

4.3.3. Recommendation(s) and Observations

Recommendation

4.3.3.1 Training Videos.

Produce several short safety training programs that can be placed on the WS Intranet and be copied to a DVD for distribution to remote locations not having high-speed internet service.

These video learning tools should be short (15-20 minutes each), should be pesticide-or process-specific, and their major emphasis should be on safety. The video should show actual applicators “out in the field,” demonstrating the proper precautions (eye protection, glove, wind-direction, etc.) and identify when the application is at the most dangerous point, i.e., do not place face over M-44 device, stay upwind, have strong gloves; for DRC-1339 or zinc phosphide concentrate, when mixing small quantities, always mix in a closed container and let the dust and aerosols settle before opening; for aluminum phosphide, in rare instances the dust inside the air-tight container may spontaneously ignite if damp—do not cover—since confinement in this instance can cause an explosion. The aforementioned instances are only a few safety issues that should be demonstrated.

The videos could include the following topics: 1) safe use of M-44's; 2) safe use of LPC collars; 3) safe use and mixing of DRC-1339 concentrate; 4) safe use and mixing of zinc phosphide; 5) safe use of aluminum phosphide; 6) need for participation in an OMMP; 7) different types of gloves and eyewear that protect you from different pesticides; 8) when respirators are to be used and their limitations; 9) disposal of pesticides and spent containers; and 10) storing and securing pesticides.

These 15 minute productions should be used for various training sessions, such as during the monthly training requirement mentioned in the following training plan.

Observation

4.3.3.2 Training Plan

A training plan and documentation tools could be developed and used by each State Director as a guidance document to develop a training plan. Currently, each State Director is responsible for determining who will provide specific and general training.

The applicators obtain the general training from the State during their certification process. However, specific training for WS products, M-44, LPC-1080 collars, zinc and aluminum phosphide, and DRC-1339 are generally the responsibility of the State Directors or their designee. WS should formalize a written program and update training forms to reflect the current requirements.

4.3.3.2.1 I have provided the following formalized plan for consideration, revision, and WS use.

**Animal and Plant Health Inspection Service (APHIS)
Wildlife Services (WS)**

Pesticide Safety Training Program
Revised:

I. Policy Statement

The Director's Pesticide Safety Training Program, henceforth referred to as the Program, is being implemented to clearly demonstrate my commitment to establish a clear, concise, and accurate pesticide safety training initiative to ensure employees, contractors, and visitors are adequately protected from the adverse affects of pesticide exposure by creating a thorough, continuous and proactive training process. It shall be WS policy to follow all State and Wildlife Services safety policies and procedures and to exceed those requirements to ensure a structured and effective training program is implemented.

II. Training Program Curriculum

1. New Employees' Orientation Training

The District Directors will ensure all new employees are trained on the following topics on the first day of work:

- Emergency procedures.
- Identifying pesticide storage areas and other hazardous locations.

2. General HAZCOM Training

All employees will be trained in basic Hazardous Communication (HAZCOM) training if they will be transporting, applying, or storing pesticides. If state-certified applicators have received this training through the certifying state, they need not be

retrained. The following general training components will be covered:

- How to read and understand a Material Safety Data Sheet (MSDS).
- How to read and understand Pesticide Labels.
- Emergency procedures.
- Signs and symptoms of pesticide exposure.
- Personal protective equipment (PPE).
- Pesticide storage requirements.

3. Pesticide Application Training

All pesticide applicators will be trained in accordance with state requirements and will be state-certified to perform the types of activities required by their position.

Although state-certified applicators receive the General HAZCOM training mentioned above, pesticide-specific training may still be required.

4. Disposal Training

Many pesticides can be classified as acutely-hazardous waste under the Resource Conservation and Recovery Act (RCRA) and should be treated as such when no longer needed for their useful purpose or if disposal is required. All employees will be instructed to contact the District Supervisor to arrange disposal of pesticides that are out-of-date or are not longer needed.

III. Frequency of Training

1. State-required Training

All certified applicators will attend the appropriate annual training program to keep their certification current.

2. Monthly Training

The District Supervisor will conduct a safety-related presentation for all applicators a minimum of once a month to address one or more of the following topics:

- PPE (use and limitations)
 - Respirators
 - Gloves
 - Protective clothing
- MSDS or Pesticide Label review currently being used

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- Emergency procedures including whom to call to report a spill
 - Storage requirements
 - Documentation requirements

3. New Pesticide Training

A specific pesticide is considered “new” if not routinely applied more than once in a three month period. Before any new pesticide is applied, mixed, or opened, the District Supervisor will ensure that applicator has read and understands the entire pesticide label and MSDS. The District Supervisor will ensure that the label instructions are followed. The District Supervisor will ensure all PPE is provided to the employee and is in good condition. If the applicator has any questions concerning the safe application of the pesticide, the pesticide will not be handled until the safety issue is resolved.

IV. Certification of Competency

New pesticide applicators using a restricted-use pesticide must have on-the-job training provided by another certified applicator, preferably the District Supervisor. Before any new employee is assigned to apply a restricted use pesticide, the District Supervisor must visually observe the proposed new applicator applying the pesticide and demonstrate competency and safety techniques required by the pesticide label and/or use restrictions. The District Supervisor must document that the employee has demonstrated competency of the application and is cleared to proceed with further applications without direct supervision. Direct supervision in this instance means the supervisor need not be present while the employee is performing applications, but must be available by telephone.

V. Recordkeeping

All training will be documented. At a minimum, documentation will include the date, the instructor’s name, the names of all attendees, and the topics that are covered.

All applicators will provide a copy of all training certificates (or other proof of training) to the District Supervisor within one week of taking the class.

