

Management Instruction

Response to Hazardous Materials Releases

This instruction provides policy and guidance for responding to hazardous materials releases in a manner that is appropriate to the type of materials and circumstances of the release in accordance with 29 Code of Federal Regulation 1910.120 (known as the “HAZWOPER” regulation). The instruction focuses primarily on responding to spills and leaks originating from items placed in the mailstream, which can usually be handled by individuals who have received training and follow these procedures.

Responding to Incidental Spills and Leaks from Mailed Items

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 items that are accepted are equivalent in potential hazard to Department of Transportation “other regulated materials” (ORM-D) (consumer commodities).


Most mailed items can be absorbed or otherwise controlled at the time of release, and it is unlikely that a release would result in airborne concentrations above OSHA permissible exposure limits or any other hazardous situation.

Preventing Incidents

Acceptance personnel must help prevent incidents in the following ways:

1. Assist customers by advising them about what materials are mailable. Use approved inquiry procedures when doing so.
Poster 76, Hazardous Materials, should be prominently displayed in all lobbies, and *Notice 107, Hazardous Materials*, should be available at counters and display racks. Publication 52, *Acceptance of Hazardous, Restricted, or Perishable Matter*, provides specific mailability standards for hazardous materials, and is based on Domestic Mail Manual C023.

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Gail Sonnenberg
Vice President
Human Resources

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Business Mail Acceptance at Headquarters or rates and classification service centers (RCSCs) determine mailability.

2. Make sure that parcels are properly packaged and labeled.

Acceptance and other personnel should be alert to the potential presence of hazardous materials in a package. Indicators include:

- The sound of liquid or a shifting weight.
- A Department of Transportation diamond-shaped label or marking placed on the parcel to comply with the hazardous materials regulations.
- Address information showing the parcel is being mailed to or from a chemical firm or laboratory.
- An International Biohazard Symbol label to comply with the Postal Service standard in the *Domestic Mail Manual*, C023.
- A stain or unusual odor.

Cleanup Policy

Planning

Processing and distribution plants and other facilities that frequently handle mailed hazardous materials, regardless of the size of the facility, must establish both of the following:

1. Facility standard operating procedures (SOPs) for dealing with spills and leaks of items in the mailstream. These designate personnel to make early decisions and clean up incidental spills and leaks, establish procedures, and provide for training, personal protective equipment, and other resources. See attachment 1 for guidance in preparing an SOP.
2. Emergency action plans (EAPs) for dealing with emergency situations, including a section on emergencies that may arise as a result of spills and leaks. These provide emergency numbers to call and outline shut-down, escape, and rescue procedures. Publication 52, sections 240 and 250, outlines procedures that must be followed to establish EAPs in accordance with 29 CFR 1910.38. See attachment 2 for further guidance in preparing an EAP.

Some facilities must also have emergency response plans (ERPs) required by 29 CFR 1910.120 to address hazardous materials emergencies. See Hazardous Materials Releases in this document for guidance in preparing an ERP.

Facility safety personnel, in conjunction with area or district environmental coordinators, prepare SOPs, EAPs, and ERPs, as needed.

Cleanup

Postal employees (other than emergency response team members) must limit cleanup of spills and leaks of mailed hazardous materials to cleaning up the quantities and types of materials that are mailable and that are not normally expected to exceed Occupational Safety and Health Administration (OSHA) Permissible Exposure Limits (PELs) or pose any other hazard (e.g., flame, explosion, radioactivity).

Employees must not be directed to handle parcels leaking nonmailable 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 expert hazardous materials response personnel, and proceed with other actions indicated in the facility EAP.

Trained and equipped members of an emergency response team, established in some facilities in accordance with the OSHA standard 29 CFR 1910.120 (HAZWOPER), may respond to emergencies within the scope of their training *provided* they retreat and leave further response to outside hazardous materials experts if they discover an extremely hazardous, toxic, radioactive, or explosive material.

Responding to Exposure or Injury

Injured or exposed personnel must receive immediate medical attention. Exposure may occur by inhalation of vapors or fumes, skin contact, or some other route. If no medical assistance is 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, the employee must be examined and cleared by a physician before returning to duty. Servicing medical personnel must conduct appropriate medical follow-up to exposure. For exposure to bloodborne pathogens, see Management Instruction MI-EL-810-95-3, *Bloodborne Disease Exposure Control Plans*.

Filing Hazardous Materials Incident Report

Incident reports must be filed when a mailed item produces injury, illness, significant property damage, or disruption to operations. Form 1770, *Hazardous Materials Incident Report*, is used to report incidents to Safety and Risk Management at Headquarters, and a copy must go to the local inspector in charge.

