

# Management Instruction

## Response to Hazardous Materials Releases

This Management Instruction (MI) provides policy and guidance for responding to hazardous materials releases:

- As defined by the Occupational Safety and Health Administration (OSHA).
- In a manner appropriate to the type of material and circumstances of the release in accordance with 29 Code of Federal Regulations (CFR) 1910.120, Hazardous Waste Operations and Emergency Response (HAZWOPER).

Hazardous materials are also known as "hazardous substances." (See the definition in attachment 4.)

This MI covers how to plan for and respond to releases (spills and leaks) of hazardous materials originating from:

- Items placed in the mail stream (that can usually be handled by employees who have received training and follow set procedures).
- Outside the mail stream.

## Incidental Releases Versus Emergency Releases

Incidental releases are spills or leaks from pieces of mail that can be absorbed or otherwise controlled at the time of release. Incidental releases are unlikely to result in (1) airborne concentrations above the exposure limits permitted by OSHA, or (2) any other hazardous situation. Spills and leaks of other hazardous materials in Postal Service™ facilities may also be incidental in nature. (See the section on "Releases of Hazardous Materials Outside the Mail Stream: Planning and Response," found on page 7 of this MI and the definitions in attachment 4.)

Emergency releases are releases of hazardous substances (in or out of the mail stream) that by their nature pose a threat to health and safety sufficient to require an emergency response regardless of the circumstances surrounding the release or the mitigating factors.

Date	March 27, 2006
Effective	March 27, 2006
Number	EL-810-2006-3
Obsoletes	EL-810-96-1
Units	Safety and Environmental Performance Management Employee Resource Management



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## CONTENTS

Incidental Releases Versus Emergency Releases .....	1
Responding to Exposure or Injury .....	2
Preventing Releases From Pieces of Mail .....	2
Safe Handling of Mail Containing Hazardous Materials .....	3
Releases (Spills and Leaks) from Mail Pieces: Planning, and Response .....	4
Limited Mailability of Hazardous Materials .....	4
Responding to Suspicious Mail and Unknown Powder or Substances .....	4
Filing Form 1770, Mail Piece Spill or Leak Incident Report .....	6
Required Training .....	6
Releases of Hazardous Materials Outside the Mail Stream: Planning and Response .....	7
Resource Conservation and Recovery Act .....	8
Toxic Substances Control Act .....	9
The Clean Water Act and the Comprehensive Environmental Response, Compensation, and Liability Act .....	10
Program Responsibilities .....	10
Headquarters .....	10
Areas .....	11
Districts and Plants .....	11

## **CONTENTS**

### **continued**

#### **Attachment 1**

Standard Operating Procedures for Cleaning Up Incidental Releases .....	13
---	----

#### **Attachment 2**

Emergency Action Plan: Hazardous Materials Emergency Releases .....	19
---	----

#### **Attachment 3**

HAZWOPER Training Requirements for Postal Service Employees .....	21
---	----

#### **Attachment 4**

Definitions .....	25
-------------------	----

#### **Attachment 5**

Acronyms .....	27
----------------	----

#### **Attachment 6**

References .....	29
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This MI discusses how to handle incidental and emergency releases, whether the releases occur within or outside of the mail stream.

## **Responding to Exposure or Injury**

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Personnel injured by or exposed to either type of release must receive immediate medical attention. Exposure may occur by inhalation of vapors or fumes, skin contact, or some other route. If medical assistance is not available, the injured person should receive first aid measures until he or she can be seen by a physician.

In all cases of injury or exposure involving hazardous materials, a physician must examine and clear the employee before he or she returns to duty. Medical personnel treating employees must conduct appropriate medical follow-up with exposed employees. (See MI EL-810-2000-2, *Bloodborne Disease Exposure Control Plans*, for more detailed information.)

**Note:** Since the anthrax attacks of 2001, suspicious mail and unknown powders or substances discovered in the mail present a unique challenge. The Postal Service has developed and put in place policies and procedures to deal with such incidents. While this MI refers to some of those policies and procedures, consult the Emergency Preparedness Suspicious Mail Web site for the latest information. (See attachment 6 for directions to the site.)

## **Preventing Releases From Pieces of Mail**

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All Postal Service personnel—from acceptance to processing to delivery—must help prevent releases from pieces of mail by following the Standard Acceptance Instructions for Hazardous Materials and the standard operating procedures (SOPs) for the Handling and Processing of Hazardous Materials issued by Aviation Mail Security. (Attachment 6 gives directions for finding these documents on the Intranet.)

Employees accepting pieces of mail that may be hazardous must conduct a thorough examination of each piece of mail to include the following:

- 1. Check delivery and return addresses.**
- 2. Conduct visual inspection.**

All personnel should be alert to indicators that hazardous materials may be present in a piece of mail. Indicators include:

- Sound of broken glass or plastic.
- Stains, leaks, or unusual odor.

