Introduction
How well would your agricultural production facility meet the regulations of Florida’s pesticide law? This article will assist agricultural producers in preparing for the day when the inspector arrives at their operation. It reviews the elements that an inspector for the Florida Department of Agriculture and Consumer Services (FDACS) Bureau of Compliance Monitoring (BCM) will examine during a routine agricultural establishment inspection.

Role of the Bureau of Compliance Monitoring
FDACS’ BCM is the state licensing agency in Florida for agricultural pesticide applicators who must be licensed to use EPA registered, restricted-use pesticides.

They perform routine inspections of facilities and operations of all types of private and commercial pesticide applicators, as well as of government agencies that are using pesticides. Inspections include a review of application records and an evaluation of product labels to ensure that use, storage, disposal and safety requirements of pesticides are being followed.

Inspections are necessary to ensure the safety of workers, to protect the environment and natural resources and to maintain the secure use and storage of agrichemicals.

The Basic Components
A compliance inspection of an agricultural facility is very comprehensive. Besides completing all official documentation forms, inspectors may take photographs for future evidence. The inspector will cover the components included on the Pesticide Use Inspection report and the Worker Protection Standard (WPS) inspection form. Records pertaining to pesticide applications and Florida rules regarding pesticides should also be made available to inspectors. The following sections will discuss each component in greater detail with links to the individual inspection forms. A pdf of the entire set of inspection forms is also available (http://edis.ifas.ufl.edu/pdffiles/PI/PI19500FDACSInspection-Forms.pdf)

Inspector Identification
Inspectors will properly introduce and identify themselves once they arrive at a place of business by presenting their BCM licenses and explaining the reason for the visit. They can arrive at any establishment without a prior appointment, so an establishment manager may already be engaged in some work activity. However, the inspection will go more smoothly with a manager’s full cooperation.

Pesticide Use Inspection Report
Following introductions, the inspector will fill out sections I and II on page 1 of the Pesticide Use Inspection Report for the agricultural establishment’s contact information (Figure 1).
**Restricted Use Pesticide License Verification**

During the early phase of the inspection, the inspector will determine whether restricted use on property pesticides are used at establishment and verify that the appropriate license is held.

**Pesticide Storage**

Ideally, storage would not be an issue if all products could be used within a single season. But, the reality for most Florida producers is that pest management is a year-round concern because of the nature of cropping systems and environmental conditions. The main check points the inspector will look for at the storage area are whether the facility appears to be secure, whether pesticides are held according to label directions, and what the overall condition of the facility is, each listed in section III (Figure 1). A secure storage area has a lock and is well-marked with signs (Figure 2).

Although not required by law, the inspector may make a few suggestions including:

- having a spill kit on hand
- keeping an inventory list
- keeping liquid and dry materials apart
- not keeping personal protective equipment (PPE) inside with chemicals
- keeping all materials up, off of the floor

The spill kit contains items such as absorbent material and containment snakes to clean up liquid spills. More information about assembling and using a spill kit can be found in UF/IFAS EDIS document PI-159, Pesticide Spill Kits [http://edis.ifas.ufl.edu/PI196](http://edis.ifas.ufl.edu/PI196). An inventory list of the materials held in the facility will provide a record for the length of time they've been held. It's always a good idea to store dry and liquid materials apart. If a liquid spills on a dry material, both materials will have to be disposed of. All materials, regardless of formulation, should be stored up off the floor so that they are protected from water leakage and flooding.

**Application Information**

After examining the products held in the storage facility, the inspector will select a label from one of the containers which will serve as the basis for the questions asked in section IV, page 2 of the Pesticide Use Inspection Report (Figure 3).

