

OREGON OSHA PESTICIDE EMPHASIS PROGRAM ANNUAL REPORT



Federal Fiscal Year 2011

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**Oregon OSHA
Pesticide Emphasis Program
FFY 2011 Annual Report**



Introduction:

Oregon OSHA (OR-OSHA) and the United States Environmental Protection Agency (EPA), Region 10 Pesticides and Toxics Unit, have worked together on pesticide safety issues since 1993. OR-OSHA enforces the Worker Protection Standard, which is supplemented with a pesticide emphasis program. The Pesticide Emphasis Program has been in effect since 2000. This report is the annual review of the pesticide emphasis program for federal fiscal year 2011 (FFY 2011). The data elements and analysis are presented, along with recommendations for program improvements for the coming year.

Data Elements:

The data elements examined in this report are based on OR-OSHA's Program Directive A-235, entitled "Local Emphasis Program for Pesticides." Inspections were completed from a programmed list selected from the following list of North American Industrial Classification System (NAICS) codes which will be referred to as "selected NAICSs" for the purposes of this report.

NAICS 111998 General farming, field Crops, except Cash Grains, Not Elsewhere Classified
NAICS 111339 Deciduous Tree Fruits
NAICS 111421 Nursery & Tree Production
NAICS 111422 Floriculture Production
NAICS 115112 Crop preparation including pesticide spraying

Other NAICSs inspected as a result of complaints, referrals or programmed Agricultural Health inspections are included in this report if the inspection addressed pesticide-related issues.

Data Summary:

Pesticide exposures occur throughout the handling process, from purchase to disposal. The goal of the Pesticide Emphasis Program is to reduce occupational exposures to pesticides in agriculture through enforcing the pesticide-related standards such as the Worker Protection Standard, Hazard Communication, Respiratory Protection, Pesticide Storage, Fumigation and supervision. Implementation of these requirements can reduce the likelihood of exposures resulting in acute or chronic effects. The Pesticide Emphasis Program continues to be an effective tool for disseminating information, education, compliance assistance and enforcement activities to reduce occupational exposures to pesticides in the agriculture industry.

The following is a brief summary of the findings resulting from the evaluation of FFY 2011 activity. Please see each section for tables and explanations of each.

- ◆ **Inspection Activity**
- ◆ **Violation characteristics**
- ◆ **Summary of previous years:**
- ◆ **Inspection History for WPS Inspections:**
- ◆ **Pesticide Analytical Response Center (PARC) Cases**
- ◆ **External Training**
- ◆ **Conclusions**
- ◆ **Accomplishments**
- ◆ **Goals for the coming year**

Inspection Activity:

In FFY 2011, 68 inspections were completed. Shown in the table below are the inspections attempted, whether they were Complaint, Referral or Program Planned inspections. A Program Planned inspection means it was a scheduled Pesticide Emphasis inspection from the emphasis list. Summary tables show previous inspection data for 2002 thru 2011 and are included as a reference.

Attempted and Completed Inspections by Inspection Type

Inspection type	Federal fiscal year									
	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011
Total completed inspections	89	72	61	75	74	74	99	90	86	68
Fat/Cat	1	-	-	-	-	-	-	-	-	-
Complaint	8	10	8	9	4	9	11	7	8	10
Referral	11	5	4	6	8	11	15	8	9	6
Monitoring	-	-	-	-	-	1	-	-	-	-
Follow-up	-	-	-	-	-	-	-	-	1	-
Unprog. Related	1	2	-	-	-	-	2	-	3	-
Programmed Planned	68	55	49	60	62	52	70	73	63	52
Programmed Related	-	-	-	-	-	1	1	2	2	-
Attempted (triple zero)	12	30	19	22	16	11	18	11	11	16

Attempted and completed inspections by inspection type and industry (NAICS), FFY 2011

Inspection type	Total	Selected NAICS					Other NAICS*
		111339	111421	111422	111998	115112	
Total completed inspections	68	4	24	5	15	-	20
Complaint	10	-	4	-	2	-	4
Referral	6	-	1	-	-	-	5
Programmed Planned	52	4	19	5	13	-	11
Attempted (triple zero)	16	2	6	-	1	1	4

*Other NAICS include: 111219, 111331, 111332, 111334, 113210, 115115, 424510, 611110, 622110, 624310, 921140, 999999.

