shields can provide eye protection.

Additional Information

Department of Pesticide Regulation

Worker Health and Safety Branch

1001 I Street

Sacramento, CA 95814

Harvard R Fong, CIH, Senior Industrial Hygienist
916-445-4211 or harvard.fong@cdpr.ca.gov

Emma Wilson, Associate Industrial Hygienist
916-324-4155 or emma.wilson@cdpr.ca.gov

CDPR Website

WWW.CDPR.CA.GOV

California Department of Pesticide Regulation

HOME PROGRAMS DATABASES NEWS/PUBLICATIONS QUICK LINKS

Health & Safety
Report an Illness | Food Safety | Mitigating Exposure | Risk | Physicians | Workers | Fact Sheets

Enforcement
Complaints | County Oversight | Actions | Compliance | Restricted Materials | Endangered Species

Pest Management
Pesticide Use Report | Pest Problems | Grants | Innovator Awards | Schools | Child Care | Projects

Licensing
Exam Schedule | Valid Licenses | Continuing Ed | Study Materials | Fees | Forms | Index

Monitoring
Surface Water | Ground Water | Air | Special Projects

Laws & Regulations

Pesticides and Human Health Information

INJURED OR ILL FROM A PESTICIDE?

HEALTH & SAFETY RESOURCES

- Farmworker Safety and Outreach
- Worker Protection Program
- Worker Safety Regulations
- U.S. EPA Worker Protection Standard

WORKPLACE RESOURCES

- County Agricultural Commissioners
- Pesticide Safety Information Series Handouts
- Compliance Assistance for Employers
- UPDATED Workplace Safety/Industrial Hygiene
- Safety Data Sheets

COMMUNITY RESOURCES

- Community Guide to Recognizing and Reporting Pesticide Problems
- Consumer Fact Sheets
- Pesticide Residues on Food
- FAQ
- Household Products Database
- School IPM
- National Pesticide Information Center

EVALUATING AND REDUCING EXPOSURE

- UPDATED Reducing Exposure
- UPDATED Personal Protective Equipment (PPE)
- UPDATED Engineering Controls
- Assessing Health Risk
- Exposure Assessment
- U.S. EPA Pesticides: Health and Safety Quick Finder

MEDICAL RESOURCES

- Information for Physicians
- Pesticide-Related Illnesses
- California Pesticide Illness Query (CalPIQ)

HEALTH AND SAFETY PROGRAMS

- Worker Health and Safety Branch
 - Publications
- Enforcement Branch
- Human Health Assessment Branch
 - Publications



We're Done!!!

QUESTIONS?

