

September 3, 2020

Mr. Brian J. Wagner  
President  
National Association of Postal  
Supervisors  
1727 King Street, Suite 400  
Alexandria, VA 22314-2753

Dear Mr. Wagner:

As a matter of general interest, the Postal Service plans to revise Management Instruction (MI) EL-810-2006-3, *Response to Hazardous Materials Releases*.

This revision reflects updates to policies and guidance for responding to issues related to hazardous material releases. Additional changes were made throughout the document to clarify existing language, correct grammatical and structural errors, and to update organizational titles and reference materials.

We have enclosed a final draft of the revised Management Instruction (MI) EL-810-2006-3, *Response to Hazardous Materials Releases*, one with and one without changes identified.

Please contact Bruce Nicholson at extension 7773 if you have any questions concerning this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "David E. Mills".

David E. Mills  
Manager  
Labor Relations Policies and Programs

Enclosures

# Management Instruction

## Response to Hazardous Materials Releases

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

- 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 the following:

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

## 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 the following:

- a. airborne concentrations above the exposure limits permitted by OSHA
- b. any other hazardous situation.

Such events are typically small in volume, have little potential for human exposure, and involve materials of low toxicity.

Spills and leaks of other hazardous materials in Postal Service<sup>®</sup> facilities may also be incidental in nature. (See the section on "Releases of Hazardous Materials Outside the Mailstream: Planning and Re-sponse," found on page 7 of this MI and the definitions in attachment 4.)

Emergency releases of hazardous substances (in or out of the mailstream) are ones 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.

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|-----------|---|
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| Obsoletes | EL-810-2006-3   |
| Units     | Safety and OSHA<br>Compliance Programs<br>Employee Resource<br>Management |

*Simon Storey  
Vice President  
Employee Resource Management*

## CONTENTS

|  |   |
|--|---|
| Incidental Releases Versus<br>Emergency Releases .....                                     | 1 |
| Responding to Exposure or Injury .....   | 2 |
| Preventing Releases From Pieces<br>of Mail .....   | 2 |
| Safe Handling of Mail Containing<br>Hazardous Materials .....                              | 3 |
| Releases (Spills and Leaks) from<br>Mail Pieces: Planning, and<br>Response .....           | 4 |
| Limited Availability of Hazardous<br>Materials .....                                       | 4 |
| Responding to Suspicious Mail and<br>Unknown Powder or Substances .....                    | 4 |
| Response Planning .....  | 4 |
| Cleanup .....  | 4 |
| Filling Mail Piece Spill<br>or Leak Incident Report .....                                  | 5 |
| Required Training .....  | 6 |
| Availability of Training and Materials .....   | 6 |
| Record Keeping .....   | 6 |
| Releases of Hazardous Materials<br>Outside the Mail Stream: Planning<br>and Response ..... | 7 |
| Hazardous Waste Generators .....   | 7 |
| Storage Tanks .....  | 7 |
| Polychlorinated Biphenyls .....  | 8 |
| Asbestos .....   | 8 |
| Reporting Releases to the Environment .....  | 8 |
| Program Responsibilities .....   | 9 |
| Headquarters .....   | 9 |
| Areas .....  | 9 |
| Districts and Plants .....   | 9 |

## CONTENTS

### continued

#### Attachment 1

|  |    |
|--|----|
| Standard Operating Procedures for<br>Cleaning Up Incidental Releases ..... | 11 |
|--|----|

#### Attachment 2

|   |    |
|---|----|
| Emergency Action Plan: Hazardous<br>Materials Emergency Releases..... | 15 |
|---|----|

#### Attachment 3

|  |    |
|--|----|
| HAZWOPER Training Requirements<br>for Postal Service Employees ..... | 17 |
|--|----|

#### Attachment 4

|                  |    |
|------------------|----|
| Definitions..... | 19 |
|------------------|----|

#### Attachment 5

|                |    |
|----------------|----|
| Acronyms ..... | 21 |
|----------------|----|

#### Attachment 6

|                 |    |
|-----------------|----|
| References..... | 23 |
|-----------------|----|

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

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/exposed 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-810-2017-4, *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 National Preparedness Suspicious Mail Web site for the latest information. (See attachment 6 for directions to the site.)

## Preventing Releases From Pieces of Mail

All Postal Service personnel—from acceptance to processing to delivery—must help prevent hazardous 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 the Hazardous Material Program. (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 doing the following:

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

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

- 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.
- Department of Transportation (DOT) labels and markings (prohibited or otherwise).

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.

Not all mail with these characteristics will contain hazardous materials. However, give extra scrutiny to mail with one or more of these characteristics. Handle any parcel with these characteristics as if it contains hazardous materials.

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

Do any of your articles contain anything liquid, fragile, perishable or potentially hazardous, such as lithium batteries, perfume or mercury?

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

To maximize safety for employees, the general public, and transportation networks, the Hazardous Materials Program (HMP) has developed standard operating procedures for the handling and processing of hazardous materials for facilities that process mail. The procedures are on the HMP Web site. (See Attachment 6 for directions to the site.)

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

## 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. Publication 52, *Hazardous, Restricted, and Perishable Mail*, and the *Mailing Standards of the United States Postal Service, International Mail Manual* (IMM) provide guidance on mailing requirements for limited quantities of hazardous materials.

## Responding to Suspicious Mail and Unknown Powder or Substances

A subset of potential emergency releases has become increasingly important since the anthrax attacks in October of 2001. The Postal Service Office of National Preparedness (National Preparedness) maintains policies and procedures, including checklists for managers and supervisors, tabletop exercises, and 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 must 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. SOPs for dealing with spills and leaks of items in the mailstream 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. Select team members from volunteers. If there are insufficient volunteers, then management 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 website 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 Mailstream: Planning and Response," found on page 7 of this MI provides guidance on when an ERP is required.)

