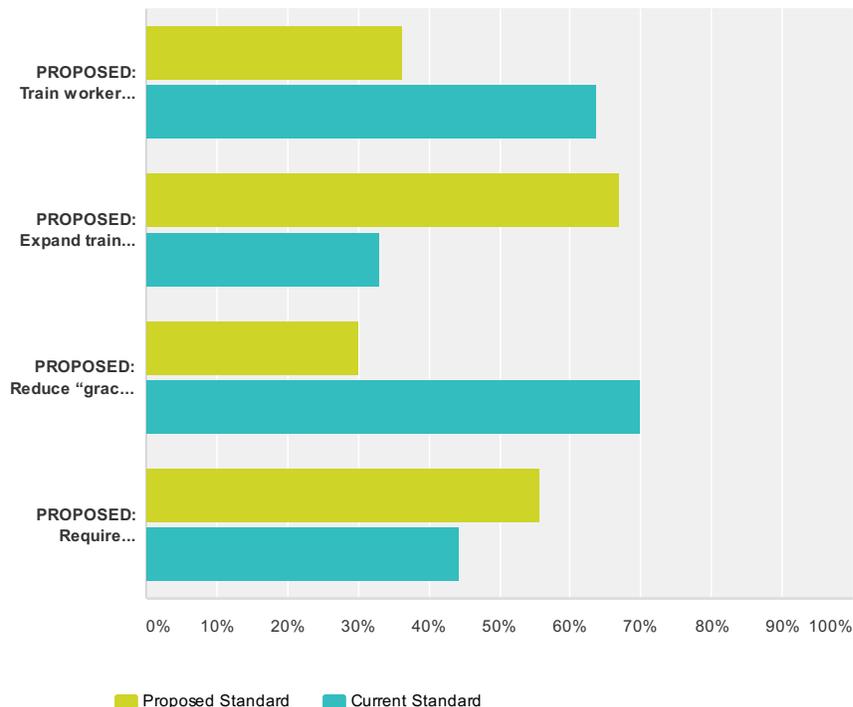


Proposed Changes to EPA Agricultural Worker Protection Standard

Q1 Please Indicate your preference for "Proposed Standard" or "Current Standard" relating to Pesticide Safety Training.

Answered: 320 Skipped: 8



	Proposed Standard	Current Standard	Total
PROPOSED: Train workers and handlers every year. Stricter qualification for trainers of workers. CURRENT: Train workers and handlers every 5 years.	36.36% 116	63.64% 203	319
PROPOSED: Expand training content to include information on reducing take-home exposure. Workers and handlers would be trained on reducing take-home exposure, the hazards from residues on clothing, and warned not to take containers home. CURRENT: No training provided on reducing take-home exposure. Workers and handlers are trained on hazards from residues on clothing and warned not to take containers home.	66.98% 211	33.02% 104	315
PROPOSED: Reduce "grace period" to 2 days before full WPS training is required, expand the content of the abbreviated, pre- "grace period" training, and require distribution of information sheet listing training points. CURRENT: Grace period is 5 days and there is less content to the abbreviated training, and no information sheet.	30.06% 95	69.94% 221	316
PROPOSED: Require recordkeeping of training for 2 years. CURRENT: Recordkeeping of training is not required.	55.70% 176	44.30% 140	316

#	Comments (optional):	Date
1	Requiring reduced grace periods, more frequent training, and more record keeping creates a bureaucratic nightmare and puts a further burden on farmers to hold onto increasingly more records. Also, it is unrealistic to have only a 2 day grace period since in our operation, some of our workers don't last a full week, so it is a waste of time and money to train people who may not work out.	7/30/2014 5:03 PM
2	Farmers should be able to train their own employees. Having to have all employees trained off-site will be a huge hassle for farmers and will not necessarily result in better instruction.	7/22/2014 11:49 AM
3	Insufficient data on pesticide exposure of seed corn production field workers in Hawaii. What are the cumulative impacts of year-round exposure to a mixture of miticides, fungicides, and insecticides in Hawaii?	7/20/2014 5:09 PM
4	It seems to me on the question of training every year or every 5 years - there is some room for middle ground. Why not every 2 or 3 years?	7/16/2014 5:37 PM
5	there is not anything wrong with the current system, all the proposed changes will do is take more time away from production and the workers and handlers will have to make up for lost time in productivity because someone in the E.P.A. is trying to justify their existence, these proposed changes are going to cause more accidents, spills and exposure to the pesticides than with the current system. I believe the current system should be left alone and let the farmers in this country do what they do best and the E.P.A. pencil pushers find another entity to destroy as they have done a great job of destroying this country. oh I forgot that the farmers are the last business in the country, all the other business's have left the country because of the E.P.A.	7/14/2014 7:31 PM
6	Without information that the current standards cause problems and what sorts of problems, let's not burden the the industry with more paperwork and time sinks.	7/14/2014 12:00 PM
7	Requiring training every year would put an undue burden on Extension Agents and farmers. Extension Agents would not get anything else accomplished during the training period.	7/14/2014 11:49 AM

Proposed Changes to EPA Agricultural Worker Protection Standard

8	We already are required to do as proposed for the 1st and 4th proposals. the second makes sense and would not be more. The 3rd proposal is murky. These required trainings should only apply to those who work directly with pesticides, not every worker.	7/13/2014 3:05 PM
9	Don't understand question about grace period.	7/12/2014 8:58 AM
10	Trainings should be provided in Spanish for spanish speaking farmworkers. Currently over 80% of the Farm workers are hispanics. According to the recently released Ag Census, the number of Hispanic operated farms has increased 21 percent between 2007 and 2012. The National Agricultural Workers Survey shows that Spanish was the predominant native language of farm workers (81%). Of U.S. born Hispanic farm workers, only 66% said that they could read and write English well. This drops to 4% for Mexican born Hispanics. Fifty seven percent of Mexican born workers said they could not speak English at all, while 68% said they could not read English.	7/11/2014 10:29 AM
11	WPA scope should be expanded to include "non-agricultural" uses such as lawn care companies, golf courses, pest control operators, etc. There should be a threshold level of something like 2 acres of treated land. This threshold would a cumulative daily threshold; example: 8 1/4 acre home lawns treated would require compliance to WPA.	7/11/2014 5:21 AM
12	It's time to respect the worker's intelligence. These people are intelligent and understand the importance of proper sanitation and handling of chemicals. The employers do not need additional costs of training on a yearly basis. Let's get some work done!	7/10/2014 6:12 PM
13	The reasoning for conducting training each year, is that the employee turn over is usually about 1/3 year year, so every four years there is a 100 turnover...	7/9/2014 6:27 PM
14	Knowledge is power. By making sure that workers are trained annually on both the occupational and collateral issues related to using pesticides, we may stave off illnesses of relatives etc that are inadvertently exposed to these chemicals. I would also note that similar notices or offers of training should be available to places like garden centers, nurseries and big box stores that sell similar chemicals because many homeowners do not know how to safely apply or handle pesticides.	7/9/2014 2:40 PM
15	Check other countries, imports of fruit and vegetables, organic fruits and veggies.	7/9/2014 8:04 AM
16	As a former Pesticide Regulatory official who carried both State and Federal credentials I had enforced WPS for a period of 10 years in the central US. The current regulations as written are more than enough to to insure the protection of workers and handlers if the workers and handlers follow the training they receive! There should be a joint responsibility between the employer and the worker and handlers, don't penalize employers because employees can't follow directions. More regulations is not needed in this case, I suspect this is again USEPA attorneys and the Pesticide Sections means of justification for the program.	7/9/2014 6:12 AM
17	Is there room for compromise? Training every five years is probably too long, but every year could be repetative and ignored. Every two or three years seems like a sensible and workable training schedule.	7/7/2014 4:35 PM
18	Expand education that will help workers/handlers but don't add more record keeping burden to farmers.	7/7/2014 10:22 AM
19	i think that there should be 3-year training cycle instead of annual (proposed) and 5-years (current) for workers and handlers.	7/6/2014 8:01 PM
20	The proposed regulations will impose an undue hardship on Mom and Pop growers and those in the North East in general. New Englanders farm on parcels that are far smaller than their mid-west brethren. The control therefore, as it currently stands, is more than adequate and secure.	7/4/2014 2:31 PM
21	training people every year for the same things is like teaching someone to drive every year, its nonsense.	7/4/2014 10:05 AM
22	Any standards need to account for movement of employees. Training should be portable. A person trained needn't be retrained only because they change employers. If your going to increase the standards then honor the higher level of training by eliminating redundancy.	7/4/2014 6:48 AM
23	When the current standards are adhered to how many incidents have been reported alleging harm to the worker?	7/3/2014 1:50 PM
24	For the first proposal, I answered the way I did because, many times, constant, similar training is less absorbed because it is the same material every single time over and over again. Trainees become bored with the material and not educated. Every 5 years keeps it fresh enough where the student is more engaged when the re-training happens.	7/3/2014 1:45 PM
25	Many of our workers come to the job for a few days & just leave abruptly because the work isn't what they want to do. We waste enough time already with paperwork with these people without adding to the burden.	7/3/2014 1:37 PM
26	proposed rules will put undue burdens on small farms where the owner is also the operator/trainer/record-keeper.	7/3/2014 10:50 AM
27	Record keeping for one year would make sense	7/2/2014 5:13 PM
28	We are currently over regulated to the extent of not being profitable and cannot stay in business if additional regulation is imposed on us. I have no money to hire an additional person to follow your proposed new rules which I would have to do in that case. We are safe with our chemicals, use no more than necessary and treat our employees like family. Very soon you will be getting all your vegetables from South America if you don't ease up on us. Why do you continue to make new regulation when there are no new problems? Every year I make less money because of the taxes I pay, inflation, and increasing regulation- all a direct cause of a liberal, socialist government agenda. My next step will be to raise all grain and have no employees. How do you figure that helps the people I currently employ? Please remember that you get a check every Friday and I have to figure out how to generate wages for my people every Friday and you are not helping. I am blessed to have very good people working with me, I respect them and they are my friends. If you think you need to impose additional safety regulations on me with regard to them you are dead wrong. I am out of business without them.	7/2/2014 4:12 PM
29	Only should apply to workers that are legal. Non-legal works should have no rights and should fall outside this proposed standard. Finger print idea them and run back ground checks = if they're not legal ship their asses back!	7/2/2014 12:30 PM
30	the devil will be in the details. Like the information sheet. If it is going to say everything around you is poison, do not touch anything or you will die, I am against it.	7/2/2014 7:46 AM
31	WPS training is very good. More will not make it any safer for the worker and handler.	7/2/2014 7:24 AM
32	These proposals would increase the level of regulation when no need for the increase has been identified. Most farms are already facing higher levels of scrutiny because of GAP requirements and the subsequent employee training. Increased EPA standards would be a duplication and is unnecessary.	7/1/2014 10:54 PM
33	These new proposals should reduce pesticide exposure.	7/1/2014 9:00 PM
34	Increased regulation and education could be beneficial, however funding is always a concern.	7/1/2014 7:50 PM
35	my crops are sold entirely intrastate. Therefore, EPA has no constitutional jurisdiction and should not impose any standards, whether current or proposed, on my operation.	7/1/2014 7:25 PM

