

**FISH AND WILDLIFE SERVICE  
OCCUPATIONAL SAFETY AND HEALTH**

**Occupational Safety and Health**

**Part 241 Safety Operations**

**Chapter 9 Wildlife Inspection and Handling Safety for the Office of Law Enforcement**

**241 FW 9**

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## **OVERVIEW**

**9.1 What is the purpose of this chapter?** This chapter describes the U.S. Fish and Wildlife Service (Service) requirements and responsibilities for minimizing or eliminating the risk of exposing Office of Law Enforcement (OLE) employees to chemical, physical, or biological hazards that can cause adverse health effects or injury when they are inspecting or handling wildlife.

**9.2 What is the Service policy about controlling the exposure of OLE employees to hazards?**

**A.** We must:

**(1)** Minimize or eliminate the risk of exposing employees to hazards encountered while conducting wildlife inspections, and

**(2)** Comply with applicable Occupational Safety and Health Administration (OSHA) standards.

**B.** To do this, we:

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- (1) Establish procedures and controls that comply with OSHA, and
- (2) Monitor employee exposure to hazards through a medical surveillance program.

**9.3 What is the scope of this chapter?** This chapter applies to the following employees whose work involves the handling and inspection of wildlife through shipments of live wildlife specimens, trophy shipments, wildlife skins, etc.:

- A. Wildlife Inspectors,
- B. Wildlife Inspector Assistants,
- C. Supervisors of Wildlife Inspectors,
- D. Evidence Custodians, and
- E. Special Agents.

**9.4 What are the authorities for this chapter?**

- A. Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters (29 CFR 1960).
- B. *Department of the Interior Occupational Medicine Program Handbook*, Tab 8 and 12(E2), Specific Medical Program Requirements.
- C. Executive Order 12196, Occupational Safety and Health Programs for Federal Employees.
- D. Occupational Safety and Health Act of 1970, Section 19, Federal Agency Safety Program and Responsibilities (Public Law 91-596).
- E. OSHA Standards:
  - (1) Bloodborne Pathogens (29 CFR 1910.1030).
  - (2) Formaldehyde (29 CFR 1910.1048).
  - (3) Hazard Communication (29 CFR 1910.1200).

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(4) Occupational Exposure to Hazardous Chemicals in Laboratories (29 CFR 1910.1450).

(5) Respiratory Protection (29 CFR 1910.134).

(6) Occupational Noise Exposure (29 CFR 1910.95).

F. U.S. Geological Survey, *Field Manual of Wildlife Disease: General Field Procedures and Diseases of Birds*, 1999.

G. 485 Departmental Manual (DM) 17 and 18, Industrial Hygiene and Occupational Medicine Programs, respectively.

### **9.5 What terms do you need to know to understand this chapter?**

**A. Anaphylaxis** is a reaction to a foreign substance induced by an initial brief exposure that results not in immunity, but future hypersensitivity.

**B. Aspergillosis** is a respiratory tract infection typically found in birds. Although not considered contagious, it can be a health risk for people with suppressed immune systems.

**C. Avian influenza** is a viral infection of wild birds that is usually not apparent or nonclinical and is caused by a group of viruses known as type A influenza. Avian influenza commonly occurs in avian species in the low pathogenic form and generally does not infect humans. Mutation of low pathogenic avian influenza into a highly pathogenic strain may infect humans.

**D. Biohazard** is an infectious agent presenting a risk or potential risk to human or wildlife well-being, either directly through infection or indirectly through disruption of the environment.

**E. Contact** means coming within 3.05 meters (10 feet) of wildlife or a container in which wildlife currently resides or resided.

**F. Exposure** means to subject or potentially subject personnel to chemical, biological, or physical agents that are or may be a health hazard. Exposure can occur through inhalation, ingestion, injection, or absorption.

**G. Hantavirus** is a viral infection people get from inhaling or ingesting contaminated dust or aerosolized excreta (i.e., sweat, urine, or feces) of several species of mice or rats. Those infected often develop Hantavirus Pulmonary Syndrome, which is an infection of the lungs.