The District Supervisor will keep a separate, up-to-date training file on each

applicator. In addition to the annual training requirements, the District Supervisor will keep records on the new employee, new pesticide, and monthly training presentations.

No later than January 10 of each year, the District Supervisor will provide the State Director a spreadsheet summary of all applicator training records to include:

- Name of Participant(s)
- Date of Training
- Training Topic(s)

Records shall be kept until the applicator no longer works for WS, or for a minimum of three years, whichever is longer.

In addition, copies of all state-certification renewal forms, permits, and training records will be kept in the State Director's Office.

State Director: _____ Date: _____

Wildlife Services, Animal and Plant Health Inspection Service

United States Department of Agriculture

4.4. Review of WS accidents. (Calendar Years 2002-2007)

4.4.1. Strength(s)

Employees at the visited locations were aware that there had been no accidents which produced a possible pesticide poisoning or exposure. However, WS OSS was aware of four incidents of possible sodium cyanide exposure between 2000 and 2007.

4.4.2. Weakness(es)

Workers Compensation records (2000 – 2006) were searched for possible indicators of pesticide poisoning or exposure to M-44 (sodium cyanide) from an accidental discharge. In 2001 one possible sodium cyanide exposure was discovered. This was classified as a no-lost time accident.

Although the results can be tragic, the risk associated with sodium cyanide exposure to WS trained applicators is extremely low if appropriate procedures are followed and old M-44 device replacements are performed. To put the risk in perspective, according to the American Association of Poison Control Centers, there were 163 cases of cyanide

poisonings in 2004 in the US, 8 of which resulted in death (most were intentional suicides). By comparison, 24 deaths were attributed to marijuana use.

The single case of possible sodium cyanide exposure noted above was correctly documented on a CA-1. However, a much further, in-depth accident investigation should have been conducted and documented. It would have been beneficial if the description of the accident, causation factor(s), and the remedy for preventing a recurrence had been advertised, distributed to all State Directors and District Supervisors, and included in the training program for M-44's.

WS provided EnviroHygiene four CA-1's of possible sodium cyanide exposures from 2000 to 2007. This clearly indicates that the Worker's Compensation summary reports do not provide significant, specific, injury-related information. This reinforces the need for a comprehensive process to identify when the SHEWB is to be notified of a severe accident or illness, or when the definition of a severe illness or accident exists.

4.4.3. Recommendation(s) and Observation(s)

Observation

As previously stated, a system should be developed, written, and implemented that would instruct supervisors and employees alike, that severe accidents must be investigated by the SHEWB professionals to ensure accident investigations are conducted and documented to prevent a recurrence. The WS should consult with SHEWB to define the requirements to be included in the policy.

All four possible exposures could have been prevented if appropriate procedures were followed or appropriate goggles were used.

4.5 Evaluation of WS culture as it relates to pesticide safety.

4.5.1. Strength(s)

During the site visits, every applicator, without exception, including the State Directors and District Supervisors demonstrated their commitment to safety by continually pointing out the location of their PPE, the application records, the pesticide inventory locations, the pesticide labels and MSDS, and other equipment they use to

ensure compliance with the regulations. I found this quite refreshing and it was apparent they were dedicated to their jobs and customers.

During the site visits, it was determined that all State Directors and District Supervisors were state-certified pesticide applicators; had obtained State-Dealer Licenses for state and district offices (as required); complied with all Federal and State regulations; had no notices of violations (NOV) or official warnings for at least the last five years even though they were inspected at least annually by state inspectors; and had taken the OIG audit recommendations extremely seriously by adhering to the audit recommendations whenever possible.

4.5.2. Weakness(es)

The pesticide applicators that work with a certain pesticide frequently have the human tendency to become somewhat complacent over time. This is perfectly understandable, but cannot be accepted and the dangers associated with the active ingredients must be reinforced through training on a routine basis. Using the example of the M-44 accidental discharge accident report findings (if there was one) and telling them of what could have prevented it, would have been one of the reinforcing training opportunities.

The lack of safety requirements and PPE requirements on some of the Pocatello Supply Depot manufactured pesticides are somewhat troubling. This lends the user to believe that no PPE should be worn. When one reads the label and sees the skull and crossbones it tells one to immediately take care, but it does not tell one how to take care. When an applicator starts to read the label, they immediately notice that there are copious amounts of information on endangered species, but little on safety. This leads the applicator to wrongly assume that no PPE is required.

The Worker Protection Standard (WPS) and FIFRA requires that the pesticide label clearly indicates what applicators must do to keep them safe during all operations, i.e. mixing, loading, and applying, including what PPE to wear and when to wear it. It is true that the WPS **does not apply** when pesticides are applied on livestock or other vertebrate animals, or in or about animal premises; however, many of its requirements are now recognized as industry standards and should be followed.

Pesticide applicators are taught that what is on the label is law, and therefore, to follow the label instructions. If the label does not require any special safety requirements, regardless if they are noted elsewhere, they wrongly assume that no PPE or other safety requirements exist.

For instance, I am not sure if any studies of sufficient reliability exist (I could not find them in my research) that state respirators and eye protection are not required while installing M-44 devices, nor that they are required. The question is should they be required or not required and why?

4.5.3. Recommendation(s) and Observation(s)

Observation

The pesticide label instructions for the Pocatello Supply Depot manufactured pesticides should be evaluated and revised and updated as necessary. If a pesticide label does not need updated, sufficient scientific data should be available to justify the decision not to require PPE or other safety requirements. If revisions are required the label should be revised and submitted to EPA for concurrence and implementation.

