County of Los Angeles
Department of
Agricultural Commissioner/
Weights & Measures



# Cannabis Production Pesticide Use Guide



#### **Headquarters**

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#### THIS IS A GENERAL GUIDE.

## LAWS AND REGULATIONS ARE PERIODICALLY UPDATED.

## THERE IS NO SUBSTITUTE FOR KNOWING THE LAWS & REGULATIONS THAT GOVERN PESTICIDE USE.

Please follow the guidelines set forth by the
California Department of Pesticide Regulation (CDPR)
when determining which pesticides to use on your crop.
The County of Los Angeles Department of Agricultural
Commissioner/Weights & Measures (ACWM) does not make
recommendations regarding the use of pesticides on cannabis.

Sincerely,

Erin Zavala, Deputy Director
Environmental Protection Bureau
County of Los Angeles Department of
Agricultural Commissioner/Weights and Measures

Credit given to:

CDFA: CalCannabis logo

US EPA: Read the Label logo

CDPR: DPR logo, PSIS, Glove Card

Photographs: Anne Roderick, Ellias Nassif

### **TABLE OF CONTENTS**

This guide provides general information on the following topics:

TO OUR GROWERS2
BASIC REQUIREMENTS3
RECORD KEEPING4
APPLICATION-SPECIFIC INFORMATION5
PESTICIDE USE REPORTING 6
TRAINING8
LABELS9
POSTING 10
EMERGENCY MEDICAL CARE12
DECONTAMINATION13
HEAT ILLNESS PREVENTION 13
PERSONAL PROTECTIVE EQUIPMENT 14
RESPIRATORY PROTECTION PROGRAM 15
EQUIPMENT, STORAGE, & DISPOSAL

## TO OUR GROWERS



This guide provides general information on what is required of a grower who uses pesticides or has pesticides applied by a pest control business (PCB) for the commercial production of cannabis.

Specific information can be provided by your County Agricultural Inspector.
Information is also contained in the Pesticide Safety Information Series (PSIS)
A-1 through A-10 which can be obtained from your Agricultural Inspector or the
California Department of Pesticide Regulation (CDPR) website.

You will find this guide to be very helpful in understanding the laws and regulations pertaining to the use of pesticides in these situations.

Los Angeles County Department of Agricultural Commissioner/Weights & Measures (ACWM) acwm.lacounty.gov



CalCannabis Cultivation Licensing (CCL)

calcannabis.cdfa.ca.gov



California Department of Pesticide Regulation (CDPR)

www.cdpr.ca.gov



**California Department of Industrial Relations (DIR)** 

www.dir.ca.gov





## BASIC REQUIREMENTS



Whether you apply pesticides yourself or hire a PCB to apply pesticides to the property, prior to the purchase and use of pesticides, the operator at the beginning of each and every year:

#### MUST OBTAIN AN OPERATOR ID NUMBER (Op - ID)

Organic products also require an Operator ID Number

Owners (employers) who apply pesticides are exempt from worker safety regulations; however, you **must** comply with **all** label requirements, including ones specifying personal protective equipment (PPE). Owners **must comply** with all of the following requirements listed in the booklet regardless of who applies the pesticides.

#### **DEFINITIONS**

#### **Operator of the Property**

A person who owns the property and/or is legally entitled to possess or use the property through the terms of a lease, rental contract, trust, or other management agreement.

#### **Pesticide**

Any substance or mixture of substances which is intended to be used for defoliating plants, regulating plant growth, or for preventing, destroying, repelling, or mitigating any pest, which may infest or be detrimental to vegetation, man, animals, or households, or be present in any agricultural or nonagricultural environment. Chemicals that are organic or exempt from EPA registration may also be classified as pesticides.

#### **Field**

Any area (including enclosed space) upon which one or more agricultural plant commodities are grown for commercial production.

#### **Enclosed Space**

A space enclosed, entirely or in part, with a nonporous covering of sufficient size to permit entry, and is used in the commercial or research production of an agricultural plant commodity. This includes greenhouses, polyhouses, mushroom houses, hoop houses, and similar structures.