Source: Information Management Division, Oregon Department of Consumer and Business Services, December 2011

The table below denotes whether the completed inspections were Tier 1* or Tier 2** inspections.

Completed Inspections by WPS/Emphasis Type

Inspection type	Federal fiscal year									
	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011
Total completed inspections	89	72	61	75	74	74	99	90	86	68
WPS Tier 1	46	46	39	56	55	49	77	74	70	43
WPS Tier 2	22	17	12	12	15	16	14	11	8	15
WPS (no tier specified)	13	-	-	-	-	-	-	-	-	-
Pesticide Emphasis, Non-WPS	8	9	10	7	4	9	8	5	8	10

Source: Information Management Division, Oregon Department of Consumer and Business Services, December 2011

*Tier 1 Inspections: Pesticides used within the preceding 30 days plus the restricted entry interval

**Tier 2 Inspections: Pesticides NOT used within the preceding 30 days plus the restricted entry interval.

Violation characteristics: These included violations of the Worker Protection Standard (WPS) and other occupationally-related standards pertaining to pesticides. Pesticide-related violations include the Oregon OSHA standards addressing hazard communication, respiratory protection, emergency eyewash, supervision, pesticide storage and fumigation. From the previous table, WPS Tier 1 inspections accounted for 63% (43/68) of the pesticide emphasis inspections, and 22% (15/68) were Tier 2. Programmed planned inspections accounted for 76% (52/68). This data supports the continued focus of our inspection resources within the Selected NAICS as an effective means to address worker protection and pesticide safety.

Pesticide Violations and Penalties in FFY 2011

Industry (NAICS)		Total violations	WPS Violations			Pesticide Related / Other Violations		
			Serious	Other than serious	Total penalties	Serious	Other than serious	Total penalties
Selected NAICS	111339	11	4	3	\$900	2	2	\$0
	111421	116	7	38	\$810	16	55	\$2,180
	111422	13	2	1	\$330	5	5	\$165
	111998	51	4	21	\$370	10	16	\$760
Other NAICS	111219	29	5	9	\$475	4	11	\$210
	111331	2	-	1	\$0	-	1	\$0
	111332	14	-	4	\$0	1	9	\$100
	111334	1	-	-	-	-	1	\$0
	115115	17	-	9	\$0	2	6	\$105
	424510	1	-	-	-	1	-	\$500
	611110	1	-	-	-	-	1	\$0
	622110	1	-	-	-	1	-	\$325
	624310	1	-	-	-	-	1	\$0
Total		258	22	86	\$2,885	42	108	\$4,345

Source: Information Management Division, Oregon Department of Consumer and Business Services, December 2011

If a WPS violation is grouped with another violation, the WPS and non-WPS violations are counted separately, but the penalty amount for the whole group is retained with the WPS violation.

Statistics for Completed Inspections by Industry (NAICS), FFY 2011

Industry (NAICS)		Completed inspections	Citation issued	In compliance	Percent with citation issued	Percent in compliance	WPS Tier 1	WPS Tier 2	Pesticide Emphasis, Non-WPS	Employees covered
Selected NAICS	111339	4	3	1	75.0	25.0	2	1	1	32
	111421	24	19	5	79.2	20.8	17	5	2	602
	111422	5	5	-	100.0	-	3	2	-	236
	111998	15	12	3	80.0	20.0	12	2	1	94
Other NAICS	111219	5	5	-	100.0	-	4	1	-	101
	111331	1	1	-	100.0	-	-	1	-	16
	111332	3	3	-	100.0	-	2	1	-	29
	111334	1	1	-	100.0	-	-	1	-	3
	113210	1	-	1	-	100.0	-	-	1	6
	115115	3	3	-	100.0	-	3	-	-	50
	115310	1	-	1	-	100.0	-	1	-	5
	424510	1	1	-	100.0	-	-	-	1	15
	611110	1	1	-	100.0	-	-	-	1	35
	622110	1	1	-	100.0	-	-	-	1	15
	624310	1	1	-	100.0	-	-	-	1	4
	921140	1	-	1	-	100.0	-	-	1	32
	Total		68	56	12	82.4	17.6	43	15	10

Summary of previous years:

The tables below summarize inspections, violations and penalties for federal fiscal years 2002 through 2011.