EXHIBIT: DHS LETTER GRANTING EXTENSION FROM TOP SCREEN

Office of Infrastructure Protection
National Protection & Programs Directorate
U.S. Department of Homeland Security
Washington, DC 20528



**Homeland
Security**

DEC 21 2007

Dear Sir or Madam:

I am writing to notify you that the Department of Homeland Security (DHS) is granting a time extension for certain facilities required to submit information under federal chemical security regulations. On April 9, 2007, DHS published the Chemical Facility Anti-Terrorism Standards Interim Final Rule (6 CFR Part 27); and on November 20, 2007, DHS published a final list of chemicals of interest, known as Appendix A. See 72 FR 17688 and 72 FR 65396. With the publication of the final Appendix A, all provisions of the regulations are in effect.

Upon publication of Appendix A, any facility that possesses any chemical of interest at or above the screening threshold quantity specified in Appendix A, was required to complete and submit information—called a "Top-Screen"—to DHS by January 22, 2008. See 6 CFR §§ 27.200(b)(2), 27.210(a)(1)(i).

In the final Appendix A, DHS intended to limit the coverage of that requirement, as related to farmers and other agricultural users of the chemicals of interest, by revising screening thresholds and counting rules for certain chemicals. See 72 FR 65406-65407, 65415 (Nov. 20, 2007). Since publication of the final Appendix A, however, additional questions and concerns have been raised regarding the applicability of the Top-Screen requirement to agricultural facilities and operations. DHS is gathering more information about these issues in order to determine whether any modification of the Top-Screen requirements might be warranted.

In addition, the United States Congress has now passed, and the President has signed, the Department of Homeland Security Appropriations Act of 2008, which authorizes DHS to regulate the sale and transfer of Ammonium Nitrate. The law authorizes DHS to develop processes for the registration of Ammonium Nitrate purchasers and for the maintenance of relevant records. Because this law will likely cover many farmers and other agricultural operations, DHS may review its approach towards Chemicals of Interest used in agricultural operations.

Accordingly, given the nature of these agricultural operations and the circumstances described above, I am exercising my authority under 6 CFR § 27.210(c) to extend the deadline for submitting Top-Screens under the following conditions:

(1) Until further notice, or unless otherwise specifically notified in writing by DHS, the Top-Screens will not be required for any facility that is required to submit a Top-Screen solely because it possesses any Chemical of Interest, at or above the applicable screening threshold quantity, for use—

(a) in preparation for the treatment of crops, feed, land, livestock (including poultry) or other areas of an agricultural production facility; or

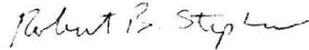
(b) during application to or treatment of crops, feed, land, livestock (including poultry) or other areas of an agricultural production facility;

(2) This extension applies to facilities such as farms (e.g., crop, fruit, nut, and vegetable); ranches and rangeland; poultry, dairy, and equine facilities; turfgrass growers; golf courses; nurseries; floricultural operations; and public and private parks.

(3) This extension does not apply to chemical distribution facilities, or commercial chemical application services.

If you have any questions about the extension described above, please contact Dennis Deziel, Deputy Director, DHS Compliance Security Compliance Division (dennis.deziel@dhs.gov) or the CSAT Helpdesk at 866-323-2957 or csat.dhs.gov.

Sincerely,



Robert B. Stephan
Assistant Secretary

5 Other Suggestions and Observations

5.1. Improve the Controlled Materials Inventory Tracking System (CMITS) and Instruction Manual.

Complete and accurate pesticide inventories are essential to ensure compliance with Federal and State regulations. Identifying pesticides that contain EPA-listed Extremely Hazardous Substances (EHS), Threshold Planning Quantities (TPQ), Reportable Quantities (RQ); DHS-listed Chemicals of Interest (COI); and shipping requirements in accordance with the Hazardous Materials (HAZMAT) Transportation Act are essential to complying with ever-changing regulations. Thus, this suggestion is to improve the Controlled Materials Inventory Tracking System (CMITS); Web Based and Instruction Manual. Currently, all required fields and substances are not uniform, defined, nor easy to understand. Terminology and some acronyms are not defined.

Suggestions for improvements and related comments are outlined below and are referenced to the CMITS Instruction Manual pages and terminology to assist in identifying the suggested changes.

Page 3 -- The first sentence states that the CMITS is designed to inventory all hazardous materials. However, CMITS does not include explosive materials. One statement appears to conflict with the other.

The first sentence should be specific to the hazardous materials that CMITS is designed to inventory. For example:

- Pesticides.
- Immobilization and euthanasia (I&E) drugs.
- Pyrotechnics.

The second sentence should be specific to the materials/explosives that CMITS is not intended to track.

- Pistols and other firearms.
- Blank ammunition.

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- Ammunition.
 - Alpha Chloralose.
 - Trap tranquilizer device/tabs (TTD's)
 - Binary Explosives.

The State Director must ensure the CMITS is kept current, accurate, and that inventories are reconciled and reported monthly. Specific information related to the reporting requirements should address:

- the date reports are due
- the "send to" address/email for the report
- Suggest all abbreviations be identified with the full name, i.e., OSS.
- Suggest email addresses be provided for "technical support" and "OSS".
- Suggest Field documents be developed for use when computer access is not readily available. The field documents are not intended to replace State-required application logs. The documents (forms) should be developed with all information needed for appropriate entry into CMITS and included in an Appendix to the manual. These documents could be used by the State and District Directors or the State Director could elect to use his current, written field records. The field tracking documents located in the Appendix could be used to enter pesticide use, disposal, purchase, loss, or sales into the CMITS.
- Suggest a definition section be included after the Introduction. The following words should be considered for inclusion and be clearly defined so user ambiguity is eliminated.

Applicators. Applicators include WS employees certified by the State to apply pesticides. If applicators other than WS employees are listed, they should be identified as non-WS employees.