Contact your National Preparedness Specialist for guidance on developing EAPs and facility safety personnel for SOPs and ERPs. Incorporate SOPs, EAPs, and ERPs 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:

- a. Immediately isolate the area where suspicious mail or unknown powders or substances were found.
- b. 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 do the following:

- a. Isolate the area,
- b. Call for local first responders (or the Inspection Service when suspicious mail or unknown powders or substances are involved), and
- c. 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.

Leaking parcels may contain materials that are regulated waste, e.g., hazardous waste, universal waste, medical waste, etc., when disposed. Regulated wastes must be placed in labeled containers, tracked through disposal, and managed by a licensed hazardous/regulated waste management supplier. Regulated wastes must never be placed in the trash. Contact the designated Office of Sustainability (Sustainability) regional field staff or visit the *Sustainability website* for assistance with waste classification and disposal.

## Filing a Mailpiece 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 the Mailpiece Incident Report Tool (MIRT) to report incidents to Safety and OSHA Compliance Programs and the Hazardous Materials Program at Headquarters. In addition, the HMP must be notified by email at [HAZMAT@usps.gov](mailto:HAZMAT@usps.gov).

For those with access to the Safety Toolkit (STK), the Mailpiece Incident Report Tool can be found in the menu under the "Create Safety Records" tab. Those who do not have access to the STK can reach the MIRT by clicking here: <http://safetytoolkit.usps.gov/IRT/ListingPage.aspx>. Incidents involving suspicious mail and unknown powders or substances must be reported in the Postal Alert Network System (PANS). Follow the procedures established by National 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. Complete Section G, "Notification and Follow-up Action," on the MIRT to help prevent further incidents of the same type. Completing this report does not satisfy the requirement to complete Postal Service accident forms and other reports required by federal or state environmental regulations. (See the Sustainability website for guidance: [http://blue.usps.gov/sustainability/environmental/spills\\_and\\_regulatory\\_reporting.htm](http://blue.usps.gov/sustainability/environmental/spills_and_regulatory_reporting.htm)).

## **Required Training**

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

Supervisors must periodically do the following for all employees:

- a. Inform the employees about the facility EAP and procedures for handling suspicious mail and unknown powders or substances, and
- b. Review with the employees the contents of 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 IMM 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 Integrated HR System (HERO). (See Attachment 3 for content requirements and further information.)

### **Record Keeping**

Supervisors must ensure that all training is documented in the Integrated HR System (HERO).



## Releases of Hazardous Materials Outside the Mailstream: 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 mailstream. Incidental releases may be handled by the incidental spill and leak team using the SOP for incidental releases.

In most facilities, employee safety can be assured during a hazardous materials emergency release by the following:

- a. Including initial actions in a section of the EAP required by 29 CFR 1910.38; and
- b. 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 National Preparedness.

Some facilities have special requirements mandated by specific OSHA or Environmental Protection Agency (EPA) regulations. Sustainability has issued environmental compliance and risk mitigation policies, programs, and procedures addressing compliance with EPA and state environmental regulations. These resources can be found on the Sustainability website: <http://blue.usps.gov/sustainability/environmental.htm>. OSHA requires hazard communication training on handling hazardous materials, and the EAP/IEMP should address releases of hazardous waste.

### Hazardous Waste Generators

Postal Service facilities that generate hazardous waste may be required to follow EPA contingency planning requirements. Incorporate EPA contingency planning requirements into the facility EAP/IEMP. For facilities generating more than 100, but less than 1,000 kilograms, of hazardous waste per month (known as Small Quantity Generators), the EAP must include the following information:

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

For facilities generating 1,000 kilograms or more of hazardous waste in a month (known as Large Quantity Generators), facility managers must coordinate preparation of a contingency plan with the EAP/IEMP to ensure that these plans include the information required. The Office of Sustainability regional field staff and Safety personnel may help the facility manager to develop the plan (either directly or through a contractor). National Preparedness Specialists can provide guidance on the EAP/IEMP. Under these plans, Postal Service employees will not respond to releases of hazardous waste.

## Storage Tanks

When storage tanks leak, response and corrective action is required. For employee safety and health, the EAP/IEMP must include the following procedures:

- a. Determine if there is an immediate fire or health hazard and take appropriate action (e.g., contact the fire department, evacuate affected employees).
- b. Notify the facility manager. After that, Facilities Operations, in coordination with the Office of Sustainability, is in charge of all cleanup and reporting activities. The Office of Sustainability can help to determine reporting requirements and cleanup standards.
- c. 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 Office of Sustainability for technical assistance; contractors may be required.

Facilities that store or use large quantities of oil (i.e., capacities above ground greater than 1,320 gallons or below ground greater than 42,000 gallons) must prepare and implement a Spill Prevention Control and Countermeasure (SPCC) Plan. Facilities that conduct vehicle maintenance or other fueling activities may be required to prepare a Stormwater Pollution Prevention Plan (SWPPP). These site-specific plans are separate from the EAP/IEMP and contain specific procedures necessary to comply with environmental regulations. Facilities with SPCC Plans and SWPPPs must adhere to the requirements defined in those Plans, in addition to the EAP/IEMP.

## 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.

## 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 must respond. See Handbook AS-556, *Asbestos Management Guide*, for guidance.

## Reporting Releases to the Environment

Hazardous and regulated material releases into the environment in excess of threshold quantities must be reported to the EPA and/or state and local agencies. Additionally, the Postal Service requires completion of PS Form 8187, *Hazardous and Regulated Substance Release Notification*, to internally report a release of a regulated or hazardous material into the environment.

In general, spills that reach stormwater, sanitary sewer drains, waterways, soil, groundwater, or surface water must be reported. For more information, visit the Sustainability website: <http://blue.usps.gov/sustainability/environmental.htm>.

