

WPS-Enclosed Cab Guidance for PPE/Respiratory Protection

Taken from General Guidance for Regions/States/Tribes Regarding Enclosed Cabs and PPE memo dated April 2004.

An *enclosed cab*, according to EPA regulation, is a cab that has a nonporous barrier which totally surrounds the occupant(s) of the cab and prevents contact with pesticides outside of the cab. Such cabs could include tractor cabs, cockpits and truck/vehicle cabs as long as the cabs do not have doors, hatches or windows that are open anytime during the pesticide application.

When applying pesticides from within an enclosed cab, current pesticide regulations in the Worker Protection Standard (WPS) allow an applicator to wear less personal protective equipment (PPE) than what may be required for outside or open cab applications. The applicator must have a complete set of label-specified PPE clean and immediately available inside the cab or stored outside the cab in a chemical-resistant container, such as a plastic canister or trash bag. The full label-specified PPE must be put on and worn if it necessary to exit the cab and come in contact with pesticide treated surfaces in the treated area. Once PPE is worn in the treated area, it must be removed before reentering the cab. Contaminated PPE should not be stored inside the cab unless it is first placed in a chemical-resistant container such as a plastic canister or trash bag.

When a pesticide label specifies that a respiratory protection device is required for application, it must be worn unless the enclosed cab has a properly functioning

ventilation system that has been declared in writing by the manufacturer or a governmental agency to provide respiratory protection equivalent to or greater than the respiratory protective device required by the product labeling, and such ventilation system has been used and maintained in accordance with the manufacturer's written operating instructions.

It should be noted that some pesticide labels mention an exception to the requirement to wear the prescribed respirator if the occupant is in an enclosed cab that is in conformance with the American Society for Agricultural Engineers (ASAE) Standard S525 **or** the WPS requirements at 40 CFR 170.240(d)(5). Since the ASAE has withdrawn the S525 Standard and has not changed their position regarding this Standard (as of April 19, 2004), that criteria for the exception is no longer valid. The ASAE has issued a press release noting the withdrawal of the S525 standard and ASAE advised applicators to consider enclosed cabs a "supplement to PPE" and advised them to still wear all applicable label-required respiratory protection/PPE.

Although the WPS exception at 40 CFR 170.240(d)(5) is still valid, in the case of vapor- or gas-removing respirators, EPA has been advised by experts that it is unlikely that most enclosed cabs can/will be maintained in a way to assure that respiratory protection provided by ventilation systems on enclosed cabs is truly equivalent to vapor- or gas-removing respirators. In light of this information and the action taken by ASAE, EPA is concerned about the risks of relying on enclosed cabs in lieu of label-required respiratory protection, especially for vapor- or gas-removing respirators. Therefore, in the case of

respiratory protection, EPA is recommending applicators to wear all applicable label-required respiratory protection even when using an enclosed cab that provides respiratory protection. EPA is not recommending any action with regard to the exception allowed for other types of PPE (non-respiratory protection) when using an enclosed cab since that part of the WPS exception is not affected by the above information. As always, users should consult the pesticide label regarding PPE requirements and allowable exceptions.

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