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# HEALTHY SCHOOLS

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## Pesticide Training in Schools

*What is a pesticide and who needs to be trained?*

What materials are classified as pesticides?

When we ask people to name a pesticide, many respond with the name of an insecticide such as "Malathion" or "Raid". The term "pesticide" is actually a very broad term that covers many different kinds of materials. The definition of a pesticide is any substance used to defoliate plants, regulate plant growth, or for preventing, destroying, repelling, or mitigating insects, fungi, bacteria, weeds, rodents, etc. "Pesticides" include insecticides, herbicides, fungicides, rodent baits, pool chlorine, sanitizers and disinfectants.

How can you tell if a product is a pesticide?

Read the product label. All pesticide products have a registration number issued by the Environmental Protection Agency. This number is listed on the label and may be abbreviated as "EPA Reg. No." There are also some "exempt pesticides" that don't have a registration number, but like their registered counterparts, their labels will make pesticidal claims, such as "kills", "controls", "disinfects", or "sanitizes".

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Who needs to be trained?

Employers are required to train all employees that handle pesticides. This training must be documented and follow specific State guidelines.

There are two agencies that oversee pesticide use, Cal OSHA and the county Department of Agriculture. Cal OSHA covers materials such as sanitizers, disinfectants, medical sterilants, and many other hazardous materials other than pesticides. If you have janitorial staff that use sanitizers and disinfectants and are already following OSHA's Industrial Illness Prevention Program to train your employees, you are in compliance. (Because there is some overlap between these two agencies, you would also be in compliance if you trained your employees that handle sanitizers and disinfectants by following the Department of Agriculture's guidelines.)

For all other pesticides, training requirements fall under the jurisdiction of the Department of Agriculture. All employers are required to train their employees on a yearly basis and cover the topics listed in Title 3 California Code of Regulations Section 6724. If you would like to review this regulation, you can do so at this website: <http://www.calregs.com/default.htm>

Our office also has a website where you can download pesticide training forms and a written training program. You can visit our website at: <http://www.sccagriculture.org>

Do you have questions regarding your pesticide training program?

Call our office! We are available to answer your questions regarding pesticides.

Santa Clara County Division of Agriculture  
(408) 918-4600 (Our office duty hours are from 1p.m. - 5p.m. Monday through Friday.)

If you prefer to e-mail us your questions, you may do so at: [sccagriculture@era.co.scl.ca.us](mailto:sccagriculture@era.co.scl.ca.us)

## Protective Eyewear



*What is required?*

All employees, at the minimum, are required to wear gloves and safety glasses whenever they handle pesticides. These requirements are found in worker protection regulations and are sometimes above and beyond safety gear required by a pesticide label.

Can wrap-around sunglasses qualify as safety glasses?

Title 3 California Code of Regulations Section 6738(b)(2)(A) states that regular eyeglasses, including sunglasses, do not meet the protective eyewear requirement. This is because normal glasses do not provide adequate protection. Some styles of wrap-around sunglasses, however, are not like average eyeglasses because they can provide temple and brow protection. Many manufacturers have even styled their safety gear to look like sunglasses so they are not only more comfortable to wear, but are also practical. When we perform an application inspection, we look for eyewear that provides proper protection. If your eyewear, including wrap-around glasses, is covering your eyebrows and temples, your safety gear is doing its job!

Are all safety glasses the same?

NO! There are many professions that require the use of safety glasses. Just because a pair of glasses is sold as safety glasses, doesn't mean they are appropriate for pest control. Determine that they will provide temple and brow protection before purchasing them. For example, some safety glasses will provide temple protection but won't cover the brow.

Further, everyone's face is shaped differently; some safety glasses will work great for some workers, but may not provide adequate protection for others. Each worker needs to be fitted for their safety eyewear before they spray any pesticides.

It's also important to note that some labels require the use of goggles or faceshields. Safety glasses are not a substitute for goggles! The order of safety protection starts with safety glasses, moves up to goggles, then to a faceshield. You can always use safety gear that provides more protection, but you cannot move downward in protection!