**H. Histoplasmosis** is an infection of the respiratory tract people get by inhaling or ingesting spores from a fungus that proliferates in soil contaminated with bird or bat excreta.

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**I. Job Hazard Assessment (JHA)** is a systematic method for breaking down a job task, duty, or activity into basic steps, examining each step for potential hazards, and determining how to minimize the risk(s) (see [240 FW 1, Exhibit 1](#)).

**J. N or P100 respirator filtration** is a high efficiency particulate air (HEPA) filter or its equivalent mechanical filtration device certified under 42 CFR Part 84. It can trap and retain at least 99.97 percent of 0.075 +/- .02 mean micron-sized sodium chloride particulate (N filters) and 0.185 +/- .02 mean micron-sized dioctyl phthalate aerosol (P filters).

**K. Personal Protective Equipment (PPE)** is specialized clothing or equipment worn for protection against a hazard. General work clothes (e.g., uniforms, pants, shirts, and blouses) are not PPE (see [241 FW 3](#)).

**L. Psittacosis** is commonly referred to as Chlamydiosis, Parrot Fever, or Ornithosis. It is an acute or chronic respiratory and systemic disease of various wild and domestic birds. Humans and wildlife can get it by inhaling dried bird excreta, through the bite of an infected bird, or by handling feathers and tissues of infected birds.

**M. Severe Acute Respiratory Syndrome (SARS)** is a viral respiratory illness caused by a coronavirus, called SARS-associated coronavirus (SARS-CoV). It's primarily transmitted by close person-to-person contact, which Wildlife Inspectors may encounter during passenger inspections.

**N. Tuberculosis** is an infectious disease that both humans and wildlife can get. It is characterized by the formation of tubercles or necrosis in tissues.

**O. Tularemia** is primarily a disease of mammals, but some avian species have also died as a result. It's commonly transmitted by ticks, which we sometimes find on shipments (e.g., tortoises, etc.).

**P. Wildlife** (in this chapter) means live and dead wild animals of all types and includes any part, product, egg, or offspring.

**9.6 Who is responsible for the wildlife inspection safety program?** See Table 9-1.

<b>Table 9-1: Responsibilities for the Service's wildlife inspection safety program</b>	
<b>This official...</b>	<b>Is responsible for...</b>
<b>A. The Director</b>	<b>(1)</b> Ensuring that we maintain an effective and comprehensive occupational safety and health program, and

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<b>Table 9-1: Responsibilities for the Service's wildlife inspection safety program</b>	
<b>This official...</b>	<b>Is responsible for...</b>
	(2) Approving our wildlife inspection safety policy.
<b>B. The Assistant Director – Business Management and Operations</b>	Ensuring:  (1) We have a wildlife inspection safety policy, and  (2) That the Headquarters office has sufficient support and resources to implement the policy.
<b>C. Chief – OLE</b>	Ensuring:  (1) Sufficient resources and support are provided to implement a comprehensive and effective wildlife inspection safety program, and  (2) That funding for travel costs is provided to Regional Safety Managers (RSM) to conduct periodic (i.e., every 3 years) safety evaluations of Wildlife Inspector ports-of-entry offices and operations.
<b>D. The Chief, Division of Safety and Health</b>	(1) Revising and updating this chapter, as necessary, and  (2) Interpreting wildlife inspection safety program requirements and serving as a consultant to resolve Servicewide questions or issues.
<b>E. Regional Safety Managers (RSM)</b>	(1) Assisting Resident Agents-in-Charge and supervisory Wildlife Inspectors in interpreting, evaluating, and implementing the requirements in this chapter;  (2) Evaluating implementation of the programs that are part of the wildlife inspection safety program during Regional periodic field station safety program evaluations, such as the programs for bloodborne pathogens, respiratory protection, and hearing conservation; and  (3) Reviewing and advising Project Leaders and other managers as they develop JHAs.

