

Hazardous Materials and Spill Response

Handbook EL-812
October 2017

**U.S. Postal Service
Safety and OSHA Compliance Programs
Employee Resource Management
Washington, DC 20260-4201**

The following trademarks appear in this handbook and are among the many trademarks owned by the United States Postal Service®:

Business Reply Mail®, First-Class Mail®, First-Class Package Service®, IMM®, Priority Mail®, Priority Mail Express®.

This is not a comprehensive list of all Postal Service™ trademarks.

Contents

1	Introduction.....	1
2	Title 18.....	3
3	Postal Service Regulations	5
4	Hazardous Materials and the Postal Service.....	7
41	What Are Hazardous Materials?	7
42	Hazardous Chemical Characteristics	8
43	Hazardous Chemicals Found at Postal Service Facilities	9
44	Division 6.2, Biological Materials and Infectious Substances Found at Postal Service Facilities	10
5	Recognition and Handling	11
51	Hazardous Chemicals Recognition.....	11
511	Hazardous Chemicals used in Postal Service Operations	11
512	HAZMAT in the Mail Stream	13
513	Characteristics of Suspicious Mail	14
514	HAZMAT Labels	15
515	Safe Handling of Mail Containing Hazardous Materials	17
6	Hazardous Materials Accepted for Mailing	19
61	General	19
62	Packaging, Labeling, and Shipper's Declaration	20
621	General	20
622	Packaging Requirements	20
623	Labeling Requirements	21
624	Shipper's Declaration Requirements	21
625	Tag 44 Requirements	21
7	Response to Hazardous Material Incidents and Emergencies	23
71	OSHA Regulations That Cover Hazardous Materials	23
711	General	23
712	Hazard Communication	23
713	Hazardous Waste Operations and Emergency Response	23
714	Occupational Exposure to Bloodborne Pathogens.....	24

72	What is a Hazardous Material Release?	24
73	Who May Respond to Hazardous Material Releases?	26
74	What Emergency Response Procedures to Follow	27
741	General	27
742	HAZWOPER First Responder Awareness Level	27
743	HAZWOPER First Responder Operations Level	28
744	HAZWOPER Specialist Postal.	28
745	Incidental and Emergency Release Procedures	28
75	Site-Specific Emergency Response Procedures	29
751	General	29
76	Hazardous Materials Incident Reports	31
77	Reporting a Release to the Environment	31
Appendix A — Existing Policy, References, and Resources		33
Appendix B — HAZMAT Course Information		35
Appendix C — HAZWOPER Course Information		37
Appendix D — HAZMAT Posters and Brochure		39

1 Introduction

This handbook outlines the procedures for the following:

- Properly handling hazardous materials (HAZMAT) in U.S. Postal Service facilities and in the mail stream, and
- The appropriate response to releases of these materials.

It is an educational and safety tool for employees to use in conjunction with approved guidelines.

In the event of a hazardous material release, it is important that trained personnel be able to quickly assess and determine whether an *incidental* or *emergency release* is occurring. The two categories of releases require different response procedures. See Chapter [7](#) for further information on this topic.

The Aviation Mail Security Group of the Postal Inspection Service has developed Standard Operating Procedures (SOPs) for the handling and processing of hazardous materials, including HAZMAT training (see Appendix [B](#)). Once a spill or leak has occurred, portions of the Occupational Safety and Health Administration's Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations apply. There are three levels of HAZWOPER training:

- Awareness.
- Operations.
- HAZWOPER Specialist, Postal.

For more information on HAZWOPER training, see Appendix [C](#). Employees who have not completed HAZWOPER training at either the Awareness or Operations level must not participate in the response to a hazardous material release.

Employees who notice a leaking mailpiece must immediately notify their supervisor that a potential hazardous material release has occurred.

- If the leak involves suspicious mail or an unknown powder or substance, do not touch or handle it.
- Immediately clear the area of people to isolate the spill.

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 issued special policies and procedures for dealing with such incidents. Every employee must be familiar with the following:

- Poster 205-A or -B, *Suspicious Mail and Unknown Powders or Substances*.
- Publication 167-B, *Response Checklist for Suspicious Mail and Unknown Powders or Substances*.

See Appendix [D](#) for information on where to locate these materials.

Employees must contact their supervisor regarding facility plans for dealing with suspicious mail and unknown powders or substances. HAZWOPER Operations-level First Responder training also addresses these types of incidents. When in doubt, always check with one of the following:

- A supervisor.
- HAZWOPER Operations-level First Responder.
- Plant or district safety specialist.

Play it safe and err on the side of caution.

2 Title 18

It is a federal crime, punishable by fines and imprisonment, to place in the mails any “...natural or artificial article, compositions, or material which may kill or injure another, or injure the mails or other property...” [18 U.S.C. Section 1716(a)].

This statute allows the Postal Service to permit the mailing of small amounts of some hazardous materials under regulations that prescribe conditions of preparation and packaging [18 U.S.C. Section 1716(b)]. See the following documents for details:

- Publication 52, *Hazardous, Restricted, and Perishable Mail*.
- *The Mailing Standards of the United States Postal Service*, International Mail Manual (IMM).

This page intentionally left blank

3 Postal Service Regulations

The Postal Service permits mailers to mail some hazardous materials and otherwise restricted or perishable matter when mailers meet Postal Service requirements, specified in Publication 52. For international mailings, the mailer must reference the IMM also.

Generally, the Postal Service classifies the materials permitted for mailing as the following:

- Consumer Commodity or Mailable Limited Quantity. These must be in a quantity and form that present little hazard to life, health, or property when handled properly.
- ORM-D (other regulated material) classified materials can also be mailable. However, this category is restricted to surface mail only and will be eliminated in 2021.

