

**California Department of Pesticide Regulation
Pest Management and Licensing Branch**

**Criteria for Instructor Training (Train-the-Trainer) Programs
for Trainers of Pesticide Handlers and Field Workers**

Introduction

California pesticide worker safety regulations require pesticide safety training be provided to pesticide handlers and field workers. These regulations also require persons providing training to pesticide handlers and field workers involved in commercial or research production of plant commodities to meet minimum qualifications before acting as trainers.

Purpose

This document provides guidance to persons interested in becoming instructors approved by the Department of Pesticide Regulation (DPR), of trainers of pesticide handlers and field workers in California. This document includes minimum criteria for "Train-the-Trainer" (T2) instructors and programs that meet California requirements under Title 3 of the California Code of Regulations (3 CCR). Current California regulations incorporate the Federal Worker Protection Standard (WPS) requirements for pesticide safety training and have been approved by U.S. Environmental Protection Agency (U.S. EPA) to either meet or exceed the current federal requirements. This document and other worker protection information can be found on DPR's Licensing and Certification Program Website at: <http://www.cdpr.ca.gov>

This document is organized into the following sections:

- I. Who is qualified to train?
- II. What are the minimum criteria that T2 trainers and programs must meet?
- III. How can I obtain DPR approval as a T2 trainer and for my T2 program?
- IV. What are the basic training requirements for pesticide handlers?
- V. What are the basic training requirements for field workers?
- VI. How does the voluntary U.S. EPA Worker Protection Standard Training Verification Card Program (blue cards) function in California?

I. Who is qualified to train?

Trainers of Pesticide Handlers and Field Workers:

Certified private applicators (PA) are qualified to provide handler and field worker training to their employees. Other persons considered "qualified" include qualified applicator licensees (QAL) and certificate holders (QAC), journeyman pilots (JPC), agricultural pest control advisers (PCA), registered professional foresters, county biologists with a license in pesticide use enforcement, U.C. Farm Advisors, and those who have completed a T2 program approved by DPR.

T2 Trainers and Programs:

Individuals who wish to **train trainers** using a DPR-approved T2 program are required to meet certain qualifications. DPR is authorized to evaluate and approve T2 trainers and T2 programs for **training trainers** who wish to train pesticide handlers and field workers in pesticide safety.

II. What are the minimum criteria that T2 trainers and programs must meet?

In order obtain DPR approval, both the qualifications for T2 trainers and the criteria for the T2 training program must be met.

Minimum Qualifications for T2 Trainers

1. Instructors conducting a T2 program for trainers of **pesticide handlers** must possess the following minimum qualifications:
 - a. Demonstration of knowledge of pesticide handling activities and regulatory requirements;
and

Note: DPR considers that the following qualifications meet this requirement: county biologists with a license in pesticide use enforcement issued by the California Department of Food and Agriculture; possession of a qualified applicator certificate (QAC), qualified applicator license (QAL), or agricultural pest control adviser license (PCA); or completion of training program courses for pesticide handlers; or professional experience in providing instruction to persons handling pesticides or other chemicals.

- b. Demonstration of knowledge of instruction techniques and principles of teaching, or professional experience in providing instruction to adults using teaching techniques.
2. Instructors conducting a T2 training program for trainers of **field workers** must possess the following minimum qualifications:
 - a. Demonstration of knowledge of pesticide regulatory requirements in field worker safety,
and

Note: DPR considers that the following qualifications meet this requirement: county biologists with a license in pesticide use enforcement issued by the California Department of Food and Agriculture; possession of a qualified applicator certificate (QAC), qualified applicator license (QAL), or agricultural pest control adviser license (PCA); or completion of training program courses related to regulatory requirements in field worker safety; or professional experience in providing instruction to persons handling pesticides or other chemicals.

- b. Demonstration of knowledge of instruction techniques and principles of teaching, or professional experience in providing instruction to adults using teaching techniques.