Statistics for Completed Inspections by Federal Fiscal Year

Federal fiscal year	Completed inspections	Citation issued	In compliance	Percent with citation issued	Percent in compliance	WPS Tier 1	WPS Tier 2	WPS (no tier specified)	Pesticide Emphasis, Non-WPS	Employees covered
2002	89	69	20	77.5	22.5	46	22	13	8	1,884
2003	72	63	9	87.5	12.5	46	17	-	9	1,928
2004	61	45	16	73.8	26.2	39	12	-	10	2,235
2005	75	60	15	80.0	20.0	56	12	-	7	1,561
2006	74	59	15	79.7	20.3	55	15	-	4	2,779
2007	74	66	8	89.2	10.8	49	16	-	9	1,792
2008	99	87	12	87.9	12.1	77	14	-	8	2,361
2009	90	80	10	88.9	11.1	74	11	-	5	2,214
2010	86	69	17	80.2	19.8	70	8	-	8	2,411
2011	68	56	12	82.4	17.6	43	15	-	10	1,275

Pesticide Violations and Penalties in FFY Totals

Federal fiscal year	Total violations	WPS Violations					Pesticide Related / Other Violations				
		Serious	Other than serious	Repeat	General	Total penalties	Serious	Other than serious	Repeat	General	Total penalties
2002	299	27	85	-	-	\$3,065	47	132	8	-	\$6,040
2003	315	29	88	-	-	\$3,225	38	159	1	-	\$2,490
2004	271	26	62	2	-	\$3,580	29	147	5	-	\$4,465
2005	324	7	122	-	-	\$1,575	28	167	-	-	\$3,400
2006	316	22	121	2	-	\$3,580	23	144	4	-	\$2,065
2007	409	42	127	1	6	\$5,925	80	131	1	21	\$23,365
2008	492	23	187	1	-	\$4,055	98	176	1	6	\$10,175
2009	448	30	160	-	-	\$5,735	103	154	1	-	\$15,760
2010	385	28	167	2	-	\$4,470	44	143	1	-	\$4,250
2011	258	22	86	-	-	\$2,885	42	108	-	-	\$4,345

Source: Information Management Division, Oregon Department of Consumer and Business Services, December 2011
If a WPS violation is grouped with another violation, the WPS and non-WPS violations are counted separately, but the penalty amount for the whole group is retained with the WPS violation.

The violations below are divided up into either handler or worker related, showing the categories of issues for each group.

Pesticide Violations Cited in FFY 2011

Violation type		Violations
Handler related	Central posting	9
	Decontamination	14
	Emergency eyewash	7
	Fumigation	2
	Hazard communication	33
	Label specific	1
	PPE - Other	8
	PPE - Respirators	41
	Pesticide storage	23
	Training	12
Worker related	Central posting	38
	Decontamination	4
	Notification to workers	10
	Safe practices	11
	Training	16
Other	Other	29

Source: Information Management Division, Oregon Department of Consumer and Business Services, December 2011

Employers inspected in FFY 2011 - Current inspection results and previous inspection history

WPS Tier 1

Previous Oregon OSHA inspections prior to FFY 2011	Inspection results from FFY 2011					Total employers
	Cited for WPS Violations	Cited for other pesticide violations	Cited for non-pesticide violations	Ag Exempt	In compliance - no violations	
Last health inspection was within the last five years	8	1	-	-	1	10
Last health inspection was more than five years ago	10	1	-	1	-	12
Previous Oregon OSHA inspection(s) were other than health	7	-	-	-	1	8
Never inspected by Oregon OSHA	11	-	-	-	1	12
Total employers	36	2	-	1	3	42

WPS Tier 2

Previous Oregon OSHA inspections prior to FFY 2011	Inspection results from FFY 2011					Total employers
	Cited for WPS Violations	Cited for other pesticide violations	Cited for non-pesticide violations	Ag Exempt	In compliance - no violations	
Last health inspection was within the last five years	1	-	-	-	-	1
Last health inspection was more than five years ago	2	1	-	1	-	4
Previous Oregon OSHA inspection(s) were other than health	1	1	-	-	1	3
Never inspected by Oregon OSHA	-	7	-	-	-	7
Total employers	4	9	-	1	1	15

Pesticide Emphasis, Non-WPS

Previous Oregon OSHA inspections prior to FFY 2011	Inspection results from FFY 2011					Total employers
	Cited for WPS Violations	Cited for other pesticide violations	Cited for non-pesticide violations	Ag Exempt	In compliance - no violations	
Last health inspection was within the last five years	2	-	1	-	1	4
Last health inspection was more than five years ago	1	-	2	1	1	5
Previous Oregon OSHA inspection(s) were other than health	-	-	-	-	-	-
Never inspected by Oregon OSHA	-	-	1	-	-	1
Total employers	3	-	4	1	2	10

Source: Information Management Division, Oregon Department of Consumer and Business Services, December 2011

If an employer was inspected more than once in FFY 2011 they were categorized only once based on inspection type in the following order of precedence: WPS tier 1; WPS tier 2; non-WPS.

