

FIELD SANITATION
Comparison Of
PDA, Ch. 82, Seasonal Farm Labor Camps
And
USDOL, 1928.110 , OSHA

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

AREAS OF CONCERN	PDA	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 or more employees who are engaged on any given day in hand labor operations in the field. EXEMPT: logging operations, care of livestock, or working in a permanent structure (canning facilities/packaging houses)
POTABLE WATER	Yes ⁽¹⁾	Yes ⁽¹⁾
Potable water temperature	Cool	Suitably cool, considering temperature, humidity, and nature of work performed
Potable water location	In the working area, at a reasonable distance	Readily accessible
Amount of potable water	1 drinking fountain /100 persons or crew OR 10 gallons/100 persons or crew OR a fraction thereof	Sufficient amounts considering temperature, humidity, and nature of work performed
Dispensing of potable water	From approved container with no use of a common drinking vessel	In single use cups or from a fountain
Potable water container	Shall meet construction standards of the National Sanitation Foundation or its equivalent	Containers to maintain water quality and are clean and covered. Regularly cleaned
HAND WASHING		
When to provide hand washing	Where toilet facilities are required a hand washing station shall be convenient thereto.	If working 3 hrs or more in the field. 1 facility/20 workers OR a fraction thereof AND provided along with toilet facilities
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.	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
TOILET FACILITIES		
Where to provide toilets	On the premise where seasonal farmworkers are employed or permitted to work	Within ¼ mile walk of each employee’s place of work in the field
When to provide toilets	Available all the time	Not required for employees who work for 3 hours or less including transportation time. Otherwise, one for each 20 workers or a fraction thereof.
Location of toilets	1–10 workers, 1 within 1,000ft 11-15 workers, 1 within 500ft 16 + workers, 1 per 15 males and 1 per 15 females within 500 feet of the work area	Located within ¼ mile walk of each employee’s place of work in the field OR Terrain limitations will allow for placement at the point of closest vehicular access and transportation available at all times to the facility.
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	N/A
Maintenance of toilets	Adequate supply of toilet paper, kept in sanitary condition, operational and in good repair	In a clean and sanitary fashion. Disposal of wastes from facility shall not cause unsanitary conditions

(1) PA Safe Drinking Water Act and 25 Pa Code Ch. 109