CCR § 6000, 6420, 6622

#### **NO SULFUR BURNING — IT IS ILLEGAL**

For more detailed information: See CCR and PSIS references listed at the end of each page.

**CCR - California Code of Regulations** (§ - section)

Title 3. Food and Agriculture, Division 6. Pesticides and Pest Control Operations

Title 8. Industrial Relations, Division 1. Cal/OSHA

**PSIS - Pesticide Safety Information Series** 

California Department of Pesticide Regulation (CDPR)



## RECORD KEEPING



#### Maintain the following for 2 years:

- Permit. Operator ID Permit; make available for the inspector upon request.
- Pesticide Use Records (Daily). A detailed record of each pesticide application is required. The totals from these applications are compiled into the Production Agriculture Monthly Pesticide Use Report.
- Training Records. Training records and the written training program must be available at a central location at the workplace. It is the employer's responsibility to make sure it is accessible by employees.
- **Application-Specific Information.** The information must be displayed when the operator of the property receives notice of the completion of an application and before any person is allowed to enter the treated field.

#### If a PCB performs the pest control applications:

- **Recommendations (1 year).** A recommendation is required for any agricultural use unless the application is made by the property operator or his/her employees. It can be written by a Pest Control Adviser or the owner of the property.
- **7 Day Report (2 years).** If a PCB does the work, then they are responsible for reporting the use. They must report the application within 7 days. A copy of the report must be mailed to the operator of the property within 30 days of completion of the pesticide application.



## APPLICATION-SPECIFIC INFO



## APPLICATION-SPECIFIC INFORMATION FOR HANDLERS/FIELDWORKERS

FOR COMPLIANCE WITH CCR 6723.1/6761.1

1. TREATED AREA IDENTIFICATION	2. APPLICATION DATE	3 APPLICATION TIME Start-End	4. REI	5. PRODUCT NAME	6. EPA REG NO.	<b>7.</b> ACTIVE INGREDIENTS
Mother Room	03/02/2020	13:00 14:00	0	Plant Therapy	Exempt	Soybean oil, citric acid, peppermint oil
Veg Room 1	03/04/2020	09:00 10:00	4	Regalia CG	84059-3	Reynoutria sachalinensis
Flower Room 2	03/06/2020	11:30 12:45	0	Nuke 'Em	Exempt	Citric acid

NOTE: This information must be available to employees without them having to make a specific request. Place this information where employees have access.

- 1. Indicate the area (room) where the application was performed.
- **2.** Enter the **date** when the pesticide was applied.
- **3.** Indicate the **time** the application started and ended. This should be reported using a 24-hour clock or military time.
- **4.** Restricted entry interval **(REI)** means the period of time after an area is treated with a pesticide during which restrictions on entry are in effect to protect persons from potential exposure to hazardous levels of residues. An REI may be found on pesticide product labeling (Agricultural Use Requirements) or in regulation.
- **5.** Write the pesticide **product name** in accordance to the label.
- **6.** Indicate the EPA Registration Number **(EPA Reg. No.)** that appears on the label. Do not use the "EPA Est. No." For exempt products, enter "Exempt."
- **7.** Enter the **active ingredients** found on the labeling of the pesticide used.

CCR § 6723.1, 6761.1

## PESTICIDE USE RECORD



#### **PESTICIDE USE RECORD**

California Code of Regulations, Section 6624

1. NAME OF APPLICATORS
A. Roderick, C. Belden

2. MONTH March 2020

3. DATE	4. PESTICIDE USED	5. EPA REG NO.	6. AMT. USED	7. ADDRESS	8. SITE	9. SQ. FEET
3/2/2020	Plant Therapy	Exempt	1 OZ	1212 Green St. Arcadia	Mother Room	1,000
3/4/2020	Regalia CG	84059-3	2.5 OZ	1212 Green St. Arcadia	Veg Room 1	2,000
3/6/2020	Nuke 'Em	Exempt	8 OZ	1212 Green St. Arcadia	Flower Room 2	3,000

Office record for tracking monthly pesticide use for the "Production Agriculture Monthly Pesticide Use Report" submitted monthly.