# Program Responsibilities

## Headquarters

Safety and OSHA Compliance Programs (SOCP) coordinates and establishes policy relating to Postal Service employee handling of and safe response to hazardous materials releases. Sustainability coordinates internal and external response to hazardous materials releases to the environment. SOCP and the Hazardous Materials Program (HMP) receive reports of hazardous materials incidents involving mailed items via the MIRT and coordinate with Headquarters, area, district, and plant offices to prevent future occurrences. SOCP also coordinates with Product Classification, which has primary responsibility for determining the mailability of hazardous materials.

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

National 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.

The Office of Sustainability, Environmental Compliance and Risk Management, establishes policies and procedures for planning and responding to releases of hazardous materials to the environment and the disposal of regulated wastes.

## Areas

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

The Office of Sustainability regional field staff provide assistance and guidance on SPCC, SWPPP, and other environmental 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 National Preparedness Specialists to develop the IEMP, EAP, and other response plans (HAZWOPER) as needed. They coordinate with Environmental Compliance and Risk Management staff for technical assistance on environmental regulations as needed.

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# Attachment 1- Standard Operating Procedures for Cleaning Up Incidental Releases

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 (EAP) (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 (e.g., examine label information, contact the mailer, look online for a Safety Data Sheet for the product) and determine if spill 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 (e.g., 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 205-A, Immediate Response Actions — Suspicious Mail and Unknown Powders or Substances. (Attachment 6 provides instructions for obtaining Poster 205-A this poster.)
2. *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, team members 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 (Chemical Transportation Emergency Center) is dedicated to helping emergency responders deal with incidents involving hazardous materials. Call the CHEMTREC hotline, 800-424-9300, for assistance.
  - c. First responders and other local resources.
3. *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 - A free pdf copy is available to download [here](#) or search online [here](#).
  - b. *Emergency Response Guidebook*, Department of Transportation (click [here](#) for downloads and mobile apps.)
  - c. Facility SOP and EAP.
  - d. Suspicious Mail Web site (see Attachment 6).
  - e. Regulated/Hazardous Waste Management and Disposal (see [Sustainability website](#))
4. *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.

Filtering facepiece respirators may be provided to spill teams, along with a copy of Appendix D of the OSHA respiratory protection standard. 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.

4. *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 the following:
  - 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-810-2017-4, Bloodborne Disease Exposure Control Plans).
  - e. A HAZMAT handling and storage area with local exhaust ventilation and eye lavage and shower.
5. *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).
6. *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 Poster 205-B, *Immediate Response Actions — Suspicious Mail and Unknown Powders or Substances*. (Attachment 6 provides instructions for obtaining this poster.)
7. *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:
    - (1) 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.
    - (2) 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:

- (1) When notified of a leaking parcel, contact the identified cleanup persons and make sure the parcel is isolated and the immediate area cleared.
  - (2) If a hazard (emergency release) is immediately apparent, follow the facility EAP.
- c. *Incidental Spill and Leak Team Members.* Persons assigned and trained to deal with incidental releases must do the following:
- (1) Determine if the material is obviously hazardous and/or constitutes an emergency release (smoking, irritating, odorous, or labeled or marked as hazardous).
    - (a) - If so, follow the facility EAP.
    - (b) - 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
    - (c) - Do not place the leaking package or letter back into the mailstream. Contact the mailer or addressee to pick up the item.
  - (2) Consult the designated Office of Sustainability regional field staff or visit the [Sustainability website](#) for guidance on disposal of hazardous wastes and reporting requirements.
8. *Documentation of Training Activities.* Training of employees based on the requirements of this MI must be documented in the Integrated HR System (HERO).
9. *Periodic Program Review.* Safety, National 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 mailstream 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 and other designated local first responders 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, national preparedness specialists, and operations managers must review the EAP (1) for conformance with 29 CFR 1910.38 and Postal Service national preparedness policy, and (2) to ensure that it is implemented and reviewed periodically.

Consult the [Safety Resources Website](#) for details on EAPs.

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# Attachment 3 - HAZWOPER Training Requirements for Postal Service Employees

In addition to the courses described here, the Hazardous Materials Program 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 [\*HMP Web site.\*](#))

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

### ***Required for:***

- a. Mail handlers.
- b. Supervisors.
- c. 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 the following:

1. An understanding of hazardous materials, including the general categories of hazardous materials accepted into the mailstream.
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 HAZMAT; 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 for:***

- a. Maintenance and custodial personnel
- b. Supervisors
- c. Other persons identified to manage and clean up incidental releases (incidental spill and leak team members).

### ***Duration***

8 hours – Initial Training in HERO: Hazwoper Ops 1st Responder-VLR

4 hours - Annual Refresher - in HERO: Hazwoper Ops 1st Responder Refresher-VLR. (Note: courses include a required hands-on section at the employee's worksite)

### ***Subject Matter***

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

- a. Basic hazard and risk assessment techniques.
- b. Selecting and using PPE for limited cleanup duties.
- c. Basic HAZMAT terms

- d. Understanding the facility SOP and EAP.
- e. How to respond to suspicious mail and unknown powders or substances.

### **III. HAZWOPER Specialist Postal Equivalent**

#### ***Recommended for:***

- a. Safety and health personnel.
- b. National Preparedness Specialists and area managers.
- c. Maintenance managers and supervisors.

#### ***Duration***

24 hours – Initial Training in HERO: Hazwoper Special Postal Equivalent

4 hours – Annual Refresher – in HERO: Hazwoper Specialist Refresher-VLR. (NOTE: courses include a required hands-on section at NCED or the employee's worksite)

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

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

- a. Classify, identify, and verify known and unknown materials.
- b. Perform specialized control, containment, and confinement operations.
- c. Assess the risks and hazards of a release.
- d. Contain a release safely and defensively.
- e. Contact appropriate response personnel when necessary.
- f. Evaluate chemical and physical hazards in order to distinguish between incidental and emergency releases.
- g. Understand procedures for responding to incidents involving suspicious mail and unknown powders or substances.

