

SAFETY COMPENDIUM – HAZARDOUS SPILLS AND LEAKS

Regardless of size, every postal facility must establish an Emergency Action Plan that clearly identifies actions that management and other employees must take to ensure safety of employees and protection of property from hazardous materials (HAZMAT) spills, including the following:

1. Standard operating procedures (SOPs) for dealing with spills and leaks of items in the mail stream or from other sources. At a minimum, the facility SOP must identify personnel (incidental spill and leak teams) who will make early decisions and clean up incidental releases, establish procedures, and provide training, personal protective equipment (PPE), and other resources. Team members are to be selected from volunteers. If there are insufficient volunteers, then members are designated.
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 installation head must establish a program of promoting safety awareness through communications or training, as appropriate. Such a program must include, but is not limited to, the following elements:

- a. Make sure that all employees are familiar with hazardous materials (HAZMAT) procedures for handling leaking packages.
- b. Provide training for employees who handle HAZMAT spills or leaks and document when training occurred.
- c. Make a list of available trained employees and post it on appropriate bulletin boards.
- d. Each facility must have written standard operating procedures (SOPs) to handle a HAZMAT spill or leak and a specifically designated area for holding or rewrapping leaking packages.
- e. The Chemical Transportation Emergency Center (CHEMTREC) is dedicated to helping emergency responders deal with incidents involving hazardous materials. Instruct your employees to call CHEMTREC'S hotline, 800-424-9300, for expert assistance in dealing with spilled or leaking materials.

Incidental releases are spills or leaks from pieces of mail that can be absorbed or otherwise controlled at the time of release. Incidental releases are unlikely to result in (1) airborne concentrations above the exposure limits permitted by OSHA, or (2) any other hazardous situation. Spills and leaks of other hazardous materials in Postal Service facilities may also be incidental in nature.

Emergency releases are releases of hazardous substances (in or out of the mail stream) that by their nature pose a threat to health and safety sufficient to

require an emergency response regardless of the circumstances surrounding the release or the mitigating factors.

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:

Employees. Persons handling mailed items must be apprised (through awareness training) of the facility SOP and EAP and follow these procedures:

- When an employee discovers a leaking parcel, he or she must (1) isolate the package; (2) shut down mechanization, if applicable; (3) summon the supervisor or persons identified in the SOP; and (4) and have no further contact with the package. If the employee comes in contact with the material, he or she must immediately wash up and seek medical attention.
- When a package in a delivery vehicle leaks, the employee must isolate it if it is safe to do so. If there is any indication of a hazard (such as labeling, odor, smoke, or eye irritation), the employee must (1) park the vehicle in a safe location; (2) notify the supervisor and fire department; and (3) have no further contact with the package.
- If you suspect that a spilled substance is hazardous or is releasing vapors, evacuate the area immediately and notify your supervisor, or activate your facility's emergency action plan.
- If the spilled substance is flammable, take every precaution to avoid igniting the substance.
- Never start, stop, plug, or unplug electrical equipment around a flammable spill. These actions could generate sparks that ignite the flammable substance.
- If an incidental spill (a spill limited in quantity, exposure potential, and toxicity) of a known substance occurs, notify your supervisor for immediate cleanup.
- Employees must not be directed to handle parcels leaking non-mailable hazardous materials or substances that are irritating to the eyes or respiratory tract, smoking or releasing visible vapors, or otherwise suspected of a hazard. Instead, they are to isolate the area, call for local first responders (or the Inspection Service when suspicious mail or unknown powders or substances are involved), and proceed with other actions indicated in the facility EAP.

Supervisors. Supervisors must be trained to follow procedures in the facility SOP and EAP and do the following:

- When notified of a leaking parcel, contact the identified cleanup persons and make sure the parcel is isolated and the immediate area cleared.

- If a hazard (emergency release) is immediately apparent, follow the facility EAP.

Incidental Spill and Leak Team Personnel. Persons assigned to deal with incidental releases (volunteers unless none are available) are assigned to a team. 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. 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. Team leaders, supervisors, and other personnel are trained to handle incidental releases must do the following:

- Immediately isolate the area where suspicious mail or unknown powders or substances were found.
- Try to identify the spilled material and determine if it can be handled by Postal Service personnel.
- Determine if the material is obviously hazardous and/or constitutes an emergency release (smoking, irritating, odorous, or labeled or marked as hazardous).
- If so, follow the facility EAP.
- Decide on cleanup and disposal measures for materials that can be safely handled by Postal Service employees.
- If Postal Service personnel can manage the incidental release, identify appropriate PPE.
- If the material is hazardous and constitutes an emergency release, initiate the facility EAP (evacuate, call fire department, and so forth.)
- If the incident involves suspicious mail and unknown powders or substances, follow the procedures in the Poster, *Immediate Response Actions — Suspicious Mail and Unknown Powders or Substances*.
- If the material is mailable and can be safely handled, select PPE and cleanup methods and equipment. Place the package in a spill control tub or other container and transfer it to the HAZMAT holding or rewrap areas for further examination or rewrap.
- Do not place the leaking package or letter back into the mail stream. Contact the mailer or addressee to pick up the item.

Disposal:

- Dispose of hazardous materials according to your facility's Pollution Prevention Plan.
- If a spill beyond the incidental stage occurs, invoke your facility's Spill Prevention Control and Countermeasure (SPCC) plan or emergency action plan. (An incidental-stage spill is limited in quantity, exposure potential, and toxicity.)

Filing Form 1770, Mail Piece 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 to report incidents to Safety Performance Management and Aviation Mail Security at Headquarters; a copy must go to the local inspector in charge. Incidents involving suspicious mail and unknown powders or substances must be reported in the Postal Emergency Management System (PEMS). Follow the procedures established by Emergency Preparedness and the Inspection Service for reporting this kind of emergency.

Sources: 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response (HAZWOPER); ELM Chapter 817.53; EL-801; EL-803; EL-810-2006-3, Response to Hazardous Materials Releases (January 23, 2009)