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<b>Table 9-1: Responsibilities for the Service's wildlife inspection safety program</b>	
<b>This official...</b>	<b>Is responsible for...</b>
<b>F. Project Leaders/Supervisors/ Resident Agents-in-Charge/Supervisory Wildlife Inspectors (called "Project Leaders/supervisors" throughout the remainder of this chapter)</b>	<ul style="list-style-type: none"> <li><b>(1)</b> Recognizing hazards personnel encounter during inspection of wildlife specimens and trophy shipments;</li> <li><b>(2)</b> Developing JHAs for inspection activities;</li> <li><b>(3)</b> Incorporating JHAs into their station safety plans;</li> <li><b>(4)</b> Providing and verifying that personnel have the training, tools, and appropriate PPE for inspection activities and documenting that training through the Department's Learning Management System (i.e., DOI Learn) or at their duty station;</li> <li><b>(5)</b> Ensuring that Wildlife Inspectors have access to a medical provider who will deliver portions of the procedures recommended in their medical examinations (current medical forms can be found through the OLE intranet); and</li> <li><b>(6)</b> Ensuring that biohazards or biohazard wastes generated from wildlife inspections are disposed of in accordance with <a href="#">242 FW 12</a> and <a href="#">561 FW 13</a>.</li> </ul>
<b>G. Wildlife Inspectors</b>	<ul style="list-style-type: none"> <li><b>(1)</b> Complying with wildlife inspection safety program requirements;</li> <li><b>(2)</b> Completing the Wildlife Inspector Basic School Safety and Health Training Course, which is designed specifically for Wildlife Inspectors (Evidence Custodians and Wildlife Inspector Assistants can take the course, as needed);</li> <li><b>(3)</b> Periodically reviewing course training materials, which they can access through the <a href="#">OLE intranet</a>); and</li> <li><b>(4)</b> Cleaning and maintaining PPE so that it is in a good, serviceable condition (<a href="#">see 241 FW 3</a>).</li> </ul>
<b>H. Wildlife Inspector Assistants</b>	<ul style="list-style-type: none"> <li><b>(1)</b> Complying with wildlife inspection safety program requirements, and</li> <li><b>(2)</b> Becoming familiar with the Wildlife Inspector Basic School Safety</li> </ul>

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<b>Table 9-1: Responsibilities for the Service’s wildlife inspection safety program</b>	
<b>This official...</b>	<b>Is responsible for...</b>
	and Health Training materials.
<b>I. Evidence Custodians</b>	<p><b>(1)</b> Complying with wildlife inspection safety program requirements,</p> <p><b>(2)</b> Becoming familiar with the Wildlife Inspector Basic School Safety and Health Training materials, and</p> <p><b>(3)</b> Cleaning and maintaining PPE so that it is in a good, serviceable condition (<a href="#">see 241 FW 3</a>).</p>

## PPE NEEDS

**9.7 Are there standard equipment and PPE needs for Wildlife Inspectors?** Yes. Wildlife Inspectors generally need the tools and PPE in Table 9-2, although port activities and JHAs applicable to site-specific scenarios ultimately dictate which equipment and PPE is needed.

<b>Table 9-2: Standard inspection equipment and PPE bags</b>	
<b>Inspection Equipment Bag</b>	<b>PPE Bag</b>
<ul style="list-style-type: none"> <li>• Battery operated screw guns</li> <li>• Screw bit and adapter kit</li> <li>• Screwdrivers or multi-tip screwdriver</li> <li>• Wire snips/cutters</li> <li>• Small and medium sized pry-bars (e.g., Wonder Bars)</li> <li>• Pliers – blunt and needle nose</li> <li>• Box cutter with retractable blade</li> <li>• Nail punches</li> <li>• Flashlight</li> <li>• Hammer</li> <li>• Impact goggles and cowhide leather gloves</li> <li>• Canvas and large size clear plastic storage bags</li> <li>• Biohazard disposal bag</li> <li>• First-aid kit</li> <li>• Antiseptic towelettes</li> <li>• Reptile handling tools (e.g., tongs, snake hook, capture net,</li> </ul>	<ul style="list-style-type: none"> <li>• Protective footwear meeting OSHA 1910.136(b)(1) (i.e., safety toed shoes)</li> <li>• Hearing protection, including ear muffs or plugs rated above 20 decibels on the A-weighted scale (dB) noise reduction rating, or both</li> <li>• Spun-bonded polypropylene disposable coveralls with hood, elastic wrists, and booties (e.g., Tyvek® suits)</li> <li>• Face shields, safety glasses, anti-fog goggles, and anti-fogging impact goggles</li> <li>• Nitrile rubber gloves worn under heavy gauntlet type rubber gloves (i.e., long cuff nitrile with 6 mill minimum)</li> <li>• Leather gauntlets</li> <li>• Kevlar/puncture-resistant gloves</li> <li>• Tear-resistant gloves</li> <li>• Disposable N or P-100 filter respirators (≥ 99.97% efficiency) meeting National Institute for Occupational Safety and Health (NIOSH) certification (see 42 CFR 84)</li> </ul>