- Delivery or return address information (chemical company, laboratory, or medical facility).
- Preprinted markings (such as aerosol, hair spray, or bleach).
- Manufacturer's name (for example, Joe's Chemicals, Butane Lighters 'R Us).
- Shifting weight or liquid sound.
- Tape or plastic wrapping.
- Prohibited DOT labels and markings.

When evaluating signs of suspicious mail, remember the acronym **SLAP**:

- **S** for unusual **Shape**.
- **L** for unusual **Look**.
- **A** for unusual **Address** features.
- **P** for unusual **Packaging**.

Obviously, not all mail with these characteristics will contain hazardous materials. However, mail with one or more of these characteristics must be given extra scrutiny. Handle any parcel with these characteristics as if it contains hazardous materials.

**3. Always ask the hazardous materials question:**

**Does the parcel (item, article) contain anything liquid, fragile, perishable, or potentially hazardous?**

## **Safe Handling of Mail Containing Hazardous Materials**

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To maximize safety for employees, the general public, and transportation networks, Aviation Mail Security (AMS) has developed standard operating procedures for the handling and processing of hazardous materials for facilities that process mail. The procedures are on the AMS Web site. (See attachment 6 for directions to the site.)

# **Releases (Spills and Leaks) from Pieces of Mail: Planning and Response**

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## **Limited Mailability of Hazardous Materials**

The Postal Service accepts for mailing, in limited quantities, potentially hazardous materials that are not outwardly or of their own force dangerous or injurious to life, health, or property. Most of the accepted items are equivalent in potential hazard to DOT "other regulated materials" (ORM-D), consumer commodities.

## **Responding to Suspicious Mail and Unknown Powder or Substances**

A subset of potential emergency releases has become increasingly important since the anthrax attacks of October of 2001. The Postal Service Office of Emergency Preparedness (Emergency Preparedness) maintains the latest policy and procedures, including checklists for managers and supervisors, tabletop exercises, and the latest safety talks and other information related to suspicious mail and unknown powder or substances.

Postal Inspection Service Dangerous Mail Investigation Teams are the primary responders to incidents of suspicious mail and powders or substances. Contact the Inspection Service first. However, if an emergency involving smoke, fumes, vapors, or employees exhibiting medical symptoms arises, evacuate the area and call local emergency responders according to the facility emergency action plan.

If members of an incidental spill and leak team discover a suspicious piece of mail or unknown powders or substances, they should retreat and contact the Inspection Service and first responders.

For more information see the Suspicious Mail Web site. (See attachment 6 for directions to the site.)

## **Response Planning**

Regardless of size, processing plants, distribution plants, and other facilities that frequently handle mailed hazardous materials, must establish the following:

1. Standard operating procedures (SOPs) for dealing with spills and leaks of items in the mail stream or from other sources. At a minimum, the facility SOP must identify personnel (incidental spill and leak teams) who will make early decisions and clean up incidental releases, establish procedures, and provide training, personal protective equipment (PPE), and other resources. Team members are

to be selected from volunteers. If there are insufficient volunteers, then members are designated. (See attachment 1 for guidance in preparing an SOP.)

2. Emergency action plans (EAPs) for dealing with emergency situations, including a section on emergency releases from pieces of mail. The facility EAP must provide emergency telephone numbers and outline shut-down, evacuation, and exit routes. The *Employee and Labor Relations Manual (ELM)* 850, and program guides on the Safety Resources Web site outline procedures for establishing EAPs in accordance with 29 CFR 1910, Subparts E and L, including 29 CFR 1910.38, Emergency Action Plans.

In rare cases, a facility must also have an emergency response plan (ERP), as required by 29 CFR 1910.120, to address hazardous materials emergencies. (The section on “Releases of Hazardous Materials Outside the Mail Stream: Planning and Response,” found on page 7 of this MI provides guidance on when an ERP is required.)

Contact Emergency Preparedness managers for guidance on developing EAPs and facility safety personnel for SOPs and ERPs. SOPs, EAPs, and ERPs must be incorporated into the facility’s integrated emergency management plan (IEMP).

## Cleanup

Postal Service employees assigned to incidental spill and leak teams must clean up *only* substances known to be mailable and not normally expected to exceed OSHA permissible exposure limits (PELs) or pose any other hazard (such as flame, explosion, or radioactivity). Employees must not move, transport, handle, or clean up any suspicious mail or unknown powders or substances and must follow established response procedures, including the following:

- Immediately isolate the area where suspicious mail or unknown powders or substances were found.
- Notify a supervisor or manager, who must contact the Inspection Service.

Employees must not be directed to handle parcels leaking non-mailable hazardous materials or substances that are irritating to the eyes or respiratory tract, smoking or releasing visible vapors, or otherwise suspected of a hazard. Instead, they are to isolate the area, call for local first responders (or the Inspection Service when suspicious mail or unknown powders or substances are involved), and proceed with other actions indicated in the facility EAP.

Members of an emergency response team, established in a few facilities in accordance with OSHA standard 29 CFR 1910.120, may respond to emergencies within the scope of their training. However, they must withdraw and leave further response to outside hazardous materials experts if they discover a hazardous, toxic, radioactive, or explosive material or suspicious mail or unknown powders or substances.