Buyers. Buyers are WS customers that purchase pesticides from WS. Perhaps the word "customer" rather "than buyer" would be a more relevant term.

Distribute. Define distribute. It is unclear what “distribute” means in this instance.

Employees. All WS employees authorized to make changes to the CMITS. If other than WS employees are to be included, a pick-list is required to ensure continuity of understanding, i.e., State employee, County employee, WS employee, etc. This listing is entitled “Employees” or “Employee.”

Transactions. Transactions are those actions that include Purchase, Use and Transfer groups, with several subgroups called transaction types. The “Purchase” group would be better defined as “Obtained by.” The term “Sale” group might be better classified as “Use” group. Another group should be created and should be identified as “Disposal” with transaction type subgroups as “Damaged”, “HW contractor”, “by State disposal program”, etc. It would also be beneficial to have another Group named “Lost.” The subgroups could be “lost”, “unaccounted for”, “stolen”, or “no longer in inventory”.

Transfers. Transfers are moving a product between warehouses.

Products. Products are the items being inventoried and are available from a pick-list. Perhaps “Substance” would be a better term.

Vendors. Vendors are those companies authorized by the state to sell pesticides, and from whom you buy.

Warehouses. Warehouses are approved pesticide storage areas and are divided into four subgroups:

- 1) State Office Storage Areas,
- 2) District Office Storage Areas,
- 3) Residential Storage Areas, and
- 4) Remote Storage Areas.

The term warehouse should be evaluated to see if “storage area” would be a better term suited in this instance.

- Suggest the following acronyms used throughout this instruction manual be

memorized by the users:

- CMITS - Chemical Materials Inventory Tracking System
- I&E - Immobilization and Euthanasia
- MIS 2000 - Not currently identified in manual
- OSS - Not currently identified in manual

Page 4.

- Describe how a user accesses “MIS 2000” and how it relates to CMITS.
- Throughout the manual there are instructions to “click” on certain words, such as “click” on CMITS. Fully explain the “click” instruction and be consistent. Should the user left, “double-click” on CMITS selection or do they right, “single-click” on CMITS button, or do they right, “single click” on CMITS selection, etc?
- Superfluous words are used throughout the document; however, words needed for clarity are missing. An example is readily noted in the second instruction box (blue table) of instructions. It should read “the Main Menu screen will appear.” The word screen should be included when appropriate.

Page 6.

In the second instruction box (blue table), the word de-active is used. Does this mean to revoke an employee’s access? Could it mean remove the employee from the applicators list? Explain the meaning.

Page 9.

In the first instruction box (blue table), provide an email address or phone number for the Point of Contact (POC).

Give a few examples of the most common pesticides currently used in the pick list, or pull-down menu, and place complete list in the Manual appendix.

Page 11.

The pick list from the “Select Transaction Types” screen is confusing. The group names in the “Group” column may be clearer to the user if they were organized as follows: 1) “Obtained by”, instead of Purchase; 2) “Used”, instead of Sale; 3) Transfer is relevant, and 3) add two additional group columns, “Disposal” and “Unaccounted For”. After the group column names are changed, change the “Transaction Type” column to

reflect the appropriate names in the Group column.

Next to the word "Disposal" in the "Section Transaction Types" column, add a note: Contact SOHES at 301-734-6116 to arrange for, and to ensure appropriate disposal.

Page 14.

It may be helpful to the State Director if a logic field (yes/no) was included that identifies if the Vendor will accept the Government VISA purchasing card.

For security purposes, before a new vendor is utilized, it would behoove the State Director, or his designee, to call the appropriate State Department of Agriculture to ensure the vendor's information matches the license information on file with the State.

Suggest another logical data field (yes/no), with the question: "Was an initial security review performed?"

Page 23.

Is the Transfers screen only for transfers from one facility to another, or can this be used for disposals, lost items, etc?

Page 24.

When the transfer is submitted, is it automatically transferred to someone else's inventory? It may be beneficial to instruct the user what happens when they designate material for transfer, or instruct user what additional actions are required.

The aforementioned suggestions are only examples of how the instruction manual and system could be improved.

5.2. The following suggestions will be challenges to IT to incorporate into the CMITS, but should be considered:

- The CMITS has the selection of quantity. What about mass or weight indications?

- Many pesticides need to be reported to various authorities, depending upon concentration, amount, and specific requirements. The tables below illustrate requirements for different regulations as compared to the specific chemical used by WS personnel noted in the pesticide labels and MSDS's.

The following chart(s) contain(s) sample information on a few products

(pesticides) used by APHIS. It would be beneficial if the CMITS system could link the information so that the CMITS system could be used for quantifying information thereby eliminating duplication of effort for supervisors at the State level. One could also link MSDS's and Pesticide Labels to the system to ensure the most up-to-date information is available.

Product (Substance)	Active Ingredient			
	CAS No.	HazMat	Synonyms	
M-44	Sodium Cyanide	143-33-9	Marine pollutant Haz Class 6.1 Pkg. Grp. I	Hydrocyanic acid, sodium salts, Cyanogran, Cyanide of Sodium, Cymag Cyanobirk, Prussiate of soda
Rodent Baits	Zinc Phosphide	1314-84-7	Haz Class 4.3	Trizinc diphospide
Compound DRC-1339	3-chloro-p-touidine hydrochloride	62-74-8	Haz Class 6.1 Pkg. Grp. 1	Starlicide
Avitrol	4-Aminopyridine	504-24-5	Haz Class 6.1 Pkg. Grp. 1 UN 2671	Gamma-aminopyridine, P-aminopyridine, AVITROL 200, 4-Pyridinamine, Pyridine, 4-Amino-, 4-Pydrilaminie
Mesurool 75%	methiocarb	2032-65-7		Bay 37344, Carbamic Acid, Draza, Methicarb, Methiocarb, Metiocarbe

5.3. Write and distribute a fact sheet explaining NFPA 704.

WS Directive 2.401, Pesticide Use, Attachment 1, Standard for Storing Pesticides, requires pesticide storage areas to be marked using the NFPA 704 (Diamond) Hazard Ranking System placards (when applicable local regulations require).