# Attachment 4 - Definitions

## 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, or property during transportation. In international commerce, hazardous materials are known as "dangerous goods." — Publication 52, *Hazardous, Restricted and Perishable Mail*.

## Occupational Safety and Health Administration Definitions from OSHA Regulation 1910.120(a)(3):

"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 103(14) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)(42 U.S.C. 9601);
- [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 off-spring;
- [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:

- a. The release requires evacuation of employees in the area;
- b. The release poses, or has the potential to pose, conditions that are immediately dangerous to life and health (IDLH);
- c. 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);
- d. The release requires immediate attention because of imminent danger;
- e. The release may cause high levels of exposure to toxic substances;
- f. 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
- g. 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 (e.g., mutual aid groups, local fire departments) 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

|          |   |
|----------|---|
| CDC      | Centers for Disease Control and Prevention            |
| CFR      | Code of Federal Regulations                           |
| CHEMTREC | Chemical Transportation Emergency Center              |
| DOT      | Department of Transportation                          |
| EAP      | Emergency Action Plan                                 |
| EPA      | Environmental Protection Agency                       |
| ELM      | Employee and Labor Relations Manual                   |
| ERP      | Emergency Response Plan                               |
| HAZMAT   | hazardous materials                                   |
| HAZWOPER | Hazardous Waste Operations and Emergency Response     |
| HERO     | Integrated HR System                                  |
| HMP      | Hazardous Materials Program                           |
| IDLH     | Immediately dangerous to life and health              |
| IEMP     | Integrated Emergency Management Plan                  |
| IMM      | International Mail Manual                             |
| MI       | Management Instruction                                |
| MIRT     | Mailpiece Incident Report Tool                        |
| NCED     | National Center for Employee Development              |
| NIOSH    | National Institute for Occupational Safety and Health |
| OSHA     | Occupational Safety and Health Administration         |
| PANS     | Postal Alert Notification System                      |
| PCB      | polychlorinated biphenyl                              |
| PEL      | permissible exposure limit (OSHA)                     |
| PPE      | personal protective equipment                         |
| SCBA     | self-contained breathing apparatus                    |
| SOC      | Safety & OSHA Compliance Programs                     |
| SOP      | Standard Operating Procedure                          |
| SPCC     | Spill Prevention Control and Countermeasure (Plan)    |
| SWPPP    | Stormwater Pollution Prevention Plan                  |
| VLR      | Virtual Learning Room                                 |

## Attachment 6 — References

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.

Federal regulations that involve OSHA can also be found at <http://www.osha.gov>, 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 110-112, Responding to Releases and SPCC Plans

40 CFR 261-280-Hazardous and Regulated Waste and Underground Storage Management

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

49 CFR 171.8, Transportation, Definitions and abbreviations

### 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. Use the A to Z button to find links to information on spill and leak response, safety program management, accident reduction, emergency evacuation, and frequently used documents.

The Safety Toolkit (STK) is an online, interactive management tool for safety and management personnel, who use the toolkit to record and track facility inspections, Program Evaluation Guide inspections, OSHA citations, and more. To reach the toolkit from the Safety Resources home page, click on the Safety Toolkit button at the upper left. To use the Safety Toolkit, you must set up an account through eAccess. Instructions for requesting an account are in Chapter 1 of the STK User Guide, which can be reached by clicking the STK User Guide button on the Safety Resources page.

### PolicyNet

International Mail Manual (IMM)

- Employee and Labor Relations Manual (ELM) MI EL-810-2017-4, Bloodborne Disease Exposure Control Plans



- HBK EL-812, Hazardous Materials and Spill Response
- PUB 52, Hazardous, Restricted, and Perishable Mail
- Poster 286, Suspicious Mail
- Poster 205-B, Immediate Response Actions – Suspicious Mail and Unknown Powders or Substances

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

### **National Preparedness and Suspicious Mail**

For up-to-date information, consult the National Preparedness Suspicious Mail web site. On the Suspicious Mail web site, you will be able to view and download videos on suspicious mail and unknown powders or substances, as well as the posters and response checklists mentioned above.

### **Hazardous Materials Program**

On the Hazardous Materials Program website you will find information on retail hazardous materials acceptance, and handling and processing of hazardous materials.

### **Office of Sustainability**

From the Sustainability website on blue, click on the appropriate environmental compliance topic (e.g., Hazardous and Regulated Waste Management, Spills and Release Reporting, Storage Tanks) to find guidance on environmental compliance requirements.

# Management Instruction

## Response to Hazardous Materials Releases

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

- 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 the following:

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

- a. ~~(1)~~ airborne concentrations above the exposure limits permitted by OSHA, or
- b. ~~(2)~~ any other hazardous situation.

Such events are typically small in volume, have little potential for human exposure, and involve materials of low toxicity. 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 Mailstream: 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) are ones 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.

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

|   |                              |
|---|------------------------------|
| Date  | March 27, 2006TRD            |
| Effective   | March 27, 2006Immediately    |
| Number  | EL-610-2006-32019-5          |
| Obsoletes   | EL-610-96-42006-3            |
| Units   | Safety and Environmental     |
| Performance/Management Programs   | OSHA Compliance Programs     |
|   | Employee Resource Management |
|          |                              |
| Anthony J. Vigilante Simon Storey<br>Executive Vice President<br>Human Resources Management |                              |

### 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 of Mail: Planning and Response               | 3 |
| Limited Availability of Hazardous Materials   | 3 |
| Responding to Suspicious Mail and Unknown Powder or Substances                            | 4 |
| Response Planning   | 4 |
| Cleanup   | 4 |
| Filing Form 4720, Mail Pieces Mailpiece Spill or Leak                                     | 5 |
| Incident Report   | 5 |
| Required Training   | 6 |
| Required Availability of Training and Materials   | 6 |
| Record Keeping  | 6 |
| Releases of Hazardous Materials Outside the Mail-Stream/Mailstream: Planning and Response | 7 |
| Resource Conservation and Recovery Act-Hazardous Waste Generators                         | 7 |
| Storage Tanks   | 8 |
| Toxic Substances Control Act  | 8 |
| The Clean Water Act and Polychlorinated Biphenyls   | 8 |
| Asbestos  | 8 |
| Reporting Releases to the Environment   | 8 |