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<b>Table 9-2: Standard inspection equipment and PPE bags</b>	
<b>Inspection Equipment Bag</b>	<b>PPE Bag</b>
restraining/control pole, etc.) <ul style="list-style-type: none"> <li>• Snake viewing tube</li> </ul>	<ul style="list-style-type: none"> <li>• Non-disposable half-face or full-face silicone, NIOSH-certified respirators, with an N or P-100/OV/pesticide/acid gas combination cartridge</li> <li>• Department of Transportation (DOT) Type II high visibility vest</li> </ul>

## SAFETY PROGRAM

**9.8 What are the elements of the wildlife inspection safety program?** The elements of our safety program are hazard assessment, exposure control, training, appropriate PPE, and medical surveillance.

**A. Hazard Assessment.** Project Leaders/supervisors must evaluate the workplace activities in their areas of responsibility to determine what hazards their employees may be exposed to and identify the steps everyone needs to take to ensure safety.

**(1) JHAs:** As part of that process, the Project Leader/supervisor must write a JHA for all activities with potential hazards (see [240 FW 1, Exhibit 1](#)). The JHA may be documented on [FWS Form 3-2279](#), and it must, at a minimum, address the associated hazards, the required PPE needs (see Table 9-3), and how the work will be done. The Project Leader/supervisor should periodically review the JHA and update it as exposure risks or activities change. See Exhibit 1 for an example JHA for a particular activity Wildlife Inspectors perform (i.e., inspecting live, non-human primates).

**(2) Hazard identification:** Table 9-3 on the following pages describes a wide array of different inspection types, associated hazards, recommended PPE, and required safety plans. (This table is not an all-inclusive list of inspection types.)

<b>Table 9-3: Inspection type, associated hazards, and recommended PPE</b>			
<b>Inspection Type</b>	<b>Hazards</b>	<b>Recommended PPE (also see sections 9.8C &amp; D)</b>	<b>Required Safety Plans</b>
Mail (UPS/Fedex)	<ul style="list-style-type: none"> <li>• Cuts</li> <li>• Punctures</li> <li>• Noise</li> </ul>	<ul style="list-style-type: none"> <li>• Cut-resistant gloves (i.e., Kevlar)</li> <li>• Safety glasses</li> <li>• Hearing protection</li> </ul>	<ul style="list-style-type: none"> <li>• JHA</li> <li>• Hearing conservation</li> </ul>
Live Birds	<ul style="list-style-type: none"> <li>• Psittacosis</li> </ul>	<ul style="list-style-type: none"> <li>• Hearing protection</li> </ul>	<ul style="list-style-type: none"> <li>• Hearing</li> </ul>

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**Table 9-3: Inspection type, associated hazards, and recommended PPE**