Mandatory mailing requirements include the following:

- Quantity and concentration limitations.
- Specific packaging, labeling, and declaration procedures.
- Limitations on mail class of service permitted.

The Postal Service considers any mailpiece not meeting all of these requirements as nonmailable.

This page intentionally left blank

4 Hazardous Materials and the Postal Service

41 What Are Hazardous Materials?

According to Publication 52, a 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. The provisions concerning hazardous material include mailability restrictions and instructions for the following:

- a. Explosives.
- b. Gases.
- c. Flammable and combustible liquids.
- d. Flammable solids.
- e. Organic substances, organic peroxides.
- f. Toxic substances and infectious substances.
- g. Radioactive material.
- h. Corrosives.
- i. Miscellaneous.

Hazardous materials may pose risks to the safety and health of Postal Service employees if the employees do not handle or use them appropriately.

- Some Postal Service operations, such as maintenance work, involve the use of small quantities of hazardous materials.
- Certain limited types and amounts of hazardous materials and infectious biological substances are mailable, and employees may find them in the Postal Service mail stream.

42 Hazardous Chemical Characteristics

The following characterize hazardous:

- Flammability,
- Corrosivity,
- Reactivity, or
- Toxicity.

Some materials may exhibit more than one of these characteristics.

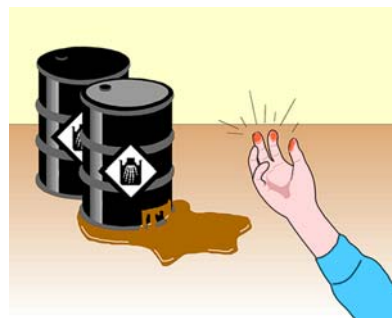
Flammable Materials have the following characteristics:

- Can burn, explode, or both.
- Include liquids with low flash points (below 140° F), flammable solids, flammable compressed gases, and oxidizers.
- Can spread to areas containing combustible materials.
- Examples: lighter fluid, highway flares, aerosol paint, and gasoline.



Corrosive Materials have the following characteristics:

- Can eat through containers and combine with other chemicals.
- Can burn skin and eyes on contact.
- Can appear harmless until contact produces harmful effect.
- Examples: caustic soda, hydrochloric acid, drain cleaner, and mercury (corrosive to aluminum).



Reactive Materials have the following characteristics:

- Can explode, ignite, or produce toxic vapors when exposed to air, water, or other materials.
- Can create hazards much more severe than the materials themselves.
- Can take a long time for a reaction to develop.
- Examples: sodium nitrate, chlorine, and ammonia.



Toxic Materials have the following characteristics:

- Can enter the body through inhalation, ingestion, skin absorption, or injection.
- Include poisons that may create acute or chronic health effects (acute effects are immediate and short term; chronic effects develop over time and are long term).
- Examples: lead, asbestos, chlorine, pesticides, herbicides, and mercury.



43 Hazardous Chemicals Found at Postal Service Facilities

Employees use a variety of hazardous chemicals in daily Postal Service activities and operations or can find them at typical Postal Service facilities. Some hazardous chemicals and their uses at Postal Service facilities include the following:

- Acetylene — welding and cutting equipment.
- Gasoline, diesel, and other oils — motor vehicles and motorized equipment.
- Bleach — cleaning.
- Paint and thinner — painting.
- Ammonia — cleaning.
- Inks — cancellation and printing.
- Insecticides — pest control.
- Caustics — janitorial supplies.
- Isopropyl Alcohol — removal of coating ink.
- Hazardous wastes — from the above operations.
- Polychlorinated Biphenyls (PCBs) and asbestos — transformers and insulating materials.
- Lead — water supplies and paint.
- Mercury — fluorescent lights.

In some instances, the use of these hazardous materials generates hazardous and regulated wastes. Postal Service sites that generate hazardous and regulated wastes are subject to strict management and disposal standards.

The Postal Service is actively reducing the presence and use of hazardous materials in the workplace through a variety of pollution prevention initiatives. This includes the designation of Targeted Chemicals, which are specific chemicals targeted for elimination by the Postal Service. For more

information on Targeted Chemicals, pollution prevention, and hazardous and regulated waste management, do any of the following:

- Contact your supervisor.
- Go to the [Sustainability/Environmental website](#) on Blue.

44 Division 6.2, Biological Materials and Infectious Substances Found at Postal Service Facilities

Employees may encounter Division 6.2 substances at Postal Service facilities and within operations. Division 6.2 materials include the following:

- Infectious substances.
- Biological products.
- Regulated medical waste.
- Sharps medical waste.
- Used health care products.
- Forensic materials.

An infectious substance is a material known to contain or suspected of containing a pathogen. A pathogen is a virus or microorganism or an infectious particle (prion) that has the potential to cause disease in humans or animals. Bloodborne pathogens (BBP) are the disease-causing agents found in some infectious substances.

The ability to cause infection and disease characterizes infectious substances (also known as etiologic agents). For packaging and labeling purposes, the Postal Service does not consider a biological material “not known” or “not reasonably believed” to contain an etiologic agent as an infectious substance. However, requirements under Publication 52, 346, may subject these biological materials to the following:

- Quantity limitations.
- Packaging and marking requirements.

Infectious substances must be assigned to either Category A or Category B as appropriate.

- A substance is defined as a Category A infectious substance if the biological material is transported in a form capable of causing permanent disability or life threatening or fatal disease in otherwise healthy humans or animals when exposure occurs. **All Category A materials are nonmailable. This includes all materials classified under UN2814 or UN2900.** See IMM 135.11a for more information.
- Category B covers all infectious substances not meeting the definition of Category A. The Postal Service permits Category B infectious substances with a proper shipping name “Biological Substance, Category B” (UN3373) in the mail only when a mailer prepares them according to Publication 52, 346, and the applicable packaging instruction.