**CONTENTS** Comprehensive Environmental  
Response, Compensation, and  
Liability Act ..... 10 (continued)

|                                |     |
|--------------------------------|-----|
| Program Responsibilities ..... | 109 |
| Headquarters .....             | 10  |
| Areas .....                    | 9   |
| Districts and Plants .....     | 11  |

**CONTENTS**  
continued

|  |    |
|--|----|
| Attachment 1 — Standard Operating<br>Procedures for Cleaning Up<br>Incidental Releases ..... | 13 |
| Attachment 2 — Emergency Action<br>Plan: Hazardous Materials<br>Emergency Releases .....     | 15 |
| Attachment 3 — HAZWOPER<br>Training Requirements for<br>Postal Service Employees .....       | 24 |
| Attachment 4 — Definitions .....   | 19 |
| Attachment 5 — Acronyms .....  | 22 |
| Attachment 6 — References .....  | 29 |

## Responding to Exposure or Injury

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/exposed 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~~2017-24, *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 into place policies and procedures to deal with such incidents. While this MI refers to some of those policies and procedures, consult the Emergency National Preparedness Suspicious Mail Web site for the latest information. (See Attachment 6 for directions to the site.)

## Preventing Releases from Pieces of Mail

All Postal Service personnel—from acceptance to processing to delivery—must help prevent hazardous 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, the Hazardous Materials Program. (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 doing the following:

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

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

- 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 Department of Transportation~~ (DOT) labels and markings: (prohibited or otherwise).

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, give extra scrutiny to 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)~~ Do any of your articles contain anything liquid, fragile, perishable, or potentially hazardous, such as lithium batteries, perfume or mercury?

## Safe Handling of Mail Containing Hazardous Materials

To maximize safety for employees, the general public, and transportation networks, ~~Aviation Mail Security (AMS)~~ the Hazardous Materials Program (HMP) has developed standard operating procedures for the handling and processing of hazardous materials for facilities that process mail. The procedures are on the AMSHMP 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 Publication 52, Hazardous, Restricted, and Perishable Mail, and the Mailing Standards of the accepted items are equivalent in potential hazard to DOT "other regulated United States Postal Service, International Mail Manual (IMM) provide guidance on mailing requirements for limited quantities of hazardous 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 National Preparedness (Emergency— National Preparedness) maintains the latest policy policies 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 must 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 mailstream 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. Select Team members are to be selected from volunteers. If there are insufficient volunteers, then management members are designated. (See Attachment 1 for guidance in preparing an SOP.)

- 3.2. 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 website 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~~ Mailstream: Planning and Response," found on page 7 of this MI provides guidance on when an ERP is required.)

Contact ~~Emergency~~your ~~National~~ Preparedness ~~managers~~Specialist for guidance on developing EAPs and facility safety personnel for SOPs and ERPs. ~~Incorporate~~ 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:

- a. Immediately isolate the area where suspicious mail or unknown powders or substances were found.
- b. 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 do the following:

- a. ~~i~~Isolate the area;
- b. ~~e~~Call for local first responders (or the Inspection Service when suspicious mail or unknown powders or substances are involved); ~~and~~
- c. ~~p~~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.



Leaking parcels may contain materials that are regulated waste, e.g., hazardous waste, universal waste, medical waste, etc., when disposed. Regulated wastes must be placed in labeled containers, tracked through disposal, and managed by a licensed hazardous/regulated waste management supplier. Regulated wastes must never be placed in the trash. Contact the designated Office of Sustainability (Sustainability) regional field staff or visit the [Sustainability website](#) for assistance with waste classification and disposal.

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

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~~the Mailpiece Incident Report Tool (MIRT) to report incidents to Safety ~~Performance Management and Aviation Mail Security~~OSHA Compliance Programs and the Hazardous Materials Program at ~~Headquarters; a copy~~Headquarters. In addition, the HMP must be notified by email at [HAZMAT@usps.gov](mailto:HAZMAT@usps.gov)

For those with access to the local inspector in charge, Safety Toolkit (STK), the Mailpiece Incident Report Tool can be found in the menu under the "Create Safety Records" tab. Those who do not have access to the STK can reach the MIRT by clicking here: <http://safetytoolkit.usps.gov/IRT/ListingPage.aspx>. Incidents involving suspicious mail and unknown powders or substances must be reported in the Postal ~~Emergency Management~~Alert Network System (PEMSPANS). Follow the procedures established by ~~Emergency~~National 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~~Complete Section G, "Notification and Follow-up Action," on ~~Form 1770~~ must indicate who was contacted, how contact was made, and the date. ~~MIRT to help prevent further incidents of the same type.~~ Completing this ~~form~~report 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, Procedure~~the Sustainability website for guidance: [http://blue.usps.gov/sustainability/environmental/spills\\_and\\_regulatory\\_reporting.htm](http://blue.usps.gov/sustainability/environmental/spills_and_regulatory_reporting.htm)

~~Reporting Releases of Hazardous and Regulated Substances to the Environment.)).~~

## Required Training

### Types of Training (See Attachment 3)

~~All employees~~Supervisors must ~~(1) be trained~~ periodically ~~and~~ do the following for all employees:

a. Inform the employees about the facility EAP and procedures for handling suspicious mail and unknown powders or sub- stances, and ~~(2) receive~~

b. Review with the employees the contents of 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~~IMM 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). Integrated HR System (HERO).~~ (See Attachment 3 for content requirements and further information.)