The information that the inspector will verify pertains to the following aspects of the product labeling:

- labeled sites/crops for the application
- proper rates, methods, and equipment used
- pre-harvest intervals followed
- whether supplemental intervals were on-hand, if needed
- whether PPE was available and worn
- whether restricted entry intervals (REIs) were observed where applicable
- whether containers, rinsates, and excess pesticide have been properly disposed of
- whether state specifically-regulated pesticides were used properly
- any other specific restrictions that would apply
This particular section will also cover the condition of the mix/load/wash down site at the facility. The inspector will determine whether an anti-siphon device is installed in the plumbing used for filling tanks to hold diluted pesticides for application, or at least whether an air gap was present at the time of filling.

**Recordkeeping of Restricted Use Pesticides**

This is the point of the inspection when a manager will be asked to provide application records of restricted use pesticides. Records must be complete and must include these elements:

- licensed applicators’ names and license numbers
- actual applicators’ names if not the licensed applicators
- date of application
- start and end times of application
- location and description of the treated site
- target site or crop
- total size of treated area
- pesticide brand name
- product’s EPA registration number
- total amount of product applied
- application method

A sample form for recordkeeping is shown in Figure 4 (Figure 4). However, managers may choose to use software programs or any other recordkeeping system deemed appropriate for their establishment so long as the required elements are included.

When applicable, inspectors will also need to see records pertaining to Florida rules such as the Organoc-Auxin herbicide rule (http://edis.ifas.ufl.edu/wg051) and the Aldicarb rule (http://edis.ifas.ufl.edu/pi111).

**Workers Protection Standard (WPS) Inspection**

The inspector will conduct worker and handler interviews to verify the components of the WPS for establishments that employ workers outside immediate family. The following sections discuss the components of the WPS inspection.

**WPS Inspection: Central Information Display**

The inspector will ask to see the central information display which must include the EPA-approved safety poster, emergency medical information, and pesticide application information. These points for inspection can be found on Page 1 of the WPS inspection form (Figure 5).

The display can be placed anywhere that is available to all workers at the establishment and is a convenient, visible place. Application information must be posted from the date of the application until 30 days following the product’s REI. The elements required for this WPS central information display posting are designated by a “W” on the form listed in Figure 4. As with the restricted use record, there is no required format for the form so long as the necessary elements are present. An example of a central information display is provided (Figure 6). More detailed information
is contained in UF/IFAS EDIS Document PI-112, Worker Protection Standard: Information at a Central Location http://edis.ifas.ufl.edu/pi149.

WPS Inspection: Pesticide Safety Training Assurance

If workers and handlers are certified and licensed as restricted use pesticide applicators, they are considered trained. If not, training for handlers needs to be conducted before they participate in any pesticide handling task. If they are workers who don’t handle any pesticides, they must be trained within their first 5 days on the job. Handling tasks include such activities as mixing/loading, repairing application equipment, making applications, adjusting tarps used during fumigations, and any task that involves direct contact with a pesticide. Some inspectors will suggest training everyone as handlers. A person who is trained as a handler can conduct training at establishment. There are several approved methods of training, but most establishments use the EPA-approved WPS video which is available from FDACS by calling (386) 418-5525.

Documentation of training must be kept on file. Workers and handlers should sign a roster of the training including the date and method of training that was used. The inspector will ask for this documentation and will check the date that the training was conducted (Figure 5). Training must be done at least once every 5 years, should be a standard part of hiring a new employee, and should be done immediately before assigning work. Based on FDACS’ inspection records, training concerns are the most common WPS violations in Florida. More detailed information is contained in UF/IFAS EDIS Document PI-113, Worker Protection Standard: Training Workers and Handlers http://edis.ifas.ufl.edu/pi150.

Worker Protection Standard: Employer Information Exchange

Commercial handlers are required to notify the establishment of application information before making the application (Figure 5). The purpose of this is so that the establishment owner can, in turn, notify his employees of the application. Likewise, if a commercial handler will be on the establishment and within ¼ mile of an area that is under a restricted entry interval (REI), then the owner should notify the commercial handler. More detailed information is contained in UF/IFAS EDIS Document PI-115, Worker Protection Standard: Employer Information Exchange http://edis.ifas.ufl.edu/pi152.