A fact sheet containing information similar to the information below should be developed and distributed to all State Offices and should be included in the specific pesticide training program.

NFPA 704 Hazard Identification System

RED = Fire

- 4 – Very Flammable gases or very volatile flammable liquids
- 3 – Can be ignited at all normal temperatures
- 2 – Ignites if moderately heated
- 1 – Ignites after considerable
- 0 – Will not burn



YELLOW = Reactive

- 4 – Readily detonates or explodes
- 3 – Can detonate or explode but requires strong initiating force or heating under confinement
- 2 – Normally unstable but will not detonate
- 1 – Normally stable. Unstable at high temperature and pressure. Reacts with water.
- 0 – Normally stable.

BLUE = Health

- 4 – Can cause death or major injury even with medical attention
- 3 – Can cause serious injury despite medical treatment
- 2 – Can cause injury. Requires prompt treatment.
- 1 – Can cause irritation if not treated
- 0 – Normal material

WHITE = Specific Hazard

- OX = Oxidizer
- ACID = Acid
- ALK = Alkali
- COR = Corrosives
- W = Use no water
- ☢ = Radioactive
- ☠ = Poison

To appropriately mark storage areas:

1. Determine what pesticides are being stored in the particular storage unit.
2. Determine the highest number for each category, i.e., fire, health, reactive, and specific hazard. The most severe hazard (highest number) must be placed on the appropriate diamond (category).
3. After determining the appropriate numbering for each category, place the numbered placard on the storage unit. Small diamonds can be used on pesticide storage cabinets; however, larger diamonds should be used to mark outside storage units.

The following is a list of WS pesticides and their NFPA Hazard Codes obtained by evaluating the pesticide labels and MSDS's.

Pesticide	EPCRA Hazard Classifications	NFPA Hazard Ratings			
		Fire	Health	Reactive	Special
Amyl Nitrite Antidote	Severe Fire Hazard, Acute Health Hazard (Very Toxic)	4	3	2	0
Avitrol	Acute Health Hazard (Toxic)	0	2	0	0
Dichacinone	Slightly Toxic	1	1	0	0
DRC-1339	Slightly Toxic	0	1	0	0

Pesticide	EPCRA Hazard Classifications	NFPA Hazard Ratings			
		Fire	Health	Reactive	Special
Fumitoxin	Fire, Reactivity (water-reactive), Acute Health Hazard (Highly Toxic)	4	4	2	W
Gas Cartridge	Fire, Slightly Toxic	1	1	0	0
LPC 1080 Collar	Acute Health Hazard (Highly Toxic)	0	4	0	0
M-44 Cyanide Capsule	Acute Health Hazard (Very Toxic)	0	3	0	0
Mesurool	Fire	2	0	0	0
Repellent, Snake-a-Way	Acute and Chronic Health Hazard (Carcinogen), Slight Fire Hazard	1	2	0	0
Strychnine (Non concentrate)	Acute Health Hazard, Slight Fire Hazard	1	3	0	0
Zinc Phosphate (Non concentrate)	Slight Fire and Toxic Hazard, and Reactive	1	1	2	0

5.4. Annually review chemical stocks and uses for other regulatory requirements.

The chart in this section, directly following this explanation of requirements, represents a consolidated list of pesticides the WS uses and includes active ingredients (chemicals) subject to reporting requirements under the Emergency Planning and Community Right-to-Know Act (EPCRA), chemicals listed under section 112(r) of the Clean Air Act (CAA), and the Department of Homeland Security (DHS) list of Chemicals of Interest.

Facilities handling chemicals determine whether they need to submit reports under the DHS Facilities, or under sections 302, 304, or 313 of EPCRA for specific chemical, and what reports need to be submitted. Facilities must also determine whether they are subject to accident prevention regulations under CAA section 112(r).

Many pesticide wastes are classified as acutely hazardous wastes as defined by the Resource Conservation and Recovery Act (RCRA).

Spills of pesticides may be reportable under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA).

The chemicals on the list below are in alphabetical order and contain both the Chemical Abstracts Service (CAS) number and/or the EPA pesticide registration number.

More than one chemical name may be listed for one CAS number because the same chemical may appear on different lists under different names.

The following chart delineates a myriad of requirements for specific chemicals. The columns in the following chart are explained as:

Column (1) Pesticide. Name of pesticide used by WS.

Column (2) EPA Registration No. The federal registration number required by the Federal Insecticide, Fumigant, and Rodenticide Act (FIFRA). It should be noted that in addition to registration under FIFRA, the States require annual registration.

Column (3) Restricted Use. Is the pesticide categorized as a restricted-use pesticide?
Yes/No

Column (4). Active Ingredient. This is the regulated chemical ingredient in the pesticide.

Column (5). CAS Number. This is the Chemical Abstracts Service (CAS) registry number for the active ingredient (chemical).

Column (6) RCRA Code. The letter-and-digit code in the RCRA Code column is the chemical's RCRA-listed hazardous waste code. This column includes specific numbers from the RCRA P and U lists only (40 CFR 261.33). P-listed wastes are considered acutely-hazardous wastes and U-listed wastes are considered toxic by EPA.

Column (7) CERCLA RQ. This column shows the RQs (in pounds) for chemicals that are CERCLA hazardous substances. Releases of CERCLA hazardous substances, in quantities equal to or greater than their RQ, are subject to reporting to the National Response Center under CERCLA.

