

# Cotton

## Cotton Producers Facing The Worker Protection Standard

Winter 1999

Information Sheet 2

### Coping with the Restricted Entry Interval (REI) for Pesticide Use In Cotton

Compliance with the Restricted Entry Interval (REI) is much easier if you understand what it is and how it is associated with pesticide application. A better understanding of the REI and its relationship with the Worker Protection Standard is the goal of this information sheet.

#### Defining the REI

The restricted entry interval is the time immediately after a pesticide application when entry into the treated area is limited. Some pesticides have one REI, such as 12 hours, for all crops and uses. Other products have different REIs depending on the crop and method of application. **When two (or more) pesticides are applied at the same time, and have different REIs, you must follow the longer interval.** As an example, if you plan to tank mix and spray Guthion (48-hour REI) and Dipel (12-hour REI) on cotton, then the longer interval (Guthion, 48 hour REI) must be followed on field entry, notification, PPE and other requirements of the Worker Protection Standard.

#### Location of the REI of a Pesticide Label

The REI will be found on the pesticide label of the product you will be using. The REI is found under a specific heading entitled "**Agricultural Use Requirements,**" which is in the **Directions for Use** section of the pesticide labeling or next to the **crop or application method** to which it applies.

#### Identification of the REI found on Pesticide Labels

The REI is expressed in hours or days based on specific designated intervals. The most common intervals found on pesticide labels are **12, 24 and 48** hours and usually the higher the REI hour interval, the more risk to the handler, early entry worker and worker.

**Arid area REIs.....**Some pesticide labeling requires a different REI for arid areas. Labeling might say, for example, "72 hours in outdoor areas where average annual rainfall is less than 25 inches a year." You can get information on average annual rainfall for your area from any nearby weather bureau, such as one located at a local airport and one affiliated with the National Oceanographic and Atmospheric Administration.

#### SAMPLE LABELING

##### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers and restricted entry interval. The requirements in this box apply to uses of this product that are within areas covered by the Worker Protection Standard.

**Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 48 hours. The REI is 72 hours in outdoor areas where average annual rainfall is less than 25 inches a year.**

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is :

- coveralls over long-sleeved shirt and long pants
- chemical-resistant gloves, such as barrier laminate or viton
- chemical-resistant footwear plus socks
- protective eyewear
- chemical-resistant headgear

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

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## Use of the REI

The REI has many functions in the Worker Protection Standard. The most common are:

- notification of workers by oral warnings and/or posting of warning signs at entrances to fields where the REIs are in effect.
- use of specific types and amount of personal protective equipment required when entering fields under some exceptions while the REI is in effect.
- the location and length of time that decontamination supplies must be made available to workers and handlers during and following an REI.
- the length of time specified before workers may enter a treated field under an REI and exceptions for early entry are restricted to early entry with no contact and early entry with contact for short-term, emergency or specially excepted tasks.
- the training for workers and handlers is better defined based on exposure risks associated with different REI's.

## What If...The State Established REIs

The **Interpretive Policy Document** states, "If the label bears the WPS reference statement and a statement requiring compliance with a Restricted Entry Interval (REI), albeit one that was placed on the labeling to reflect a state-established REI, it is considered to be the restricted entry interval required under FIFRA. Thus, the WPS provisions apply unless otherwise specified on the label. Please note that REIs on labeling must be reflected in the federal registration of the product. If states impose an REI through state regulation which is not on the labeling, the state REI would not trigger the REI-related provisions from the WPS (March 22, 1993)." States may not establish REIs that are less restrictive than federal label REIs.

### Sources For Obtaining More Information

- **Federal Register (Worker Protection Standard, 40 CFR Parts 156 & 170)**
- **The Office of the Environmental Protection Agency...contact your regional office.**
- **Past newsletter published by the Cotton Foundation and National Cotton Council**
- **The "How to Comply Manual" published by the EPA**
- **The State Department of Agriculture or State Lead Regulatory Agencies**
- **The Pesticide Coordinators with the State Cooperative Extension Services**



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