

3/16/17

Hi Allison,

We wanted to share some information about a crop advisor question we received yesterday. A certified crop advisor was under the impression that the revised WPS took away the exemption for going into a pesticide-treated area to look for control before the restricted-entry interval (REI) expires. This is not correct. Here is a summary of what did/did not change regarding the WPS certified crop advisor exemption. Feel free to share this with your membership.

- Both the old and revised WPS allow crop advisors to go into a field during the restricted-entry interval (REI). In this case (in both the old and revised WPS), the crop advisor is considered to be a handler under the WPS and generally the crop advisor's employer must provide all of the WPS protections for handlers (training, PPE, decontamination supplies, etc.)
- Both the old and revised WPS exempt licensed/certified crop advisors from the WPS pesticide safety training for handlers and workers.
- Both the old and revised WPS provide an exemption for licensed/certified crop advisors who enter a field during the REI and only do crop advising tasks. Under this exemption:
  - The licensed/certified crop advisor can determine what PPE they wear (i.e., they don't have to wear the PPE specified on the label for handlers);
  - The crop advisor's employer does not have to provide the licensed/certified crop advisor with certain information, emergency assistance (transportation to medical care if exposed), information from the label, access to the label, PPE or decontamination supplies.
- The old WPS provided this exemption to licensed/certified crop advisors and their employees. This is the main thing that changed in the revisions. Under the revised WPS, the exemption applies only to licensed/certified crop advisors. Non-certified crop advisors must:
  - Wear PPE (see the next bullet for more information)
  - Receive all of the protections of the WPS for handlers, including pesticide safety training for handlers, being provided certain information need to comply with the rule, emergency assistance (transportation to medical care if exposed), information from the label, access to the label, PPE and decontamination supplies.
- If a non-certified crop advisor enters a field during the REI, he/she is a handler (as explained above), which means that he/she would have to wear the PPE specified for handlers, who are most commonly mixers, loaders and applicators. However, WPS provides several alternatives to the handler PPE to make things easier but to still ensure protection from residues. As long as the application has been complete for 4 hours and any inhalation exposure level on the label or ventilation criteria (for enclosed spaces) has been met, a non-certified crop advisor who enters a field during the REI to do crop advising tasks must wear one of these sets of PPE:

- The PPE for handlers specified on the label;
- The PPE for early-entry workers specified on the label (which was an exception in both the old and revised WPS); or
- Cloth coveralls, shoes, socks, and waterproof gloves. If the label requires eye protection for handlers, the non-certified crop advisor must also wear that eye protection. (This option was added to the revised WPS to provide even more flexibility in response to comments from crop advisors.)



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