Inspection Type	Hazards	Recommended PPE (also see sections 9.8C & D)	Required Safety Plans
	<ul style="list-style-type: none"> <li>• Histoplasmosis</li> <li>• Bites</li> <li>• Scratches</li> <li>• Excessive noise</li> <li>• Motorized equipment (i.e., forklifts)</li> <li>• Heat stress</li> <li>• Allergens (hair/feather dander)</li> </ul>	<ul style="list-style-type: none"> <li>• A Tyvek® suit</li> <li>• Face shields and anti-fog goggles</li> <li>• Nitrile rubber gloves worn under heavy gauntlet type gloves</li> <li>• Disposable N or P-100 filter respirators (≥ 99.97% efficiency) meeting NIOSH certification (see 42 CFR 84)</li> <li>• Type II high visibility vest unless wearing Tyvek®</li> </ul>	<p>conservation</p> <ul style="list-style-type: none"> <li>• Respiratory protection</li> <li>• JHA</li> </ul>
Live Fish and Invertebrates	<ul style="list-style-type: none"> <li>• Puncture wounds</li> <li>• Bites</li> <li>• Mechanical abrasions</li> <li>• Cyanide (sometimes added to water to slow down fish respiration)</li> <li>• Bacterial infections</li> <li>• Anaphylaxis</li> <li>• Motorized equipment (i.e., forklifts)</li> <li>• Heat stress</li> </ul>	<ul style="list-style-type: none"> <li>• Tear-resistant gloves</li> <li>• Safety glasses</li> <li>• Type II high visibility vest</li> </ul>	<ul style="list-style-type: none"> <li>• JHA</li> </ul>
Live Turtles	<ul style="list-style-type: none"> <li>• Salmonella</li> <li>• Scratches</li> </ul>	<ul style="list-style-type: none"> <li>• Nitrile rubber gloves</li> <li>• Type II high visibility vest</li> </ul>	<ul style="list-style-type: none"> <li>• JHA</li> </ul>
Coral	<ul style="list-style-type: none"> <li>• Scrapes</li> <li>• Abrasions</li> <li>• Skin irritation</li> <li>• Motorized equipment (i.e., forklifts)</li> </ul>	<ul style="list-style-type: none"> <li>• Tear-resistant gloves</li> <li>• Type II high visibility vest</li> </ul>	<ul style="list-style-type: none"> <li>• JHA</li> </ul>

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**Table 9-3: Inspection type, associated hazards, and recommended PPE**

Inspection Type	Hazards	Recommended PPE (also see sections 9.8C & D)	Required Safety Plans
	<ul style="list-style-type: none"> <li>• Heat stress</li> </ul>		
Mammals (excluding non-human primates)	<ul style="list-style-type: none"> <li>• Bites</li> <li>• Scratches</li> <li>• Transfer of superficial bacterial infections</li> <li>• Vector-borne diseases (e.g., lyme disease, plague – prairie dogs)</li> <li>• Respiratory hazards (e.g., tuberculosis, anthrax, etc.)</li> <li>• Viral infections (e.g., rabies, hantavirus, etc.)</li> <li>• Bloodborne pathogens (i.e., human body fluids on packing containers) – see 242 FW 12 for universal precautions and guidance</li> <li>• Motorized equipment (i.e., forklifts)</li> <li>• Heat stress</li> </ul>	<ul style="list-style-type: none"> <li>• A Tyvek® suit</li> <li>• Face shield and anti-fog goggles</li> <li>• Non-latex gloves worn under leather or leather gauntlet gloves</li> <li>• Disposable N or P100 filtered respirators meeting NIOSH certification</li> <li>• Type II high visibility vest unless wearing Tyvek®</li> </ul>	<ul style="list-style-type: none"> <li>• JHA</li> <li>• PPE</li> <li>• Respiratory protection</li> </ul>
Non-Human Primates	<ul style="list-style-type: none"> <li>• Respiratory (e.g., tuberculosis)</li> <li>• Dermal (bacterial infections and viruses, such as</li> </ul>	<ul style="list-style-type: none"> <li>• A Tyvek® suit</li> <li>• Face shields or anti-fog goggles</li> <li>• Non-latex gloves worn under tear-resistant</li> </ul>	<ul style="list-style-type: none"> <li>• JHA</li> <li>• PPE</li> <li>• Respiratory protection</li> <li>• Bloodborne</li> </ul>

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**Table 9-3: Inspection type, associated hazards, and recommended PPE**