### Record Keeping

Supervisors must ensure that all training is documented in the Integrated HR System (HERO) National Training Database.



# Releases of Hazardous Materials Outside the Mailstream: 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~~mailstream. 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 the following: (1)

- a. ~~i~~Including initial actions in a section of the EAP required by 29 CFR 1910.38; and (2)
- b. ~~p~~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 EmergencyNational 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~~Sustainability has issued documents environmental compliance and risk mitigation policies, programs, and procedures 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~~ resources can be found on the Sustainability website: <http://blue.usps.gov/sustainability/environmental.htm> ~~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 Hazardous Waste Generators**

Facilities Postal Service facilities that generate hazardous waste may be required to follow EPA contingency planning requirements. Incorporate EPA contingency planning requirements into the facility EAP/IEMP. For facilities generating between more than 100 and, but less than 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 (known as Small Quantity Generators), the EAP must include the following RCRA-mandated information:

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

## **Large-Quantity Generators**

Facilities For facilities generating more than 1,000 kilograms or more 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 (known as Large Quantity Generators), 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/Office of Sustainability regional field staff and Safety personnel may help the facility manager to develop the plan (either directly or through a contractor). District Emergency National Preparedness Managers Specialists 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 is required. For employee safety and health, the EAP/IEMP must include the following procedures:

- b.a. 1. Determine if there is an immediate fire or health hazard and take appropriate action (e.g., contact the fire department, evacuate affected employees).
- d.b. 2. Notify the facility manager. After that, Facilities Operations, in coordination with the facility manager and facilities service office are Office of Sustainability, is in charge of all cleanup and reporting activities. They should contact the Area Environmental Compliance Specialist, who The Office of Sustainability can help to determine reporting requirements and cleanup standards.
- f.c. 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 Office of Sustainability for technical assistance; contractors may be required.

## **Toxic Substances Control Act**

Facilities that store or use large quantities of oil (i.e., capacities above ground greater than 1,320 gallons or below ground greater than 42,000 gallons) must prepare and implement a Spill Prevention Control and Countermeasure (SPCC) Plan. Facilities that conduct vehicle maintenance or other fueling activities may be required to prepare a Stormwater Pollution Prevention Plan (SWPPP). These site-specific plans are separate from the EAP/IEMP and contain specific procedures necessary to comply with environmental regulations. Facilities with SPCC Plans and SWPPPs must adhere to the requirements defined in those Plans, in addition to the EAP/IEMP.

## **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~~must respond. See Handbook AS-556, *Asbestos Management Guide*, for guidance.

## **Reporting Releases to the Environment**

Hazardous and regulated material releases into the environment in excess of threshold quantities must be reported to the EPA and/or state and local agencies. Additionally, the Postal Service requires completion of PS Form 8187, *Hazardous and Regulated Substance Release Notification*, to internally report a release of a regulated or hazardous material into the environment.

In general, spills that reach stormwater, sanitary sewer drains, waterways, soil, groundwater, or surface water must be reported. For more information, visit the Sustainability website: <http://blue.usps.gov/sustainability/environmental.htm>.

# 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) OSHA Compliance Programs (SOCP) coordinates and establishes policy relating to Postal Service employee handling of and safe response to hazardous materials releases. SEPM Sustainability coordinates internal and Aviation Mail Security (AMS) external response to hazardous materials releases to the environment. SOCP and the Hazardous Materials Program (HMP) receive reports of hazardous materials incidents involving mailed items (on PS Form 1770) via the MIRT and coordinate with Headquarters, area, district, and plant offices to prevent future occurrences. SEPM SOCP also coordinates with Mailing Standards Product Classification, which has primary responsibility for determining the mailability of hazardous materials.

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

Emergency National 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.



The Office of Sustainability, Environmental Compliance and Risk Management, establishes policies and procedures for planning and responding to releases of hazardous materials to the environment and the disposal of regulated wastes.

### **Areas**

Area Safety managers, in conjunction with Area Managers, EmergencyNational 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~~The Office of Sustainability regional field staff provide assistance and guidance on emergency-SPCC, SWPPP, and other environmental 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 EmergencyNational Preparedness ~~managers~~Specialists to develop the IEMP, EAP, and other response plans (HAZWOPER) as needed. They coordinate with ~~Area~~Environmental Compliance Specialists and Risk Management staff for technical assistance on environmental regulations as needed.



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# Attachment 1- Standard Operating Procedures for Cleaning Up Incidental Releases

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 ([EAP](#)) (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.

2.1. *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 ([e.g., examine label information, contact the mailer, look online for a Safety Data Sheet for the product](#)) and determine if [it spill](#) 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 ([e.g.,](#) 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 [205-A](#), Immediate Response Actions — Suspicious Mail and Unknown Powders or Substances. (Attachment 6 provides instructions for obtaining [Poster 205-A this poster.](#))

4.2. 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, [theyteam members](#) 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:

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

c.b. CHEMTREC (~~The Chemical Transportation Emergency Center~~;) [is](#) dedicated to helping emergency responders deal with incidents involving hazardous materials. Call the CHEMTREC hotline, 800-424-[93209300](#), 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>.~~

e.c. d. First responders and other local resources.

6.3. 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](#) (A free pdf copy is available [at to download here](#) or search online [here](#).)
- b. *Emergency Response Guidebook*, [ERG2004](#), Department of Transportation ([click here](#) for further information, [see downloads and mobile apps.](#))

~~c. Hazardous Materials Cleanup: Student Handbook from PEDC~~



~~d.c.~~ d. Facility SOP and EAP.

~~f.d.~~ e. Suspicious Mail Web site (see Attachment 6).

e. Regulated/Hazardous Waste Management and Disposal (see Sustainability website)

7.4. 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.

~~e.b.~~ b. Neoprene gloves or equivalent that provide forearm protection.

~~d.c.~~ c. Rubber boots or equivalent.