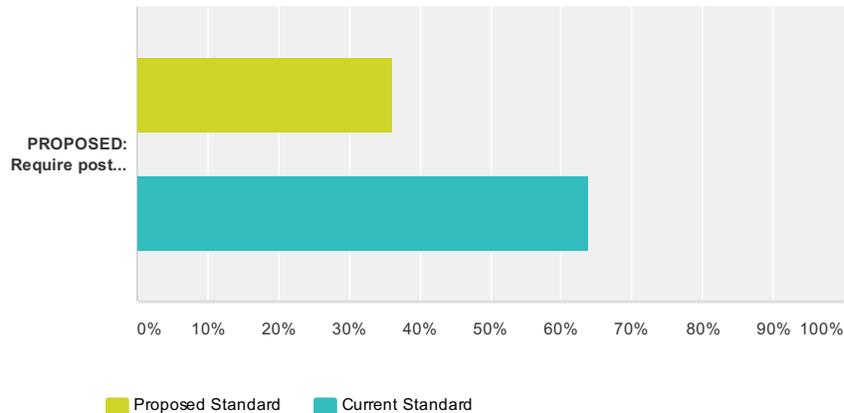
Proposed Changes to EPA Agricultural Worker Protection Standard

36	new employees should be trained - returning employees could be updated and reminded	7/1/2014 7:21 PM
37	Tain workers every three years?? Given the number of workers, the mobility of the workforce it is extremely difficult for a qualified trainer to train everybody within five days, let alone two days.	7/1/2014 5:43 PM
38	AZ law requires recordkeeping. The concern with the new standard is providing copies of the training.	7/1/2014 3:59 PM
39	it should be illegal for employers to knowingly expose their employees to neurotoxins. Therefore, farm owners who allow their employees to handle and be exposed to pesticides should be held liable for criminal charges. Training for 'safe' handling is insufficient, since accidents frequently happen, and protection is not complete. For the health and safety of their employees, farm owners should take full responsibility to farm in such a way that neurotoxins are not required as part of their management and operation.	7/1/2014 3:18 PM
40	We farm 66-acres of Pears and Cherries. Our biggest crop is D'Anjou pears where we need 18-25 workers to help us get the pears off the tree. We start slowly, put on 5-8 on the first day, another 5 or so the second day, and then if we are lucky to find enough workers they can start anywhere from the 3 day of harvest up to the 5 or even 7th day of harvest. If we had to train within 2 days, it would be a tremendous hardship on us smaller growers who do not have access to a full time employee who can do the training. I take a day off my "paying" job to come train all the workers on the 5th day of harvest. There is no way I could take time every 2-days to do this. At the time of hire we provide the workers with the information and give them a copy of the Pesticide Safety brochure.	7/1/2014 3:07 PM
41	Who or what entity will be able to provide 2 million persons with training? Who or what entity will track and qualify the trainers? These types of questions need answers prior to asking whether the cost is worth x benefit.	7/1/2014 3:03 PM
42	Keep records longer, as long as personal injury statutes of limitation.	7/1/2014 1:08 PM
43	Stricter qualification for trainers sounds fine but having to get trained every single year does not seem very feasible. also unsure about whether reducing grace period to 2 days makes sense in all cases.	7/1/2014 12:01 PM
44	I support annual training, but I feel the current trainer qualification is adequate. The current focus on content rather than the recommended focus on training methods is preferable. The existing 5 day grace period is difficult enough to fulfill, and the existing EPA distributed pre-training materials are adequate.	7/1/2014 8:29 AM
45	Proposed stricter qualifications of trainers should provide the owner or manager of the operation to become reasonably easily qualified. This training should be very simple as an example would be to read and understand the label statements on the pesticide. For example copies of the labels should be provided as an open source information for workers. This survey question is over simplified because if protective garments are provided and worn, normal clothing should be safe to wear at home after work. Take-home exposure should not be the focus of regs because protective materials/supplies/garments should be provided. EPA registration has data on worker exposure and should be incorporated into the label statements.	7/1/2014 8:18 AM
46	These seem non-burdensome and an improvement	7/1/2014 8:07 AM

Proposed Changes to EPA Agricultural Worker Protection Standard

Q2 Please Indicate your preference for "Proposed Standard" or "Current Standard" relating to Mandatory Posting of No Entry Signs.

Answered: 315 Skipped: 13



	Proposed Standard	Current Standard	Total
PROPOSED: Require posting of treated areas when Restricted-Entry Interval (REI) is greater than 48 hours. The REI is the interval after application during which worker entry is generally prohibited, except as allowed under the early entry exceptions. CURRENT: Either oral or posted notification is acceptable for REIs of any length, unless the pesticide labeling requires both.	36.19% 114	63.81% 201	315

#	Comments (optional):	Date
1	Although REI signage is important, its more important to establish exposure levels in a year-round production system. Data from temperate crop production do not apply, but 4X exposure levels of Midwest farming may be a start.	7/20/2014 5:14 PM
2	I would prefer even more strict guidelines. Too many times I have run into a situation using just oral notification and the block is being sprayed when someone is in it. Miscommunication happens. When spray schedules are on large acreage and dictated by weather, schedules change constantly- it is hard to keep up and everyone informed about everything. I think that we should be as cautious as we can by using signs as well as oral communication. I would also include special notes such as restrictions based on what is being done to the crop. Sometimes we are told that we can go into a block as the REI is up but what we are doing is not what is specifically on the label as the other REI, but does involve touching the crop (Pristine for grapevines). I feel as if those things get lost in the cracks and would be caught more often if there were several lines of communication about what was sprayed along with other information. Along those lines, new chemistries are always being brought online and everyone can't remember everything about every chemical. It is for those reasons that I think more information needs to be shared with everyone who may be in contact with all sprays.	7/17/2014 6:40 PM
3	If property is not located in highly populated or traveled area or is marked private property the current standard should be fine.	7/16/2014 5:37 PM
4	The chemical use in Agriculture area or in the Nursery, whether restricted or general used pesticides, always need the REI sign posted.	7/14/2014 7:34 PM
5	Most growers use the warning signs as well as oral warnings for all pesticides. The signs offer a visual reminder even if they were given an oral warning.	7/14/2014 10:03 AM
6	No need, since only trespassers would not know about REI and would ignore warnings anyhow.	7/13/2014 3:11 PM
7	Signs should be in English and Spanish.	7/11/2014 10:30 AM
8	For small farms and farms with few employees the posting requirement will add a burdensome expense.	7/11/2014 4:24 AM
9	Again, let's treat these employees as the intelligent people they are. All this additional paperwork is not going to make anyone safer.	7/10/2014 6:15 PM
10	Workers only go into field which I tell them. I think there should be some difference in standard for small farms and large farms where there is a lot of spraying everyday	7/9/2014 8:07 PM
11	I am not thrilled with these two options. Posting is better than oral in general, but not requiring it unless REI is greater than 48 hours seems too lax. I would prefer requiring posting if the chemicals are hazardous even if less than a 48 hour period. If something is less hazardous after it dries, then posting probably is not necessary if one stays until it dries.	7/9/2014 2:45 PM
12	The scale of our operations and day to day contact with workers is such that posted notifications are unnecessary. I am, for example, aware of what everyone is doing and where they are at all times.	7/8/2014 12:09 PM
13	Very few chemicals have rei over 48 hours.	7/7/2014 4:37 PM
14	The label should dictate posting requirements. Huge sums of money are expended to get label approval. Farmers then pay the labeling costs by purchasing the product. Follow the label.	7/4/2014 6:50 AM
15	Same question - what is driving the changes?	7/3/2014 1:51 PM
16	Outdoor areas are difficult to post effectively over a large area. Greenhouse posting is not a problem because of the restricted entry points.	7/3/2014 11:41 AM

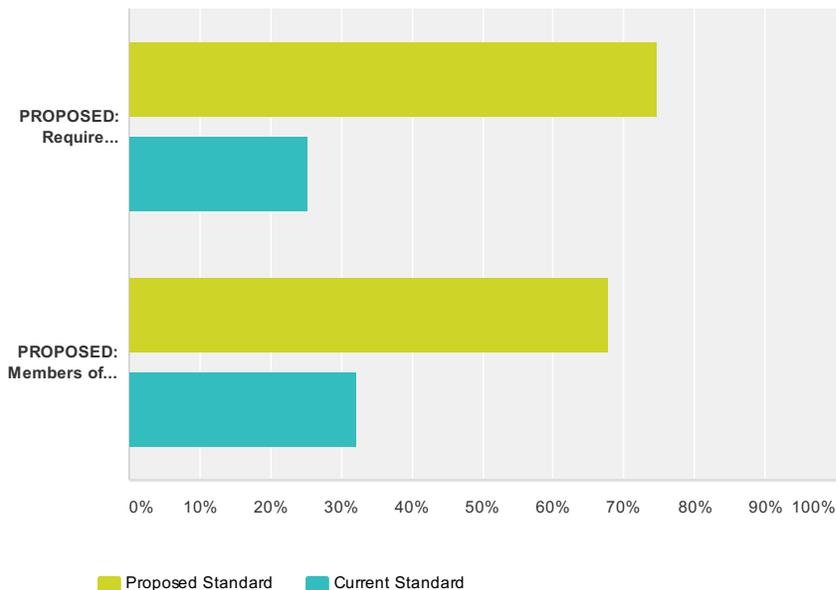
Proposed Changes to EPA Agricultural Worker Protection Standard

17	again, posting signs to notify the one to ten workers on a small farm puts undue burden on owner/operator of a small farm.	7/3/2014 10:52 AM
18	it should be illegal for employers to knowingly expose their employees to neurotoxins. Therefore, farm owners who allow their employees to handle and be exposed to pesticides should be held liable for criminal charges. Training for 'safe' handling is insufficient, since accidents frequently happen, and protection is not complete. For the health and safety of their employees, farm owners should take full responsibility to farm in such a way that neurotoxins are not required as part of their management and operation.	7/1/2014 3:18 PM
19	We do this for Global Gap certifications anyway. No big deal.	7/1/2014 3:09 PM
20	CA already requires posting for REI's over 48 hours and in some counties everything is posted.	6/30/2014 6:11 PM

Proposed Changes to EPA Agricultural Worker Protection Standard

Q3 Please Indicate your preference for "Proposed Standard" or "Current Standard" relating to Minimum Age.

