

COMPARISON OF PDA Ch 82 AND USDOL 1928.110 (OSHA) FIELD SANITATION STANDARDS

AREA OF CONCERN	PDA Ch. 82	USDOL (OSHA)
FIELD SANITATION		
When field is inspected	When a “camp” by definition (Ch 82.1) or on any premise where seasonal farm workers are permitted to work, even if not a camp by definition.	11+ employees who are engaged on any given day in agricultural field activities performed by hand or with hand tools. EXEMPT: logging operations, care of livestock, or working in a permanent structure (canning facilities/package houses) – 1928.110(a).
POTABLE WATER		
Potable water temperature	Cool – Ch 82.7(m).	Suitably cool, considering temperature, humidity, and nature of work performed – 1928.110(c)(1)(ii).
Potable water location	In the working area, at a reasonable distance – Ch 82.7(m).	Readily accessible to all employees – 1928.110(c)(1)(i).
Amount of potable water	1 drinking fountain/100 persons or crew OR 10 gallons/100 persons or crew OR fraction thereof – Ch 82.7(m).	Sufficient amounts to meet needs of all employees – 1928.110(c)(1)(ii)
Dispensing of potable water	From approved container with no use of a common drinking vessel – Ch 82.7(o).	Dispensed in single use cups or by fountain. Common drinking cups prohibited – 1928.110(c)(1)(iii).
Potable water container	Shall meet construction standards of the National Sanitation Foundation or its equivalent – Ch 82.7(n).	Containers to maintain water quality, kept covered and regularly cleaned – 1928.110(c)(3)(i).
HAND WASHING		
When to provide hand washing	Where toilet facilities are required, a hand washing station shall be convenient thereto – Ch 82.11(h).	If working > 3 hours in field = 1 facility/20 workers or fraction thereof AND provided along with toilet facilities – 1928.110(c)(2)(i).
Acceptable hand washing station	A washbasin or bowl used for the purpose of obtaining personal cleanliness. Common towels prohibited. Single service towels or linen dispensers provided. Supplied with potable water. – Ch 82.11(i).	Basin, container or outlet with an adequate supply of potable water, soap and single-use paper towels. Potable water refilled as necessary. Area and facility kept clean and sanitary – 1928.110(c)(3)(iii).
TOILET FACILITIES		
Where to provide toilets	On the premise where seasonal farmworkers are employed or permitted to work-Ch82.9(n)	Within ¼ mile walk of each employee’s place of work in the field – 1928.110(c)(2)(iii).
When to provide toilets	Available all the time – Ch 82.9(n).	If working < 3 hours in field including transportation time not required – 1928.110(c)(2)(v). If > 3 hours in field = 1 facility/20 workers or fraction thereof AND provided along with handwashing facilities – 1928.110(c)(2)(i) .
Toilet facilities	Sufficient, suitable and separate toilet facilities – Ch 82.9(n).	Adequately vented, appropriately screen, self-closing doors that latch from inside and insure privacy – 1928.110(c)(2)(ii).
Location of toilets	1–10 workers, 1 within 1,000 ft 11-15 workers, 1 within 500 ft 16 + workers, 1/15 males and 1/15 females within 500 feet of the work area – Ch 82.9(n)	Located within ¼ mile walk of each employee’s place of work in the field – 1928.110(c)(2)(iii) OR if terrain limitations located at closest vehicular access point – 1928.110(c)(2)(iv).
Agreements needed for transportation to toilets	If not in the immediate work area, then a written agreement in the native language of the worker shall state that transportation will be provided at least 1X/4 hrs of continuous work – Ch 82.9(n).	Employer shall notify employees of location allow each employee reasonable opportunities during the workday to use them – 1928.110(c)(4).
Maintenance of toilets	Adequate supply of toilet paper, kept in sanitary condition, operational and in good repair – Ch 82.9(j).	Operational and maintained in clean and sanitary conditions – 1928.110(c)(3)(ii). Disposal of wastes from facility shall not cause unsanitary conditions – 1928.110(c)(3)(iv).

NOTE: Bolded descriptions are the strictest regulation. Where both are equal, PDA is bolded.