

3.6 Pesticides

Safety Initiatives in Place Prior to Review

The WS pesticide safety program promotes training, proper use, employee safety, environmental safety, and accountability. Wildlife Services employees who apply restricted use pesticides receive a state-issued Certified Pesticide Applicator license. They also receive additional safety training as determined by the state (continuing education courses) and/or WS program such as use of personal protective equipment (PPE), understanding of pesticide labels and their Material Safety Data Sheets (MSDS), proper reporting of pesticide application requirements, and the proper field application of each pesticide that they use.

The WS pesticide program underwent an audit by the USDA Office of Inspector General (OIG) after the Management Alert in 2001 regarding hazardous materials inventory and accountability. Wildlife Services worked with OIG to refine and strengthen hazardous materials management. All OIG 2004 Audit Report recommendations regarding hazardous materials management have been implemented, primarily through policy improvements and development of revised directives to refine the inventory and reconciliation processes. The audit is officially closed. Examples of these improvements include WS Directives pertaining to pesticides and hazardous materials were developed or updated, WS Control Materials Inventory Tracking System (CMITS) was developed to provide a robust accountability and reconciliation procedures, and pesticide storage and security for WS offices and duty stations were updated.

Review Activities

Review of the WS pesticide program was conducted by EnviroHygiene, LLC under contract with FOH. EnviroHygiene is involved in all aspects of consulting for integrated environmental and safety auditing, pesticide use and safety and related training. During the review, a EnviroHygiene representative examined all WS Directives, documents and manuals pertaining to management and operations of WS pesticide operations, training requirements and curricula and training records, safety procedures. EnviroHygiene staff also interviewed WS management and field personnel. EnviroHygiene conducted inspections of four WS state offices.

Summary of Review Findings

The recommendations and observations made by the pesticide reviewer were based on a review of current directives and accident reports for the past five years. Current training, program culture, and program administration were also evaluated. Additional information was derived from site visits in four states, including all district offices in these states, and several residential storage sites.

The reviewer stated that WS employees readily and openly informed him of their responsibilities and commitment to safety, and described what training they felt was adequate for others, and continually emphasized their commitment to comply with

existing regulations and directives. Their basic philosophy was to go beyond the regulation's requirements rather than taking a chance of not complying.

All pesticide applicators were certified state applicators and for those state programs selling pesticides, they had current state dealer licenses. A review of annual inspection reports conducted by the appropriate state authority showed that there were no violations in the past five years at any state or district office covered by this review. There were no federal or state noncompliance issues. One finding indicated non-compliance with a WS directive.

Priority Recommendations

The top priority recommendations made by the pesticides reviewers were as follows:

1. It is critical that the M-44 mechanisms be easily and thoroughly cleaned to prevent accidental injector activation. The newer type of mechanisms should be used. These are the Type 4 produced 2002 to present – no bottom crimp; a retaining pin holds plunger and ejector spring in place – the pin permits field disassembly for cleaning, lubrication or replacement of inner parts. The district supervisors should examine all M-44 devices in the applicator's possession, designate the old-type devices for recycling, and ensure the policy states that only new mechanisms are to be used. In addition, the cleaning technique of using vinegar and water to clean the mechanisms should be further evaluated.
2. The accident investigation program should be strengthened to provide an accurate assessment of a significant event so that adequate preventive actions can be implemented to prevent any recurrence. Those significant events must be first identified as significant, reported to the appropriate authority in an expeditious manner, and finally, investigated as close as possible to the time of occurrence. Significant events must be elevated through the management structure to ensure that an unbiased, professional evaluation is conducted.
3. All applicators must carry a decontamination kit containing at least one quart of water, coveralls (they could be one-use, disposable overalls), a towel, and soap in case the applicator splashes some pesticide on him or herself.
4. The WS program should produce several short, pesticide specific, i.e., M-44, LPC 1080, DRC-1339, safety training programs that can be placed on the WS Intranet and be copied to a DVD for distribution to remote locations not having high-speed internet service. These programs should stress safety, the use of pesticide/task-specific personal protective equipment, and should clearly delineate correct application procedures
5. Pesticide storage should be clearly defined in the directives as incidental, small, or large. Incidental storage areas should not be defined as pesticide storage areas with regard to inspections, storage requirements, and other items mentioned in any directives.