Inspection Type	Hazards	Recommended PPE (also see sections 9.8C & D)	Required Safety Plans
	<ul style="list-style-type: none"> <li>filovirus)</li> <li>• Ocular hazards</li> <li>• Bloodborne pathogens (e.g., simian immunodeficiency virus)</li> <li>• Motorized equipment (i.e., forklifts)</li> <li>• Heat stress</li> </ul>	<ul style="list-style-type: none"> <li>gauntlet type gloves</li> <li>• Disposable N or P-100 filtered respirators meeting NIOSH certification</li> <li>• Hearing protection</li> <li>• Type II high visibility vest unless wearing Tyvek®</li> </ul>	<ul style="list-style-type: none"> <li>pathogens</li> <li>• Hearing conservation</li> </ul>
Trophy Shipments	<ul style="list-style-type: none"> <li>• Fumigant vapors</li> <li>• Pesticide vapors or mists</li> <li>• Cuts and scrapes due to opening crates</li> <li>• Motorized equipment (i.e., forklifts)</li> <li>• Heat stress</li> <li>• Bloodborne pathogens</li> <li>• Viral infections</li> <li>• Bacterial infections</li> </ul>	<ul style="list-style-type: none"> <li>• A Tyvek® suit</li> <li>• Face shield or anti-fog goggles</li> <li>• Nitrile rubber gloves worn under tear-resistant gauntlet type gloves</li> <li>• Non-disposable half-face or full-face silicone, NIOSH-certified respirators, with an N or P-100/OV/pesticide/acid gas combination cartridge</li> <li>• Type II high visibility vest unless wearing Tyvek®</li> </ul>	<ul style="list-style-type: none"> <li>• JHA</li> <li>• PPE</li> <li>• Respiratory protection</li> <li>• Bloodborne pathogens</li> </ul>
Non-Venomous Reptiles and Amphibians	<ul style="list-style-type: none"> <li>• Bites</li> <li>• Scratches</li> <li>• Transfer of superficial bacterial and fungal infections</li> <li>• Vector-borne diseases (e.g., lyme disease)</li> <li>• Respiratory hazards (e.g., tuberculosis,</li> </ul>	<ul style="list-style-type: none"> <li>• Nitrile rubber gloves</li> <li>• Leather gloves (leather gauntlet as required)</li> <li>• Type II high visibility vest</li> </ul>	<ul style="list-style-type: none"> <li>• JHA</li> <li>• PPE</li> <li>• Bloodborne pathogens</li> <li>• Snake bite protocol</li> </ul>

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**Table 9-3: Inspection type, associated hazards, and recommended PPE**

Inspection Type	Hazards	Recommended PPE (also see sections 9.8C & D)	Required Safety Plans
	anthrax, etc.) • Bacterial/viral infections (e.g., salmonella, etc.) • Bloodborne pathogens (i.e., human body fluids on packing containers) • Motorized equipment (i.e., forklifts) • Heat stress		
Venomous Reptiles and Amphibians	• Snake venom from bites, dermal contact with liquid venom or crystallized venom • Motorized equipment (i.e., forklifts) • Heat stress	• Leather gloves • Face shields or anti-fog goggles • Leather gauntlets • Type II high visibility vest	• JHA • PPE • Bloodborne pathogens • Snake bite protocol

**B. Exposure Control.** One way we can keep exposures below applicable levels is by using administrative or engineering controls. We also can sometimes reduce the amount of PPE employees must wear through administrative or engineering controls.

**(1)** Consult your Regional Safety Manager or Regional Engineering Office to discuss ways of achieving such controls.

**(2)** The sample JHA in Exhibit 1 describes one such control that reduces potential exposure to bird-borne contaminants.

**(3)** Setting up an animal inspection room at each port-of-entry may help reduce hazards that Wildlife Inspectors encounter. Project Leaders/supervisors should consider discussing establishing such rooms with the local port-of-entry authorities.

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**C. Training.**

(1) Wildlife Inspectors and other OLE employees involved in wildlife handling and inspections must stay current with required safety and health measures described in this chapter, endangered species guidance, and any OLE directives, or review current Wildlife Inspector Basic School Safety and Health Training materials.