5 Recognition and Handling

51 Hazardous Chemicals Recognition

511 Hazardous Chemicals used in Postal Service Operations

You can identify hazardous chemicals, a subset of hazardous materials, by the labels affixed to their container. Labels are generally the first source of information about chemical or biological hazards. They must be affixed to bags, bottles, boxes, drums, and all other chemical containers except those used to transfer chemicals. Labels for containers containing *hazardous chemicals* must include the following:

- The name, address, and telephone number of one of the following:
 - The chemical manufacturer.
 - Importer.
 - Other responsible party.
- Product identifier (chemical name, code number, or batch number).
- Signal word (e.g., “Danger” or “Warning”).
- Hazard statement(s) (e.g., “Harmful if Swallowed”).
- Precautionary statement(s) (e.g., “Keep away from heat”).
- Pictogram(s) – see [Figure 1](#) for Pictograms and their associated hazard(s).

Figure 1
Pictograms and Hazards

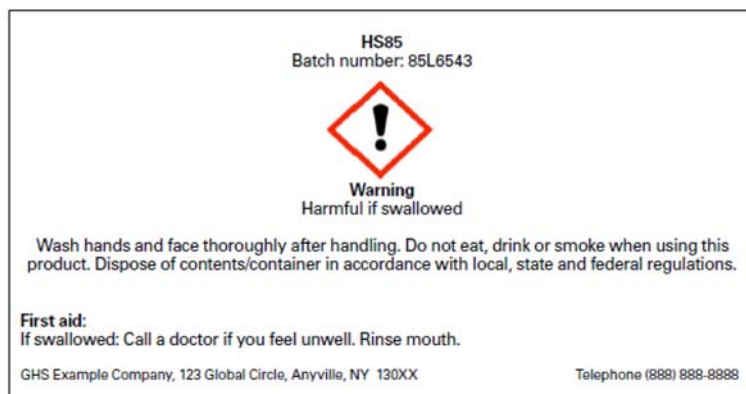
Health Hazard	Flame	Exclamation Mark
		
■ Carcinogen ■ Mutagenicity ■ Reproductive Toxicity ■ Respiratory Sensitizer ■ Target Organ Toxicity ■ Aspiration Toxicity	■ Flammables ■ Pyrophorics ■ Self-Heating ■ Emits Flammable Gas ■ Self-Reactives ■ Organic Peroxides	■ Irritant (Skin and Eye) ■ Skin Sensitizer ■ Acute Toxicity (Harmful) ■ Narcotic Effects ■ Respiratory Tract Irritant ■ Hazardous to Ozone Layer (Non-Mandatory)

Gas Cylinder 	Corrosion 	Exploding Bomb 
■ Gases under Pressure	■ Skin Corrosion/ Burns ■ Eye Damage ■ Corrosive to Metals	■ Explosives ■ Self-Reactives ■ Organic Peroxides
Flame over Circle 	Environment (Non Mandatory) 	Skull and Crossbones 
■ Oxidizers	■ Aquatic Toxicity	■ Acute Toxicity (fatal or toxic)

You can use the name and product identifier on the label to find the corresponding safety data sheet (SDS), which will provide more information about the chemical. In addition, the appropriate hazard statements provide information about potential dangers associated with the chemical. Labels for containers containing known infectious substances must bear the Class 6.2 Infectious Substance label (see Publication 52, 346.12, for information on mailability of items with the Class 6.2 label).

[Figure 2](#) provides an example of a product label. In addition, Poster 298 contains common DOT hazard warning labels, showing which items the Postal Service prohibits in the mail and those that are potentially mailable.

Figure 2



512 HAZMAT in the Mail Stream

512.1 Declared HAZMAT

Declared HAZMAT is mail that contains HAZMAT that the mailer has packaged, marked, and declared properly and the Postal Service has accepted properly in accordance with Publication 52 and the International Mail Manual.

- Mailers must identify mailpieces containing HAZMAT with appropriate hazard warnings, labels, or markings placed on the outer packaging.
- The mailer must display all labels and markings exactly as specified in Postal Service regulations. These labels and markings may include the following:
 - “Magnetized Material.”
 - “Dry ice.”
 - “ORM-D.”
 - “DOT-approved Square-on-Point.”
 - Other markings as shown in Publication 52, 325.2 and 325.3.

The Postal Service only permits declared HAZMAT meeting all Postal Service requirements in the mail stream.

512.2 Undeclared HAZMAT

Undeclared HAZMAT is any parcel suspected of containing acceptable or prohibited HAZMAT, as described in the IMM and Publication 52, which the mailer has not properly labeled or identified as such. Employees may recognize mail, especially parcels, containing undeclared HAZMAT by the following characteristics:

- Sound of broken glass or plastic.
- Stains, leaks, or unusual odor.
- Delivery or return address information (e.g., chemical company, laboratory, medical facility).
- Preprinted markings on the box (e.g., aerosol, hair spray, bleach).
- Manufacturer’s name (i.e., Joe’s Chemicals, Butane Lighters ‘R Us).
- A shifting weight or liquid sound.
- Wrapped in tape or plastic.
- Prohibited DOT labels and markings.

Not all mail with these characteristics contains HAZMAT. However, employees must give mail with one or more of these characteristics extra scrutiny. If you cannot determine otherwise, you must handle parcels bearing these characteristics as though they contain HAZMAT.