## Cleaning Pesticide Spray Equipment

*Cleaning tanks and rinsate disposal*

As you well know, cleaning your spray equipment on a regular basis is an important step in caring for your equipment. Pesticides can corrode and clog tanks, seals, and hoses if they are allowed to sit or accumulate.

Where should you clean your equipment?

You should select a location where any spilled rinsate will not contaminate storm drains, desirable plants, wildlife, etc.

If you have a wash area that drains into a sanitary sewer system, call your sanitary district and ask them about your pesticide rinsate. Sanitary districts do have some restrictions on the type of pesticides that can be sent to waste treatment plants.

Is rinsate hazardous waste?

That depends on what you do with it. Pesticide rinsate can be considered hazardous waste if you wash the material down a storm drain. The only substance allowed to go down a storm drain is water. Diluted rinsate that has been neutralized is not water!

On the other hand, rinsate can be considered a diluted pesticide and not hazardous waste. After rinsing your tank and hoses with water and tank cleaner / neutralizing agent, you can spray your rinsate and cleaning solution onto a site that is consistent with the use of the pesticide. By discharging your rinsate onto a use site, you are essentially spraying out diluted pesticides. However, be aware of how much you discharge in one area, especially if you are discharging onto desirable plants. Even though your spray solution is very diluted, a large accumulation of the material may harm plants.

## Posting of Storage Areas

*What is required?*



California Code of Regulation Section 6674 requires pesticide storage areas to be posted if they hold category 1 or 2 materials (Danger & Warning). This code section does not apply to pesticides in category 3 (Caution). Even though it is not a requirement, our office recommends posting all storage areas, regardless of the categories of the pesticides stored. If you have your storage areas posted, and you purchase a new chemical in a higher category, you never have to worry about being out of compliance.

*What is required to be on the sign?*

Each sign must be readable from 25 feet away and must have the following verbiage:

DANGER

POISON STORAGE AREA

ALL UNAUTHORIZED PERSONS KEEP OUT

KEEP DOOR LOCKED WHEN NOT IN USE

In addition to these statements, the notice must "be repeated in an appropriate language other than English when it may reasonably be anticipated that persons who do not understand the English language will come to the enclosure." This would mean that if you have workers that speak Spanish and not English, you would need to post your storage area with this same verbiage in Spanish.

## Pesticide Containers

*Section 6680: Prohibited pesticide containers*

The ideal pesticide container is the product's original container. In most cases, the label with all the pertinent information is present on the original container. However, when applying pesticides, it's often necessary to transfer the chemical into application equipment and other acceptable service containers such as tip-and-pours. It's important to **never** place or store pesticides in containers commonly used for food, drink, or household products. Every now and then when inspecting storage sites, we still find coffee cans being used to hold snail bait. This is not an appropriate container!

## Service Container Labeling

*What are the requirements?*



A service container is simply any container that holds a pesticide other than the original pesticide container. A number of items can qualify as a service container. Some examples of acceptable containers are backpack sprayers, B&G's, tip & pours, spray rigs, and bait stations.

*What information is required to be on the service container label?*

California Code of Regulations Section 6678 requires all service containers to have the following:

- 1) The name and address of the person or firm responsible for the container.
- 2) The identity of the economic poison in the container
- 3) The word "Danger", "Warning", or "Caution", in accordance with the label on the original container.

Many companies use their business cards to create service container labels. Business cards are not only a convenient size, but also satisfy the requirement to identify the company and their address. To complete the service container label, a company can simply write the name of the chemical and its signal word on the back of the card and affix it to their service container. Prior to attaching the service label to the container, many companies laminate the card to make it waterproof. To attach the laminated card, a hole is punched in the corner of the card and a plastic tie is used to affix the label to the service container.

This option is an easy and inexpensive way to create service container labels. (It's also a good idea to make extra labels in case the original tag becomes worn or falls off)