(2) Based on the hazards identified in the JHAs, Project Leaders/supervisors may require additional training for wildlife inspections and handling trophy shipments so employees have a better understanding of the hazards they face (e.g., training on respiratory protection, bloodborne pathogens, and hazard communication).

(3) Project Leaders/supervisors should consult with their Regional Safety Manager if ergonomic training is needed (e.g., multiple inspections where boxes have to be moved or lifted).

(4) Project Leaders/supervisors must ensure employees get training on the PPE they have to use for the hazards identified [see the Department's Learning Management System (i.e., DOI Learn) or contact the Regional Safety Manager, who may have videos for PPE training], and the decontamination of non-disposable PPE. Respiratory protection training is provided through the Wildlife Inspector Basic School and through annual in-service events.

**D. PPE.** PPE selection and use varies depending on the inspection type, the identified hazards, and any engineering controls that are in place (also see Table 9-3 above).

(1) Following are universal PPE requirements:

(a) Employees conducting inspections or collecting evidence in active warehouses, on airport tarmacs, and in airline freight terminals must wear, at a minimum, a DOT Type II high visibility vest that complies with their port authority requirements based on a JHA assessment. The only exception to this is when they are wearing Tyvek® suits to conduct inspections.

(b) When noise exposures are equal to or exceed 85 dBA, employees must wear appropriate hearing protection (i.e., ear plugs or muffs with at least a 20 dB noise reduction rating) (see 242 FW 3). Contact your port safety office for documented noise levels. If levels are unknown, work with the port safety office to determine levels or contact your Regional Safety Office for guidance on how to get noise levels measured.

(2) When handling contaminated or potentially contaminated wildlife or wildlife containers, employees must wear disposable gloves and clothing (i.e., Tyvek® suits, coveralls, or aprons).

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(3) Depending on the location and associated hazards, employees may be required to wear safety toed shoes (e.g., steel toed shoes).

(4) You can find more information about specific PPE recommendations in Table 9-3, the *Wildlife Inspector Basic Safety Training Manual*, JHAs for the activity, and 241 FW 3, Personal Protective Equipment.

**E. Medical Surveillance.** We have established a mandatory medical surveillance program for Wildlife Inspectors, Wildlife Inspector Assistants, Evidence Custodians, and Special Agents that includes baseline clinical and medical monitoring services for all incumbents and new hires with follow-up annual medical evaluations (see OLE's intranet site for current medical forms and 242 FW 4). Biological monitoring helps occupational health professionals to detect any absorption of contaminants through the skin or gastrointestinal system and by inhalation. Health professionals can also use it to assess body burden, reconstruct past exposure, monitor work practices, and test the effectiveness of PPE and other controls.

(1) Following are tests and practices we use for these employees:

(a) Typical laboratory tests include complete blood count (CBC), urinalysis, cholinesterase, red blood cell count, and baseline plasma.

(b) Typical exposure monitoring tests could include analysis for histoplasmosis, psittacosis, and tuberculosis.

(c) Typical physical testing may include audiometry, spirometry (measuring lung function), and vision/baseline color screening.

(d) Optional immunizations may include Hepatitis A, B, or combination vaccine; influenza; rabies; and tetanus.

(2) Although there is a periodic exam cycle of 3 to 5 years for Special Agents, OLE requires an annual exam for Wildlife Inspectors, Wildlife Inspector Assistants, and Evidence Custodians.

## **RECORDKEEPING**

### **9.9 What are the recordkeeping requirements associated with the wildlife inspection safety program?**

A. Project Leaders/supervisors must retain:

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(1) A copy of the employee's medical clearance allowing him/her to use respiratory protection until the next medical exam,

(2) A copy of any exposure sampling results for a minimum of 30 years, and

(3) A written record of all hazard communication (242 FW 2), respiratory protection (242 FW 14), bloodborne pathogen (242 FW 12), and PPE (241 FW 3) training employees receive.

**B.** Headquarters OLE must maintain all medical evaluation documents, such as physician opinions, physical exam results, physical exam supporting documentation, etc. for a minimum of the years of employment plus 30 years.

/sgd/ Stephen Guertin  
DEPUTY DIRECTOR

Date: January 23, 2017