While acceptance personnel are responsible for preventing undeclared HAZMAT from entering the mail stream, nonmailable parcels are sometimes erroneously accepted. All employees share the responsibility to look for and remove suspected undeclared HAZMAT from the mail stream. Employees must not assume that because a mailpiece was accepted it meets all requirements.

Employees suspecting that a mailpiece contains undeclared HAZMAT must do the following:

- Handle that item as though it contains HAZMAT.
- Immediately notify their supervisor.

Most mailpieces required to bear a DOT diamond shaped class label (except those listed as mailable in Publication 52, 325.2 and 325.3) are **nonmailable**. If an employee finds a parcel bearing any of these prohibited labels in the mail stream, the employee must follow the *Standard Operating Procedures for the Handling and Processing of Hazardous Materials*. If a mailpiece presents an immediate threat, the facility must follow the procedures found in *Postal Operations Manual* (POM) 139.117.

513 **Characteristics of Suspicious Mail**

Employees must be familiar with the characteristics of “**Suspicious Mail.**” Generally, the Postal Service considers a parcel or letter suspicious when it has more than one of the following characteristics:

- No return address or a fictitious return address.
- Restrictive markings (e.g., “Personal”, “Confidential”, or “Do Not X-Ray”).
- Addressed to a job title with no name.
- Excessive postage.
- Handwritten or badly typed address.
- Misspelled words.
- Oily stains, discoloration, or crystallization (including powders).
- Strange odors.
- Excessive tape.

The acronym SLAP is an easy way to help identify suspicious mail. Each letter in SLAP represents one of the four broad categories of suspicious characteristics as follows:

- Unusual **S**hape.
 - Rigid, uneven, irregular, or lopsided package.
 - Package with soft spots, bulges, or excessive weight.
- Unusual **L**ook (odor or sound).
 - Discoloration, oily stains, or an unusual odor.
 - Crystals, powder, or powder-like residue on the package or spilling out from the package.
 - Protruding wires or aluminum foil.
 - Ticking sound.
- Unusual **A**ddress features.
 - Suspicious or threatening language on the outside of the package.
 - Postmark that doesn’t match the return address or no return address.
 - Restrictive endorsements such as “Personal” or “Confidential.”

- Distorted handwriting, block print, or poorly typed addresses.
- Excessive postage.
- Title but no name or incorrect title.
- Misspelled addressee's name, title, or location.
- Misspelled common words.
- Addressee unknown or no longer with organization.
- Unexpected mail from a foreign country.
- Unusual **Packaging**.
 - Excessive tape.
 - Excessive string or binding material.

If a leak involves suspicious mail, do not touch or handle it. Instead, you must do the following:

- Immediately clear the area of people.
- Isolate the spill.
- Notify a supervisor.

For suspicious mail, all employees must adhere to the following:

- The steps in Publication 167-B, *Response Checklist for Suspicious Mail and Unknown Powders or Substances*.
- Your facility plan for dealing with suspicious mail.

514 **HAZMAT Labels**

514.1 **The Written Label**

As discussed in [511](#), the written label provides comprehensive information on the chemical in the container in a written format. It includes the following:

- A signal word.
- Hazard statements.
- Precautionary statements.
- Pictograms.
- Appropriate first aid measures.

See [511](#) for an example of a written label. In addition to the written label, you may see the labels described in [514.2–514.5](#) on chemicals or their Safety Data Sheets:

514.2 The NFPA Label

The National Fire Protection Association (NFPA) label is a diamond divided into four smaller diamonds, each representing a color-coded hazard category.

- Red represents flammability.
- Blue represents a health hazard.
- Yellow represents reactivity.
- White represents special hazards.

The NPFA rates these hazards on a scale of zero to four, with zero being non-hazardous and four being extremely hazardous.



514.3 The HMIS Label

The Hazardous Material Identification System (HMIS) label is similar to the NFPA label, but uses colored bands instead of diamonds to represent the type of hazard. Each band contains the type of hazard and a 0 to 4 (zero to four) NFPA rating.

The final band designates appropriate personal protective equipment (PPE) using alphabetic codes ranging from A to K. Each code represents specific personal protective gear.



514.4 The DOT Label

The Department of Transportation (DOT) label classifies hazardous materials by one of the following:

- Hazard class (or division) number.
- Class (or division) name.

The labels have the following characteristics:

- Diamond-shaped.
- Color-coded.
- Contain a symbol and hazard class number.



514.5 The International Biohazard Symbol

The international biohazard symbol indicates contaminated or infectious material. You cannot substitute red containers for biohazard warning labels. When mailers use red containers, the containers must have a biohazard warning label.



515 Safe Handling of Mail Containing Hazardous Materials

515.1 SOP for HAZMAT

To maximize safety for our employees, the public, and our transportation networks, the Postal Service has developed the *Standard Operating Procedures for the Handling and Processing of Hazardous Materials*, which applies to facilities that distribute and process mail. Due to the nature of operations and the types of mail typically handled, there are different procedures for the following:

- Network Distribution Centers (NDCs) and Auxiliary Service Facilities (ASFs).
- Processing and Distribution Centers/Facilities (P&DC/Fs) and Airport Mail Centers/Facilities (AMC/Fs).

Refer to the SOP for more details.

Remember: Employees must not handle or move suspicious mail and unknown powders or substances from the place of discovery unless cleared by the Postal Inspectors or, in certain cases, local first responders.

515.2 General HAZMAT Handling Procedures

Any parcel suspected of containing hazardous materials as described in IMM 136 and PUB 52 that is not properly labeled or identified as such (undeclared) or containing prohibited hazardous materials is **nonmailable**.