## ***Filing Form 1770, Mail Piece Spill or Leak Incident Report***

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Incident reports must be filed for any incident involving hazardous materials or when a mailed item produces injury, illness, significant property damage, or disruption to operations. Use Form 1770 to report incidents to Safety Performance Management and Aviation Mail Security at Headquarters; a copy must go to the local inspector in charge. Incidents involving suspicious mail and unknown powders or substances must be reported in the Postal Emergency Management System (PEMS). Follow the procedures established by Emergency Preparedness and the Inspection Service for reporting this kind of emergency.

Installation heads must ensure that mailers involved in hazardous materials incidents are contacted promptly. Block E, "Notification and Follow-up Action," on Form 1770 must indicate who was contacted, how contact was made, and the date. Completing this form does not satisfy the requirement to complete Postal Service accident forms and other reports required by federal or state environmental regulations. (See MI AS-550-96-8, *Procedures for Reporting Releases of Hazardous and Regulated Substances to the Environment*.)

## **Required Training**

### **Types of Training (See Attachment 3)**

*All employees* must (1) be trained periodically on the facility EAP and procedures for handling suspicious mail and unknown powders or substances, and (2) receive Handbook EL-812, Hazardous Materials and Spill Response, which discusses facility SOPs.

*Acceptance personnel* must be trained annually on the hazardous materials mailability standards contained in the Domestic Mail Manual and Publication 52, Hazardous, Restricted, and Perishable Mail.

*Mail handlers, supervisors, and other employees who frequently handle packages that may contain hazardous materials* must receive HAZWOPER First Responder — Awareness Level training or its equivalent. This includes training in response procedures for suspicious mail and unknown powders or substances and the awareness procedures covered in the operational handling and processing training described in attachment 3.

*Maintenance and custodial personnel, supervisors, and other persons identified to manage and clean up incidental spills and/or appointed to incidental spill and leak teams* must receive HAZWOPER First Responder — Operations Level training or its equivalent. This includes training in response procedures for suspicious mail and unknown powders or substances applicable to operations-level employees.

*Safety and health personnel* must receive professional-level training in hazardous materials (HAZWOPER Specialist Postal or equivalent), but they do not need certification. The training provides information on suspicious mail, unknown powders or substances, and chemical, biological, and radiological agents.

*Police officers*, according to OSHA regulation, must receive First Responder — Awareness Level training and annual refreshers. The Inspection Service administers this training as well as advanced HAZWOPER training for Postal Service inspectors involved in dangerous mail investigations.

## **Availability of Training and Materials**

All training described in this MI is available through the National Center for Educational Development — onsite or via the Postal Service Training Network (PSTN). (See attachment 3 for content requirements and further information.)

## **Record Keeping**

Supervisors must ensure that all training is documented in the National Training Database.

# **Releases of Hazardous Materials Outside the Mail Stream: Planning and Response**

The Postal Service is required by OSHA, other federal, and some state environmental regulations to plan for and provide appropriate response to an emergency release of hazardous materials outside of the mail stream. Incidental releases may be handled by the incidental spill and leak team using the SOP for incidental releases. This section deals only with emergency release planning and response issues directly affecting employee safety. For other requirements involving the effects of hazardous materials releases on the environment, consult policy and procedures issued by Environmental Management Policy.

In most facilities, employee safety can be assured during a hazardous materials emergency release by (1) including initial actions in a section of the EAP required by 29 CFR 1910.38; and (2) providing the means to notify response personnel and, if necessary, federal and state officials. If a facility has an IEMP, the EAP must be included in the annex for hazardous materials releases. Consult policy and procedures issued by Emergency Preparedness.

Some facilities have special requirements mandated by specific OSHA or Environmental Protection Agency (EPA) regulations. Environmental Management Policy at Headquarters, Area Managers of Environmental Compliance, and Environmental Compliance Specialists have issued

documents addressing compliance with EPA and state environmental regulations. These include MI AS-550-96-8, *Procedures for Reporting Releases of Hazardous Materials and Regulated Substances to the Environment*, and MI AS-550-92-8, *Hazardous Waste Management* (update scheduled for 2006).

## **Resource Conservation and Recovery Act**

EPA's Resource Conservation and Recovery Act (RCRA) regulations require facilities that generate and accumulate hazardous waste on site to comply with contingency planning and emergency response procedures. State environmental agencies may impose more stringent requirements.

### **Conditionally Exempt Small-Quantity Generators**

Facilities generating less than 100 kilograms of hazardous waste per month are conditionally exempt from RCRA contingency planning and response requirements. However, OSHA requires hazard communication training on handling hazardous materials, and the EAP/IEMP should address releases of hazardous waste. Postal Service policy requires the use of properly licensed contractors for hazardous waste remediation.