If an employer was inspected more than once in FFY 2011 their current inspection results were categorized based on the following order of precedence: WPS violations; other pesticide violations; non-pesticide violations; Ag Exempt; in compliance.

If an employer had more than one inspection prior to FFY 2011 they were categorized based on the following order of precedence: health inspection; other than health inspection; no previous inspections.

Pesticide Analytical Response Center (PARC) Cases:

In FFY 2011, Oregon OSHA investigated 5 PARC cases. The cases occurred in a variety of settings, with only one connected to agriculture (grain handling). The other settings included health care, a care center for the developmentally disabled, and a roof treatment company. The case investigations originated from complaints (2), a referral from a safety compliance officer, and direct reporting of incidents to Oregon OSHA by the employer. Contributing factors in the PARC cases involved failure to notify individuals of pending applications and for failure to provide information on the products involved. Two of the three PARC cases involved group exposures, with medical treatment sought. A summary of the case investigations is as follows:

Case #1 - a joint investigation by Oregon OSHA and the Oregon Department of Agriculture (ODA) took place after a county health department employee placed Enoz Old Fashioned Mothballs (EPA Reg.# 1475-74), a naphthalene product, on their flat roof to get rid of pigeons. The mothballs had been placed by the HVAC intake where the pigeons roosted. The HVAC system drew the material into the clinic. Multiple staff experienced symptoms including a metallic taste in the mouth, headaches, nausea, violent vomiting and scratch throats. One employee was treated in the emergency room and multiple staff left work early. There were no violations alleged as the application was not authorized by the employer.

Case #2 – a joint investigation by Oregon OSHA and the ODA took place after a commercial application was made to the crawl space of a medical clinic on hospital grounds. On-going exterior perimeter treatments had been taking place without success to control black ants. The employer hired a second commercial applicator to apply the organophosphate insecticide Orthene PCO Pellets (EPA Reg. # 5481-8973) and Dagnet SFR (EPA Reg. # 279-3062) in the crawl space underneath the clinic all along the footings, as well as along the exterior perimeter. The insulation under the crawl space was not intact, and the floor vents had gaps between the duct flashing and the floor. In addition, the HVAC system had not been shut off during the application. The original commercial applicator arrived to perform his regular application the next morning to the perimeter with some interior work with Cy-kick Aerosol (EPA Reg. # 499-470). Employees began experiencing symptoms shortly after arrival. Positive samples for Orthene were obtained by the ODA off the interior vent ducts. Three employees experienced symptoms. Two had severe asthmatic episodes and the third with severe headache and vomiting. The asthmatic employees sought medical treatment. All three left work for the day. The employer was cited for failure to notify employees that a pesticide application was to occur and for not providing Material Safety Data Sheets for the pesticides involved.

Case # 3 involved a complaint about an alleged exposure at a large grain handling facility to the aluminum phosphide product Weevil-cide (EPA Reg. # 7506-14) during the loading of trucks with potentially treated grain. While the exposure to aluminum phosphide could not be substantiated, and appeared to be related to grain dust, the employer was cited for failure to complete Fumigation Management Plans.

Case #4 involved a complaint which alleged adverse health effects after a pesticide application occurred at a facility that worked with developmentally disabled adults. The product used by the commercial applicator was Phantom Aerosol (EPA Reg. # 7969-285) Chlorfenapyr. The employer was cited for failure to notify employees that the pesticide application was to occur, and did not provide a Material Safety Data Sheet. A referral was made to the ODA regarding the application being made while food preparation activities were taking place, which was prohibited by the label.

Case #5 was a referral from a safety compliance officer involving a roof treatment product called “No-Moss” which was not an EPA registered product. The employee using the product experienced constant sneezing and watery eyes despite the use of eye protection and a respirator. The product contained cottonseed oil, cloves and garlic and was labeled as a “Caution” Broad spectrum mossicide. The employer was cited for hazard communication, personal protective equipment and respiratory protection violations. A referral was also made to the ODA for the pesticidal claims of the product.