~~f.d.~~ 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~~ Filtering facepiece respirators may be provided to spill teams, along with a copy of Appendix D of the OSHA respiratory protection standard. 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.

9.5. 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 the following:

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-810-2000-22017-4, Bloodborne Disease Exposure Control Plans).

e. A HAZMAT handling and storage area with local exhaust ventilation and eye lavage and shower.

11.6. 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).

13.7. 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 205-B, Immediate Response Actions — Suspicious Mail and Unknown Powders or Substances. (Attachment 6 provides instructions for obtaining this poster.)

14.8. 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:
- (1) ■ 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.
  - (2) ■ 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:
- (1) ■ When notified of a leaking parcel, contact the identified cleanup persons and make sure the parcel is isolated and the immediate area cleared.
  - (2) ■ If a hazard (emergency release) is immediately apparent, follow the facility EAP.
- c. *Incidental Spill and Leak Team ~~Personnel~~Members.* Persons assigned and trained to deal with incidental releases (~~volunteers unless none are available~~) must do the following:
- (1) ■ Determine if the material is obviously hazardous and/or constitutes an emergency release (smoking, irritating, odorous, or labeled or marked as hazardous).
    - (a) - If so, follow the facility EAP.
    - (b) - 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
    - (c) - Do not place the leaking package or letter back into the mailstream. Contact the mailer or addressee to pick up the item.
  - (2) ■ Consult ~~Area Environmental Compliance Specialists~~the designated Office of Sustainability regional field staff or visit the Sustainability website for guidance on disposal of hazardous wastes and reporting requirements.
- ~~16.9. 10.~~ *Documentation of Training Activities.* Training of employees based on the requirements of this MI must be documented in the ~~National Training Database~~Integrated HR System (HERO).
- ~~18.10. 11.~~ *Periodic Program Review.* Safety, ~~emergency preparedness, main-tenance~~National 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 mailstream or during other operations, and must include the following information about hazardous materials incidents:

- 2.1. Telephone numbers of HAZMAT experts and the local first responders to be called in cases of emergency release. Prior coordination with the fire department and other designated local first responders is required.
- 4.2. Emergency evacuation procedures, emergency exit assignments, and places of refuge.
- 6.3. 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.
- 8.4. Procedures to account for all employees after an emergency evacuation.
- 10.5. Provisions for first aid, rescue, and medical follow-up.

### Emergency Action Plan Compliance

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

Consult the [Safety Resources Website](#) for details on EAPs. ~~(Attachment 6 provides directions to the site.)~~

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# Attachment 3 - HAZWOPER Training Requirements for Postal Service Employees

In addition to the courses described here, ~~Aviation Mail Security~~the Hazardous Materials Program 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 HMP Web site~~AMS Web site; directions are provided in attachment 6-).~~)

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

**Required ~~of~~for:**

b.a. ☐ Mail handlers.

d.b. ☐ Supervisors.

f.c. ☐ 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 the following:

2-1. An understanding of hazardous materials, including the general categories of hazardous materials accepted into the ~~mail stream~~ mailstream.

4-2. An understanding that hazardous materials incidents can result in injury, damage to equipment, or damage to mail if not properly handled.

6-3. The ability to (a) identify an emergency release; (b) look for labels, placards, and addresses that may indicate the presence of HAZMAT; and (c) avoid contact with packages that are leaking, smoking, or irritating to eyes or respiratory tract.

8-4. Familiarity with the facility incidental release SOP (such as whom to call, when to isolate an area, and other elements of the EAP).

10-5. Familiarity with recognition and response procedures for dealing with suspicious mail and unknown powders or substances.

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

**Required ~~of~~for:**

b.a. ☐ Maintenance and custodial personnel

d.b. ☐ Supervisors

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

**Duration**

8 hours – Initial Training in HERO: Hazwoper Ops 1st Responder-VLR

4 hours - Annual Refresher - in HERO: Hazwoper Ops 1st Resp Refresher-VLR. (Note: courses include a required hands-on section at the employee's worksite)

**Subject Matter**

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

- b.a. ~~1.~~ Basic hazard and risk assessment techniques.
- d.b. ~~2.~~ Selecting and using PPE for limited cleanup duties.
- e.c. ~~3.~~ Basic HAZMAT terms
- g.d. ~~4.~~ Understanding the facility SOP and EAP.
- i.e. ~~5.~~ How to respond to suspicious mail and unknown powders or substances.

**VI.III. HAZWOPER Specialist Postal Equivalent**

**Recommended for:**

- b.a. ~~■~~ Safety and health personnel.
- d.b. ~~■~~ EmergencyNational Preparedness ManagersSpecialists and area managers.
- f.c. ~~■~~ Maintenance managers and supervisors.

**Duration**

24 hours – Initial Training in HERO: Hazwoper Special Postal Equivalent

4 hours – Annual Refresher – in HERO: Hazwoper Specialist Refresher-VLR. (NOTE: courses include a required hands-on section at NCED or the employee's worksite)

**Subject Matter**

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

- b.a. ~~1.~~ Classify, identify, and verify known and unknown materials.
- d.b. ~~2.~~ Perform specialized control, containment, and confinement operations.
- e.c. ~~3.~~ Assess the risks and hazards of a release.
- g.d. ~~4.~~ Contain a release safely and defensively.
- i.e. ~~5.~~ Contact appropriate response personnel when necessary.
- k.f. ~~6.~~ Evaluate chemical and physical hazards in order to distinguish between incidental and emergency releases.
- l.g. ~~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

### 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/or property during transportation. In international commerce, hazardous materials are known as "dangerous goods." —Domestic Mail Manual— Publication 52, Hazardous, Restricted and Perishable Mail.