Worker Protection Standard: Emergency Assistance

The inspector will ask the following regarding emergency assistance: “is prompt transportation to an emergency facility available for employees who become sick or injured by pesticides,” and “is information provided to medical personnel regarding the pesticide to which employees may have been exposed?” (Figure 5).
Worker Protection Standard: Decontamination Sites

The inspector will check to see whether the necessary items for the decontamination site are present (Figure 7). Some decontamination sites are portable and can easily be transported from site to site where workers and handlers are present (Figure 8). Many establishments make portable kits containing the decontamination supplies and keep them on the equipment or vehicle that is near or used by workers (Figure 9). Decontamination supplies should be provided to workers entering treating areas until 30 days following the REI's expiration and they should also be provided for early entry workers during and after early entry. More detailed information is contained in UF/IFAS EDIS Document PI-116, Worker Protection Standard: Decontamination Supplies http://edis.ifas.ufl.edu/pi153.

Worker Protection Standard: Restrictions during Applications

Inspectors will inquire about workers in or around treated areas while an REI is in effect (Figure 7 and Figure 10). If there is early entry of workers into an area that is under an REI, the inspector will ask about the PPE that was worn, the applicator training, and time limitations. The necessary PPE can be found in the Agricultural Use Requirement box of each pesticide's label (Figure 11).
that has been treated and is within an REI. Therefore, it is important to remove the signs as soon as the REI expires if workers will be within the site. More detailed information is contained in UF/IFAS EDIS Document PI-107, Worker Protection Standard: Notice about Applications http://edis.ifas.ufl.edu/pi144.

Worker Protection Standard: Application Restrictions and Monitoring

The inspector will ask if the person who handled the product was monitored visually or verbally at least once every 2 hours when handling a pesticide whose label contains the skull and crossbones symbol (Figure 13). If a fumigant is used in a greenhouse, the handler must have continuous visual or voice contact with another trained and PPE-equipped handler (Figure 10).

Worker Protection Standard: Specific Instructions for Handlers

The inspector will ask about specific instructions for handlers (Figure 10). These questions will include verifying that a manager assures handlers read the label or are informed about the label requirements for safe use before performing any handling activity, that the handler has access to the product's labeling during handling activities, and that - if a commercial handler is contracted - the handler be
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informed of any treated areas, REIs, and entry restrictions on the establishment that may be within ¼ mile.

**Worker Protection Standard: Safe Operation of Equipment**
The inspector will interview handlers employed at an establishment and ask them (Figure 10):

- whether they have been instructed in the safe operation of any handling equipment before it is used;
- whether the equipment is inspected and repaired before each day of use; and
- whether the employer assures that only trained and PPE-equipped handlers repair, clean, or adjust any handling equipment that contains pesticides or pesticide residues.

**Worker Protection Standard: Personal Protective Equipment Requirement for Handlers**
The inspector will ask (Figure 10):

- whether the handler is provided with the appropriate PPE
- whether it is clean and good in working order
- whether the applicator wears the PPE and uses it correctly;
- whether filters are replaced on respirators when required
- whether there is a clean place to store, put on, and remove PPE and
- whether the handler employer takes appropriate measures to prevent heat-related illness for handlers using PPE

**Worker Protection Standard: Family Establishments**
Owners of agricultural establishments and members of their immediate families are exempt from many WPS provisions; however, they must comply with these sections:

- employer information exchange,
- restrictions during applications,
- restrictions during handling tasks, and
- restrictions during REI’s.

A checklist of these issues can be found in the final portion of the inspection sheet in Figure 10.

**Conclusion**
The inspection is not necessarily a one-way street for the inspector. Operators and employees have an opportunity to ask questions regarding the facility, pesticide laws, and making compliance more efficient in the operation.

Because a major objective of the BCM is to serve an educational role, the inspection should be considered a two-way means of communication.

**References**