Answered: 317 Skipped: 11



	Proposed Standard	Current Standard	Total
PROPOSED: Require pesticide handlers and early-entry workers to be at least 16 years old. CURRENT: No minimum age.	74.76% 234	25.24% 79	313
PROPOSED: Members of owner's immediate family are exempt from this (and most other) requirements of the WPS. CURRENT: No minimum age requirement.	67.91% 201	32.09% 95	296

#	Comments (optional):	Date
1	Worker protection standards of family members is important, and they should not be exempted. If more stringent laws are proposed, there should be sufficient funds to cover implementation for increased federal enforcement.	7/20/2014 5:18 PM
2	Age should be higher since kids are still developing and don't understand the harmful nature of these chemicals	7/20/2014 4:20 AM
3	I don't think that there should be an exemption to this. Anyone who handles/is exposed to pesticides should be well informed of any and all dangers.	7/17/2014 6:41 PM
4	Our state requires a minimum age of 16 years for pesticide certification. I believe this should extend to immediate family as well.	7/14/2014 10:05 AM
5	Not applicable on our farm.	7/13/2014 3:12 PM
6	Persons less than 16 years of age Other than family are not allowed to work on the farm.	7/11/2014 3:40 PM
7	This may set us up for law suits. If a person applies chemicals in their home and lets their 5 year old kid play in the room and the kid later gets a nerve disease that can be related to exposure to pesticide, a lawsuit can be filed. There are way too many such suits filed because adults cannot take responsibility for their own knowledge or actions. Suggest that the standard states that parents are responsible for managing their family members' exposure to pesticides within the home.	7/9/2014 2:48 PM
8	No one under the age of 16 should be allowed in the field.	7/9/2014 8:12 AM
9	I think that family members should not be exempt, but there wasn't that choice.	7/8/2014 5:02 PM
10	How are we going to teach the next generation of farmers if these rules are proposed?	7/7/2014 4:39 PM
11	Follow the label. Some pesticides might be safe for any age.	7/4/2014 6:52 AM
12	Members of owner's immediate family should still be at least 16 years of age to apply pesticides.	7/3/2014 4:07 PM
13	Let kids help on the farm - they are going to anyhow. Shouldn't be limited to immediate family members = any one under 16 with the parent's written OK.	7/2/2014 12:33 PM
14	Putting the age for handlers and early-entry workers to 16 is just common cence.	7/2/2014 7:47 AM
15	16? Should be 18, MINIMUM	7/2/2014 7:37 AM
16	I would prefer an older age of 18 - both to protect the handler and allow regulatory agents to hold handlers accountable.	7/2/2014 5:22 AM
17	Younger people can be less tolerant of pesticides so I think this is a good idea.	7/1/2014 9:04 PM
18	They have expanded who is immediate family which is a good thing. My concern with changing to a minimum age is what are people going to do with their kids if it is not during school. However, I believe an age is needed just to get people off the concerns over children in ag.	7/1/2014 4:02 PM

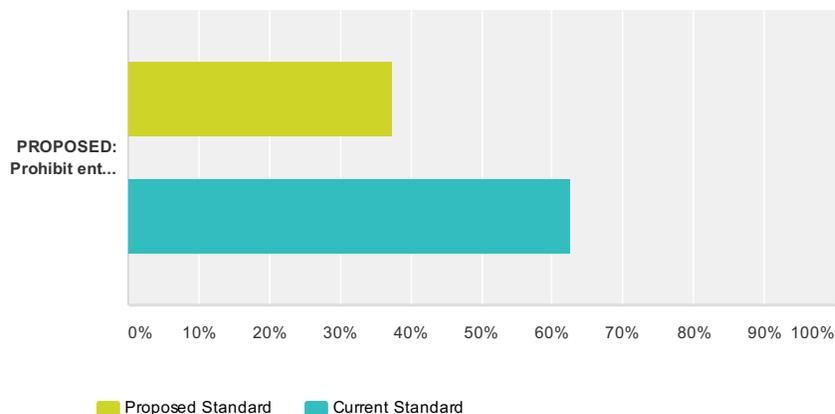
Proposed Changes to EPA Agricultural Worker Protection Standard

19	it should be illegal for employers to knowingly expose their employees to neurotoxins. Therefore, farm owners who allow their employees to handle and be exposed to pesticides should be held liable for criminal charges. Training for 'safe' handling is insufficient, since accidents frequently happen, and protection is not complete. For the health and safety of their employees, farm owners should take full responsibility to farm in such a way that neurotoxins are not required as part of their management and operation. Farm owners who knowingly expose children, below the age of 18, to neurotoxins should also be held liable for child abuse.	7/1/2014 3:19 PM
20	Do not exempt members of owners' immediate families from sixteen year old minimum age requirements or other safety requirements.	7/1/2014 1:10 PM
21	I don't understand the implications of the current or proposed standard exempting owners immediate family from WPS	7/1/2014 9:28 AM
22	Minimum age for pesticide handlers No minimum age for early-reentry workers	7/1/2014 8:54 AM
23	This question is ambiguous because	7/1/2014 8:49 AM
24	The sentiment here is good however, the wording excludes interns and other agricultural workers who are part of the "next generation" of farmers. Please do not discourage future farmers!	7/1/2014 7:50 AM
25	If proposed, both. If no family exemption, then keep as-is.	7/1/2014 7:31 AM
26	Several small farming operations utilize extended family. Although it is preferable that handlers be 16 years +, sometimes it is safer for a supervised younger family member to perform handling tasks vs. an older family member. The younger generation is often better equipped to read and follow label instructions in cases where English is a secondary language.	6/30/2014 2:27 PM

Proposed Changes to EPA Agricultural Worker Protection Standard

Q4 Please Indicate your preference for "Proposed Standard" or "Current Standard" relating to No Entry Buffer Areas Adjacent to Areas being treated on Farms and Forests.

Answered: 315 Skipped: 13



	Proposed Standard	Current Standard	Total
PROPOSED: Prohibit entry into 25-100 foot buffer areas around the field during pesticide application on farms, forests, nurseries, and greenhouses to protect persons from pesticide overspray and fumes. The buffer size depends on the type of application. CURRENT: Applies only in nurseries and greenhouses.	37.46% 118	62.54% 197	315

#	Comments (optional):	Date
1	This requirement is completely unnecessary and will have significant operational impacts on both small and large farms.	8/4/2014 7:28 PM
2	We have many small farmers in Hawaii. Some are close to residential. New rulings may affect them.	8/3/2014 10:02 PM
3	This is EXTREMELY problematic to operations that border areas where the public visits. A 25-100 ft buffer means many acres would not be able to be treated.	7/30/2014 5:06 PM
4	There should be greater buffers for windy areas and for fields along highways, especially for pesticide intensive seed corn production.	7/20/2014 5:21 PM
5	that can be a significant are for a small farm. What would constitute a pesticide?	7/20/2014 10:38 AM
6	Make it a standard sized buffer-period. This avoids having to determine what buffer is needed for what chemical. Keep it Simple.	7/14/2014 12:06 PM
7	Drift and overspray are currently illegal. If workers are being sprayed, then maybe we need to do more to address the issue at the applicator level. Also, how will these buffers be determined? Will this information be on the product label or will the applicator have charts to figure it out?	7/14/2014 10:11 AM
8	Impossible to enforce equitably. It would be possible for enforcers to a few farmers for whatever reason.	7/13/2014 3:16 PM
9	no opinion	7/11/2014 5:25 AM
10	I mostly support the proposed but am concerned about the buffers, do they apply only during spraying? Is spot spraying with a back pack sprayer require a 100' radius buffer?	7/11/2014 4:26 AM
11	lot of farm dosnot have	7/10/2014 2:50 PM
12	While the concept is great, many of us do not have 25 feet of unused land as a buffer....We have 30 ares of grapes, therefore it would take 12 rows of vines out to create the buffer zone.	7/9/2014 6:29 PM
13	Proposed standard is difficult to implement in field situations.	7/9/2014 6:43 AM
14	Many blocks are within 100 feet of external properties/roads/trails and this is impossible to manage. Normal practice is to stop spraying if persons come into range.	7/8/2014 12:13 PM
15	For small patches in mixed vegetable fields this would be very difficult.	7/8/2014 3:58 AM
16	we always apply with zero entry of any visitor or worker in our organically managed fields Must we legislate common sense?	7/7/2014 9:10 PM
17	100 foot buffers would be extremely problematic on small farms (such as the majority in the northeast) since fields are often less than 100 feet from roads, houses, and public areas.	7/7/2014 9:45 AM
18	This would be impossible to implement. You'd have to close roads down when you were spraying, effectively eliminating a growers ability to spray if his field were adjacent to a road.	7/7/2014 8:52 AM
19	This proposed standard would be impossible for us folks in the Northeast because of the small size of our farm & the many different crops that are grown in a very tight area.	7/3/2014 1:45 PM
20	100' on a small farm is too restrictive	7/3/2014 10:57 AM

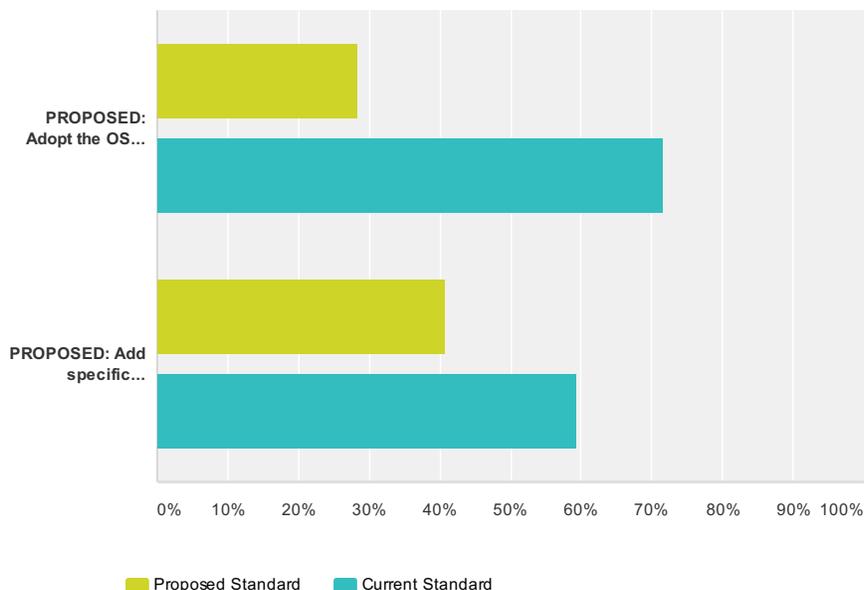
Proposed Changes to EPA Agricultural Worker Protection Standard

