



Compliance with the Cholinesterase Rules

Pedro Serrano, Safety and Health
Specialist
WISHA Services



Objective

Discuss enforcement
considerations of the rule



Rule Scope

- Agriculture sector covered by Chapter 296-307 WAC
- Employers who have workers who handle toxicity class I and II organophosphate or N-methyl-carbamate pesticides (insecticides)



Rule Scope



- Pesticide handling (WAC 296-307-11005)
 - Mixing, loading, transferring or applying
 - Disposing of pesticides or containers
 - Handling opened containers
 - Acting as a flagger
 - Equipment maintenance
 - Entering treated areas during REI
 - Performing certain tasks as a crop advisor



How will this rule be enforced?

- L&I will collect information from employers and workers in order to evaluate the rule whenever:
 - Cholinesterase depression is reported
 - As part of targeted inspection activities
 - Whenever a complaint is received



How will WISHA Know About Depressions?

- DOH will maintain an aggregate electronic data base of all test results
- DOH will calculate depressions
- WISHA will be notified of significant depressions
- Employee's identity will not be reported
- The employer and medical providers contact information will be available



What will be WISHA Response?

- ChE depression is not citable
- In most cases WISHA will offer consultation services to the employer
- An inspection may be opened if the employer refuses consultation or if other factors are present, e.g., repeated employee depressions



Handling Records

- Employers must:
 - Maintain records of all hours handling covered pesticides
 - Keep these records for at least seven years

- A sample recordkeeping form will be provided
 - An electronic form will also be made available



How will a ChE Monitoring inspection be conducted?

- There will be a cholinesterase monitoring section added to our existing Worker Protection Standard checklist.
- Handling hours can be determined through review of handling and application records and through employee/employer interviews



Medical Monitoring

- The employer must:
 - Identify a medical provider (post contact info)
 - Ensure the provider is familiar with the rule
- Cholinesterase testing (at no cost to employee)
 - Annual baseline determinations (“working baseline” provision)
 - Periodic tests compared to baseline
- Employer must follow all medical provider recommendations



Identify a Physician

- Provide testing
- Provide written recommendations to:
 - Identify employees requiring work practice evaluations
 - Employees with depressed levels
 - Guidance on medical monitoring
 - Other relevant information



Make ChE testing available

- Annual baseline
 - After 30 days of handling pesticides
- Periodic test
 - With in 3 days after fifty hours in 2004 and 50 hours in 2005 in a consecutive 30 day period



Medical Removal Protection



- Removed employees may be shifted to other duties.
- Medical removal protection benefits are provided for up to 3 months
 - Pay
 - Seniority
 - Other benefits



Exemptions

- Testing is not required for employee's who handle only N-methyl-Carbamates
- Hours spent mixing and loading using closed systems are not counted in determining need for periodic testing



Questions?