### **Small-Quantity Generators**

Facilities generating between 100 and 1,000 kilograms of hazardous waste per month must comply with the RCRA standards on emergency response and prevention procedures in 40 CFR 265, Subpart C. However, these facilities are not required to prepare and maintain formal contingency plans. OSHA requires hazard communication training, and the EAP must include the following RCRA-mandated information:

- The facility emergency coordinator's name and telephone number. (This could be the facility manager, emergency management team leader, safety professional, or another official identified in the EAP/IEMP.)
- The location of fire extinguishers, defensive spill control measures, and fire alarms.
- The fire department's telephone number.

### **Large-Quantity Generators**

Facilities generating more than 1,000 kilograms of hazardous waste in a month must comply with all RCRA requirements for planning and response in 40 CFR 265, Subparts C and D, including development of a contingency plan. Facility managers must coordinate preparation of the contingency plan with the EAP/IEMP to ensure that these plans include the information required. The Area Environmental Compliance Specialist and Safety personnel may help the facility manager to develop the plan (either directly or through a contractor). District Emergency

Preparedness Managers can provide guidance on the EAP/IEMP. Under these plans, Postal Service employees will not respond to releases of hazardous waste.

## **Underground Storage Tanks**

When underground storage tanks (USTs) leak, 40 CFR 280 requires response and corrective action. For employee safety and health, the EAP/IEMP must include the following procedures:

1. Determine if there is an immediate fire or health hazard and take appropriate action (e.g., contact the fire department, evacuate affected employees).
2. Notify the facility manager. After that, the facility manager and facilities service office are in charge of all cleanup and reporting activities. They should contact the Area Environmental Compliance Specialist, who can help to determine reporting requirements.
3. Determine if the release presents a continuing health hazard to employees (e.g., gasoline vapors in substructures) and advise management on corrective actions. Consult safety personnel and the Area Environmental Compliance Specialist for technical assistance; contractors may be required.

## **Toxic Substances Control Act**

### **Polychlorinated Biphenyls**

Polychlorinated biphenyl (PCB) transformers and other electrical equipment must be marked in compliance with 40 CFR 761. The EAP/IEMP must describe actions to take in case of fire or explosion involving PCB transformers or other PCB-containing electrical equipment or leaks from transformers. Facility managers, assisted by an emergency response cleanup contractor, must ensure that PCB spills and leaks are cleaned up in accordance with 40 CFR 761. If a spill is released into the environment, Area Environmental Compliance Specialists may help to determine reporting requirements.

### **Asbestos**

OSHA requires compliance with HAZWOPER for asbestos releases (from disturbance of building materials, abatement projects, transportation of waste, and so forth). If such releases occur, only trained experts should respond.

## **The Clean Water Act and the Comprehensive Environmental Response, Compensation, and Liability Act**

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Facilities with an aggregate aboveground oil storage capacity greater than 1,320 gallons or a buried oil storage capacity greater than 42,000 gallons must prepare and implement a Spill Prevention Control and Countermeasure (SPCC) Plan. SPCC Plans ensure that facilities establish containment and other measures to prevent oil spills from reaching navigable waters and to facilitate emergency response measures if a release occurs (see 40 CFR 110 and 112). Facility managers must ensure that these plans comply with the EAP/IEMP. The Area Environmental Compliance Specialist may help the facility manager to develop the plan (either directly or through a contractor).

The facility manager is responsible for responding to releases of oil or hazardous substances as defined in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), with assistance from the Area Environmental Compliance Specialist and emergency response cleanup contractor, if necessary (see 40 CFR 300). Safety personnel participate to ensure that Postal Service employees are protected and informed of potential health risks.

## **Program Responsibilities**

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### **Headquarters**

Safety and Environmental Performance Management (SEPM) coordinates and establishes policy relating to Postal Service employee handling of and safe response to hazardous materials releases. SEPM and Aviation Mail Security (AMS) receive reports of hazardous materials incidents involving mailed items (on PS Form 1770) and coordinate with Headquarters, area, district, and plant offices to prevent future occurrences. SEPM also coordinates with Mailing Standards, which has primary responsibility for determining the mailability of hazardous materials.

AMS establishes policies and procedures to ensure proper acceptance, handling, and transportation of hazardous materials to prevent releases from pieces of mail.

Emergency Preparedness establishes policies and procedures for planning and responding to all kinds of emergencies in accordance with the National Response Plan and National Incident Management System.

## **Areas**

Area Safety Managers, in conjunction with Area Managers, Emergency Preparedness, evaluate facility level hazardous materials spill and leak SOPs, ERPs within the scope of HAZWOPER, and EAPs required by 29 CFR 1910.38.

Area Environmental Compliance Specialists provide assistance and guidance on emergency release response plans, hazardous material disposal and remediation, and release-reporting requirements within the scope of environmental regulations.

## **Districts and Plants**

Facility managers are responsible for establishing incidental release SOPs, EAPs, and, as appropriate, ERPs.

Safety Managers develop incidental release spill and leak SOPs and coordinate with Emergency Preparedness managers to develop the IEMP, EAP, and other response plans (HAZWOPER) as needed. They coordinate with Area Environmental Compliance Specialists for technical assistance on environmental regulations as needed.