21	Land owners/farmers shouldn't be forced into not working the outside of fields to allow such buffer strips. If you own it you should have complete (100%) freedom to farm it.	7/2/2014 12:35 PM
22	Current pesticide labels and field record data provide enough protection.	7/2/2014 7:26 AM
23	The proposed regulation is vague. How large an area would be restricted?	7/1/2014 11:00 PM
24	How do you define a field? A field can be five acres or 1,000 acres plus.	7/1/2014 5:46 PM
25	Provides another protection to keep allegations at bay. However, it will be terribly difficult to enforce. How do we know where people are, the application equipment was	7/1/2014 4:03 PM
26	it should be illegal for employers to knowingly expose their employees to neurotoxins. Therefore, farm owners who allow their employees to handle and be exposed to pesticides should be held liable for criminal charges. Training for 'safe' handling is insufficient, since accidents frequently happen, and protection is not complete. For the health and safety of their employees, farm owners should take full responsibility to farm in such a way that neurotoxins are not required as part of their management and operation. Farmers who allow neurotoxins and other toxic and unwanted products, including pollen, to travel off their farm should be held liable for trespass. Farmers should take full responsibility to keep such firmly on their property.	7/1/2014 3:20 PM
27	Who will subsidize the farmer for the 25-100' buffer zones on all perimeters due to lost production of non-pesticide use? Is there data to demonstrate harm has come to use of pesticide applications that resulted in drift? Fumes. What is that considered? Most current pesticides are non-volatile. If fumes are a qualification/consideration, then they need to be separated away from dilutable or granular products.	7/1/2014 3:12 PM
28	Have buffer zones of 100 feet or more when edge of zone is property boundary. Notice to neighbors prior to application.	7/1/2014 1:11 PM
29	Buffers would/should apply in those instances when there is a human hazard potential from contact or inhalation exposure. In some cases the material used does not pose a risk or hazard.	7/1/2014 12:42 PM
30	This would restrict applications along many roads. Exempt fields along roads because vehicles would be moving through and not exposed to fumes for very long?	7/1/2014 8:56 AM

Proposed Changes to EPA Agricultural Worker Protection Standard

Q5 Please Indicate your preference for "Proposed Standard" or "Current Standard" relating to Personal Protective Equipment (PPE): Respirators and Closed Systems.

Answered: 317 Skipped: 11



	Proposed Standard	Current Standard	Total
PROPOSED: Adopt the OSHA standard for respirators: fit test, medical evaluation, and training. Require recordkeeping to document completion of these requirements. CURRENT: Employer must provide the respirator listed on the pesticide labeling and ensure it fits. Recordkeeping is not required.	28.48% 90	71.52% 226	316
PROPOSED: Add specific performance standard requirements for closed systems based on California (CA) standard to permit PPE exceptions. Does not include the CA requirement to use closed systems for certain types of pesticides. CURRENT: The closed system definition fails to provide specific criteria for the PPE exception.	40.80% 122	59.20% 177	299

#	Comments (optional):	Date
1	There is not an agency or company close to all growing regions that are qualified to do fit testing, etc. Can be hard to locate and expensive to get to. Who will test the closed system performance?	7/16/2014 5:43 PM
2	this is common sense.	7/14/2014 7:31 PM
3	I often get questions on the use of respirators and the OSHA standard. Making them consistent would end confusion but ability to fit test and have medical evaluations could prove problematic especially in rural areas. Questions arise as to the cost of the evaluation and who pays.	7/14/2014 10:14 AM
4	We are in CA. Let others learn.	7/13/2014 3:18 PM
5	Don't know what the Ca requirements are	7/12/2014 9:09 AM
6	no opinion on second	7/11/2014 5:25 AM
7	OSHA standard will place time and expense burden on small farms	7/11/2014 4:30 AM
8	Don't understand question	7/10/2014 4:33 AM
9	When do growers have time to get a Doctor to test their Respirator.	7/9/2014 8:11 PM
10	The standard needs to be clear and easy to implement.	7/9/2014 6:46 AM
11	Employer must provide the respirator listed on the pesticide labeling and ensure it fits. Recordkeeping should be mandatory	7/8/2014 5:13 PM
12	Many pesticides do not require use of respirators, and for those that do there are alternatives such as pressurized spray cabs on tractors. Requiring all pesticide applicators to follow OSHA respirator guidelines would add enormous cost, as well as the difficulties in many areas of getting the medical evaluation.	7/7/2014 9:51 AM
13	Recordkeeping is just a way for OSHA to audit and find lacking a grower. The more of this that is required the less small and family farms you will see as OSHA and other organizations make the record keeping too onerous to handle. These requirements for documentation, if followed would require one man doing this full time on a small farm. Something they cannot afford.	7/7/2014 8:54 AM
14	The record keeping in this situation would be overkill.	7/3/2014 1:49 PM
15	#1 Screw OSHA. Keep them off "our" farms. #2 Screw any requirements based on California standards. This is NY not CA. Keep these a state issue - not a Federal issue.	7/2/2014 12:37 PM

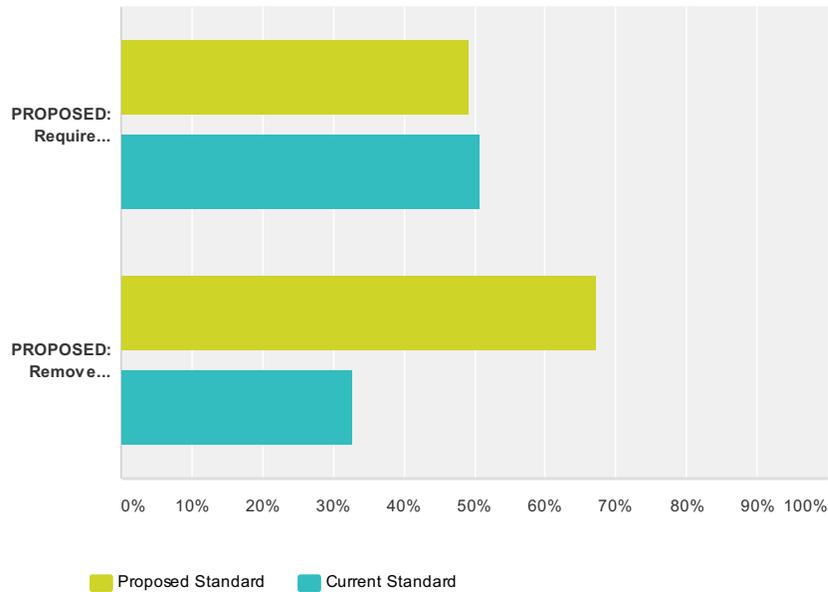
Proposed Changes to EPA Agricultural Worker Protection Standard

16	It is a liability issue if the growers do not follow the OSHA. Put it out in front of folks so they know. The closed system allows for the use of less PPE so that is a good thing.	7/1/2014 4:04 PM
17	Why would you require what is beyond manufacturer specifications? The last thing a manufacturer wants is to place a customer in danger, causing a lawsuit or worse, actual harm to the individual(s). Why is a California standard dictating what the should be done for the remainder of the nation? They have been known for paltry science and emotional decisions. e.g. pyrethroid usage in residential settings study that only used one neighborhood, forcing many times larger water volumes at higher pressure than normal. Pesticides were applied beyond label specifications. And yet, all pesticide levels were found below minimum thresholds, and still CA reacted as though great harm was done despite past scientific findings. And the nation followed suit. Why continue this false science?	7/1/2014 3:22 PM
18	it should be illegal for employers to knowingly expose their employees to neurotoxins. Therefore, farm owners who allow their employees to handle and be exposed to pesticides should be held liable for criminal charges. Training for 'safe' handling is insufficient, since accidents frequently happen, and protection is not complete. For the health and safety of their employees, farm owners should take full responsibility to farm in such a way that neurotoxins are not required as part of their management and operation. Respirators, especially during the summer heat, are very inadequate. Employees should not be placed in situations where toxins could leak inside the respirators.	7/1/2014 3:21 PM
19	I am adamantly opposed to adopting the OSHA standard, with its requirement for medical evaluation. This standard is practically unworkable in all but the largest industrial organizations, and would be a terrific burden for all but the largest farms. It is very expensive and very paperwork intensive. It would effectively remove the capability of small farms to apply any pesticide that requires respirator use on the label. This is the most onerous part of the proposed rule, and far more costly than the EPA estimates.	7/1/2014 8:38 AM
20	This second question really does not make sense and do not seem to actually reflect standards	7/1/2014 7:57 AM
21	The current California standard is not a good model. The language is not clear to growers and enforcement staff alike.	6/30/2014 2:30 PM

Proposed Changes to EPA Agricultural Worker Protection Standard

Q6 Please Indicate your preference for "Proposed Standard" or "Current Standard" relating to Hazard Communications.

Answered: 312 Skipped: 16



	Proposed Standard	Current Standard	Total
PROPOSED: Require employer to maintain and make available to workers, handlers, or their authorized representatives application-specific information, labeling and Safety Data Sheets (SDS). Retain this information for 2 years. CURRENT: No requirement to make safety information available to authorized representative.	49.20% 153	50.80% 158	311
PROPOSED: Remove burdensome requirement to post application-specific information at central display. CURRENT: Record keeping is not required, except, application-specific information must be posted at a central display until 30 days after the REI expires.	67.22% 203	32.78% 99	302

#	Comments (optional):	Date
1	Pesticide specific application should be posted for all workers. In most instances, pesticide applicators especially in large farms do not have a basic knowledge of pesticides, mode of action, impacts on human health, and cannot pass a pesticide applicators exam. All pesticide applicators must be able to pass an applicators exam and have an applicators license.	7/20/2014 5:27 PM
2	establishment of reasonable guidelines for data sheets would be helpful.	7/20/2014 10:42 AM
3	Let's work on the basis that employers will take the right steps to provide info to those who need it.	7/14/2014 12:09 PM
4	The central location puts the information in a place for everyone to see without having to make a request. I think a hybrid of the current and proposal is needed.	7/14/2014 10:19 AM
5	1st must have been written by lawyers, they have the resources to look it up. 2nd makes things more sensible.	7/13/2014 3:38 PM
6	Again for farms with few employees and acres the proposed while important for worker safety on larger farms places a disproportionate burden on small farms.	7/11/2014 4:32 AM
7	Providing Hazard Communications ... I do not see the need for keeping this information for two years - I suggest keeping it for the current season or year	7/9/2014 5:50 PM
8	Information should be available to workers and others at a convenient location.	7/9/2014 6:48 AM
9	this is way to vague needs to be cleaned up	7/7/2014 8:11 PM
10	This proposal looks like they are setting us up for litigation. It should be sufficient that we have labels to work by & follow directions.	7/3/2014 1:53 PM
11	"Authorized Representative" = lawyer? Keeping records for 2 years is just more office work. Fewer records = fewer issues. Keep the current rule on posting = any time the gov. wants to reduce something it results in more \$\$\$ being spent somewhere else.	7/2/2014 12:41 PM
12	Authorized rep is going to be a problem. I can see every do gooder, anti pesticide group using this to get at my records.	7/2/2014 7:50 AM
13	Authorized representative is unclear to me and seems like moving toward unions, I do not like that. Having the info available is important for exposures or to dispel rumors. Eliminating the central posting of application information is good as it is difficult to keep current and based on presentations has the highest violation rate.	7/1/2014 4:07 PM