The SOP provides these general handling procedures for employees to follow when dealing with declared, mailable HAZMAT mailpieces:

- Do not throw, drop, or slide mailpieces containing HAZMAT.
- Separate HAZMAT parcels from other mail items.
- Separate mailable HAZMAT from nonmailable HAZMAT parcels during movement in the facility and at the HAZMAT staging area.
- Separate nonmailable HAZMAT parcels during staging and transportation by placing them in a flat tray (tub) that will contain potential leakage. Line the flat tray with a plastic bag, if necessary.
- Stage HAZMAT parcels in a HAZMAT staging area.

- Employees must handle HAZMAT parcels manually as such parcels cannot enter mechanized/automated equipment. **Exception:** Employees can place ORM-D on mechanized/automated equipment at a Network Distribution Center or Surface Transportation Center.
- Do not place HAZMAT parcels in sacks. **Exception:** You may place “Biological Substances, Category B (UN 3373)” in a sack, pouch, tray, or container provided you attach a Tag 44, *Sack Contents Warning*, to the sack, pouch, tray, or container.

If a parcel is leaking or broken, follow the procedures described in Chapter [7](#).

6 Hazardous Materials Accepted for Mailing

61 General

For the purposes of mailability, the Postal Service has developed the following definition of HAZMAT:

Hazardous material (HAZMAT) 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 mail, hazardous materials are known as “dangerous goods” (IMM 136.1).

This definition is very broad and includes many items in everyday use such as perfumes, cosmetics, and cleaning supplies, among others. Many hazardous materials are relatively safe under normal conditions, but may exhibit potentially dangerous characteristics under certain circumstances, such as the following:

- Careless handling.
- Exposure to extreme temperatures or excessive vibration during transport.
- When stored near an incompatible material.

Mailable hazardous materials are only acceptable if they meet the following conditions:

- The mailer packaged, marked, and declared the materials properly.
- The Postal Service accepted the materials properly.

The following documents provide guidance on the mailability of hazardous materials:

- *Mailing Standards of the United States Postal Service*, International Mail Manual (IMM), 130, Mailability; 135, Mailable Dangerous Goods; and 136, Nonmailable Goods.
- Publication 52, *Hazardous, Restricted, and Perishable Matter*.
- Notice 107, *Let's Keep The Mail Safe*.
- *Standard Operating Procedures for the Handling and Processing of Hazardous Materials*.
- Poster 138, *Keep the Mail Safe*.

Acceptance clerks may refuse a parcel containing hazardous materials if it is determined that the item does not meet Postal Service mailability criteria. Mail acceptance personnel may use the references listed above when deciding when, and under what conditions, the Postal Service may accept hazardous, restricted, or perishable material for mailing.

If an employee believes a parcel found in the mail stream is nonmailable, the employee must follow the *Standard Operating Procedures for the Handling and Processing of Hazardous Materials*. If a mailpiece presents an immediate threat, the facility must follow the procedures found in POM 139.117.

62 Packaging, Labeling, and Shipper's Declaration

621 General

Safe handling of hazardous materials requires proper packaging to protect customers, employees, equipment, and other mail. Postal Service employees must inform customers of appropriate packaging, labeling, and shipper's declaration requirements as applicable.

Mailers are responsible for complying with all Postal Service and federal laws pertaining to packaging, labeling, and shipping hazardous materials.



622 Packaging Requirements

Acceptance personnel must observe packaging requirements.

- The weight of the contents of a parcel must not exceed the rating of the container. Packaging, including containers, cushioning, closures and reinforcement, must meet the requirements of Publication 52, at a minimum.
- Cushioning must do the following:
 - Protect against breakage.
 - Absorb the contents in case of leakage.
- Inadequate closure and reinforcement causes most package failures.
 - Mailers must use pressure-sensitive filament tape for reinforcement. If mailers use other packaging tape, it must be at least 2 inches wide.
 - A screw top closure must need at least 1 to 1 1/2 turns to open and it is recommended that mailers reinforce the closure with plastic tape.
 - Friction closures (such as paint cans) are unacceptable without reinforcing clips or rings.

623 **Labeling Requirements**

Mailers must mark appropriately and legibly all parcels containing mailable hazardous materials as indicated in Publication 52 and the IMM. Acceptance personnel must observe the following labeling requirements.

- Except for Business Reply Mail (BRM) and Merchandise Return Service (MRS), both the delivery and return address must appear on every parcel and must be large enough to be legible at arm's length.
- Mailers must label plainly the outside of parcels containing mailable hazardous materials as required in Publication 52 and the IMM.
- Generally, a shipper's declaration is required on hazardous materials sent by air transportation (First-Class Mail, First-Class Package Service, Priority Mail, and Priority Mail Express). Certain diagnostic specimens are the only exception to this requirement.

624 **Shipper's Declaration Requirements**

Employees must complete the following items to check the shipper's declaration:

- Examine the parcel and check labeling.
- Verify that the shipper's declaration is complete and in triplicate.
- Make sure the mailer has signed the shipper's declaration.
- Make sure the shipper's declaration clearly identifies the parcel (as required by Publication 52 and applicable chapters of the IMM).

625 **Tag 44 Requirements**

Employees must adhere to the following Tag 44 requirements:

- Attach Tag 44 to a sack, pouch, or tub containing **only** Biological Substance, Category B (UN 3373) packages.
- Handle any container bearing Tag 44 as an outside piece.

This page intentionally left blank

7 Response to Hazardous Material Incidents and Emergencies

71 OSHA Regulations That Cover Hazardous Materials

711 General

Employees must follow at least three sets of Occupational Safety & Health Administration (OSHA) regulations, depending on the nature of the release:

- Hazard Communication (HAZCOM).
- Hazardous Waste Operations and Emergency Response (HAZWOPER).
- Occupational Exposure to Bloodborne Pathogens (BBP).