Column (8). EPCRA Threshold Planning Quantity (TPQ). The presence of Extremely Hazardous Substances (EHS) in quantities at or above the Threshold Planning Quantity (TPQ) at a single facility requires certain emergency planning activities to be contacted. The extremely hazardous substances and their TPQs are listed in 40 CFR Part 355, Appendices A and B. For section 302 EHS's. Local Emergency Planning Committees (LEPCs) must develop emergency response plans and facilities must notify the State Emergency Response Commission (SERC) and LEPC if they receive or produce the substance on site at or above the EHS's TPQ. Additionally, if the TPQ is met, facilities with a listed EHS are subject to the reporting requirements of EPCRA section 311 (provide material safety data sheet or a list of

covered chemicals to the SERC, LEPC, and local fire department) and section 312 (submit inventory forms, usually Tier II, by March 1 of each year. The TPQ for EHS's is 500 pounds or the TPQ, whichever is less.

Column (9) EPCRA EHS RQ. Releases of reportable quantities (RQ) of EHSs are subject to state and local reporting under section 304 of EPCRA.

Column (10) EPCRA Section 313 Toxic Chemicals. Emissions, transfers, and waste management data for chemicals listed under section 313 must be reported annually as part of the community right-to-know provisions of EPCRA (40 CFR Part 372). The notation "313" in this column indicates that the chemical is subject to reporting under section 313 and section 6607 of the Pollution Prevention Act. Reporting under EPCRA section 313 is triggered by the quantity of a chemical that is manufactured, processed, or **otherwise used** during the calendar year. For most TRI chemicals, the thresholds are 25,000 pounds manufactured or processed or 10,000 pounds of "otherwise used" chemicals.

EPA has recently lowered the reporting thresholds for certain chemicals and chemical categories that meet the criteria for persistence and bioaccumulation. Some chemicals not specifically listed under CERCLA may be subject to CERCLA reporting as part of a category. For example, strychnine sulfate (CAS number 60-41-3), listed under EPCRA section 302, is not individually listed on the CERCLA list, but is subject to CERCLA reporting under the listing for strychnine and salts (CAS number 57-24-9), with an RQ of 10 pounds.

Column (11) CAA 112(r). The Clean Air Act (CAA) section 112(r) shows the (Threshold Quantities) TQs (in pounds) for chemicals listed for accidental release prevention. The TQ applies to the quantity of substance in a process, not at the facility as a whole. Under the accident prevention provisions of section 112(r) of the CAA, EPA developed a list of toxic substances and flammable substances.

Column (12) DHS COI. This column denotes the screening thresholds for reporting under the Department of Homeland Security (DHS), Chemicals of Interest (COI).

(Column 1) Pesticide	(Column 2) EPA No.	(Column 3) Restricted Use	(Column 4) Active Ingredient	(Column 5) CAS No.	(Column 6) RCRA No.	(Column 7) CERCLA RQ	(Column 8) EPCRA TPC	(Column 9) EPCRA EHS RQ	(Column 10) EPCRA TRI	(Column 11) CAA 112 r	(Column 12) DHS CDC RQ
Antidote Kit	N/A	N/A	Amyl Nitrite	110-46-3	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Avitrol Mixed Grain	11649-4	Yes	4-Amino-pyridine	504-24-5	P008	1000 lbs.	500 lbs.	1000 lbs.	N/A	N/A	N/A
Avitrol Double Strength Corn Chops	11649-5	Yes									
Avitrol Corn Crop (Sparrow)	11649-6	Yes									
Avitrol White Corn (Pigeons)	11649-7	Yes									
Avitrol Double Strength Whole Corn	11649-8	Yes									
Diphacinone	61282-23	No (except above 3 %)	Diphacinone	82-66-6	N/A	N/A	10 lbs.	10 lbs.	N/A	N/A	N/A
DRC 1339 Concentrate (Feedlots)	56222-10	Yes	3-Chloro-4-Methylbenzenamine	7745-89-3	N/A	N/A	N/A	N/A	N/A	N/A	N/A
DRC 1339 (Pigeons)	56228-28	Yes									
DRC 1339 Concentrate (Black Bird Starling)	56228-28	Yes									
DRC 1339 Concentrate (Livestock, Nest and Fodder Depredations)	56228-29	Yes									
DRC 1339 (Raven)	56228-29	Yes									
DRC 1339 Concentrate -- Slaging Areas	56228-30	Yes									
Funitoxin (Tablets)	72959-1	Yes	Aluminum Phosphide	20869-73-8	P006	100 lbs.	500 lbs.	100 lbs.	Yes	N/A	Any Amount
Funitoxin (Pellets)	72959-2	Yes									
Funitoxin (Bags)	72959-3	Yes									
Gas Cartridges (Small)	56228-2	No	Sodium Nitrate	7631-99-4	N/A	N/A	N/A	N/A	N/A	N/A	400 lbs
Gas Cartridges (Large)	56228-21	No									
LPC 1080	56228-22	Yes	Sodium Fluoroacetate	62-74-8	P058	10 lbs.	10 lbs.	10 lbs.	N/A	N/A	N/A
M44	56228-15	Yes	Sodium Cyanide	143-33-9	P106	10 lbs.	100 lbs.	10 lbs.	Yes	N/A	1001 lbs
Mesuroil 75-W	10163-231	Yes	Methiocarb	2032-65-7	P199	13.3 lbs	667 lbs	13.2 lbs	Yes	N/A	N/A
Snake Away	58630-1	No	Naphthylene	91-20-3	U165	100 lbs.	N/A	N/A	Yes	N/A	N/A
Strychnine Milo Pocket Gopher Bait for Use in Burrow Builders	56228-11	Yes	Strychnine	57-24-9	P108	10 lbs.	100 lbs.	10 lbs.	Yes	N/A	N/A
Strychnine SRO Pocket Gopher Bait for use in Burrow Builders	56228-12	Yes									
Strychnine Milo for Hand Baiting Pocket Gophers	56228-19	Yes									
Strychnine on Oats for Hand-Baiting Pocket Gophers	56228-20	Yes									
Zinc Phosphide on Wheat	56228-3	Yes	Zinc Phosphide	1314-84-7	U249	100 lbs.	500 lbs.	100 lbs.	Yes	N/A	N/A
Zinc Phosphide Concentrate	56228-6	Yes									
Zinc Phosphide on Oats	56228-14	Yes									
ZP Tracking Powder	12455-16	Yes									

