

WPS PPE AMENDMENTS- Optional Liners for Workers & an Exemption for Ag-Pilots

Taken from 69 Fed. Reg. 53341-53346 (September 1, 2004)

Recent amendments to the Federal Worker Protection Standard (WPS) now permit the optional use of separable glove liners beneath chemical-resistant gloves and makes optional the wearing of gloves by agricultural pilots when entering or leaving aircraft. The amendments appear in the WPS as follows:

“Separable glove liners may be worn beneath chemical-resistant gloves, unless the pesticide product labeling specifically prohibits their use. Separable glove liners are defined as separate glove-like hand coverings made of lightweight material, with or without fingers. Work gloves made from lightweight cotton or poly-type material are considered to be glove liners if worn beneath chemical-resistant gloves. Separable glove liners may not extend outside the chemical-resistant gloves under which they are worn. Chemical-resistant gloves with non-separable absorbent lining materials are prohibited.

If used, separable glove liners must be discarded immediately after a total of no more than 10 hours of use or within 24 hours of when first put on, whichever comes first. The liners must be replaced immediately if directly contacted by pesticide. Used glove liners shall not be reused. Contaminated liners must be disposed of in accordance with any Federal, State, or local regulations.

Aerial application--Use of gloves. The wearing of chemical-resistant gloves when entering or leaving an aircraft used to apply pesticides is optional, unless such gloves are required on the pesticide product labeling. If gloves are brought into the cockpit of an aircraft that has been used to apply pesticides, the gloves shall be kept in an enclosed container to prevent contamination of the inside of the cockpit.”

In regards to the optional glove liner the EPA felt that that these changes will reduce the cost of compliance and will increase regulatory flexibility without increasing potential risks. During the comment period the National Institute for Occupational Safety and Health (NIOSH) agreed with EPA that permitting workers to wear glove liners under their chemical-resistant gloves should result in increased compliance with the standards and decreased exposure to pesticides. NIOSH commented further that permitting workers to wear glove liners might also reduce the risk of allergic reactions to certain glove materials.

In general, the supporters of the Agency’s proposal said that workers often do not wear chemical-resistant gloves because of the discomfort they experience. Several testified to witnessing the discomfort that can result from the wearing of unlined chemical-resistant gloves. The major discomfort is profuse sweating in the summer and extreme cold during cooler months. One commenter cited his experiences with workers who had developed severe hand dermatitis as a result of wearing chemical-resistant gloves without liners. This commenter also stated that he believed that EPA’s prohibition against the use of separable glove liners was increasing the incidence of dermatitis.

In regards to the optional use of gloves by Ag-pilots when entering and exiting the aircraft, the major point made by the commenters in favor of the proposal was that the introduction of contaminated gloves into the confined area of the cockpit would create a hazard far in excess of any hazard caused by the minimal hand contact with the aircraft occurring when entering or exiting the cockpit. Also mentioned by the National Agricultural Aviation Association and some individual agricultural aviators was the use of gloves by pilots when adjusting spray equipment. This appropriate use of gloves can result in significant pesticide residues on the gloves. Therefore, gloves used by pilots should not be assumed to be lightly used and thus free of significant pesticide residues. Ideally, gloves that have been worn to perform pesticide-related tasks outside the airplane should be discarded, but if they are brought into the cockpit, they must be stored in an enclosed container to prevent contamination of the inside of the cockpit, as stated in the current regulation. As long as gloves brought into the cockpit are stored properly, they should generally present no risk of concern.

Risk assessments were performed on chemicals with a wide variety of toxicological characteristics throughout both the registration process and under the Agency's pesticide reregistration program and have not identified concern for exposure at the levels evaluated without gloves. Consequently, EPA has concluded that there is not a routine need for pilots to wear gloves when entering and exiting the cockpit. The Agency may, however, determine on a case-by-case basis that some pesticide/use combinations could trigger the need for gloves or the need to prohibit the use of gloves when entering or exiting the cockpit. The Agency expects that such determinations would be followed by requirements to revise product labeling. #