### Occupational Safety and Health Administration Definitions from OSHA Regulation 1910.120(a)(3):

"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:

[B][A] Any substance defined under section 101103(14) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)(42 U.S.C. 9601);

[D][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 off-spring;

[F][C] Any substance listed by the U.S. Department of Transportation as hazardous materials under 49 CFR 172.101 and appendices; and

[H][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:

- a. ■ The release requires evacuation of employees in the area;
- e.b. ■ The release poses, or has the potential to pose, conditions that are immediately dangerous to life and health (IDLH);
- d.c. ■ 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);

- f.d. ■ The release requires immediate attention because of imminent danger;
- g.e. ■ The release may cause high levels of exposure to toxic substances;
- h.f. ■ 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
- i.g. ■ 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

### Acronyms

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|                 |   |
|-----------------|---|
| AMS             | Aviation Mail Security  |
| CDC             | Centers for Disease Control <u>and Prevention</u>                                 |
| CFR             | Code of Federal Regulations-  |
| DMM             | <del>Domestic Mail Manual</del>   |
| CHEMTREC        | <u>Chemical Transportation Emergency Center</u>                                   |
| DOT             | Department of Transportation  |
| EAP             | Emergency Action Plan   |
| EPA             | <u>Environmental Protection Agency</u>  |
| ELM             | Employee and Labor Relations Manual   |
| ERP             | Emergency Response Plan   |
| HAZMAT          | hazardous materials   |
| HAZWOPER        | Hazardous Waste Operations and Emergency Response                                 |
| HERO            | <u>Integrated HR System</u>   |
| HMP             | <u>Hazardous Materials Program</u>  |
| IDLH            | immediately dangerous to life and health  |
| IEMP            | Integrated Emergency Management Plan  |
| IMM             | <u>International Mail Manual</u>  |
| MI              | Management Instruction  |
| MIRT            | <u>Mailpiece Incident Report Tool</u>   |
| NCED            | National Center for <u>EducationalEmployee</u> Development                        |
| NCP             | <del>National Oil and Hazardous Substances Pollution Contingency Plan (EPA)</del> |
| NEPA            | <u>National Fire Protection Association</u>                                       |
| NIOSH           | National Institute for Occupational Safety and Health                             |
| ORM-D           | <del>other regulated materials</del>  |
| RCRA            | <del>Resource Conservation and Recovery Act</del>                                 |
| OSHA            | Occupational Safety and Health Administration                                     |
| PANS            | <u>Postal Alert Notification System</u>   |
| PCB             | polychlorinated biphenyl  |
| PEDC            | <del>Postal Employee Development Center</del>                                     |
| PEL             | permissible exposure limit (OSHA)   |
| <del>PEMS</del> | <del>Postal Emergency Management System</del>                                     |
| PPE             | personal protective equipment   |
| PSTN            | <del>Postal Service Training Network</del>  |
| SCBA            | self-contained breathing apparatus-   |
| SLAP            | <del>Shape, Look, Address, Packaging</del>  |
| SOC             | <u>Safety &amp; OSHA Compliance Programs</u>                                      |
| SOP             | Standard Operating Procedure  |

|       |  |
|-------|--|
| SPCC  | Spill Prevention Control and Countermeasure ( <del>Plan</del> EPA) |
| UST   | <del>underground storage tank</del>                                |
| SWPPP | <u>Stormwater Pollution Prevention Plan</u>                        |
| VLR   | <u>Virtual Learning Room</u>                                       |



## 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/](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 110-112, Responding to Releases and SPCC Plans](#)

[40 CFR 261-280 110.63, National Emission Standards for Air Pollutants for Source Categories Hazardous and Regulated Waste and Underground Storage Management](#)

[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

[49 CFR 171.8, Transportation, Definitions and abbreviations](#)

## 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 InUse the left column, under "Essential Links," click on Safety Resources. You will A to Z button to~~ find links to information on [spill and leak response](#), safety program management, accident reduction, emergency evacuation, and frequently used documents.

The *Safety Toolkit (STK)* is an online, interactive management tool for safety ~~and management~~ personnel, who use the toolkit to record and track facility inspections, Program Evaluation ~~Guides, and Guide inspections~~, OSHA citations, ~~and more~~. To reach the toolkit from the Safety Resources [home](#) page, click on ~~the Safety Toolkit Information found in button at the upper left column~~. To use the Safety Toolkit, you must set up an account ~~with a password (available only to safety personnel) through eAccess~~. Instructions ~~for requesting an account are in Chapter 1 of the STK User Guide, which can be reached by clicking the STK User Guide button on the Safety Toolkit Web site Resources page~~.

### PolicyNet

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

~~[International Domestic Mail Manual \(IDMM\)](#)~~

■ ~~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-~~2000-22~~2017-4, [Bloodborne Disease Exposure Control Plans](#)

■ HBK EL-812, [Hazardous Materials and Spill Response](#)

■ PUB 52, [Hazardous, Restricted, and Perishable Mail](#)

■ Poster 286, [Suspicious Mail](#)

■ [Poster 205-B, Immediate Response Actions – Suspicious Mail and Unknown Powders or Substances](#)

■ [Publication 167-B, Response checklist for Suspicious Mail and Unknown Powders and Substances](#)

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



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

For up-to-date information, consult the **Emergency**National Preparedness Suspicious Mail~~Suspicious Mail Web site. From <http://blue.usps.gov>, click on *Inside USPS*, then *Emergency Preparedness*, then *Suspicious Mail*. At web site. On the Suspicious Mail ~~W~~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* view and *Unknown Powders or Substances* download videos on suspicious mail and unknown powders or substances, as well as the posters and response checklists mentioned above.~~

## **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 Program**~~

On the Hazardous Materials Program website you will find information on retail hazardous materials acceptance, and handling and processing of hazardous materials.

### **Office of Sustainability**

From the [Sustainability](#) website on blue, click on the appropriate environmental compliance topic (e.g., Hazardous and Regulated Waste Management, Spills and Release Reporting, Storage Tanks) to find guidance on environmental compliance requirements.