STATE OF WASHINGTON
DEPARTMENT OF AGRICULTURE
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# Enclosed Cabs Required For Airblast Application Of Endosulfan Products on Tree Fruits

**April 22, 2008**

**This bulletin has important changes under the "Apples and Pears" section, and supersedes the bulletin issued in early April 2008**

New labeling for endosulfan products registered for use on tree fruits (e.g. Thionex 3 EC, Thionex 50W, Endosulfan 3EC, etc.) requires that enclosed cabs must be used when applying these products with an airblast sprayer.

## Cherries, Apricots, Nectarines and Peaches

There are no exceptions for the requirement to use an enclosed cab for airblast applications in cherries, apricots, nectarines and peaches. If you do not have an enclosed cab for your airblast sprayer, or if the orchard structure is such that an enclosed cab cannot pass through, then you cannot apply the product to these crops with an airblast sprayer.

## Apples and Pears

Enclosed cabs must also be used for airblast applications to apples and pears. Certain labels may allow use of an open-cab when application with an enclosed cab is "not feasible". When this exception is on the label, applicators are permitted to use open-cab airblast equipment when enclosed cabs are not feasible provided they wear chemical resistant headgear and the maximum PPE required by the label. EPA has changed their previous position and now considers "not feasible" to include factors other than just the inability to physically pass through the orchard with an enclosed cab. In determining when it is not feasible to spray with an enclosed cab, WSDA will now take into consideration whether a grower owns or has access to enclosed cabs, and other factors such as the need to spray multiple orchards with varying tree structures during a single spray operation.

## PPE to wear in an enclosed cab

It is readily apparent that an enclosed cab in good repair offers protection from dermal exposure to pesticides. The worker protection standard acknowledges this protection and allows applicators to substitute a long-sleeved shirt, long pants, shoes and socks for the PPE specified on the label. A respirator must still be worn when and as specified by the label. All of the label-specified PPE must be immediately available and stored in a

chemical-resistant container inside the cab. Applicators shall wear such PPE if it is necessary to exit the cab and contact pesticide-treated surfaces in the treated area.

Note that we haven't mentioned "certification" in describing use of an enclosed cab. That's because the earlier certification program sponsored by the WA State Department of Labor & Industries (L&I), which was for the purpose of certifying various levels of respiratory protection provided by enclosed cabs, has not been in existence for a number of years. To put it simply, any past certification by the manufacturer or L&I is no longer valid. For all enclosed cabs, applicators must wear the respiratory protection required by the label.

Summary

1. Enclosed cabs that provide dermal protection are required for airblast applications of certain endosulfan products to apples, pears, cherries, apricots, nectarines and peaches.
2. Open cabs cannot be used for airblast applications to cherries, apricots, nectarines and peaches.
3. For apple and pear orchards only, certain labels allow open cabs to be used when it is "not feasible" to used an enclosed cab. The "not feasible" exception can include such factors as the structure of the orchard, unavailability of enclosed cabs, and the need to spray multiple orchards with varying tree structure during the same application. Chemical resistant headgear and the maximum PPE required by the label must be worn when applying by open cab.
4. Enclosed cabs do not need to be certified for dermal protection, and any past certification for respiratory protection is no longer valid. Therefore, applicators must wear the respirator specified by the label, but are allowed to wear "long-sleeved shirt, long pants, shoes and socks" in place of the other label-specified PPE. All of the label-specified PPE must be immediately available and stored in a chemical-resistant container. Applicators shall wear such PPE if it is necessary to exit the cab and contact pesticide-treated surfaces in the treated area.

For further information contact the Pesticide Compliance Program at (877) 301-4555. The information provided in this technical assistance fact sheet is accurate as of the posting date indicated. Future changes to product labels and/or regulatory enforcement schemes may affect the applicability.