- **1.** Indicate the **applicator(s)** who performed the applications.
- **2.** Enter the **month/year** when the pesticide was applied.
- **3.** Indicate the **date** when the pesticide was applied.
- **4.** Write the **pesticide product name** in accordance to the label.
- **5.** Indicate the **EPA Registration Number** that appears on the label. For exempt products, enter "Exempt."
- **6.** Identify the total **amount** of formulated **(concentrated)** product used for each application. **Do not list the total mixture after dilution.**
- **7.** Enter the **address** of the facility in where the pesticide applications occurred.
- **8.** Indicate the **site** (room) where the pesticide application took place.
- **9.** Report the total area (**square feet**) of the plants treated.



Call (626)575-5466 for assistance

## PRODUCTION AG REPORT



### PRODUCTION AGRICULTURE MONTHLY PESTICIDE USE REPORT MULTIPLE SITE/COMMODITY

California Code of Regulations, Section 6626

1. MONTH March 2. YEAR 2020

3. COUNTY NO.

8. OPERATOR ID 196001M

9. OPERATOR
Green Grass Givers

10. ADDRESS 1212 Green St. 11. CITY Arcadia 12. ZIP CODE 91006

13. SITE ID NO.	14. DATE/ TIME	15. COMMODITY/ SITE TREATED	17. TOTAL PLANTED SQ. FEET	18. TOTAL TREATED SQ. FEET	19. METHOD APPLICATION	20. EPA REG. NO.	21. TOTAL PRODUCT USED	23. DILUTION RATE	24. DAYS REENTRY	25. MANUFACTURER/ PRODUCT NAME
6-1-1	3/2/20 14:00	cannabis/ Mother Room	2,000	1,000	Other	Exempt	1 OZ	1 OZ/GAL	0	Lost Coast Plant Therapy

- 3. The county number for Los Angeles is 19.
- 8. Enter the Operator Identification Number (Op-ID # 19xxxxM) assigned to your business.
- **9.** Enter the **name of the business** and complete the address information.
- 13. The Site Identification Number is found on the second page of the Op-ID Permit.
- **14.** For each pesticide application, indicate the **date** and **time** it was completed. Use a 24-hour clock or military time, e.g. 7:00 a.m. as 07:00, 4:00 p.m. as 16:00.
- **15.** Enter the **commodity/site treated** and the room where the application occurred.
- 17. Indicate the total planted area (square feet) of the room being treated.
- **18.** Report the **total treated area** (square feet). This number may different from the total planted area.
- **19.** Check the **method** of application. Foliar spraying and soil drenches should be reported as "Other."
- **23.** Report the **dilution** rate of the pesticide that was applied. Concentrate of pesticide / 1 gallon of water = dilution rate.

Property Operators are required to report all pesticide use by the **10th of the month following the month of use**.

If you did not use any pesticides, you do not need to submit a report. Remember, you are only responsible for reporting pesticide use performed by your company's personnel.

All pesticides, including organic pesticides, must be reported.



### **TRAINING**



**HANDLERS** - "Handle" means mixing, loading, cleaning, repairing, or applying of pesticides; or maintaining, servicing, repairing, cleaning, or handling equipment used in these activities.

If you have employees who handle pesticides (handlers) or who work in a field where pesticides are applied (fieldworkers), you **must** train them **before** they are allowed to handle pesticides or enter a treated field. All training **must** be done by a **qualified person\*** including any of the following:

#### \* A qualified person:

- ♦ Private applicator
- ♦ Commercial applicator
- ♦ County Agricultural Inspector
- ♦ UC Extension Advisor
- Pest control adviser
- Registered forester
- ◆ A person who has completed a "Training the Trainer" program

#### **HANDLERS**

- Pesticide handlers must be trained every year and be continually updated to cover any new pesticides that will be handled.
- The handler's written training program **must** describe the materials and information that will be provided, and address specific topics.
- The employer **must** record the date and extent of the training. This training must be verified by the employee's signature.
- The employer must display a completed PSIS A-8 whenever employees are working as handlers.