5.5. Compose a fact sheet outlining the differences in Personal Protective Equipment (PPE)

The following would be an excellent training fact sheet for when a pesticide label instructs the pesticide applicator to use specific PPE:

5.5.1 Particulate Respirators – (42 CFR 84) – Selection and Use– (29 CFR 1910.134)

The National Institute of Occupational Safety and Health (NIOSH) published a final rule concerning new public health regulation and testing of particulate respirators.

The nine classes of particulate respirators are divided into three levels of efficiencies; 95%, 99% and 99.7%, and three series; N, R, and P. The N-series particulate respirators are to be used in oil-free environments. The R-series particulate respirators can only be worn for one 8-hour shift, while the P-series particulate respirator can be used in oil environments and can be used for more than one shift.

When the pesticide label refers to dust/mist respirators, it is referring to a particulate respirator. Generally, when WS pesticide labels require a dust/mist particulate respirator, an N series, the minimal requirement is the 95% particulate respirator.

Employers must fit-test employees that are required to wear respirators. This includes dust/mist respirators. Fit testing requirements are listed in 29 CFR 1910.134. To obtain fit-testing information, contact your Safety and Health Official first. If you cannot reach your local Safety and Occupational Health Official contact SHEWB at 301-734-6116.

5.5.2 Goggle – Selection

Most accidents are caused by flying particles or objects, with eye injuries from chemical splash a close second. Wearing the wrong kind of eye protection makes up a large percentage of eye injuries. Workers often use their safety glasses to protect from impact and flying particles, however, if the same glasses are used for chemical protection they are often not effective.

There are three types of goggles that provide more protection than safety glasses from impact, dust, and particles (and other hazards). Direct vented goggles allow a direct flow of air from the work environment into the goggle. Indirect vented goggles limit or prevent passage of liquid into the eyes and should be selected when

handling liquid pesticides. Non-vented goggles protect against dust, mist, and liquid and should be selected when the pesticide label requires goggles. The supervisor and employee should evaluate each process closely to determine what PPE should be used during what process. Only a small dose of sodium cyanide (from an accidental discharge of an M-44) in the eyes can cause severe consequences. Although an applicator may have many years of experience, familiarity breeds complacency and is often an accident waiting to happen. Applicators of deadly chemicals should consider respiratory protection and eye protection, even if the label does not require such measures.

Faceshields are considered secondary protection and require that primary protection (eyewear) also be used.

Eye and face protection is codified in 29 CFR 1910.133.

5.5.3 Glove – Selection (29 CFR 1910.138)

This OSHA requirement requires appropriate hand protection be worn in cases where hands may be exposed to hazards from skin absorption of harmful substances. Employers will base the selection on the risk posed by the task being performed. In this case, mixing or applying of pesticides. The regulation requires that the selection of the glove be based on material, thickness, length and other traits, including assessment for chemical exposures.

A hazard assessment begins with examination of the MSDS for the toxic properties in the pesticide's active ingredients. Determine if the chemicals can cause surface affects to the skin, or if they can be readily absorbed by the skin. Take into account the degree of dexterity required, length of potential exposure, chemical concentration, temperature, and the glove material's break-through time. It should be recognized that one type of glove cannot address all types of hazards.

When the pesticide label requires gloves, the correct selection of gloves must be made. Many pesticide labels on stipulate the use of cotton materials or water-proof materials. Regardless, it is good practice to double-glove. A nitrile examination glove should be used under the required glove. Nitrile is a synthetic rubber material that offers chemical and abrasion resistance and is a very good general-duty glove. The use of a proper fitting examination glove still provides the dexterity needed. In most situations this practice will further protect certain water-reactive pesticide chemicals from reacting with sweat from the applicator's hand. Caution should be taken since the nitrile glove

will increase sweating and one should be careful to remove gloves away from products such as zinc and aluminum phosphide.

Nitrile gloves are also recommended over latex gloves because of the high reports of reactions to latex over the past years. People with ongoing latex exposure are at high risk for developing latex reactions which for some people are very serious.

5.6 Update the Pocatello Supply Depot Pesticide MSDS.

In 1993, the American National Standard Institutes (ANSI) developed a comprehensive format to be followed during the creation of MSDS and was revised in 2005. ANSI Z400.1-1993 contains 16 parts to standardize and improve readability, consistency, and usefulness of this tool. It should be noted that OSHA does not require following this voluntary standard, but the chemical industry as a whole has adopted it as an industry standard. The WS should seriously consider updating these documents to reflect these current industry standards. Copies of the Standard can be obtained from the ANSI Inc., 25 West 43rd Street, New York, NY 10036, by calling 212-642-4900, or by ordering on-line at URL www.ansi.org.

6

Certification

I certify that, to the best of my knowledge, the information provided in this report is true and accurate as it relates to the scope of work and the information provided by the client.