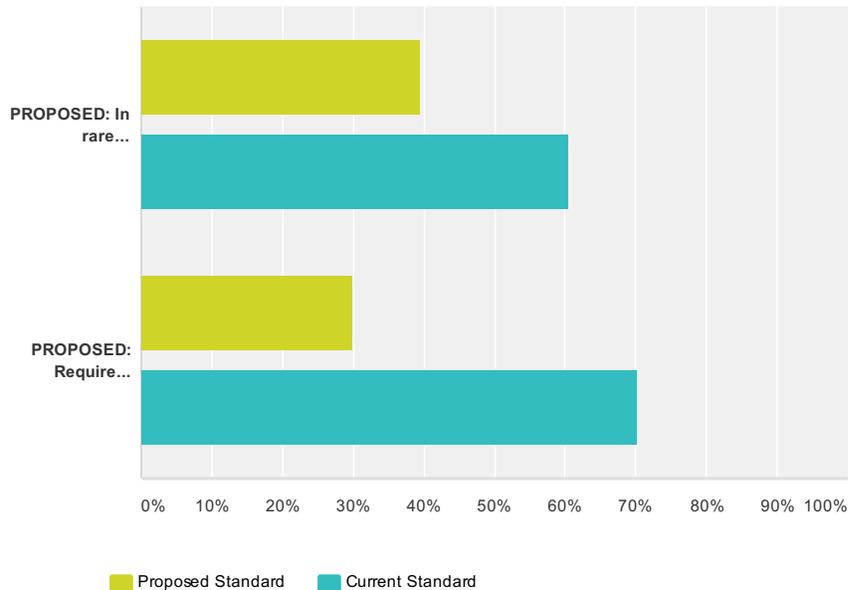
Proposed Changes to EPA Agricultural Worker Protection Standard

14	it should be illegal for employers to knowingly expose their employees to neurotoxins. Therefore, farm owners who allow their employees to handle and be exposed to pesticides should be held liable for criminal charges. Training for 'safe' handling is insufficient, since accidents frequently happen, and protection is not complete. For the health and safety of their employees, farm owners should take full responsibility to farm in such a way that neurotoxins are not required as part of their management and operation. Farmers should 'treat their employees as themselves' - and prevent exposure. Then, MSDS sheets will be irrelevant.	7/1/2014 3:22 PM
15	Would be in favor of making label and SDS available for the season but not 2 years	7/1/2014 2:21 PM
16	Retain information or summary thereof longer, as long as personal injury statutes of limitation. Central display should be retained.	7/1/2014 1:13 PM
17	This is all available on the internet	7/1/2014 8:59 AM
18	Need to keep some basic pesticide application information in a place accessible to workers without having to ask employer for it. Doesn't need to be two years, thirty days seems reasonable.	7/1/2014 7:32 AM
19	Value judgement there on 2nd question. Burdensome. Delete that word. Or, you could add helpful to the current record keeping phrase.	7/1/2014 7:22 AM

Proposed Changes to EPA Agricultural Worker Protection Standard

Q7 Please Indicate your preference for "Proposed Standard" or "Current Standard" relating to Notification for Early-Entry Workers

Answered: 305 Skipped: 23



	Proposed Standard	Current Standard	Total
PROPOSED: In rare circumstances, early-entry workers can enter while REI is in effect. For these situations, provide notification of the pesticide application (what was applied, when and where), specific task to be performed, and amount of time the worker is allowed to remain in the treated area, along with the pesticide hazard information from the labeling. CURRENT: Early-entry workers must be informed only of hazards written on pesticide labeling.	39.40% 119	60.60% 183	302
PROPOSED: Require recordkeeping for 2 years of the notifications that are provided to early-entry workers. CURRENT: Recordkeeping is not required.	29.90% 90	70.10% 211	301

#	Comments (optional):	Date
1	Only Pesticide applicators with a valid pesticide license should be allowed early entry!!!	7/20/2014 5:29 PM
2	I've seen very few instances of early entry work in our state. Seems to be excessive paperwork. If this proposal is adopted as well as keeping application records for two years, these items should be merged somehow. If a worker has some type of health problems, will this data provide information of value two years in the future?	7/14/2014 10:23 AM
3	In our orchards any early entry workers don't even get close to surfaces that have been sprayed. Very few of the orchard tasks require this contact, and are simply done at other times. For our small operation, these would be onerous requirements, and almost insulting to the intelligence of the workers who, in most cases, are the ones who apply the pesticide and have been well trained in the dangers.	7/13/2014 3:53 PM
4	I think there should be no re-entry before the REI is up no matter.	7/9/2014 8:13 PM
5	Unless there is a "policeman" at every gate, we allow our workings to use common sense and adhere to our suggestion not to enter an area until told to do so....	7/9/2014 6:33 PM
6	The current standard is sufficient.	7/9/2014 6:50 AM
7	2 year record keeping is stupid because anyone can lie.	7/4/2014 10:14 AM
8	1-"Rare circumstances" is not defined and therefore this question lacks validity. 2-Notifications should be in conformance with approved label.	7/4/2014 6:55 AM
9	I would favor record keeping for one year	7/2/2014 5:17 PM
10	Less records = less problems.	7/2/2014 12:41 PM
11	The proposal for what to tell workers is over the top. I believe they should be informed as to what is going on - why entering and pesticides applied. Recordkeeping is overly burdensome.	7/1/2014 4:08 PM
12	Who creates the time limits in the proposal statement? What determines the interval? Don't propose something that isn't a qualified statement/proposal.	7/1/2014 3:26 PM
13	it should be illegal for employers to knowingly expose their employees to neurotoxins. Therefore, farm owners who allow their employees to handle and be exposed to pesticides should be held liable for criminal charges. Training for 'safe' handling is insufficient, since accidents frequently happen, and protection is not complete. For the health and safety of their employees, farm owners should take full responsibility to farm in such a way that neurotoxins are not required as part of their management and operation. If early entry is a risky situation, then employees should not be asked or ordered to do that.	7/1/2014 3:22 PM

Proposed Changes to EPA Agricultural Worker Protection Standard

14

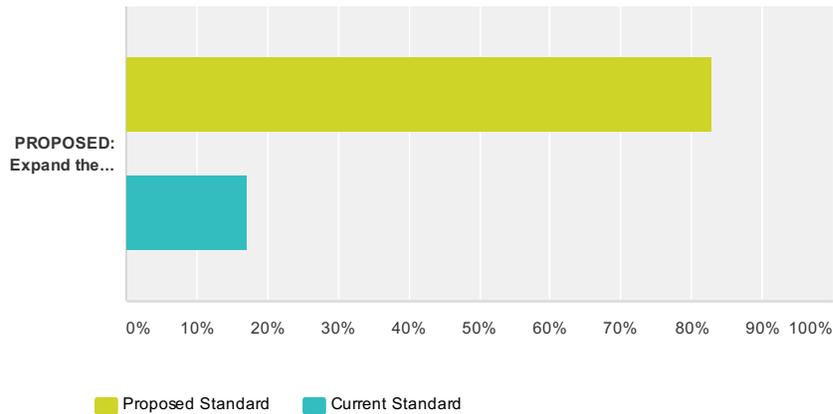
longer recordkeeping.

7/1/2014 1:14 PM

Proposed Changes to EPA Agricultural Worker Protection Standard

Q8 Please Indicate your preference for "Proposed Standard" or "Current Standard" relating to Definitions.

Answered: 305 Skipped: 23



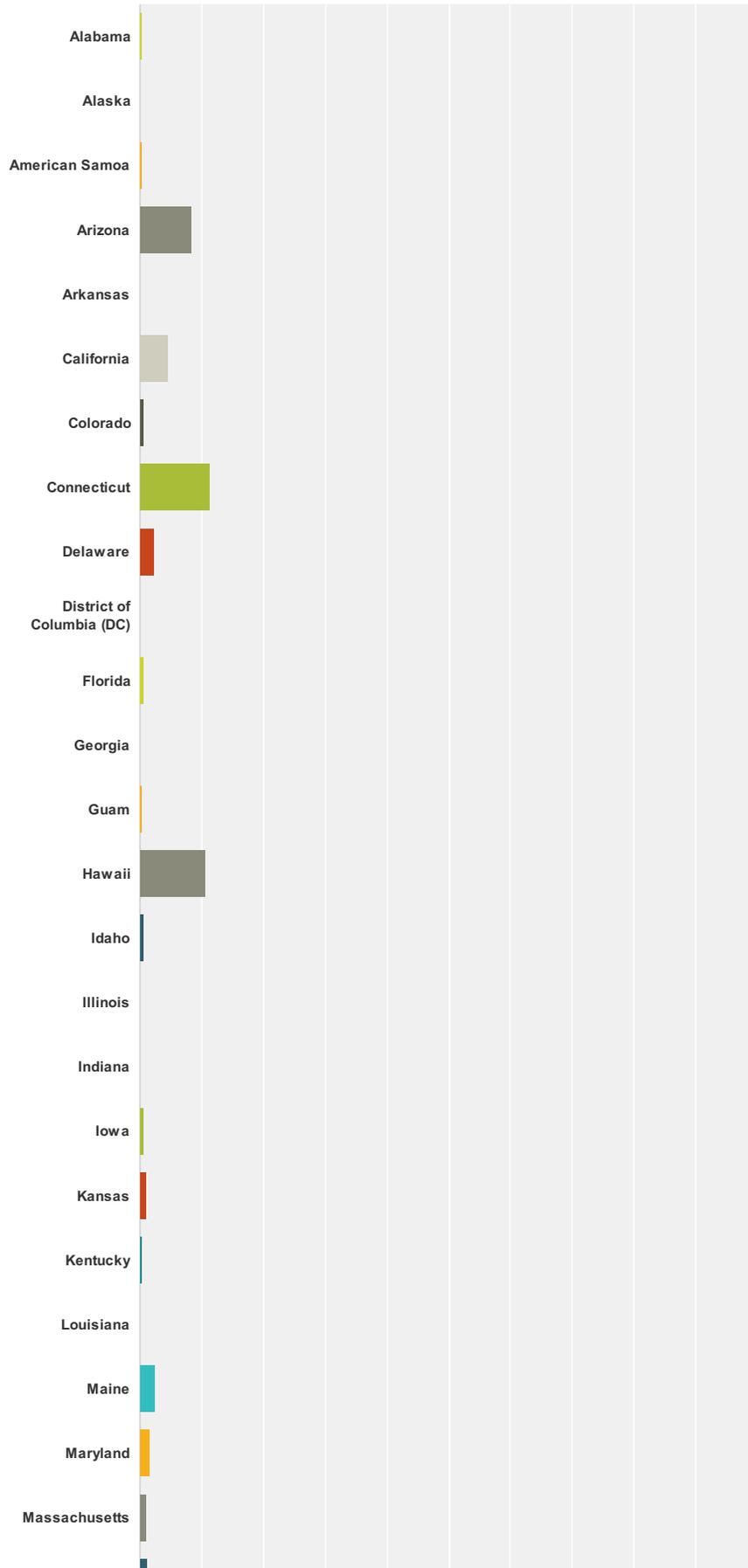
	Proposed Standard	Current Standard	Total
PROPOSED: Expand the definition of "immediate family" to more accurately reflect fam families that qualify for the exemption from most WPS requirements. CURRENT: Currently the definition does not include family members such as grandparents, grandchildren and in-laws.	82.95% 253	17.05% 52	305