712 Hazard Communication

The HAZCOM standard requires that employees know of the hazards presented by the chemicals they work with through the following:

- Training.
- Container labeling.
- Safety Data Sheets (SDSs).
- Other forms of warning.

The HAZCOM training covers the following:

- Hazardous materials characteristics.
- Where to obtain information about chemicals encountered in the workplace.

The HAZCOM training does not cover how to respond to hazardous material releases beyond notifying someone with more advanced training.

713 Hazardous Waste Operations and Emergency Response

The HAZWOPER standard does the following:

- Applies to facilities that handle or store hazardous materials.
- Covers emergency response for releases of hazardous materials.

The Postal Service has three levels of HAZWOPER training to ensure a competent and appropriate level of response:

- First Responder Awareness Level. This training does not address how to respond to hazardous materials releases beyond notifying someone with more advanced training.
- First Responder Operations Level. This training teaches employees how to respond defensively to a hazardous material incidental release.
- Specialist Postal Equivalent. This training teaches how to help Operations Level-trained employees do the following:
 - Assess the risks and hazards of a release.
 - Decide whether the release is incidental or an emergency.

714 Occupational Exposure to Bloodborne Pathogens

The bloodborne pathogens (BBP) standard applies to individuals whose work may expose them to potentially infectious substances originating from either humans or animals. These materials may include blood, urine, tissue, and other potentially infectious substances leaking from packages or resulting from a workplace accident. The BBP training teaches the following:

- How to respond to a release of potentially infectious substances.
- How employees can protect themselves and others.
- How to safely handle, dispose of, and decontaminate materials contaminated by bloodborne pathogens.

For spill cleanup, employees must use the principle of “universal precautions.” Assume all human blood and certain human body fluids are potentially infectious for bloodborne pathogens, even though Postal Service mailing rules do not make this assumption.

72 What is a Hazardous Material Release?

Postal Service employees use a variety of hazardous materials in day-to-day Postal Service facility operations (e.g., paints, inks, solvents, cleaners). In addition, some hazardous materials are considered mailable (in specific quantities), and may be found in parcels that have entered the Postal Service mail stream. Occasionally, hazardous materials may spill, leak, or otherwise be released into the workplace or the environment. Employees can categorize such events as either **incidental releases** or **emergency releases**.

An **incidental release** is a minor or non-emergency event that presents limited risk to the health and safety of employees. Such events typically fit the following descriptions:

- Small in volume.
- Have little potential for human exposure.
- Involve materials of low toxicity.

Still, employees must take incidental releases seriously by quickly confining and appropriately responding to them.

An **emergency release** is a more significant event and can result in the following:

- Major risks to the health and safety of employees and customers.
- Damage to the environment and Postal Service property.

Such events constitute real or threatened emergencies, and can involve fire, explosion, or severe chemical exposure. A coordinated response from local first responders (e.g., fire department, hazardous materials response team) is required to safely contain, clean-up, or otherwise respond to an emergency release. Follow the facility plan for such incidents.

Remember that incidents involving suspicious mail and unknown powders or substances require specific actions pending a threat assessment by the Inspection Service or local first responders. However, if there is **any evidence of an emergency** related to an incident involving suspicious mail and unknown powders or substances (e.g., medical symptoms, smoke, fumes, or vapors) do the following:

- Contact a supervisor.
- Activate your local emergency plan and evacuate.
- Call emergency responders or 911.
- Contact the Inspection Service.

In the event of a hazardous material release, it is important for trained personnel to determine quickly the following:

- Whether an incidental or emergency release is occurring.
- What response procedures to follow depending on the type of release. When in doubt, check with one of the following:
 - Supervisor.
 - Operations Level responder.
 - Plant or district safety specialist.

Play it safe and err on the side of safety.



It is also important to be aware that hazardous material releases to the environment may trigger environmental regulations, including the following:

- Requirements for reporting the release.
- Standards for managing hazardous or regulated wastes generated during the release.

Report all hazardous material releases to the environment using PS Form 8187, *Hazardous and Regulated Substance Release Notification*, and contact the Environmental Compliance/Sustainability Specialist who covers your district. For more information on reporting releases to the environment, see the [Sustainability/Environmental Spills website](#) on Blue.

73 Who May Respond to Hazardous Material Releases?

Only Postal Service personnel who have received HAZWOPER training are qualified to respond to spills, leaks, and other incidental releases of hazardous chemicals or potentially infectious biological materials. Postal Service personnel who have received BBP training are qualified to respond only to spills, leaks, and other incidental releases of potentially infectious biological materials.

- HAZWOPER Awareness Level First Responders are trained to do the following:
 - Recognize and identify hazardous materials.
 - Understand the general risks associated with a release.
 - Know how to contact or notify an Operations Level First Responder.
- HAZWOPER Operations Level First Responders are trained to do the following:
 - Assess the risks and hazards of a release.
 - Contain a release in a safe and defensive manner.
 - Contact appropriate outside response personnel as necessary.
 - Be BBP Responders.

Awareness
isolate
contact

Operations
assess
identify
respond
contact

- HAZWOPER Specialist Postal Equivalent employees are trained to help the Operations Level First Responders do the following:
 - Assess the risks and hazards of a release.
 - Determine whether to classify a release as incidental or emergency.



Employees who have not undergone BBP and HAZWOPER training at either the Awareness or Operations level must not respond to a hazardous chemical or infectious substance release. If you encounter a leaking package, immediately notify a supervisor that a potential hazardous chemical or infectious substance release has occurred.

74 What Emergency Response Procedures to Follow

741 General

Following appropriate emergency response procedures quickly and correctly can do the following:

- Reduce injuries.
- Help save lives.
- Prevent damage to Postal Service property and the environment.