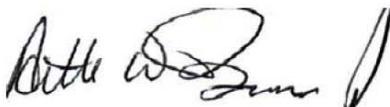
As a member of EnviroHygiene LLC, I am committed to maintaining the trust and respect of our clients and the public at large through unquestionable integrity, honesty and ethical business conduct.

EnviroHygiene LLC is committed to having and demanding a high ethical standard from its members and from its subcontractors. EnviroHygiene LLC and its subcontractors shall:

- Act impartially to ensure that it is independent in judgment and actions.
- Act honestly and in good faith.
- Use due care and diligence in fulfilling the assigned task(s).
- Inform the Owner/Member of EnviroHygiene LLC, the Contracting Officer, and the Contracting Officer's Representative of any conflicts, or potential conflicts of interest, arising out of the fulfillment of its duties.
- Treat all information as confidential. Such confidential information remains the property of the source from which it was obtained. EnviroHygiene LLC shall not disclose it, or allow it to be disclosed unless that disclosure is required by law or has been authorized by the source from whom the information was received.

EnviroHygiene LLC will promptly investigate any alleged noncompliance with this Policy and will immediately disclose the results to the client.

Respectfully Submitted,



Arthur W. Benson

Operations Manager/Member

EnviroHygiene LLC

Seal

Wildlife Services (WS)
Pesticide Safety Review Planning Tool

Work Plan

- List Wildlife Services Pesticide Application and Storage Policies to be evaluated.
- Identify four sites to be evaluated. Obtain Department of Environment and Department of Agriculture applicable regulations for identified locations.
- Identify site visit contacts.
- Develop a site visit screening tool sheet that explains information needed to be provided to reviewer by site contacts before and during site visit.
- Schedule site visits.
- Obtain injury/illness report summaries for WS. Determine which injuries/illnesses are related to pesticide safety.
- Obtain motor vehicle accident information relating to transportation of pesticides.
- List current pesticide training.
- List all other applicable USDA/APHIS policies, manuals, or directives related to pesticide transportation, handling and storage.
- Review pesticide spill reporting and spill reports.

Review Aforementioned Information

- Identify major safety topics.
- Identify if State regulations differ from Federal regulations.
- Identify where State regulations are more stringent than Federal regulations.
- Determine if major safety topics are appropriately covered in their policies, and if not, make recommendations for improvements or inclusion.

Site Visits

Prior to visits:

- Send screening tool sheet to sites before site visit.
- Request travel and lodging information from site contact.
- Review screening tool sheet information provided by site contact prior to arrival.
- Review applicable State regulations.
- Identify local jurisdiction contacts, i.e., fire departments, agriculture extensions service offices, and regulatory officials, and attempt to make appointments during site visits.

During visits:

- Perform site familiarization.
- Witness actual work "in field." Shadow workers.
- Conduct confidential interviews with APHIS employees at site.

- Conduct interviews with outside agency officials.
- Write site visit results while still on site. Return to site if results need further information or explanation.

After visits:

- Send summary of each site visit to APHIS Project Manager.
- Keep appropriate travel receipts and present to APHIS Project Manager as requested.

DRAFT REPORT

- Write draft report to include the following sections:
 - Cover Sheet
 - Table of Contents
 - 1. Introduction
 - 2. Scope
 - 3. Executive Summary
 - 4. Document Review
 - a. Weaknesses
 - b. Strengths
 - c. Recommendations
 - 5. Site Visits
 - a. Weaknesses
 - b. Strengths
 - c. Recommendations
 - 6. Other Recommendations
 - 7. Certification
 - Appendices and Tables (as necessary)
- Obtain comments from APHIS
- Revise as necessary
- Obtain APHIS Project Officer's approval for finalizing report.

Final Report

- Include photographs, charts, and other visual applications as necessary.
- Make final format changes as necessary.
- Finalize report.
- Have three copies made of final report; one for FOH, and two for APHIS Project Manager.
- Digitize final report in PDF form and provide to APHIS Project Officer.

Appendix A-2

Site Visit Screening Tool Sheet
Date:

Facility Information

Name:

Address:

Management Unit/Organizational Structure:

Provide Brief Description of Mission:
(or attach website information that explains mission)

Facility Contact Information

Name:

Title:

Telephone:

Cell Phone:

Email:

Interview Schedule

Identify those to be interviewed and briefly describe their tasks related to pesticide application, transportation, or handling.

Name:

Title:

Tasks:

Name:

Title:

Tasks:

Appendix A

Please provide the following information.

	Yes	No
Has there been any:		
1. spills of pesticides?	<input type="checkbox"/>	<input type="checkbox"/>
2. traffic accidents with pesticides?	<input type="checkbox"/>	<input type="checkbox"/>
3. injuries or illnesses caused by pesticide exposure?	<input type="checkbox"/>	<input type="checkbox"/>
4. notices of violations or other deficiencies noted by State or local regulators?	<input type="checkbox"/>	<input type="checkbox"/>
5. Grievances or complaints from employees (or others) made concerning pesticide safety?	<input type="checkbox"/>	<input type="checkbox"/>
6. current (within the last year) pesticide safety classes conducted? (Please include in-house training classes.)	<input type="checkbox"/>	<input type="checkbox"/>

If the answers to questions 1 through 6 above is yes, please number your answers and briefly explain.

EnviroHygiene will be reviewing the following:

- | | |
|-------------------------------------|---|
| Licenses/Permits | Training Records |
| Pesticide Inventories | Material Safety Data Sheets |
| Personal Protection Equipment (PPE) | PPE Storage and Cleaning Area |
| Pesticide Storage Area(s) | Local agreements |
| Standard Operating Procedures (SOP) | Pesticide Transportation Vehicles |
| Decontamination Equipment/Areas | Pesticide Waste Generation and Disposal |

Please have the aforementioned items accessible for reviewing.