Core Criteria for all T2 Programs

1. Provide 'how-to-train' information. The 'how-to-train' content of these programs is just as important as the information on the pesticide safety topics that must be covered when training pesticide handlers and field workers. Demonstration and utilization of hands-on training activities are highly encouraged. Prospective trainers must know how to most effectively communicate the information to pesticide handlers and field workers so that they understand how to work safely.
2. Stress that basic safety training presented to pesticide handlers and field workers be done orally from written materials or from audiovisual materials. The information must be presented so that it can be understood by the field workers or pesticide handlers even if a translator is required. Training for field workers must be presented using non-technical terms and the presenter must respond to questions.
3. Provide a trainer's manual as part of the program. This manual should incorporate information on training methods and development of training programs, as well as in-depth information on the required concepts.
4. Inform pesticide safety trainers that if they participate in the voluntary U.S. EPA WPS Training Verification Card Program (blue cards) for **field workers** they must also:
 - a. Use training materials developed or approved by the U.S. EPA. Teach the difference between California and federal requirements, and teach that California requirements must be followed in California. See section V of this document to locate approved training materials.
 - b. Submit an application to DPR to enter into an agreement that outlines inventory control and record requirements.
 - c. Issue **only U.S. EPA cards** to field workers who receive training.
 - d. Keep records for 5 years as outlined in this document under section V.
 - e. Contact DPR's Pest Management and Licensing Branch at (916) 445-4038 or licenseemail@cdpr.ca.gov if more information is needed.
5. Provide written documentation to each pesticide safety trainer who satisfactorily completes the program. This documentation should include: name of participant; course title; course date; statement that participant has successfully completed the course; and the training provider's signature, printed name and address. This type of documentation will provide verification of the trainer's qualification should he or she wish to participate in the voluntary WPS Training Verification Card Program for field workers.
6. Instructors who train trainers must document certain information on all persons who attend and successfully complete their training programs: the attendee's name, business name or affiliation, street address or post office box number, city, state, ZIP code, telephone number, date of training, training location, and the name of the instructor who provided the T2

training. This information must be made available to DPR upon request.

7. Limit the class size to 25 students to provide for more effective student participation.
8. Provide DPR with an advanced schedule of training dates and locations. DPR reserves the authority to monitor training to continually evaluate and qualify each program.

III. How can I obtain DPR approval as a T2 trainer and for my T2 program?

Persons requesting approval as a T2 trainer and for their T2 program must provide DPR the following information:

1. Written request for approval sent to:

T2 Program
PML Branch, MS 3-A
Department of Pesticide Regulation
1001 I Street, P.O. Box 4015
Sacramento, CA 95812

2. List of T2 instructor's qualifications, including: education, related professional experience (e.g., developing curriculum and providing instruction, knowledge of teaching techniques and principles of instruction), special skills, and areas of expertise.
3. Copy of all course materials including trainee manuals, audio-visual aids, handouts and certificates verifying course completion.
4. Course outline that describes the program in detail. *T2 Programs must be kept current to reflect any changes in federal or state requirements. T2 Instructor Training Programs not maintaining a current status with regard to changes in Federal and/or State requirements are NOT considered approved.*

IV. What are the basic training requirements for pesticide handlers?

Who must be given pesticide safety training?

3 CCR section 6724 requires employers to provide training to employees who "handle" pesticides. "Handle" is defined as mixing, loading, transferring, or applying (including chemigation) or assisting with the application (including flagging) of pesticides, or servicing, repairing, cleaning, or handling equipment used in these activities. This definition also includes working with opened (including emptied, but unrinsed) containers of pesticides, adjusting, repairing, or removing treatment site coverings, incorporating pesticides into the soil, entering a treated area during any application, or performing the duties of a crop advisor, making observations of the well-being of plants, or taking samples during an application or any restricted entry interval listed on pesticide product labeling. (3 CCR section 6000)

When must training be given?

Persons assigned handling tasks must be trained **before** they are allowed to handle any pesticide. This training must be continually updated to cover any new pesticides that will be handled, and repeated at least annually thereafter.

What concepts must be covered in the pesticide handler-training program?

Training programs for pesticide handlers must include the following minimum information:

1. Format and meaning of information, such as precautionary statements about human health hazards, contained in pesticide product labeling.
2. Hazards of pesticides, including acute and chronic effects, delayed effects and sensitization, as identified in pesticide product labeling, Material Safety Data Sheets (MSDS), or Pesticide Safety Information Series (PSIS) leaflets.
3. Routes by which pesticides can enter the body.
4. Signs and symptoms of pesticide overexposure.
5. Emergency first aid for pesticide overexposure.
6. How to obtain emergency medical care.
7. Routine and emergency decontamination procedures, including spill cleanup.
8. Need for and appropriate use of personal protective equipment.
9. Prevention, recognition, and first aid for heat-related illness.
10. Safety requirements and procedures, including engineering controls (such as closed systems and enclosed cabs) for handling, transporting, storing, and disposing of pesticides.
11. Environmental concerns such as drift, runoff, and wildlife hazards.
12. Warnings about taking pesticide containers home.
13. Applicable laws and regulations, Material Safety Data Sheets and Pesticide Safety Information Series leaflets.
14. The purposes and requirements of medical supervision if organophosphate or carbamate (esters of N-methyl carbamic acid) pesticides with the signal word "DANGER" or "WARNING" on the labeling.
15. The location of the written Hazard Communication Information For Employees Handling Pesticides (Pesticide Safety Information Series leaflet A-8), other Pesticide Safety Information Series leaflets, and Material Safety Data Sheets.
16. The employee's rights, including the right;
 - a. To personally receive information about pesticides to which he or she may be exposed;
 - b. For his or her physician or employee representative to receive information about pesticides to which he or she may be exposed; and
 - c. To be protected against retaliatory action due to the exercise of any of his or her rights.

What records must be kept by trainers of pesticide handlers?

California regulations require that the date and extent of initial and annually required training be recorded for each employee and the job to be assigned. The employee must sign the record. When persons other than the pesticide handler-employer provide training, trainers must be informed of the importance of providing the employer with a copy of the training record for each employee trained. Employers are required to retain these records for each employee assigned to handle pesticides for two years, at a central location at the work place so that employees may have access to the information. These records are required to be made promptly available to DPR or the county agricultural commissioner enforcement staff upon request.

V. What are the basic training requirements for field workers?

Who must be given pesticide safety training?

3 CCR section 6764 requires employers to provide training to all field workers working in treated fields. "Field worker" is defined as any person who is employed to perform cultural practices in a treated field. The definition does not include persons performing tasks as a pest control adviser, field checker, or scout, nor does it include local, state, or federal officials performing inspections, sampling, or other similar official duties. (3 CCR section 6000)

California requires training of **all field workers** entering a field that has been treated with a pesticide, or had a restricted entry interval in effect, within the last 30 days. There is an additional requirement for employers to inform early entry field workers of label-specific information about hazards and precautions prior to entering a treated field. (3 CCR section 6771)

When must training be given?

California requires that field workers are trained before beginning work in a treated field on the establishment. Field workers must be retrained every 5 years.

What concepts must be covered in the field worker training program?

Training programs for agricultural field workers must include the following minimum information:

1. Importance of routine decontamination and washing thoroughly after the exposure period;
2. Restricted entry intervals and what posting means, including both California and federal field posting sign formats;
3. Where pesticides are encountered, including treated surfaces in the field, residues on clothing, chemigation, and drift;
4. Routes of exposure;
5. The hazards of pesticides, including acute effects, chronic and delayed effects, and sensitization effects;
6. Common signs and symptoms of overexposure;

7. First aid including decontamination, eye flushing, and obtaining emergency medical care;
8. Warnings about taking pesticides or pesticide containers home;
9. The hazard communication program requirements of 3 CCR section 6761; and
10. Employee rights, including the right:
 - a. To personally receive information about pesticides to which he or she may be exposed;
 - b. For his or her physician or employee representative to receive information about pesticides to which he or she may be exposed; and
 - c. To be protected against retaliatory action due to the exercise of any of his or her rights.

What are the EARLY ENTRY field worker training requirements?

Early entry field workers must receive the following specific information and instructions before entering a treated area on the agricultural establishment during a restricted entry interval (see 3 CCR section 6771 for details):

1. Instructions related to personal protective equipment (PPE). They must receive instructions, in a manner they can understand, on how to put on, use, and take off early entry PPE; the importance of washing thoroughly after removing PPE; and how to prevent, recognize, and give correct first aid for heat illness.
2. Labeling information and instructions. They must be informed about the safety information and instructions on the labeling and the pesticide(s) to which the restricted entry interval applies, including human hazard state required for early entry, and any worker precautions or instructions related to safe use or early entry.

What records must be kept by trainers of field workers?

There are no requirements for keeping records of training given to field workers unless the trainer is participating in the Voluntary Training Verification Card Program (blue card). Trainers participating in this program must retain for five (5) years: a copy of a class roster signed by the trainer and each trainee that indicates the card number issued to each trainee, and the date and address of the location where the training occurred. Even if trainers choose not to participate in the blue card program, all trainers should still provide employers with the necessary information to verify field worker-employees have received the necessary training.