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# Attachment 1

## Standard Operating Procedures for Cleaning Up Incidental Releases

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Each facility must develop a standard operating procedure (SOP) tailored to its resources and needs. The SOP is a subset of the emergency action plan (see attachment 2). Facilities electing to comply with HAZWOPER must establish emergency response plans and teams in accordance with the regulation.

This attachment describes procedures for responding to incidental releases.

1. *Incidental Spill and Leak Teams.* These teams are made up of employees designated to manage the handling of incidental releases (spills and leaks) of hazardous materials in the mail and elsewhere. Team leaders, supervisors, and other personnel are trained to handle incidental releases and follow these steps:
  - a. Try to identify the spilled material and determine if it can be handled by Postal Service personnel.
  - b. Decide on cleanup and disposal measures for materials that can be safely handled by Postal Service employees.
  - c. If Postal Service personnel can manage the incidental release, identify appropriate PPE.
  - d. If the material is hazardous and constitutes an emergency release, initiate the facility EAP (evacuate, call fire department, and so forth.)
  - e. If the incident involves suspicious mail and unknown powders or substances, follow the procedures in the Poster, *Immediate Response Actions — Suspicious Mail and Unknown Powders or Substances.* (Attachment 6 provides instructions for obtaining this poster.)
3. *Incidental Versus Emergency Releases.* Members of Incidental Spill and Leak Teams must follow procedures and wear PPE if necessary. If at any point during discovery, cleanup, or disposal, they suspect or encounter an emergency release or hazardous condition, they must isolate the parcel, take protective actions, and contact management to initiate the EAP and other plans as necessary.

For 24/7 assistance, consult the following:

- a. *Suspicious Mail Response Checklist.* (Attachment 6 provides instructions for obtaining this checklist.)

- b. CHEMTREC (The Chemical Transportation Emergency Center), dedicated to helping emergency responders deal with incidents involving hazardous materials. Call the CHEMTREC hotline, 800-424-9320, for assistance.
  - c. National Center for Injury Prevention and Control, Centers for Disease Control and Prevention (CDC); toll-free telephone number, 800-222-1222; on the Web at <http://www.cdc.gov/ncipc>.
  - d. First responders and other local resources.
4. *References for Identification and Cleanup.* Resources for identifying properties of hazardous materials and precautions to be taken must be available at a designated location and may include:
- a. *NIOSH Pocket Guide to Chemical Hazards*, NIOSH Publication no. 2005-149, September 2005 (available at <http://www.cdc.gov/niosh/hpg>).
  - b. *Emergency Response Guidebook*, ERG2004, Department of Transportation (for further information, see <http://hazmat.dot.gov/pubs/erg/guidebook.htm>).
  - c. *Hazardous Materials Cleanup*: Student Handbook from PEDC Course 21511–08 for HAZWOPER First Responder — Operations course.
  - d. Facility SOP and EAP.
  - e. Suspicious Mail Web site (see attachment 6).
5. *PPE Suitable for Incidental Release Response.* PPE must be stored in a secure location and cleaned, restocked, or both after each use. PPE must be selected based on the material to be cleaned up. At a minimum, PPE must include:
- a. Chemical splash, face shield, and goggles.
  - b. Neoprene gloves or equivalent that provide forearm protection.
  - c. Rubber boots or equivalent.
  - d. Neoprene full-length apron or equivalent.

In addition, persons who frequently handle mailed medical wastes and specimens must be given Nitrile® gloves or their equivalent.

Postal Service policy is to protect employees by avoiding inhalation hazards whenever feasible instead of relying on respirators for protection. Respirators such as self-contained breathing apparatus (SCBA) systems are neither permitted nor necessary for incidental spills, unless the facility has established response plans under HAZWOPER.

If a facility respiratory protection program is in place, air purifying respirators may be provided. The SOP must clearly state that retreat is required if there is any indication of a respiratory hazard or immediate danger to life and health.

6. *Cleanup Materials, Containers, and Spill Tubs.* A supply of cleanup materials must be available to absorb, decontaminate, and assist in disposal of incidental releases of mailable hazardous materials. This must include:
  - a. Commercial, non-organic, shop drying agents, sand, and vermiculite.
  - b. Spill cleanup materials such as Solusorb, Speedi Dri, and spill control pillows available from spill cleanup vendors.
  - c. Broom, dustpan, shovel, spill control tubs, plastic bags, and other containers.
  - d. Household bleach, paper towels, and medical waste bags for handling specimen spills and leaks (see MI EL-810-2000-2).
  - e. A HAZMAT handling and storage area with local exhaust ventilation and eye lavage and shower.
7. *Washing Facilities.* An eye lavage and safety shower must be located close to the rewrap operation or where leaking containers from incidental releases are frequently handled (such as the HAZMAT room).
8. *Storage and Ventilation.* A HAZMAT room or area must be designated for handling and temporary storage of leaking parcels (from incidental releases). The area must have local exhaust ventilation (such as a laboratory hood) and storage facilities that meet National Fire Protection Association codes.