#	Comments (optional):	Date
1	It's not clear if the proposed standard expands the definition of family members or not.	7/16/2014 5:47 PM
2	again - common sense.	7/14/2014 7:32 PM
3	Sensible	7/13/2014 3:54 PM
4	What about my cousin who lives next to me and knows pesticides more than most.	7/9/2014 8:14 PM
5	Getting far to complicated....	7/9/2014 6:34 PM
6	be more specific about immediate family this tells me nothing	7/7/2014 8:15 PM
7	Let them all work = we can't support gay marriage without including them as "family" when we're out spraying. God love the gays (somebody has too).	7/2/2014 12:43 PM
8	Needs further definition not clear	7/2/2014 9:31 AM
9	This is badly needed.	7/1/2014 4:09 PM
10	it should be illegal for employers to knowingly expose their employees to neurotoxins. Therefore, farm owners who allow their employees to handle and be exposed to pesticides should be held liable for criminal charges. Training for 'safe' handling is insufficient, since accidents frequently happen, and protection is not complete. For the health and safety of their employees, farm owners should take full responsibility to farm in such a way that neurotoxins are not required as part of their management and operation. A responsible farmer would not knowingly expose their children, or even their in-laws, to neurotoxins, would they?	7/1/2014 3:23 PM
11	Expand and clarify definition of "immediate family" but do not exempt them.	7/1/2014 1:15 PM

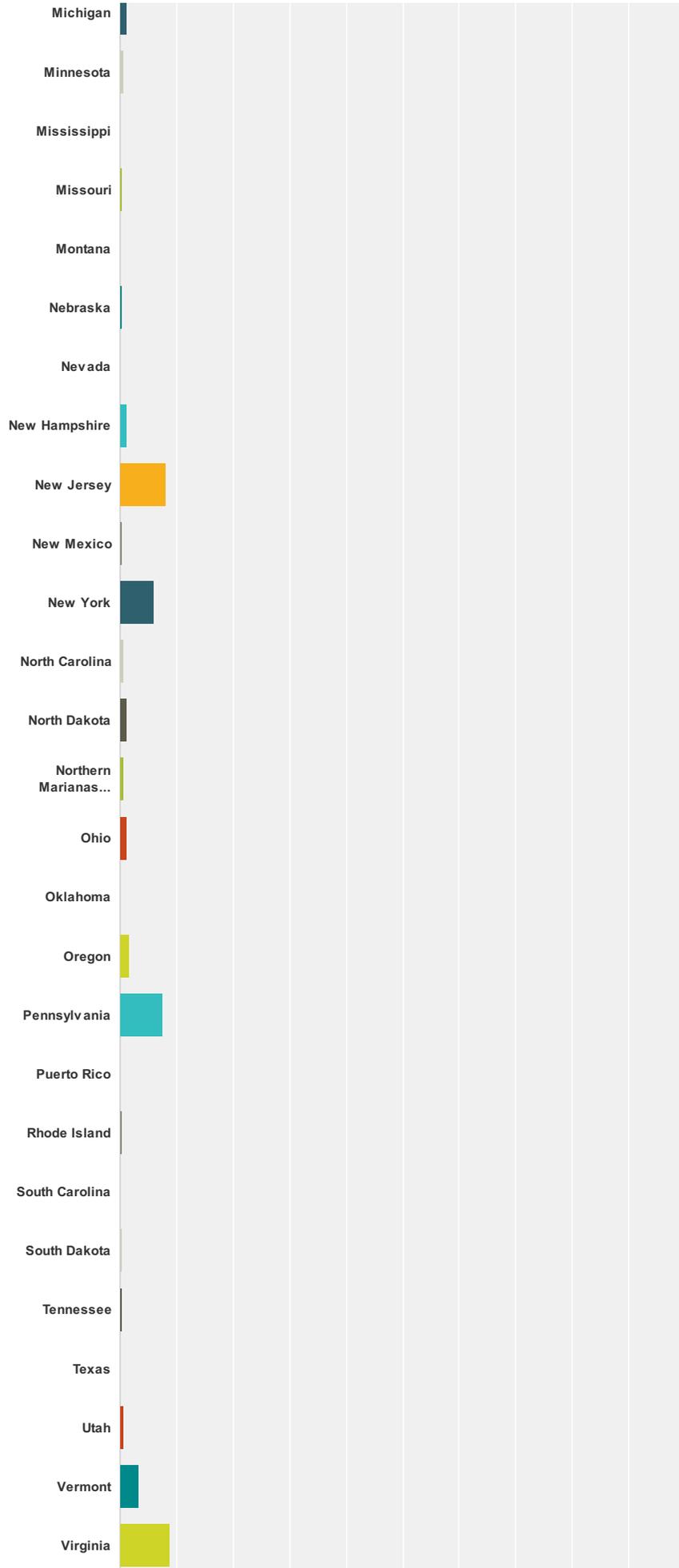
Proposed Changes to EPA Agricultural Worker Protection Standard

Q9 In what state or U.S. territory do you work?

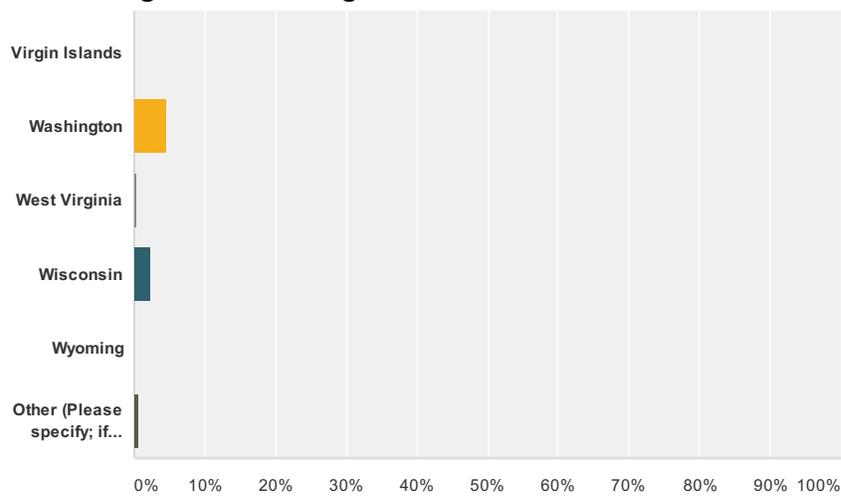
Answered: 309 Skipped: 19



Proposed Changes to EPA Agricultural Worker Protection Standard



Proposed Changes to EPA Agricultural Worker Protection Standard



Answer Choices	Responses
Alabama	0.32% 1
Alaska	0.00% 0
American Samoa	0.32% 1
Arizona	8.41% 26
Arkansas	0.00% 0
California	4.53% 14
Colorado	0.65% 2
Connecticut	11.33% 35
Delaware	2.27% 7
District of Columbia (DC)	0.00% 0
Florida	0.65% 2
Georgia	0.00% 0
Guam	0.32% 1
Hawaii	10.68% 33
Idaho	0.65% 2
Illinois	0.00% 0
Indiana	0.00% 0
Iowa	0.65% 2
Kansas	0.97% 3
Kentucky	0.32% 1
Louisiana	0.00% 0
Maine	2.59% 8
Maryland	1.62% 5
Massachusetts	0.97% 3
Michigan	1.29% 4
Minnesota	0.65% 2
Mississippi	0.00% 0
Missouri	0.32% 1
Montana	0.00% 0
Nebraska	0.32% 1
Nevada	0.00% 0

Proposed Changes to EPA Agricultural Worker Protection Standard

New Hampshire	1.29%	4
New Jersey	8.09%	25
New Mexico	0.32%	1
New York	6.15%	19
North Carolina	0.65%	2
North Dakota	1.29%	4
Northern Marianas Islands	0.65%	2
Ohio	1.29%	4
Oklahoma	0.00%	0
Oregon	1.62%	5
Pennsylvania	7.44%	23
Puerto Rico	0.00%	0
Rhode Island	0.32%	1
South Carolina	0.00%	0
South Dakota	0.32%	1
Tennessee	0.32%	1
Texas	0.00%	0
Utah	0.65%	2
Vermont	3.24%	10
Virginia	8.74%	27
Virgin Islands	0.00%	0
Washington	4.53%	14
West Virginia	0.32%	1
Wisconsin	2.27%	7
Wyoming	0.00%	0
Other (Please specify; if multiple states, please list)	0.65%	2
Total		309

#	Other (Please specify; if multiple states, please list)	Date
1	AZ, CA, NV, UT	7/9/2014 8:35 AM
2	US of A	7/2/2014 12:44 PM

Proposed Changes to EPA Agricultural Worker Protection Standard

Q10 Additional Comments (optional)

