

# MAIL HANDLING

## INFORMATION AND RESOURCES ON HANDLING POTENTIALLY HAZARDOUS MAIL & PACKAGES

In 2023, there were 6,284 suspicious or unattended package incidents in the United States.<sup>1</sup> While the number of suspicious package incidents vary widely from year to year, they continue to occur and are a real concern and hazard for workers who handle these packages and letters on a daily basis. There are no specific regulations from the Occupational Safety and Health Administration (OSHA), or the Public Employee Safety and Health (PESH) Bureau concerning suspicious mail handling, but there are regulations that apply to these incidents and the employer's responsibility to prepare for one. PESH has also cited employers under the General Duty Clause when workers have been exposed to hazardous drugs as a result of handling mail.

The Emergency Action Plans (EAP) regulation (29 CFR 1910.38) requires employers to plan for foreseeable emergencies that could occur in the workplace. It does not require that these incidents had to have happened, but could happen. If mail is handled, a suspicious package event could occur, and therefore preparation for how to respond to one must be included in the plan just as for any other emergency.

The EAP has to be in writing and employees must be trained on the plan when they are first hired and whenever the plan is changed.

The plan must be available for employee review upon request. The portion of the employer's plan that addresses suspicious mail handling should be specific to the types of suspicious mail incidents that could occur and provide appropriate protection for mail handlers.

The US Department of Homeland Security has detailed recommendations on planning for suspicious mail incidents. They recommend a four-step process in preparing for a suspicious mail handling incident which are: suspicious mail threat assessment, types of mail received, previous incident review and assessing the mail handling process and locations.

Completion of the assessment leads to the identification of control measures for the types of suspicious mail incidents that could occur. Based on the hierarchy of controls, this could result in other OSHA/PESH regulations application including:

- **Right-to-Know** – to provide information on the toxic substances encountered.
- **Personal Protective Equipment** – training on equipment needed to respond or escape and event.
- **Hazardous Materials Emergency Responder** – training and equipment if employees would respond to an incident.

### HAZARDOUS SUBSTANCES PRIMARILY SENT BY MAIL

- **Explosives**
- **Drugs**
  - Prescription Opioids
  - Heroin
  - Fentanyl
  - Cocaine
  - Synthetic Marijuana (K2)
  - Methamphetamines
  - Xylazine (Tranq)
- **Disease Agents**
  - Anthrax
  - Body Fluids
- **Toxins**
  - Ricin
  - Corrosives
  - Irritants
  - Fragrances
  - Pesticides (i.e. wasp spray)

<sup>1</sup> The US Bomb Data Center's (BDCs), a division of the Federal Bureau of Investigation (FBI), 2023 Explosive Incident Report (EIR),

## EMPLOYER REQUIREMENTS & CONSIDERATIONS

- Develop a section of the EAP that identifies the types of suspicious mail incidents that could occur, how to recognize suspicious mail items and details the steps and protective measures in place to protect employees from the potential hazards if an event occurs.
- Employers should have an exposure control plan in place. The NIEHS has many resources in place to help employers create them. (<https://tools.niehs.nih.gov/wetp/index.cfm?id=2562>)
- As part of the emergency planning process the employer should identify emergency services, like ambulance, fire and hazardous materials responds that would be needed if a release from a suspicious package occurs.
- All employees that perform mail handling operations are trained how to recognize suspicious package warning signs, on the hazards of substances that might be enclosed, and on the procedures to take if a suspicious package is identified or if a release from a suspicious package occurs.
- Display suspicious mail identification postings and a summary of the workplace specific emergency actions to take if a release occurs, including how to make proper notifications for the incident.
- A suspicious mail handling personal protective equipment (PPE) hazard assessment is performed, and all employees are provided PPE training for normal operations and if an emergency occurs.
- Consider alternative mail options, like increasing e-mail correspondence, to reduce the amount of physical mail received to reduce the potential for an incident and the number of items to be screened.
- If some of mail items received are for residents, recipients, or incarcerated individuals, a package pre-order system could be considered, where those wanting to send items to the individuals select them off and official internet website, and the selected item is sent from a secure supplier.
- Locate larger mail handling operations in a separate building, or an area separated from the rest of the location, so it can be easily isolated in the event a suspicious package is identified or a release occurs.
- Where larger packages are received, screening devices, like those using X-rays, can be provided to allow possible suspect items to be identified and isolated prior to being opened.
- Trained dogs can be used to identify materials in packages and letters so they can be isolated for further examination.
- Systems can be installed that are enclosed and ventilated for the opening of letters and packages, which can control a release if one occurs.

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