**Do not** store or contain suspicious mail and unknown powders or substances in the HAZMAT area. Never move suspicious mail and unknown powders or substances until the incident is cleared by the Inspection Service or a competent authority such as a HAZMAT first responder. Follow the procedures outlined in the Poster, *Immediate Response Actions — Suspicious Mail and Unknown Powders or Substances*. (Attachment 6 provides instructions for obtaining this poster.)

9. *Clearly Defined HAZMAT Response Procedures.* HAZMAT procedures must be set up with clearly defined guidelines for employees handling the mail, supervisors, and designated cleanup persons, as follows:
  - a. *Employees.* Persons handling mailed items must be apprised (through awareness training) of the facility SOP and EAP and follow these procedures:
    - When an employee discovers a leaking parcel, he or she must (1) isolate the package; (2) shut down mechanization, if applicable; (3) summon the supervisor or persons identified in the SOP; and (4) have no further contact with the package. If the employee comes in contact with the material, he or she must immediately wash up and seek medical attention.
    - When a package in a delivery vehicle leaks, the employee must isolate it if it is safe to do so. If there is any indication of a hazard (such as labeling, odor, smoke, or eye irritation), the employee must (1) park the vehicle in a safe location; (2) notify the supervisor and fire department; and (3) have no further contact with the package.
  - b. *Supervisors.* Supervisors must be trained to follow procedures in the facility SOP and EAP and do the following:
    - When notified of a leaking parcel, contact the identified cleanup persons and make sure the parcel is isolated and the immediate area cleared.
    - If a hazard (emergency release) is immediately apparent, follow the facility EAP.
  - c. *Incidental Spill and Leak Team Personnel.* Persons assigned to deal with incidental releases (volunteers unless none are available) must do the following:
    - Determine if the material is obviously hazardous and/or constitutes an emergency release (smoking, irritating, odorous, or labeled or marked as hazardous).
      - If so, follow the facility EAP.
      - If the material is mailable and can be safely handled, select PPE and cleanup methods and equipment. Place the package in a spill control tub or other container and transfer it to the HAZMAT holding or rewrap areas for further examination or rewrap.
      - Do not place the leaking package or letter back into the mail stream. Contact the mailer or addressee to pick up the item.

- Consult Area Environmental Compliance Specialists for guidance on disposal of hazardous wastes and reporting requirements.
10. *Documentation of Training Activities.* Training of employees based on the requirements of this MI must be documented in the National Training Database.
  11. *Periodic Program Review.* Safety, emergency preparedness, maintenance, and operations personnel are required to review this program periodically.

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## **Attachment 2**

### **Emergency Action Plan: Hazardous Materials Emergency Releases**

Emergency action plans (EAPs) cover a wide variety of potential emergencies (natural and manmade). 29 CFR 1910, Subparts E and L, and 29 CFR 1910.38 require EAPs to define the actions management and employees must take to ensure employee safety.

The EAP must tell employees what to do if a hazardous materials emergency release occurs in the mail stream or during other operations and must include the following information about hazardous materials incidents:

1. Telephone numbers of HAZMAT experts and the local first responders to be called in cases of emergency release. Prior coordination with the fire department is required.
2. Emergency evacuation procedures, emergency exit assignments, and places of refuge.
3. Procedures to be followed by employees who remain in the area to handle critical plant operations before evacuating, including shutting down mechanization and air handling equipment.
4. Procedures to account for all employees after an emergency evacuation.
5. Provisions for first aid, rescue, and medical follow-up.

### **Emergency Action Plan Compliance**

Safety managers; managers, emergency preparedness, and operations managers must review the EAP (1) for conformance with 29 CFR 1910.38 and Postal Service emergency preparedness policy, and (2) to ensure that it is implemented and reviewed periodically.

Consult the Safety Resources Web site for details on EAPs. (Attachment 6 provides directions to the site.)

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## **Attachment 3**

### **HAZWOPER Training Requirements for Postal Service Employees**

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In addition to the courses described here, Aviation Mail Security offers HAZMAT courses to help employees understand safe acceptance, handling, and transport of hazardous materials so they can prevent accidental releases. (For further information see the AMS Web site; directions are provided in attachment 6.)

#### **I. First Responder — Awareness Level** (or equivalent)

##### ***Required of:***

- Mail handlers
- Supervisors
- Other employees who frequently handle packages that may contain hazardous materials

##### ***Duration***

No set duration. May be included in employee orientation and hazard communication sessions.

##### ***Subject Matter***

OSHA requires first responders to have:

1. An understanding of hazardous materials, including the general categories of hazardous materials accepted into the mail stream.
2. An understanding that hazardous materials incidents can result in injury, damage to equipment, or damage to mail if not properly handled.
3. The ability to (a) identify an emergency release; (b) look for labels, placards, and addresses that may indicate the presence of HAZ-MAT; and (c) avoid contact with packages that are leaking, smoking, or irritating to eyes or respiratory tract.
4. Familiarity with the facility incidental release SOP (such as whom to call, when to isolate an area, and other elements of the EAP).
5. Familiarity with recognition and response procedures for dealing with suspicious mail and unknown powders or substances.