Installation heads are to ensure that mailers involved in hazardous materials incidents are promptly contacted. They should include the results of the contact in the Follow-Up Action block on the form, indicating who was contacted, how the contact was made, and the date.

A C R O N Y M S

CHEMTREC	Emergency information service of the Chemical Manufacturers Association
HAZWOPER	Hazardous Waste Operations and Emergency Response (OSHA standard 29 CFR 1910.120)
ORM-D	Other regulated material, mostly items of minimal hazard in transport due to quantity and properties (DOT Regulations)
OSHA	Occupational Safety and Health Administration

R E F E R E N C E S

Postal

- Domestic Mail Manual*
- Form 1770, *Hazardous Materials Incident Report*
- Handbook AS-553, *Hazardous Waste Guide*
- Handbook EL-812, *Employee Awareness — Hazardous Materials*
- Hazardous Materials Response Guide*: Department of Transportation
- Management Instruction AS-550-92-8, *Hazardous Waste Management*
- Management Instruction EL-810-95-3, *Bloodborne Disease Exposure Control Plans*
- Notice 107, *Hazardous Materials*
- Poster 76, *Hazardous Materials*
- Publication 52, *Acceptance of Hazardous, Restricted, or Perishable Matter*

Other

- NIOSH Pocket Guide to Chemical Hazards*

Additional information on hazardous materials releases involving environmental laws and regulations may be obtained by consulting postal environmental publications referenced in this instruction and consulting with area environmental coordinators.

Completion of this form does not satisfy the requirements to complete postal accident forms or other reports required by federal or state environmental regulations.

Providing Training

Type of Training

All employees must receive periodic training on the facility emergency action plan.

Acceptance personnel must receive annual training on hazardous materials mailability standards contained in the *Domestic Mail Manual* and Publication 52.

Mail handlers, supervisors, and other employees frequently handling packages that may contain hazardous materials must receive HAZWOPER First Responder — Awareness Level training or its equivalent.

Maintenance and custodial personnel, supervisors, and other persons designated to manage and clean up incidental spills must receive HAZWOPER First Responder — Operations Level training or its equivalent.

Safety and health personnel should have professional level training in hazardous materials (e.g., Hazardous Materials Specialist or equivalent), although they do not need certification.

Police officers, according to OSHA regulation, must receive First Responder — Awareness training and annual refreshers. The Inspection Service administers this training.

Materials

PEDC Courses 21511-00 through -06, Hazardous Materials Acceptance and Handling; PEDC Course 21511-07, Hazardous Materials Cleanup, and Handbook EL-812, *Employee Awareness — Hazardous Materials* (which informs employees of the facility SOP) are being revised to meet HAZWOPER requirements at this publication date.

As these materials become available, management must ensure that all affected employees receive the updated training. In the interim, they should use existing postal training supplemented by off-the-shelf Awareness and First Responder — Operations training. See Attachment 3 for content requirements and further information on training.

Record Keeping

All training must be documented at the facility level.

Responding to Hazardous Materials Releases

Emergency Response to Release of Hazardous Materials

The Postal Service is required by federal and some state environmental regulations to provide appropriate response to release of hazardous materials.

In many facilities, an adequate plan can be established by appending a section to the EAP required by 29 CFR 1910.38 and providing information necessary for notification of hazardous materials response personnel and, as necessary, federal or state officials.

Some other facilities have special requirements mandated by specific regulations. Environmental Management Policy at Headquarters has issued policy and guidance documents that address compliance with these regulations. These include MI-AS-550-92-8, *Hazardous Waste Management*, and Handbook AS-553, *Hazardous Waste Guide*.

Resource Conservation and Recovery Act (RCRA) Issues

Small Quantity Generators

Facilities that generate less than 100 kilograms of hazardous waste are conditionally exempt from Environmental Protection Agency (RCRA) requirements found in Interim Status Standards for Hazardous Waste Facilities Emergency Plans (40 CFR 265, Subpart C).

Facilities that generate between 100 and 1000 kilograms of hazardous waste must comply with the interim status standards for emergency preparedness and prevention procedures except that such facilities are not required to prepare and maintain contingency plans.

Management in all cases must ensure that all employees are familiar with proper waste handling and emergency procedures and that the following information is included in the emergency action plan and posted near an appropriate phone:

- The facility's emergency coordinator's name and phone number.
- The location of fire extinguishers, spill control materials, and fire alarms.
- The fire department's phone number.