Depending on the level of training, the employee must follow the general response guidelines outlined in [742–744](#) if a hazardous material release occurs.

742 HAZWOPER First Responder Awareness Level

If you're an employee trained at the HAZWOPER First Responder Awareness Level, you must respond in the following way:

1. Consider your and your co-workers' safety.
2. Contact a supervisor who will contact Operations Level trained personnel.
3. Isolate the spill if it is safe to do so.
4. Stop mechanized equipment and then clear the area.
5. Identify the hazardous material released if it is safe to do so (based on external markings).

743 **HAZWOPER First Responder Operations Level**

If you're an employee trained at the HAZWOPER First Responder Operations Level, you must respond in the following way:

1. Consider your and your co-workers' safety.
2. Contact a supervisor who will contact additional available Operations Level trained personnel for assistance.
3. Isolate the spill if it is safe to do so.
4. Identify the hazardous material released if it is safe to do so.
5. Determine whether the release is incidental or emergency. Contact a HAZWOPER Specialist-trained employee if necessary to assist in making the determination.
6. Follow guidance in [745](#) for Incidental or Emergency Releases, as applicable.

744 **HAZWOPER Specialist Postal**

Contact Safety Specialists and others with HAZWOPER Specialist-level training to do the following:

1. Assist Operations Level First Responders in determining if a release is incidental or emergency.
2. Assist Facility Emergency Management Team and coordinate between outside local first responders and facility personnel.
3. Conduct HAZWOPER First Responder Awareness and Operations Level courses. **Note:** To conduct training, you must have taken the ESH Facilitator course.

Postal Inspectors have received advanced HAZWOPER training (Technician Level and above) to respond to certain incidents, such as suspicious mail and spills of unknown materials.

745 **Incidental and Emergency Release Procedures**

If an **Incidental Release** has occurred, do the following:

- Determine safe clean up and rewrap/disposal measures. The facility SOP covers disposal procedures. Contact the Sustainability staff member who covers your district to determine applicable environmental requirements for disposal (see Contact information link on [Sustainability](#) page on Blue).
- Determine what Personal Protective Equipment (PPE) and other hazard control measures responders need.
- Follow actions indicated in the facility spill SOP.

If an **Emergency Release** has occurred, do the following:

- Contact management (e.g., Installation Head) to evaluate the need for local first responders or a spill contractor.
- Follow actions indicated in the facility Emergency Action Plan (EAP).

Employees must provide external local first responders with pertinent information, including the following:

- Their name and the location of the release.
- Estimated amount of released material.
- Identity of material (e.g., chemical, trade name, or description).
- Known hazards to workers or the environment.
- Conditions at the scene (e.g., fire, injuries, or property damage).
- Details about the nature of release (e.g., whether vapors are escaping into the air or the spill is spreading).

These response guidelines are applicable to hazardous material incidents that occur in the mail stream, but they are also part of routine facility activities. Each incident's specific circumstance will determine the order in which employees carry out these duties. **Always remember do not risk your life to respond to an emergency!**

75 Site-Specific Emergency Response Procedures

751 General

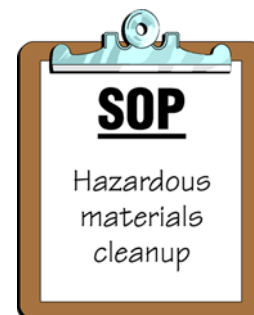
The hazardous material response procedures presented in [74](#) are generic. Postal Service locations (e.g., P&DCs, NDCs, Vehicle Maintenance Facilities [VMFs]) are required to supplement these procedures with more detailed, facility-specific procedures. Facility-specific guidance includes the following:

1. SOPs for Clean-up of Spills and Leaks of Mailed Items.

These SOPs address how to respond to releases that occur in the mail stream. They may identify the following:

- Employees trained to manage spills and leaks.
- Specific clean-up teams and contractors.
- PPE that employees must wear.
- Other procedures critical to the safe and effective response to a hazardous material incident.

Complete the information in item 2 and keep it near appropriate telephones for use during a spill or leak response.



2. Appropriate Contact Numbers.

Facility-designated employees who are HAZWOPER-trained:

Tour I: _____

Tour II: _____

Tour III: _____

Postal Inspectors: _____

Local First Responders: _____

CHEMTREC (24-Hour Number): 800-424-9300

Supervisors: _____

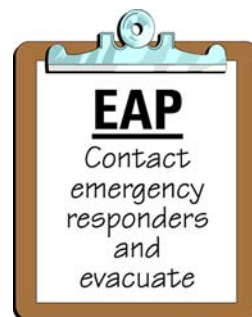
Postmaster: _____

If qualified spill response personnel are unavailable, enact the facility EAP, which may include calling local first responders and CHEMTREC (800-424-9300).

3. Emergency Action Plans.

Emergency Action Plans (EAPs) and other emergency plans cover a wide assortment of potential emergencies, including fire, explosion, and bomb threats. The EAP will identify the following:

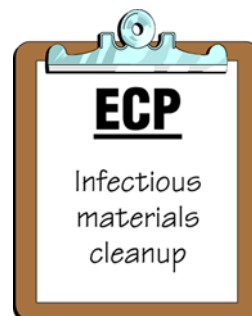
- Immediate actions employees must take in the event of a hazardous material spill and leak.
- Safe evacuation procedures.
- Telephone numbers of outside emergency responders.
- Telephone numbers of facility's spill team.



4. Exposure Control Plans.

Exposure Control Plans (ECPs) address exposure to infectious biological materials that may harbor bloodborne pathogens. They identify the following:

- Employees at risk for exposure.
- Procedures for handling, disposing, and cleaning up materials contaminated with bloodborne pathogens.
- Personal protective equipment.
- Communication of hazards to employees.
- Post-exposure Hepatitis B vaccinations.
- Medical follow-up.
- Recordkeeping.
- Procedures for implementing the plan.