#### **FIELDWORKERS**

- Fieldworkers must be trained every year and before beginning work in a treated field.
- ◆ The fieldworker's written training program must describe the materials and information that will be provided, and address specific topics.
- The employer **must** record the date and extent of the training. This training must be verified by the employee's signature.
- The employer must display a completed PSIS A-9 whenever employees are working as fieldworkers.

CCR § 6000, 6724, 6764

PSIS A-8, A-9

### **LABELS**



#### THE LABEL IS THE LAW

A copy of the registered pesticide label **must** be available at the work site. Special Local Need (SLN) registrations are supplemental labeling instructions for additional uses authorized by CDPR. The SLN **must** be in possession of the user at the time of the application. Label exemptions for SLNs and emergency conditions are provided by CDPR or US EPA.

See CDPR website for current California registered labels https://apps.cdpr.ca.gov/docs/label/labelque.cfm

#### When to read the label:

- Before buying the pesticide & PPE
- Before mixing and applying the pesticide
- When storing the pesticide
- Before disposing of unused pesticide and the empty container

Label Code	Materials Required by Law	Material Code
Α	1,2,3,4,5,6,7,8	1: Laminate
В	1,2	2: Butyl
C	1,2,3,4,7,8	3: Nitrile
D	1,2	4: Neoprene
DEFG	1,3,4,8	5: Natural
-	1,2,3,8	6: Polyethylene
H	1,8 1.8	7: PVC 8: Viton

Personal protective equipment (PPE) requirements, environmental concerns, emergency procedures, site/rate instructions, to name a few, provide vital information which the user must follow.

#### **Conflict with labeling:**

Any deviation from instructions except:

- A decrease in dosage rate per unit treated
- A decrease in the concentration of the mixture applied
- Application at a frequency less than specified

#### **Organic Exemptions (FIFRA § 25b)**

Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 25(b) and CCR  $\S$  6147-6148 exempt minimum risk pesticide products from registration, provided the products meet certain criteria. The criteria and label requirements for products that are exempt for registration are outlined in CDPR's website.



CCR § 6000, 6602, 6147, 6148 FAC § 12973

# POSTING VITAL INFORMATION



The employer **must** display a completed PSIS A-8 and A-9 at the field or a **central location** whenever employees are working as handlers or fieldworkers in a "treated field."

The Application-Specific Information **must** be displayed when the operator of the property receives notice of the completion of an application and before any fieldworkers are allowed to enter the treated field.

TREATED AREA IDENTIFICATION	APPLICATION DATE	APPLICATION TIME Start-End	REI	PRODUCT NAME	EPA REG NO.	ACTIVE INGREDIENTS
Mother Room	03/02/2020	13:00 14:00	0	Plant Therapy	Exempt	Soybean oil, citric acid, peppermint oil
Veg Room 1	03/04/2020	09:00 10:00	4	Regalia CG	84059-3	Reynoutria sachalinensis
Flower Room 2	03/06/2020	11:30 12:45	0	Nuke 'Em	Exempt	Citric acid





- Post the Safety Data Sheet(s) for the applied pesticide(s).
- Make a map of the growing location and designate each area with a numbering system. When an application is made, reference the area treated on the table.
- Single use towels, clean water, and soap must be available within 1,320 feet of the application site. Be sure to have the station away
   from where pesticide applications take place, to avoid contamination.

CCR § 6619, 6761

### FIELD POSTING



"Field Posting" as defined in CCR § 6776, is *in addition to* the regulations listed on the page prior. Certain pesticides used, or the way in which they are used, prompt additional requirements; read pesticide product labeling for information.

The owner or property operator **must** post treated enclosed spaces in the following circumstances:

**1st:** All enclosed space applications unless entry is controlled.

**2nd:** All other applications in enclosed space with an REI greater than 4 hours.

#### Post at the usual points of entry, or at the corners.

- Post before application begins; however, do not post unless a pesticide application is scheduled within the next 24 hours.
- Posting must be removed within 3 days after the expiration of the REI.