Large Quantity Generators

Facilities generating more than 1000 kilograms of hazardous waste must comply with all RCRA regulations, including the interim status standards (40 CFR 265, Subpart C) for emergency preparedness. Environmental coordinators will prepare these plans, in cooperation with safety. If employees respond to releases, HAZWOPER compliance is required.

Treatment, Storage, and Disposal Facilities (TSDFs)

Facilities permitted as TSDFs must comply with interim status standards for hazardous waste facilities, including emergency preparedness and contingency plans. Environmental coordinators, in cooperation with safety, establish these plans. If employees are evacuated when an emergency occurs and not allowed to assist in handling the emergency, only the emergency action plan need be modified to reflect this policy and procedure. If employees respond to releases in any way, HAZWOPER compliance is required.

Underground Storage Tanks (USTs)

40 CFR 280 requires release response and corrective actions when USTs leak or product is otherwise released. Emergency action plans must include the following elements:

1. Determine if there is an immediate fire or health hazard and take appropriate action (e.g., contact fire department, evacuate affected employees).
2. Notify management and the UST coordinator for the facility. All further response activities related to reporting and cleanup occur through the UST coordinator and the environmental coordinator responsible for the facility.
3. Determine (through consultants if necessary) if the release presents a continuing health hazard to employees (e.g., gasoline vapors in substructures) and advise management on corrective actions.

Emergency Planning and Community Right-to-Know Act (EPCRA) Issues

Postal facilities do not normally handle or release hazardous materials in quantities which require reporting or release information under EPCRA (40 CFR 355, 370, 372). Underground tank contents may be reportable (consult environmental coordinators). If fire departments or local emergency committees request information on hazardous materials under EPCRA 311 or 312, safety specialists, coordinating with environmental compliance coordinators, should provide the facility MSDS

inventory used to comply with the OSHA Hazard Communication Standard. Environmental coordinators respond to all other requests for emission or release information.

Toxic Substances Control Act Issues

PCBs

Polychlorinated biphenyl (PCB) transformers and other electrical equipment must be marked in accordance with 40 CFR 761. Emergency action plans must provide for appropriate actions to take in the event of a fire or explosion involving PCB transformers or other PCB-containing electrical equipment or leaks from transformers. Facility managers, assisted by environmental coordinators, ensure that PCB spills and leaks are cleaned up in accordance with 40 CFR 761.

Asbestos

OSHA has determined that releases of asbestos from abatement projects, transportation of waste, etc., require compliance with HAZWOPER. Therefore, if such releases occur, only trained experts should respond. Consult the management instruction on asbestos-containing building materials, EL-810-94-3.

National Oil and Hazardous Substances Pollution Contingency Plan (NCP) Issues

Responses to spills and leaks covered by the NCP are the responsibility of the facility manager, with technical assistance from the environmental coordinator. See 40 CFR Part 302. Safety and Risk Management personnel participate to ensure that postal employees are protected and kept informed of potential health risks.

Program Responsibilities

Headquarters

Safety and Risk Management, Human Resources, coordinates and establishes policy relating to postal employee handling of, and safe response to, spills and leaks of hazardous materials. Safety and Risk Management receives reports of hazardous materials (HAZMAT) incidents involving mailed items (Form 1770) and coordinates with Headquarters, area, district, and plant offices to prevent future occurrences. Safety and Risk Management also coordinates with Business Mail Acceptance, which has primary responsibility for determining the mailability of hazardous materials.

Environmental Management Policy establishes policies and coordinates postal efforts pertaining to cleanup and disposal of HAZMAT releases within the scope of federal and state environmental regulations.

Areas

Area Human Resources evaluates facility level HAZMAT spill and leak SOPs, emergency response plans within the scope of HAZWOPER, and emergency action plans required by 1910.38.

Area environmental coordinators evaluate emergency response plans, remedial response activities, and reporting and other activities relative to environmental regulations.

Districts and Plants

Facility managers are responsible for establishing SOPs for incidental spills and leaks of mailed items, emergency action plans, and, as appropriate, emergency response plans.

Safety and human resources specialists develop and coordinate implementation of spill and leak SOPs. They coordinate with area and district ECCs on development and implementation of emergency response plans (HAZWOPER) as needed.

Attachment 1

STANDARD OPERATING PROCEDURES FOR THE CLEANUP OF SPILLS AND LEAKS OF MAILED ITEMS

A standard operating procedure (SOP) must be developed at the facility level and tailored to the resources and needs of that facility. The emergency action plan for the facility (see attachment 2) is to be appended to and referenced in the SOP. (Facilities that elect to comply with HAZWOPER and establish emergency response plans and teams must ensure that all regulatory requirements are addressed in the SOP.)