External Training:

External training consists of two parts, workshops put on by the OR-OSHA Public Education Section, and speaking requests performed in conjunction with Oregon Department of Agriculture events. Speaking requests were conducted mostly in conjunction with day long multi-program agendas put on by grower groups, the Oregon Department of Agriculture, or the Oregon State University Extension Service for the purpose of maintaining credits for pesticide licensees.

Oregon OSHA speaking requests in FFY 2011

Date	Topic	Group	Location	Attendees
11/3/2010	PPE for Pesticide Handlers	Oregon Ag Chemical & Fertilizer Association (OACFA)	Wilsonville	220
11/4/2010	PPE for Pesticide Handlers	OACFA	Springfield	80
11/12/2010	Respiratory Hazards in AG	Chemeketa Community College	McMinnville	14
11/16/2010	Pesticide PPE	Or Vegetation Mgmt	Sunriver	230
11/18/2010	Pesticide Storage and Recertification	Portland Parks	Portland	191
12/7/2010	Respiratory Hazards in Ag	Chemeketa Community College (CCC)	Salem	16
12/10/2010	Worker Protection Standard	CCC	Salem	30
1/12/2011	PPE for AG	Chemical Applicator's Short Course	Wilsonville	220
1/25/2011	Pesticide Storage, WPS, PPE, Fumigation Management Plans	Oregon Horticultural Society	Portland	19
1/26/2011	Pesticide Storage	OSU Non-Crop	Corvallis	200
2/3/2011	Hazard Communication	Tillamook Bay Community College	Tillamook	2
2/4/2011	Mixing and Loading Pesticides	Central Oregon Pest Management	Redmond	75
2/9/2011	Pesticide Storage	OSU Extension Urban Pest Mgmt	Oregon City	75
2/9/2011	PPE	OSU Extension Urban Pest Mgmt	Oregon City	75
2/25/2011	Worker Protection Standard	CCC	Salem	23
3/8/2011	Haz Com Success, Challenges, and the Future	GOSH	Portland	27
3/29/2011	Pesticide Poisoning & AG Jeopardy	Stayton High School	Stayton	33
4/7/2011	PPE and Division 2	Redwood Safety Assoc.	Grants Pass	17
4/7/2011	Hazard Communication	South Suburban Sanitation Dist.	K. Falls	14
5/11/2011	MSDS and PPE Assessment	Or Institute of Technology	K. Falls	18
5/27/2011	Worker Protection Standard	CCC	Salem	19
8/3/2011	Oregon Rules for Soil Fumigation	EPA	Portland	210

Pesticide Related Interventions – External Training, FFY 2011

Classes (Workshop & Internet)	Sessions	Attendees
1240 – Hazard Communication Program (Haz Com)	3	84
1241 – Personal Protective Equipment (PPE)	1	131
1410 – Worker Protection Standard (WPS)	5	59
		274

Source: Information Management Division, Oregon Department of Consumer and Business Services, December 2011

Pesticide Inspectors Forum—Multi-Agency Annual Meeting:

The annual Pesticide Inspector’s Forum was held in March, 2011. Attendees included Oregon OSHA, Oregon Department of Agriculture (ODA), EPA Region X, the National Institute of Occupational Safety and Health’s National Personal Protective Technology Laboratory (NIOSH/NPPTL), the Pacific Northwest Agriculture Safety and Health Center (PNASH), the Center for Occupational and Environmental Toxicology (CROET), Oregon State University Extension Service and the National Pesticide Information Center (NPIC).

Topics discussed at the forum included an update to the NIOSH/NPPTL project related to personal protective equipment barriers for pesticide handlers, the use of fluorescent tracers to identify pesticide contamination transfer, the continuing problems associated with bed bugs, soil fumigation training, fumigation management plans, a review of agency accomplishments and compliance officer safety. The work of Oregon OSHA’s Pesticide Emphasis Program was highlighted in PNASH’s publications featuring photographs taken during compliance inspections. These were submitted to be included in their “Practical Solutions” publication.

Public Outreach: Oregon OSHA tracks publication circulation and video requests. The next few tables show what activity was done for FFY2011.