V. How does the voluntary U. S. Environmental Protection Agency Worker Protection Standard Training Verification Card Program (blue cards) function in California?

The U.S. EPA developed a program for issuing training verification cards to document that pesticide handlers and field workers received adequate pesticide safety training. It is designed to reduce the need for new and future employers to retrain employees and to maximize the effective use of training resources. Participation in the Training Verification Card Program is voluntary. DPR manages this voluntary program for field workers only. DPR does not have any plans to carry out this program for pesticide handlers. Pesticide handler training verification is covered by existing record keeping requirements for training provided to pesticide handlers.

What is the process for getting and issuing cards?

Qualified trainers electing to participate in the Training Verification Card Program must submit an application to DPR to enter into a contract that outlines inventory control and record requirements. Upon approval of the application, a supply of serially numbered **blue cards** is issued to the trainer. The qualified trainer issues the cards to field workers they train. These cards become the field worker/employee's property and may be used to verify to regulators and future employers that they have been trained. Trainers are not authorized to print their own version of the cards.

What are the unique requirements for training and training materials that must be used in this program?

In California, qualified trainers participating in the Training Verification Card Program (everyone who issues blue cards) must meet the training requirements (3 CCR section 6764) outlined in this document AND are required to use training materials developed or approved by the U.S. EPA. Resources for U.S. EPA approved training material include:

- EPA National Agricultural Center, Available Publications: Worker Protection Standard: <http://www.epa.gov/agriculture/awor.html#farmworkers>
- EPA National WPS Train-the-Trainer Manual: <http://www.nasda.org/workersafety/>
- North Dakota State University WPS Training Videos: <http://www.ag.ndsu.nodak.edu/aginfo/pesticid/wps.htm#video>

U.S. EPA training materials teach WPS 170, the federal pesticide safety requirement for workers. There are three important ways that requirements are different in the Federal WPS 170 and California Code of Regulations. As a T2 trainer, you must be sure to point out these differences in your training and make sure trainers understand that even though they are using U.S. EPA-approved materials and issuing U.S. EPA blue cards, *they must teach California pesticide laws, not just Federal WPS laws.*

California laws and regulations require:

1. “The employer shall assure that each employee assigned to work in a treated field has been trained within the last 5 years, in a manner the employee understands, **before beginning work in the treated field.**” (3 CCR section 6764)

(WPS 170.130 requires pesticide safety information to be provided before entering the field, but only requires training before the 6th day of working in the field)

2. Warning signs posted in the field must show a **clearly visible skull and crossbones symbol.** (3 CCR section 6776)

(WPS 170.120 requires “A circle containing an upraised hand on the left and a stern face on the right must be near the center of the sign.”)

3. “Whenever employees are working as field workers in a treated field, the employer shall display at the worksite, **a copy of a completed written Hazard Communication Information for Employees Working in Fields (Pesticide Safety Information Series leaflet A-9).** In the event that fieldworkers gather at a central location prior to transportation to the worksite, the Pesticide Safety Information Series leaflet A-9 may instead be displayed at that central location.” (3 CCR section 6761)

(WPS 170.135 requires that a *pesticide safety poster* is displayed that conveys basic pesticide safety concepts, which must be displayed in a central location on the farm or in the nursery or greenhouse where it can be readily seen and read by workers.)

How can I order cards and get more information?

An application for Training Verification Cards (blue cards) can be downloaded at:

<http://www.cdpr.ca.gov/docs/license/fieldworkerbluecardrequest.pdf>

Qualified trainers choosing to participate in this program may contact the Pest Management and Licensing Branch, Department of Pesticide Regulation, 1001 I Street 3-A, P.O. Box 4015, Sacramento, California, 95812 or (916) 445-4038 or licenseemail@cdpr.ca.gov for more information.

What if I choose not to participate in this card program?

Qualified trainers may choose not to participate in the Training Verification Card Program. However, employers and trainers of field workers who elect not to participate in this program must still meet California requirements for field worker pesticide safety training. To simplify compliance with California regulations, employers and trainers of field workers may elect to retain, for five years, a copy of a class roster, signed by the trainer and each trainee that shows the date and the address of the location where the training occurred.