



Pennsylvania Department of Agriculture

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.