#### **II. First Responder — Operations Level** (or equivalent)

##### ***Required of:***

- Maintenance and custodial personnel
- Supervisors

- Other persons identified to manage and clean up incidental releases (incidental spill and leak team members).

**Duration**

8 hours

**Subject Matter**

In addition to the topics covered in the First Responder — Awareness Level course, training in the following:

1. Basic hazard and risk assessment techniques.
2. Selecting and using PPE for limited cleanup duties.
3. Basic HAZMAT terms.
4. Understanding the facility SOP and EAP.
5. How to respond to suspicious mail and unknown powders or substances.

**III. HAZWOPER Specialist Postal Equivalent**

**Recommended for:**

- Safety and health personnel.
- Emergency Preparedness Managers.
- Maintenance managers and supervisors.

**Duration**

24 hours

**Subject Matter**

In addition to topics covered in the First Responder — Awareness Level and Operations Level courses, personnel should be able to:

1. Classify, identify, and verify known and unknown materials.
2. Perform specialized control, containment, and confinement operations.
3. Assess the risks and hazards of a release.
4. Contain a release safely and defensively.
5. Contact appropriate response personnel when necessary.
6. Evaluate chemical and physical hazards in order to distinguish between incidental and emergency releases.
7. Understand procedures for responding to incidents involving suspicious mail and unknown powders or substances.

**HAZWOPER Courses available through the National Center for Educational Development (NCED)**

**HAZWOPER First Responder — Awareness Level (initial and refresher)**

Field      Course No. 1950141

**HAZWOPER First Responder — Operations Level**

Field Course No. 1968305  
PSTN Course No. 19L8104  
Partner Course No. 1960118

**HAZWOPER First Responder — Operations Refresher**

Field Course No. 1960104  
PSTN Course No. 1968321  
Partner Course No. 1960110

**HAZWOPER Specialist Postal Equivalent**

Field Course No. 1968314  
Partner Course No. 1960145  
At NCED Course No. 1960119

**HAZWOPER Specialist Postal Equivalent Refresher**

Field Course No. 1968320  
PSTN Course No. 19L0107

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# Attachment 4

## Definitions

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### Postal Service Definition

**Hazardous material** is any article or substance designated by the U.S. Department of Transportation (DOT) as being capable of posing an unreasonable risk to health, safety, and property during transportation. In international commerce, hazardous materials are known as “dangerous goods.” —Domestic Mail Manual

### Occupational Safety and Health Administration Definitions

*Hazardous substance* means any substance designated or listed under [A] through [D] of this definition, exposure to which results or may result in adverse effects on the health or safety of employees:

- [A] Any substance defined under section 101(14) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA);
- [B] Any biologic agent and other disease-causing agent which after release into the environment and upon exposure, ingestion, inhalation, or assimilation into any person, either directly from the environment or indirectly by ingestion through food chains, will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations in such persons or their offspring;
- [C] Any substance listed by the U.S. Department of Transportation as hazardous materials under 49 CFR 172.101 and appendices; and
- [D] Hazardous waste as herein defined.

### Hazardous waste means:

- [A] A waste or combination of wastes as defined in 40 CFR 261.3, or
- [B] Those substances defined as hazardous wastes in 49 CFR 171.8.

*Emergency Release.* There are releases of hazardous substances that pose a sufficient threat to health and safety that, by their very nature, require an emergency response regardless of the circumstances surrounding the release or the mitigating factors. Examples include:

- The release requires evacuation of employees in the area;
- The release poses, or has the potential to pose, conditions that are immediately dangerous to life and health (IDLH);
- The release poses a serious threat of fire or explosion (exceeds or has the potential to exceed the lower explosive limit or lower flammable limit);

- The release requires immediate attention because of imminent danger;
- The release may cause high levels of exposure to toxic substances;
- There is uncertainty that the employee in the work area can handle the severity of the hazard with the Personal Protective Equipment (PPE) and equipment that has been provided and the exposure limit could easily be exceeded; and
- The situation is unclear, or data are lacking on important factors.

*Incidental Release.* An incidental release is a release of a hazardous substance which does not pose a significant safety or health hazard to employees in the immediate vicinity or to the employee cleaning it up, nor does it have the potential to become an emergency within a short time frame. Incidental releases are limited in quantity, exposure potential, or toxicity and present minor safety or health hazards to employees in the immediate work area or those assigned to clean them up.

*Emergency response or responding to emergencies* means a response effort by employees from outside the immediate release area or by other designated responders (i.e., mutual aid groups, local fire departments, etc.) to an occurrence which results, or is likely to result, in an uncontrolled release of a hazardous substance. Responses to incidental releases of hazardous substances where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area, or by maintenance personnel are not considered to be emergency responses within the scope of this standard. Responses to releases of hazardous substances where there is no potential safety or health hazard (i.e., fire, explosion, or chemical exposure) are not considered to be emergency responses.