An outline of necessary elements and procedures for responding to spills and leaks of mailed items follows.

1. Designation of employees to manage handling of spills and leaks of hazardous materials in the mails.

Trained spill team leaders, supervisors, or other personnel are designated to manage handling of spills and leaks by:

- a. Attempting to identify the spilled material and determine if it can be handled by postal personnel.
- b. Determining cleanup and disposal measures for materials that can be safely handled by postal employees.
- c. Determining what personal protective equipment (PPE) is appropriate if postal personnel can manage the incidental spill.
- d. If material is outwardly hazardous or unknown, initiating implementation of the facility emergency action plan (e.g., evacuation, call for fire department, etc.).

2. Designation of employees to clean up spills and leaks within the scope of postal policy.

Spill team personnel must follow all procedures and wear protective equipment as necessary. If at any point during discovery, cleanup, or disposal a hazardous condition is suspected or encountered, they must isolate the parcel and contact management to initiate the emergency action plan.

3. Contacts for assistance.

Phone numbers for CHEMTREC, fire department, CDC, poison control center, and other local resources.

4. References on identification and cleanup.

Resources must be available at a designated location to assist in identification of hazardous properties of materials and precautions to be taken. References may include publications such as:

- *NIOSH Pocket Guide to Chemical Hazards.*
- *Hazardous Materials Response Guide*, Department of Transportation.
- Hazardous Materials Cleanup: Student Handbook from PEDC Course 21511-08 (under revision) for HAZWOPER First Responder — Operations compliance.
- A copy of the facility SOP and Emergency Action Plan.

5. Information on PPE adequate for limited response.

Persons frequently handling mailed medical wastes, specimens, etc., must be provided impermeable gloves.

Persons designated to clean up incidental spills and leaks must be provided with appropriate protective equipment. Equipment must be stored in a secure location and cleaned after each use. Equipment must be selected, based on the material to be cleaned up, from the following minimum supplies:

- Chemical splash, face shield, and goggles.
- Neoprene gloves or equivalent that provide forearm protection.
- Rubber boots or equivalent.
- Neoprene full-length apron or equivalent.
- Air purifying respirators may be supplied if a full respiratory protection program is in place. However, the SOP must clearly state that any indication of a respiratory hazard or IDLH situation requires retreat. SCBA are not necessary unless the facility has established response plans under HAZWOPER. It is postal policy to protect employees by avoiding inhalation hazards whenever feasible rather than relying solely on respirators for protection.

6. Information on cleanup materials, containers, spill tubs.

A supply of cleanup materials should be available to absorb, decontaminate, and assist in disposal of incidental spills of mailable hazardous materials. This must include:

- Commercial nonorganic shop drying agents, sand, and vermiculite.
- Spill cleanup materials such as Solusorb, Speedi Dri, Ensafe Solidification agents, and spill control pillows available from spill cleanup vendors.
- Broom, dustpan, shovel, spill control tubs, plastic bags, and other containers.

- Household bleach, paper towels, and medical waste bags for handling spills and leaks of specimens, etc. (see MI EL-810-95-3, *Bloodborne Disease Exposure Control Plans*).
 - A HAZMAT handling and storage area with local exhaust ventilation and eye lavage and shower.
7. Information on washing facilities.
- An eye lavage and safety shower must be located in the immediate area of the rewrap operation or where leaking containers are frequently handled (e.g., the HAZMAT room).
8. Information on storage and ventilation.
- A room or area must be designated for handling and temporary storage of leaking parcels. Local exhaust ventilation (e.g., a laboratory hood) must be provided in this HAZMAT room or area. Adequate storage meeting NFPA codes is required.
9. Clearly defined procedures for HAZMAT response for affected employees handling the mail, supervisors, and designated cleanup persons.
- a. Handlers. Persons handling mailed items must be apprised (through awareness training) of the facility SOP and emergency action plans and follow these procedures:
 - Upon discovery of a leaking parcel isolate the package, shut down mechanization if applicable, and summon the supervisor or persons designated in the SOP. Have no further contact with the package. If you make any contact with the material, immediately wash up and seek medical attention.
 - When a package leaks in a delivery vehicle, isolate it, if possible. If there is any indication of a hazard (e.g., labeling, odor, smoke, or eye irritation), park the vehicle in a safe location and notify the supervisor and fire department. Have no further contact with the package.
 - b. Supervisors. Supervisors must be trained on the facility SOP and emergency action plan and assume these responsibilities:
 - Upon notification of a leaking parcel, contact the designated cleanup persons, while ensuring that the parcel is isolated and the immediate area cleared.
 - If a hazard is immediately apparent, follow the facility emergency action plan.
 - c. Designated Cleanup Persons. Persons designated to manage spills and leaks follow these procedures:
 - Determine if the material is outwardly hazardous (smoking, irritating, odorous, labeled or marked as hazardous).