#### **Enclosed Space - Sign Requirements**

- The sign shall be of a size so that the wording is readable and the skull and crossbones symbol is clearly visible from a distance of 25 feet.
- The sign shall contain the following:
  - The skull and crossbones symbol near the center of the sign
  - ◆ The words "DANGER" and "PELIGRO" and "PESTICIDES" and "PESTICIDAS" in the upper portion of the sign
  - The words "KEEP OUT" and "NO ENTRE" in the lower portion on the sign
  - See CCR § 6776 for greater detail



CCR § 6618, 6619, 6776



# EMERGENCY MEDICAL CARE



### Emergency medical care for employees handling pesticides must be planned for in advance.

The medical care information, PSIS A-8 and/or A-9, must be posted at a prominent place at the worksite. These are available in English and Spanish. Fieldworkers and their supervisors are to be informed of this information, which is provided on PSIS A-9. You can either complete the forms with the medical provider's information, or post the medical information next to the A-8/A-9 form.

In either case, if the medical care facility is not readily available, procedures to be followed to obtain immediate medical care must be given.

If you think pesticides have made you sick at work, your employer must make sure that you are taken to the doctor IMMEDIATELY.

#### **Respiratory Protection Program**

The use of respirators also requires a special medical evaluation and supervision, record keeping, and equipment maintenance, and care. See page 15 for more information.





CCR § 6726, 6739, 6766

PSIS A-8, A-9

### DECONTAMINATION



For handlers, the employer **must** assure that sufficient water, soap,\* and single use towels\* are available. If the product label requires protective eyewear, then a minimum of one pint of water for emergency eye washing must be immediately available. One clean change of coveralls shall be available at each decontamination site.

If coveralls are being used, the employer **must** make provisions to store and clean the coveralls. Employees should not be taking coveralls home, unless it is necessary. It is recommended that the work clothes be kept in a sturdy, sealed container, until they can be properly washed at the work facility.

For fieldworkers engaged in activities in the treated fields, the employee must assure that sufficient water, soap,\* and single use towels,\* are reasonably accessible.

\* Hand sanitizing gels, liquids, and wet towelettes do not meet the requirements.

#### **Change Areas**

The decontamination site must be within 1,320 feet of worker activity. The facility can be in an area under an REI for a fieldworker performing early entry activities. In no case can the facility be in an area under treatment.

CCR§ 6732, 6734, 6738

## HEAT ILLNESS PREVENTION



When employees work in hot conditions, including indoor places of employment, employers **must** take special precautions in order to prevent heat illness. Employers of agricultural workers **must** comply with the Cal/OSHA Heat Illness Prevention (HIP) standard.

- 1. Recognize the hazard
- 2. Water, Rest. Shade.
- 3. Acclimatization

- 4. Prompt medical attention
- 5. Training
- 6. Written procedures

See http://www.dir.ca.gov/DOSH/HeatIllnessInfo.html



# PERSONAL PROTECTIVE EQUIPMENT (PPE)



#### "Label" and the "Law" (Regulation)

- The pesticide label addresses specific PPE for the Mixer/Loader, the Applicator, and the Early Entry Worker.
- The employer must provide the employee with the label and regulation required PPE.
- Eye protection is required by regulation, for all "hand applications."
   ANSI Z87.1-2010 must be worn. Safety glasses must provide front,
   brow, and temple protection. Common eyeglasses, including sunglasses,
   do not meet this requirement.
- Protective gloves are required by regulation unless the label states otherwise. Gloves must be 14 mils or thicker. New regulations state that the label will also address what type of material the gloves shall be constructed of. (See glove card on page 9).

#### There are exemptions. See PSIS A-1 for those exemptions.

- Employers **must** assure employees are provided with and use approved respiratory protective equipment (RPE) when pesticide product labeling or regulations require RPE. The use of respirators requires a medical evaluation.
- **Owners** (employers) who apply pesticides are **exempt** from worker safety regulations; however, you must comply with **all** label requirements including those specifying personal protective equipment (PPE).

#### Using "DANGER" and "WARNING" Labeled Pesticides

- Coveralls must be used when an employee handles a pesticide with the signal word "DANGER" or "WARNING" on the label.
- A closed system is required only for liquid-formulation pesticide with the signal word "DANGER," as well as minimal exposure pesticides.
- Employees mixing, loading, or applying pesticide toxicity one (DANGER), may not work alone unless contact is made at least every two hours, unless the permit specifies otherwise.