Oregon OSHA Publications in FFY 2011

Titles	Internal Oregon OSHA requests	External requests
Safe Practices when Handling Agricultural Chemicals (#1951)	150	5,795
Washing pesticide contaminated clothing magnet (# 2858)	25	81
Washing pesticide contaminated clothing magnet –SP (# 2858-S)	0	2
Cultivate a Safe Environment (currently not in print) (#2411)	0	6
The Air you Breathe (#3654)	400	8
Division 4, Agriculture	25	7
Pesticide Use and your PPE (#1018)	675	207

Pesticide Related Interventions – Consultative Services Booth Shows, FFY 2011

Show	Date of show
North West Ag Show	January

Source: Information Management Division, Oregon Department of Consumer and Business Services, December 2011

Oregon OSHA's consultations are tracked to include potential outreach of information in the selected industries.

Oregon OSHA Consultations by NAICS in FFY 2011

Industry (NAICS)	Health	Safety
111339	2	53
111421	2	23
111422	1	1
111998	2	17
115112	1	3
Total	8	97

Oregon OSHA Resource Center Pesticide-related Videos, FFY 2011

#	Name	English	Spanish	Requests
464	EPA WPS for Orchard Workers	x	x	0
465	EPA WPS for Pesticide Handlers	x	x	2
474 / 475	Oregon Pesticide Safety Guide	x	x	1
384	Greenhouse Pesticide Safety Training Workers & Handlers	x	x	0
352	How to Conduct Worker Protection Training/Train the Trainer	x		1
380 / 383	Pesticide Handlers and the Worker Protection Standard	x	x	1
600	Pesticide Safety: Help Workers Protect Themselves	x		2
608	Pesticide Safety: Help Workers Protect Themselves		x	0
323	Pesticide Safety Worker Protection Oregon- DVD # 95	x	x	2
392	Pesticide Training for Agricultural Employees	x	x	0
327	Shedding Some Light on Pesticide Protection	x		1
332	Worker Protection Standard An Overview	x		1
1051	Protecting Yourself From Pesticide Hazards	x	x	2
446 / 447	Breathe Easy: Respiratory Protection Program	x	x	3
				16

Source: Information Management Division, Oregon Department of Consumer and Business Services, December 2011

Conclusions:

Nurseries (NAICS 111421) remain an important part of our focus on pesticide safety issues. One-third (35%) of all pesticide emphasis inspections, with a total of 116 violations (45%), covering 602 (47%) workers, were completed in this industry. From the PARC cases which OR-OSHA investigated, it is clear that pesticide safety can be improved through better communication between employers and their workers when applications are being planned. Pesticide applicators need to be involved in the planning and coordination of their activities. Recent PARC cases remind us how the workplace is negatively impacted when workers become ill or sickened, often forcing people to leave for the day or seek medical attention in some circumstances. OR-OSHA enforcement and voluntary compliance activities provide many opportunities for addressing worker protection and pesticide safety. The annual meeting among multiple agencies affords opportunities for developing strategies that enhance and improve worker protection.

Accomplishments:

- ◆ Partnered with the ODA providing expertise on the respiratory protection requirements on the new soil fumigant labels.
- ◆ The annual pesticide meeting continues to provide a forum of networking among multiple regulatory and educational agencies to enhance protections to pesticide users.
- ◆ Developed the Agricultural Jeopardy game to increase awareness of various hazards in the agricultural setting. This game was developed to provide a fun and interactive means of communicating hazards present in agriculture. The game includes numerous categories which are pesticide related. This game debuted at the Northwest Agriculture Show's "Safety Zone", much to the delight of those attending the show, especially children. Agriculture Jeopardy received an intensely positive response when used at the Stayton High School's Agriculture class, as a competition between teams of students.
- ◆ Continued Partnership with the National Institute of Occupational Safety and Health's National Personal Protective Technology Laboratory (NIOSH/NPPTL).

Goals for the coming year

- ◆ Provide continued assistance to the NIOSH/NPPTL program in addressing barriers to the use of personal protective equipment.
- ◆ Conduct outreach to the Organic Growers to increase awareness that the products they use are regulated pesticides and that the pesticide regulations do apply to them.
- ◆ Expand outreach through Hazard Alerts to employers who use aluminum phosphide products of the need for structural and burrowing rodent fumigation management plans.
- ◆ Conduct internal field staff training to increase awareness of the prevalence of the aluminum phosphide products.