- If so, initiate actions under the facility emergency action plan.
- If the material is mailable and can be safely handled, proceed to 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 area or rewrap area for further examination and/or rewrap.
- Consult environmental coordinators on disposal of hazardous waste as necessary.

10. Training activities appropriate to employees' duties.

Administration of training based on requirements explained in the main body of the management instruction must be documented.

11. A requirement for periodic review of the program by safety, maintenance, operations, and environmental coordinators.

Attachment 2

Emergency Action Plan (EAP)

Emergency action plans cover a wide assortment of potential emergencies, including fire, explosion, and bomb threats. They are required by 29 CFR 1910.38 to address designated actions management and employees must take to ensure employee safety.

A portion of each emergency action plan should address actions to be taken in the event of a hazardous materials spill and leak in the mail-stream or other operation. It must include the following information specific to hazardous materials incidents:

1. HAZMAT experts and/or the fire department numbers to be called in the event of a spill or leak. Prior coordination with the fire department is required.
2. Emergency escape procedures and emergency route assignments and places of refuge.
3. Procedures to be followed by employees who remain to operate critical plant operations before they evacuate, if necessary, including shutdown of mechanization and air handling equipment.
4. Procedures to account for all employees after emergency evacuations.
5. Provisions for first aid, rescue, and medical follow-up.

Safety specialists, environmental compliance coordinators, and operations management must review the entire plan for conformance with 1910.38 and ensure it is implemented and reviewed periodically.

Emergency Action Plan Compliance Checklist

(Excerpted from 1910.38(a), OSHA Instruction CPL 2-2.59)

1. Is the plan in writing?
2. Is the written plan accessible to employees?
3. Are emergency escape procedures and emergency escape routes assigned?
4. Are procedures established to account for all employees after the emergency evacuation has been completed?
5. Has an employee alarm system that complies with 29 CFR 1910.165 been established?
6. If an employee alarm system is used for other purposes, have distinctive signals for each purpose been developed?

7. Has the employer designated and trained a sufficient number of persons to assist in the safe and orderly evacuation of employees (generally one warden per 20 employees)? (See Appendix to Subpart E, Means of Egress, 3.)
8. Has the employer reviewed the emergency action plan with each employee covered by the plan initially, and when the plan or the employee's responsibilities under the plan change?
9. Is the written plan kept at the workplace and made available for employee review?
10. Is the plan real or just a subterfuge to avoid compliance with 1910.120(q)? Does the employer actually intend to have employees respond to emergencies?
11. Does the employer intend to have employees handle incidental releases? If so, are the training, tools, equipment, and personal protective equipment (PPE) appropriate for handling small releases of the hazardous substance available in the work area?

Attachment 3

HAZWOPER Training Requirements for USPS Employees

I. First Responder — Awareness Level (or equivalent)

Required of:

- Mail handlers
- Supervisors
- Other employees frequently handling packages that may contain hazardous materials.

Duration:

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

Subject Matter:

The following guidelines parallel OSHA requirements:

1. An understanding of hazardous materials, including general categories of hazardous materials accepted into the mailstream.
2. An understanding that hazardous materials incidents can result in injury, damage to equipment, or mail if not properly handled.
3. Ability to identify a potential hazardous spill or leak; look for levels, placards, addresses that may indicate the presence of HAZMAT. Avoid contact with packages that are leaking, smoking, irritating to eyes or respiratory tract.
4. Familiarity with the facility spill and leak SOP, (e.g., who to call, necessity of isolating the area, and other elements of the emergency action plan).

II. First Responder — Operations Level (or equivalent)

Required of:

- Maintenance and custodial personnel
- Supervisors
- Other persons designated to manage and clean up incidental spills.

Duration:

8 hours

Subject Matter:

In addition to content specified for First Responder — Awareness training, the following subject matter is required.

1. Knowledge of basic hazard and risk assessment techniques.
2. Selection and use of PPE provided for limited cleanup duties.
3. An understanding of basic HAZMAT terms.
4. Thorough familiarization with the facility SOP and EAP.