CCR § 6738, 6730, 6739, 6746

PSIS A-1

# RESPIRATORY PROTECTION PROGRAM



#### **Respiratory Protection Program**

- The use of respirators **requires** a special medical evaluation and supervision, record keeping, equipment maintenance, and care.
- The chart below is a summary of required elements of a respiratory protection program when using pesticides.
- See CCR § 6739 for more detail.

1. Is the respirator required by label, permit conditions, regulation or employer policy?	YES	NO		NO
2. Who provides the respirator?	Employer	Emp	Employer	
3. What type of respirator is it?	All	Filtering Facepiece	All others <sup>1</sup>	All
4. Respirator Program Administrator	Required	NR	NR	NR
REQUIREMENT				
Written Respiratory Protection Program	Required	NR	Required <sup>2</sup>	NR
Respiratory Selection and Fit Testing	Required	NR	NR	NR
Medical Evaluation	Required	NR	Required	NR
Facepiece Seal Protection	Required	NR	NR	NR
Cleaning, Inspection, Repair, and Storage	Required	NR	Required	NR
Employee Training & Program Evaluation	Required	NR	NR <sup>3</sup>	NR
End of Service Life Replacement	Required	NR	NR	NR
Record Keeping	Required	NR	Required <sup>2</sup>	NR
Medical Evaluation Questionnaire	Required	NR	Required	NR
Voluntary Respirator Provision Posting	NR	Required	Required	Required
Medical Recommendation Form	Required	NR	Required	NR

#### NR — Not Required



<sup>&</sup>lt;sup>1</sup> Included half-face and full-face elastomeric, supplied-air, SCBA, and powered air purifying respirator.

Only medical evaluation and respirator cleaning, storage, and maintenance element required.

<sup>&</sup>lt;sup>3</sup> However, training in medical evaluation and respirator cleaning, storage, and maintenance element is required.

## EQUIPMENT, STORAGE, & DISPOSAL



#### **Equipment**

The employer **must** inspect all application equipment and make sure that it is in good condition and safe to operate prior to any application. For example, **mixing tanks must have covers** to prevent splashes and spills. **Tanks 50 gallons** or greater **must** be equipped with either a **sight gauge** to indicate the liquid level in the tank or a **shut-off device** that will automatically stop the filling operation before the pesticide liquid mixture spills over the top.

#### **Storage**

PPE **must** be stored separately from pesticides and application equipment to prevent contamination. Pesticides **must** remain locked up when not attended.

The storage of pesticides **must** have distinct separation from other stored materials. The storage **must** be posted with warning signs, when the stored pesticides have the signal word "DANGER" or "WARNING" on the label.

Signs **must** be visible from any direction of probable approach, and be readable at **25 feet**. The notice shall be repeated in an appropriate language other than English when it may reasonably be anticipated that persons who do not understand the English language will come to the enclosure.



#### **Disposal Procedures**

Containers of less than 28 gallons **must** be rinsed and drained at the mix/load site. Except for the containers to be returned to the registrant or dealer, follow the directions provided in PSIS A-2.

Do not refill or reuse original containers. Destroy canisters and discard in a sanitary landfill.



Do not put pesticides in containers designated for food, drink, or household products.

CCR § 6600(a), 6608, 6674, 6684, 6742

PSIS A-2

## AIR-GAP SEPARATION



All equipment must be equipped with an air-gap separation backflow prevention device when handling pesticides and drawing water directly from any outside source. Air-Gap Separation is a physical break between the supply line and the receiving vessel.

This is the only method that is accepted by all water and health agencies.

CCR § 6610, 6672, 6674, 6678, 6742, 6744



Backpack type spray equipment with a capacity not exceeding 4 gallons and hand-held sprayers of 3 gallons or less are exempt. They may be filled by hand-holding a hose over the tank. The hose or water container **must** be held well above the tank at all times to prevent contact with the tank or its contents.



- 1. Air-gap must be at least 1" or twice the diameter of the inlet pipe size.
- 2. Lockable tank lid to prevent splashes and spills.
- **3.** Service container tag with the name of the pesticide(s), and the signal word.