Employees must become familiar with their facility's specific emergency plans, including SOPs, EAPs, and ECPs. These plans have been prepared to avoid confusion about what to do when certain situations arise. Employees must follow them to ensure safe and proper response.

76 Hazardous Materials Incident Reports

Supervisors must file incident reports when a mail stream item produces any of the following:

- Injury.
- Illness.
- Significant property damage.
- Disruption to operations.

They must use the Mailpiece Incident Reporting Tool (MIRT) in the Safety Toolkit to report such incidents. For information on how to access MIRT, see the *Standard Operating Procedures for Handling and Processing of Hazardous Materials*.

Contact a supervisor if you are involved in a hazardous material incident and would like to provide input into the report.

77 Reporting a Release to the Environment

Complete PS Form 8187 for any release of a hazardous material or chemical to the environment (e.g., soil, groundwater, storm water sewer, sanitary sewer, or surface water). The law requires the Postal Service to report certain hazardous or regulated substance releases to the environment to the following:

- The U.S. Environmental Protection Agency (EPA).
- State or Local Agencies.

For more information on reporting releases to the environment, contact the Environmental Compliance/Sustainability Specialist who covers your district and see the [Sustainability/Environmental Spills website](#) on Blue.

This page intentionally left blank

Appendix A

Existing Policy, References, and Resources

You can find additional information about existing Postal Service hazardous materials policy in the following Postal Service resources:

- *Standard Operating Procedures for the Handling and Processing of Hazardous Materials.*
- *Mailing Standards of the United States Postal Service, International Mail Manual:*
 - 130, Mailability.
 - 135, Mailable Dangerous Goods.
 - 136, Nonmailable Goods.
- Publication 52, *Hazardous, Restricted, and Perishable Mail.*
- *Employee and Labor Relations Manual*, Chapter 8.
- Poster 205-A (POS 205-A), *Suspicious Mail and Unknown Powders or Substances.*
- Publication 167-B, *Response Checklist for Suspicious Mail and Unknown Powders or Substances.*
- National Preparedness Website – Suspicious Mail and Unknown Powders or Substances.
- *Postal Operations Manual.*
- Management Instruction (MI) EL-810-2006-3, *Response to Hazardous Materials Releases.*
- Notice 107, *Let's Keep the Mail Safe.*
- MI DM-601-2009-1, *Civil Enforcement Authority for Hazardous Materials.*
- Postal Explorer website: <http://pe.usps.com>.

This page intentionally left blank

Appendix B

HAZMAT Course Information

You can find the following courses in the Learning Management System (LMS):

- Delivery HAZMAT Acceptance and Handling, course no. 1820135.
- (AVSEC) Hazardous Materials Handling for Mail Processing – Awareness, course no. 5420154.
- EAS HAZMAT Acceptance & Handling, course no. 10015092.
- Hazardous Materials (for Customer Services), course no. 10021006.
- Hazardous Materials (HAZMAT) Retail Acceptance, course no. 1820134.
- Hazardous Materials Mailability Standard, course no. 1951110.
- (AVSEC) Marketing – Business Service Net – (Sales – Hazardous Materials Operational Awareness), course no. 5429400.

This page intentionally left blank

Appendix C

HAZWOPER Course Information

You can find the following courses in LMS:

- HAZWOPER First Responder Awareness Level, course no. 10010514.
- HAZWOPER First Responder Operations, course no. 10010631, or 10021927 **and** 10021926.
- HAZWOPER 1st Responder Operations Refresher, course no. 10010574 or 10021928 **and** 10021929.
- HAZWOPER Specialist Postal Equivalent, course no. 10011021, or 10010632.
- HAZWOPER Specialist Postal Equivalent Refresher, course no. 10021930 **and** 10021931.

This page intentionally left blank

Appendix D

HAZMAT Posters and Brochure

Poster 205, Suspicious Mail and Unknown Powders or Substances

You must post Poster 205 in the employee work area for reference. The poster is available as follows:

- You can order Poster 205-A (PSN 7690-08-000-1683, size 18"x24") or -B (PSN 7690-08-000-1684, size 11"x14") through the Material Distribution Center (MDC) http://blue.usps.gov/purchase/operations/ops_mdc_automation.htm. Poster 205-B is also available on eBay2 (search for POS205B).
- You can download and print both posters from Blue at <http://blue.usps.gov/cpim>. We've listed the direct link for each poster below:
 - Poster 205-A: <http://blue.usps.gov/cpim/ftp/posters/pos205a.pdf>.
 - Poster 205-B: <http://blue.usps.gov/cpim/ftp/posters/pos205b.pdf>.

Poster 298, Domestic Hazardous Materials Warning Labels and Markings

You must place this poster in the employee work area for reference. Poster 298 is available online at <http://about.usps.com/posters/pos298.pdf> for downloading and printing.

Publication 167-B, Response Checklist for Suspicious Mail and Unknown Powders or Substances

You must hand out this brochure to employees and make it available in employee work areas for reference. The publication is available as follows:

- You can order Publication 167-B (PSN 7610-09-000-4022) through the MDC http://blue.usps.gov/purchase/operations/ops_mdc_automation.htm.
- This publication is available online on Blue at <http://blue.usps.gov/cpim>. The direct URL is <http://blue.usps.gov/cpim/ftp/pubs/pub167b.pdf>.

Tag 44, Sack Contents Warning

You can order Tag 44 (PSN 7690-02-000-9990) through the MDC.

This page intentionally left blank