# Attachment 5

## Acronyms

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AMS	Aviation Mail Security
CDC	Centers for Disease Control
CFR	Code of Federal Regulations
DMM	<i>Domestic Mail Manual</i>
DOT	Department of Transportation
EAP	Emergency Action Plan
ERP	emergency response plan
ELM	<i>Employee and Labor Relations Manual</i>
HAZMAT	hazardous materials
HAZWOPER	Hazardous Waste Operations and Emergency Response
IDLH	immediately dangerous to life and health
IEMP	Integrated Emergency Management Plan
MI	Management Instruction
NCED	National Center for Educational Development
NCP	National Oil and Hazardous Substances Pollution Contingency Plan (EPA)
NFPA	National Fire Protection Association
NIOSH	National Institute for Occupational Safety and Health
ORM-D	other regulated materials
RCRA	Resource Conservation and Recovery Act
OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyl
PEDC	Postal Employee Development Center
PEL	permissible exposure limit (OSHA)
PEMS	Postal Emergency Management System
PPE	personal protective equipment
PSTN	Postal Service Training Network
SCBA	self-contained breathing apparatus
SLAP	Shape, Look, Address, Packaging
SOP	standard operating procedure
SPCC	Spill Prevention Control and Countermeasure (EPA)
UST	underground storage tank

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# **Attachment 6**

## **References**

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This is a guide to reference materials mentioned in this MI, especially online sources. The list begins with the Code of Federal Regulations, followed by the Postal Service resources. (CHEMTREC, NIOSH, DOT, and CDC resources are listed in attachment 1.)

### **Code of Federal Regulations**

The Code of Federal Regulations (CFR) is the codification of the general and permanent rules published in the *Federal Register* by the executive departments and agencies of the federal government. The CFR can be searched online at <http://www.gpoaccess.gov/cfr/>.

Federal regulations that involve OSHA can also be found at <http://www.osha.gov>. In the left column, under “Laws and Standards,” click on *Standards*. This will take you to regulations in the 29 CFR series.

The number before “CFR” is the title; the numbers following “CFR” stand for chapters and sections. The titles, chapters, and sections cited in this MI are:

29 CFR 1910, Subpart E, Means of Egress; Subpart L, Fire Protection

29 CFR 1910.38, Emergency Action Plans

29 CFR 1910.120, Hazardous Waste Operations and Emergency Response (HAZWOPER)

40 CFR 110.63, National Emission Standards for Hazardous Air Pollutants for Source Categories

40 CFR 112, Oil Pollution Prevention and Response; Non-Transportation-Related Onshore and Offshore Facilities; Final Rule

40 CFR 265, Subpart C, Preparedness and Prevention; Subpart D, Contingency Plan and Emergency Procedures

40 CFR 280, Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks

40 CFR 300, National Oil and Hazardous Substances Pollution Contingency Plan

40 CFR 761, Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions

## **Postal Service**

### **Safety Resources and the Safety Toolkit**

The Safety Resources page on the Postal Service Intranet is your portal to information and tools for safety management. Go to <http://blue.usps.gov>. In the left column, under “Essential Links,” click on *Safety Resources*. You will find links to information on safety program management, accident reduction, emergency evacuation, and frequently used documents.

The *Safety Toolkit* is an online, interactive management tool for safety personnel, who use the toolkit to record and track facility inspections, Program Evaluation Guides, and OSHA citations. To reach the toolkit from the Safety Resources page, click on *Toolkit Information* found in the left column. To use the Safety Toolkit you must set up an account with a password (available only to safety personnel). Instructions are on the Safety Toolkit Web site.

### **PolicyNet**

The following publications are available online at the *PolicyNet* Web site: <http://blue.usps.gov/cpim>:

*Domestic Mail Manual (DMM)*

*Employee and Labor Relations Manual (ELM)*

MI AS-550-92-8, *Hazardous Waste Management* (update scheduled for 2006)

MI AS-550-96-8, *Procedures for Reporting Releases of Hazardous and Regulated Substances to the Environment*

MI EL-810-2000-2, *Bloodborne Disease Exposure Control Plans*

HBK EL-812, *Hazardous Materials and Spill Response*

PS Form 1770, *Mail Piece Spill or Leak Incident Report*

PUB 52, *Hazardous, Restricted, and Perishable Mail*

### **Emergency Preparedness and Suspicious Mail**

For up-to-date information, consult the Emergency Preparedness Suspicious Mail Web site. From <http://blue.usps.gov>, click on *Inside USPS*, then *Emergency Preparedness*, then *Suspicious Mail*. At the Suspicious Mail Web site, you will be able to

- Select PEMS, the *Postal Emergency Management System*.
- Download *Suspicious Mail and Unknown Powders and Substances*.
- Download the Poster, *Immediate Response Actions — Suspicious Mail and Unknown Powders or Substances*.

## **Aviation Mail Security**

From <http://blue.usps.gov>, click on *Inside USPS*, then *Network Operations Management*, then, *Aviation Mail Security*. At that site you will find *Retail Hazardous Materials Acceptance and Handling and Processing of Hazardous Materials*.

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