Answered: 67 Skipped: 261

#	Responses	Date
1	New rulings to protect workers are welcome. However in Hawaii, we have alot of small farmers and some new rulings may put them out business. Need more time to educate business owners on new rulings	8/3/2014 10:06 PM
2	Farming in the presence of chemicals is not easy. It is understandable that record keeping is necessary for precautionary purposes. However, when too many regulations are thrust upon farmers, it makes farming more difficult and more costly. A sure-fire way to further reduce the percentage of farmland across the country is to pass more and more silly regulations that while well-meaning will likely continue to overburden inspectors and farmers.	7/30/2014 5:13 PM
3	The regulating body (EPA) should finance good video productions in many languages to use for training. The chemical industry should help with content so the training is not used as a scare tactic.	7/25/2014 11:31 AM
4	1) unit VIII C. pages 120-124- says signs to read, Danger,Pesticides and Entry Restricted. Change shape to stop sign shape around graphic of man and hand-I think that "Keep Out" is better than "Entry Restricted" and should not be changed. In addition our signs have a Red color in the circle around the man and hand- The color Red should be an alternative to stop sign shape. In other words it should read- Either use a stop sign shape around the graphic of the Man and Hand or the circle around the Man and Hand should be colored Red". Right now we have hundreds of signs in inventory and those signs look good and work great with the "Keep Out" and red colored circle. It would be a shame to have to throw them out to relabel them "Entry Restricted" with a stop sign shape around the Man and Hand.	7/24/2014 3:56 PM
5	Please make sure that small organic farms that use pesticides are not overburdened by these changes. Organic farms still use pesticides that require regulations for worker safety but their implementation should be practical and relevant to their size and scale. Most important, please do not require that farm workers be trained off site. Farmers should be able to adequately train their own employees.	7/22/2014 11:55 AM
6	More research needs to be conducted in Hawaii related to com seed field workers exposure to year-round pesticides. What are impacts on air quality, accumulation in soil, and inhalation by workers and nearby residents. What is the impact on water quality in rivers, the nearshore environment, and fish and wildlife. Research must be conducted ASAP. This is ridiculous and EPA is derelict in their duty!!!	7/20/2014 5:34 PM
7	Must increase worker protections.	7/20/2014 4:23 AM
8	I think more research needs to be conducted surrounding the touching or manipulation of crops in conjunction with REIs. It seems like only a few pesticides suggest different REIs based on the activity to be preformed in the sprayed area. I think this should be required for all labels.	7/17/2014 6:45 PM
9	none	7/16/2014 9:40 AM
10	Most farms are family business with mostly all family workers. Unlike typical industries, which have majority of non-family persons working there, so to make a farm undertake more record keeping/training work, for the handful of non-family members they might or might not have, sounds silly. I really think that the standard should be fine-tuned and implemented upon the big farms that have hundreds of workers. And farms that have only a handful of employees, I don't believe many changes should be made.	7/16/2014 9:21 AM
11	We support family farming and would suggest keeping OSHA out of our fields.	7/15/2014 10:18 AM
12	Thank you!	7/14/2014 7:37 PM
13	there is not anything wrong with the current system, all the proposed changes will do is take more time away from production and the workers and handlers will have to make up for lost time in productivity because someone in the E.P.A. is trying to justify their existence, these proposed changes are going to cause more accidents, spills and exposure to the pesticides than with the current system. I believe the current system should be left alone and let the farmers in this country do what they do best and the E.P.A. pencil pushers find another entity to destroy as they have done a great job of destroying this country. oh I forgot that the farmers are the last business in the country, all the other business's have left the country because of the E.P.A.	7/14/2014 7:32 PM
14	Many of the current requirements (in CA) appear more designed to provide a basis for lawsuits than to protect workers; let the rest of the country have some of the same issues. We have found that the pesticides safety training is useful in teaching what the label says and why. But, requiring a medical authorization to show that a person can even wear a "respirator" is a waste; requiring yearly fit testing of that same respirator is even worse. I hope these requirements could become more sensible as the rest of the country joins us.	7/13/2014 4:36 PM
15	One size does not fit all. Small and mid size operations should not have to conform to industrial standards for worker safety. These burdensome regulations only lead to consolidation in the agriculture and the demise of the family farm. This ultimately leads to greater risk of exposure to pesticides for farmer, worker and consumer. Flexible, risk based rules will provide scale appropriate protection for all workers in the food chain.	7/12/2014 4:45 AM
16	WPS should discontinue exemptions for "non-ag" such facilities as golf courses	7/11/2014 5:29 AM
17	It's time for the EPA to stop burdening the American farmer and let us do our job. We don't need an EPA to act as a baby sitter, we need to be able to do our jobs without unnecessary regulations and red tape.	7/10/2014 6:25 PM
18	I think there needs to be some difference standards for small farms who only have a couple workers who are mostly family and big California farms where there are many managers and works. The record keeping for small farmer is very burdensome. Most of the time one person does pesticide appications and is very careful and tells all their workers,	7/9/2014 8:16 PM
19	The more complicated the rules, the less they will be followed. Most of the labor's do not speak or read english, yes you can post in another language, but they often want the dollars, so they will commence working in a field without your noticing them until they are in the area.	7/9/2014 6:36 PM
20	A comprehensive Training package should be available from the EPA or Cooperative Extension Service for all the new required training (and existing) so the farm owners can correctly train ag workers	7/9/2014 5:54 PM
21	All the proposed changes have value but how do you protect the worker from themselves? The owner can provide hours of training, have it documented and a worker will still not follow the standards. There needs to be some oweness put back on the worker and not have all incidents immediately point to a non-compliance of the owner.	7/9/2014 2:01 PM

Proposed Changes to EPA Agricultural Worker Protection Standard

22	I already maintain and keep spray records (what sprayed, amount per acre, when, FRAC code, etc). These are available on my computer for several years unless I have a major computer failure. I believe most growers keep the same records.	7/9/2014 12:46 PM
23	Always when deliberating things like this... The goal is NO HARM from using pesticides. Certain regulations and bureaucratic exercises can become onerous and accomplish nothing. For example, record keeping does not accomplish anything regarding safety. It only satisfies the regulators need to have something they can find fault with.	7/9/2014 9:47 AM
24	Someday small family farms will be regulated out of business!	7/8/2014 1:03 PM
25	There should be a "two or less" clause for small farms who only have two or less employees. When farms are that small usually the sprayer/handler knows all info prior to and after applications.	7/8/2014 10:18 AM
26	Yes, do away with the EPA because it has just tuned into another behemoth government agency that pretty much relies on extortion and harassment very similar to the Department of Energy, remember them, they were suppose to be temporary	7/7/2014 9:50 PM
27	Most of the proposed standards seem to be adding more regulations to problems that don't even exist!	7/7/2014 8:49 PM
28	There is no doubt there are areas that can be updated and improved to ensure farmer and worker safety. Hopefully the requirements are not overly burdensome and end up being ignored or shortcut. A reasonable balance must be achieved if these new changes are to be successfully implemented.	7/7/2014 6:36 PM
29	none	7/7/2014 4:33 PM
30	Additional requirement of records and filing is just one more task with no financial return for a small business.	7/7/2014 2:44 PM
31	The current program covers workers well, adding purposed standards will increase costs and create no further protection for workers.	7/7/2014 6:40 AM
32	These proposed changes will be another nail into the coffin of small farmers.	7/4/2014 5:16 PM
33	protection and safety is important, but please be sure not to over burden the farmer with paperwork, tests, classes...we do need time to farm and make a living.	7/4/2014 10:16 AM
34	I'm pretty sure that Farmers know how important safety is since ANY accidents create negative scrutiny. WPS needs to be practical and relevant. Labels are the first line of instruction and the idea that an overall catch-all for different chemicals makes no sense. More record keeping and more restrictions will not create more safety. If the EPA sees something in the data on agricultural chemical usage that warrants change then they should act, but don't change just to prove relevance.	7/4/2014 7:01 AM
35	It is my considered opinion the EPA should have no standing or regulatory oversight with agriculture. We have a Department of Agriculture and ALL matters relating to farmers should and need to be handled by this agency.	7/3/2014 1:59 PM
36	We're a small farm just trying to "keep our heads above water". In order to keep food at a reasonable cost to our consumers, many of whom are underemployed, we need to keep things simple enough so that we can perform current tasks without hiring some other person to come in & do all the extra work that lawmakers would like to dump on us. We follow our pesticide regulations to the letter & that should suffice. This business is not easy.	7/3/2014 1:58 PM
37	It seems these one size fits all regulations are unduly burdensome to small family farms that also employ a few other workers. They might be appropriate for farms with many workers and crew bosses to do the training and record-keeping, but will surely put small farms, where the owner/operator does all of the many jobs already, under what with increased time for training, sign posting, and recordkeeping requirements.	7/3/2014 11:01 AM
38	none	7/2/2014 2:05 PM
39	Pesticide handling safety standards need to be stricter to protect all workers and their families. The record-keeping requirements in the proposed standards provide legitimate enforceability.	7/2/2014 1:46 PM
40	Fuck the EPA. They are the problem not the answer! Washington is pushing for socialism = it's time to say FUCK YOU Washington! Let people work - if they're dumb enough to get sick from spray/pesticides then so be it. Some of us depend on the dumb ones to make us a living = no more worker rights/protection.	7/2/2014 12:47 PM
41	Education and access to information - Give the correct tools - work with farmers to do the right things - no one wants to hurt their employees or family members. If you give the information to the farmer they will disseminate the information to their employees. If they have to worry about making sure they fill out the proper paper work - have this form and that in the correct location for the specified period of time - put out this sign - take the sign down - the time will not be used to educate. If there were tools to do a session on taking home pesticides on clothes etc - it would be used. Gemplers has these great tail gate sessions. Education - education - education- Work with employers!	7/2/2014 12:44 PM
42	Offer self-funded labeling of products for growers who can pass an inspection on the worker protection standard. Consumers want selection among qualities of produce and qualities of employer & environmental steward. USDA should be offering this, and it can self-fund by growers paying to get the inspection & label in order to sell at a premium!	7/2/2014 12:12 PM
43	Proposed standards do not show clear reason for change. Agency is using examples of harm to workers far before the current standard was created. This is a highly flawed proposed regulation.	7/2/2014 9:34 AM

Proposed Changes to EPA Agricultural Worker Protection Standard

44	<p>Office of Pesticide Programs Environmental Protection Agency Mail Code 28221T 1200 Pennsylvania Avenue, NW Washington, DC 20460 February 25, 2014 Docket ID no: EPA-HQ-OPP-2011-0184-0002 To Whom It May Concern: I recently attended an informational meeting on the proposed changes to the Agricultural Worker Protection Standard. I support the current WPS regulations. I think they make sense and are not overly burdensome to implement. I do not see any significant benefit to worker safety by implementing changes that make these regulations significantly more burdensome for Agricultural Employers. 1.) PESTICIDE SAFETY TRAINING a.) The new regulation proposes that employers train workers and handlers every year instead of the current 5 year retraining interval. I fail to see why this should be necessary. Currently, state-issued Private Pesticide Applicator Certificates are good for 5 years. State carry permits for firearms are good for 5 years. Most driver's licenses are good for 4 years or more, depending on the state. I fail to see how worker safety is significantly improved by shortening the retraining interval from the current 5 years to 1 year. b.) The proposed standard would reduce the "Grace period" from the current 5 days to 2 days. When we begin our growing season, we are adding workers on a continuous basis. Some workers leave after 1 or 2 days because they do not like or are not capable of performing the job. In these cases the training time is wasted. The current regulation allows us to train a group of workers who arrive within a few days of each other as a group. In the real life workplace, new workers are working with a supervisor or in a group with other workers who are trained and know what to do with regards to working safely in fields where applications of pesticides may have been made within the past 30 days. I have no issue with the requirement to maintain records of training for 2 years. We currently maintain a training log that goes back for many years. 2.) MANDATORY POSTING OF NO ENTRY SIGNS The proposed regulation would make posting of treated areas mandatory for applications which require a "Restricted Entry Interval" greater than 48 hours. I think it would be more productive for EPA to make manufacturers amend the product label adding materials with REI's > 48 hours to the list of products that require posted notifications. Next I think EPA should publish a list, accessible to agricultural employers via their smart phones and computers, of all the products which require mandatory posting. This would allow employers to select from the range of appropriate products on this basis and avoid the need for mandatory posting. It is 2014 and I think the regulations need to keep up with the times. In the real world, growers are keeping in touch with agricultural employees and supervisors with cell/smart phones. Oral notification is timely and efficient and dynamic in this day and age. Let's move on from the technology of the 1970's when these regulations were promulgated. 3.) "NO ENTRY" AREAS ADJACENT TO AREAS BEING TREATED The proposed change to the regulations would prohibit entry into 25-100 foot buffer areas around the field during pesticide applications. The reality is that we already move workers away from areas that are being sprayed to avoid contact from overspray and fumes. How is the proposed change to be enforced? What would or could an employer do to document that he had prohibited entry into the required buffer area? It is already a violation of the pesticide label to allow spray drift to contact people or non-target crops. Under the current regulation, workers can contact the proper regulatory agency and file a complaint if they feel they have been exposed to a pesticide during application. An investigation of a reported incident should be enough to determine whether the employer took proper precautions to protect workers. 4.) PERSONAL PROTECTIVE EQUIPMENT (PPE): RESPIRATORS & CLOSED SYSTEMS The proposed regulation would adopt the OSHA standard for respirators. The OSHA standard imposes a huge burden on agricultural employers. It requires fit testing, medical evaluation and training and a very burdensome record keeping and documentation regimen. My understanding of the OSHA standard is that this fit testing and medical evaluation must be done annually to any worker that might need to wear a respirator in the course of their employment. Training programs for the current standard address respirator use and include information that workers can use to make sure they have a good fit or seal between the respirator and their face. There are many areas that exempt agriculture from some provisions of OSHA standards. In many cases, the OSHA standards are either not practicable in the agricultural workplace or the threat level posed in the agricultural workplace is not the same as it would be in an industrial setting. Mixers and Handlers of agricultural pesticides are generally working outside. They can almost instantly take themselves out of harms way if they detect an odor or feel short of breath. By contrast a worker in an industrial setting, such as a paint booth would be in a toxic atmosphere where they could not remove the respirator without inhaling toxic fumes. The need for a respirator is infrequent in agriculture. When a respirator is necessary, it may only be required for brief periods while the mixer / handler is filling a sprayer with the spraying operation itself taking place from inside an enclosed climate-controlled tractor cab. As I stated above the worker is in a fresh air environment, with the only threat posed by proximity to the pesticide he is handling. Ceasing the handling operation and/or stepping away from the pesticide will eliminate the threat. Under the proposed adoption of the OSHA standard, anyone who might need to use a respirator in the course of the year would require fit testing, a medical evaluation and burdensome recordkeeping requirements. This seems excessive given the actual very low potential for exposure. It does not seem practical to apply a standard designed for a more hazardous industrial setting, where workers might be exposed day after day to a toxic environment, to agriculture. I hope you will consider these comments and make changes to your proposed regulations before implementing a largely unnecessary and burdensome revision of the current standard. Updating the old standard to reflect changes in technology that didn't exist 40 years ago is a good thing. Changing just for change's sake based on the perceptions of people who don't understand agriculture is not.</p>	7/2/2014 9:17 AM
45	<p>I think the label "Agricultural Worker Protection Standards" is in the case of pesticide regulations a min-nomer. Landscapers and others who are using casual labor are or should be covered by these same regulations but are not subject to all Agricultural Worker regulations.</p>	7/2/2014 9:06 AM
46	<p>All the proposed detailed records etc. may be a moot point since a very high porportion of farm workers have questionable information regarding their status, citizenship, and other traceable information.</p>	7/2/2014 8:55 AM
47	<p>The real issue is, are these new regs a solution in search of a problem. EPA says pesticide issues with workers are way under reported. If so, prove it. There is no problem out there. Prove it before they slap us with more paperwork, rules and regs that are not needed.</p>	7/2/2014 7:54 AM
48	<p>Improper use by handlers - mixing of multiple chemicals in a tank, drift related damage to beneficial insects, and exposure to other workers needs better enforcement.</p>	7/2/2014 5:42 AM
49	<p>Our farm has never had an incident involving any pesticides for over 50 years, why must the government constantly make up more burdensome regulations to make it less efficient?</p>	7/2/2014 3:42 AM
50	<p>The proposed regulations would provide no additional protection but would make it more difficult to attract employees to the farm. The constant increase in record keeping required by the government is becoming a real burden to small farmers. We don't employ "staff" to perform this additional work. We do it ourselves and keeping up with the requirements is an impossible task.</p>	7/1/2014 11:20 PM
51	<p>I am in support of better record keeping and some more regulation of restricted use pesticides. Funding and failure of compliance penalties are my two main concerns. Who will fund these new proposals?</p>	7/1/2014 8:04 PM
52	<p>I believe that almost all of the proposed changes don't do very much to improve worker safety. Most of it is tedious paper work that nobody will look at or care about, but punishments and fines can be levied to businesses that don't comply, and some more government employees can get paid to choke our industry with bureaucracy. Where I come from we do a very good job of keeping everyone safe. This won't help.</p>	7/1/2014 6:08 PM
53	<p>Pesticides have gotten safer over time. Less safety precautions should be needed. The paperwork of the proposal as a whole is too much. There are certain areas some improvements could be made as compared to old, but most went too far.</p>	7/1/2014 4:11 PM
54	<p>Nothing to add.</p>	7/1/2014 4:04 PM

Proposed Changes to EPA Agricultural Worker Protection Standard

55	Bring actual facts that back the reasons for the proposed statements. Don't just think they are a good idea, know they are a good idea backed by science...and not bad science like CA.	7/1/2014 3:28 PM
56	it should be illegal for employers to knowingly expose their employees to neurotoxins. Therefore, farm owners who allow their employees to handle and be exposed to pesticides should be held liable for criminal charges. Training for 'safe' handling is insufficient, since accidents frequently happen, and protection is not complete. For the health and safety of their employees, farm owners should take full responsibility to farm in such a way that neurotoxins are not required as part of their management and operation. There are better ways to farm that do not require neurotoxins. This is what the EPA should be working on, not ways to make a bad situation "less bad".	7/1/2014 3:24 PM
57	More regulations. I treat my employees like family and some of them have been with me for 32 years.	7/1/2014 2:24 PM
58	In my industry most of the proposed items are in fact required by the farm customer (processor) in order to comply with good practice and safety requirements. I do not see the updated or proposed items as onerous, for those farm operations which are not already making efforts in this area the legislation is needed.	7/1/2014 12:46 PM
59	REI for OMRI listed pesticides should be a 2 to 4 hour REI because most materials are generally regarded as safe. Some OMRI materials may have a risk category rating based on the handler risk such as eye contact-injury which has very little impact on field exposure and REI determination. A 24 hr REI places a burden on producers to provide a quality product on perishable commodities and provide protection to the crop from pests. The most desirable REI for safe pesticides is a 4 hour REI which provides morning application and afternoon/evening harvest of crops. I recommend a separation of Risk evaluations for pesticide handlers and farm workers for determination of REI.	7/1/2014 9:15 AM
60	I regard the current worker protection standard a a model for other regulatory programs. The training and posting materials provided by the EPA are excellent, and they make compliance achievable by any farm willing to put in a reasonable effort. This is in sharp contrast to OSHA, which leaves everything up to the employer. At least in NY, the training and testing necessary to receive an applicators license is adequate to qualify certified applicators to train workers. Experience in the field of education indicates that a command of the content they must convey is far more important for teachers than teaching methodology. Sending farmers to take teaching courses would be an inexcusable waste of resources. The other major problem with the proposed standard is the adoption of the OSHA respirator standard. It would be an immense burden for small farms. Finally, whatever the final rule, the EPA should rewrite and reissue the training and posting materials and make them available, at no cost, to farms, before the rule is implemented. We can only hope that the FSMA will follow the lead of EPA in providing adequate training and posting materials to farms, at no cost.	7/1/2014 9:02 AM
61	I support all the proposed actions to strengthen the Agricultural Worker Protection Standards. My father was a farmer and I watched him taken to the emergency room because a severe acute reaction to pesticide exposure in 1971. He routinely suffered the side effects linked to the pesticides he sprayed on the family apple crop, starting as a small child in the 1940s and ending in the 1980s (when the farm was sold). He died from Lou Gehrig's disease in 1994 (at age 62). His sister, his only sibling, died in 1993 (in her sixties) from a rare brain cancer. Three neighbors operated adjacent apple farms, and in the 1970s, one died of rare brain cancer, one died of liver cancer and the other died from stroke (they were all in their fifties). I worked on the farm throughout my teenage years, along with my three siblings. I had several emergency incidents involving my eyes while harvesting apples, and also needed treatment from an ophthalmologist. One sister died from lung cancer in Eugene, Oregon in 2005 (at age 47). My two other siblings and I have suffered from arthritis since we were teenagers. NIH literature suggests that pesticide exposure in the farm community may be associated with increased rates of arthritis, increased susceptibility to lung cancer, an increased rate of a number of cancers, including brain cancer, and an increase in a variety of neurodegenerative diseases. In the early years after EPA was created, my father supported EPA's actions to protect wildlife from harm caused by pesticide exposure. He wished that EPA had taken action to protect the health of farmers and farm workers. I am especially concerned about the chronic impacts of pesticide exposure, which are much more difficult to measure than impacts from acute exposure.	7/1/2014 8:36 AM
62	Record keeping standards must be implemented in an intelligent way that does not duplicate records and should encourage farmers to comply. Excessive record keeping is a significant deterrent to the small - medium sized farm that cannot afford to dedicate a paid employee to this task.	7/1/2014 8:08 AM
63	These proposed changes are very much needed.	7/1/2014 7:26 AM
64	Some of the proposed changes are over burdensome for the owners and handlers!	7/1/2014 7:24 AM
65	The current standards protect workers. I am one of them.	6/30/2014 11:40 PM
66	NA	6/30/2014 8:29 PM
67	Keep the regulations simple. The more complex the language, the less likely the compliance will be in my opinion. For over ten years I worked in pesticide use enforcement. The growers are so overwhelmed by regulatory requirements (particularly in CA) and enforcement agencies (EPA, DPR, Air Resources, Water Resources). In my experience, 99% of growers try to do the right thing by their employees. Every time there is an "incident" the knee jerk reaction is to enact a new regulation. My suggestion is to closely weigh the potential value of the changes vs. the burden it places on growers.	6/30/2014 2:46 PM