

# Management Instruction

## Hazard Communication (HazCom) Program

This management instruction (MI) establishes Postal Service™ policies and requirements for implementing a Hazard Communication (HazCom) Program in compliance with Occupational Safety and Health Administration (OSHA) Hazard Communication Standard, 29 Code of Federal Regulations (CFR) 1910.1200. This MI also provides guidance on reviewing chemical products for potential hazards.

### Policy

In its continuing commitment to provide employees with a safe and healthy environment, the Postal Service will do the following:

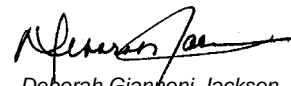
- Comply with federal regulations pertaining to the establishment of a HazCom program to transmit information about the hazards associated with chemicals used in Postal Service facilities.
- Avoid the purchase and use of hazardous chemicals and, where feasible, substitute non-hazardous chemicals or environmentally preferable chemicals.
- Give preference to chemicals with the least potential health hazard when the use of hazardous chemicals is necessary or unavoidable and no feasible alternative is available.
- Provide information to employees through implementation of a HazCom program and minimize possible effects whenever hazardous chemicals are used in the workplace.

### Scope

This MI applies to the following:

- Postal Service managers and supervisors whose employees work with hazardous chemicals.
- Postal Service contracting officials who purchase goods and services.

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- Suppliers of goods and services, including contractors performing work at Postal Service facilities.

**Note:** Employees are responsible for complying with all OSHA and Postal Service safety and health regulations, procedures, and practices (see *Employee and Labor Relations Manual* (ELM) 814.2).

## Regulatory Requirements

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The HazCom standard promulgated by OSHA requires the following:

- Chemical manufacturers and importers will perform hazard determinations for the chemicals they produce or import.
- Chemical manufacturers, importers, and distributors of hazardous chemicals will provide appropriate labeling and material safety data sheets.
- Employers will communicate information concerning chemical hazards in the workplace to their employees.

## The HazCom Program

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### Purpose

The purpose of the HazCom program is to ensure that workers receive information on hazardous chemicals used in their work areas and that the information is communicated in a way that reflects the requirements of this MI.

### Requirement

Postal Service facilities that use or produce hazardous chemicals must have a documented HazCom program.

### Program Resources

HazCom program resources provide guidance and standardized information for use in developing a site-specific OSHA Written HazCom Program.

To access these resources, go to <http://blue.usps.gov>. In the left column, click on *Safety and Environmental Resources*, then click on *Safety Programs*. In the right column, click on *OSHA Required Written Program Guides*; click on *HazCom Program Guide*.

The following resources are available:

- HazCom Program Guide.
- HazCom Decision Tree.

- HazCom Written Program Template.
- Documents to support the written program:
  - HazCom Hazardous Chemical Inventory Worksheet.
  - HazCom Safety Talk.
  - HazCom Self Evaluation.

## **Program Elements**

A HazCom program must have the following elements:

1. Hazardous chemical inventory.
2. Written program.
3. Training plan.
4. Requirements for contractors and suppliers.

### **1. Hazardous Chemical Inventory**

#### **The Steps**

Developing a hazardous chemical inventory consists of the following steps:

- Survey the facility.
- Review material safety data sheets and product labels.
- Review purchase records.
- Designate personnel to maintain the hazardous chemical inventory.
- Review the hazardous chemical inventory annually or as necessary.

#### **Survey the Facility**

##### **What to Include**

- Conduct a survey of chemicals present in the facility. Most chemicals in a workplace have some hazard potential.
- Include chemicals in all physical forms in the survey, such as liquids, solids, gases, vapors, fumes (e.g., from welding), and mists (e.g., from spraying operations).
- Include solids that change state when used as intended, such as welding rods and solder, which produce fumes when heated.

### **Exceptions**

Consumer products may be exempt from the HazCom standard if the frequency or duration of use does not exceed what a reasonable person would concede to be normal consumer use in a home or household environment. For example:

- An ammonia cleaner used once a week to clean a lobby may be exempt, but ammonia used daily to clean restrooms is not exempt.
- Rubbing alcohol in a first-aid kit is exempt.
- Cosmetics, medications, and food brought into the workplace for employee consumption are exempt.

### **Review Material Safety Data Sheets and Product Labels**

- Include products that have hazardous chemical ingredients listed on their material safety data sheets (MSDSs) or product labels; include the MSDSs in the hazardous chemical inventory.
- Maintain an MSDS for every hazardous chemical used. (Maintenance of an MSDS is not required for a product that does not contain hazardous ingredients.)

### **Designate Personnel to Maintain the Hazardous Chemical Inventory**

Refer to Roles and Responsibilities on page 14.

### **Review Purchase Records**

Review facility purchase records for products that may contain hazardous chemicals.

### **Review the Hazardous Chemical Inventory Annually**

Review and update the facility hazardous chemical inventory annually, or as necessary, to:

- Reflect current chemical use at the facility accurately.
- Identify obsolete or unnecessary chemical products and recycle or discard in accordance with local, state, and federal regulations. (See Avoiding Hazardous Chemical Accumulation, page 9.)

Consult the responsible environmental or safety specialist regarding local disposal requirements.

## **2. Written Program**

### **Requirements**

Postal Service facilities with hazardous chemicals must prepare and maintain a written program that includes instructions for the following elements:

- Hazardous chemical inventory.

- Material safety data sheets.
- Labels, and other forms of warning for nonroutine tasks.
- Information and training.
- Contractors and suppliers.

### **Labels and Other Forms of Warning**

Chemical manufacturers, importers, and distributors are required to label containers shipped with hazardous chemicals.

#### **Requirements**

Postal Service managers must:

- Designate personnel responsible for ensuring that proper labeling procedures are followed and that labels are legible and not removed or defaced.
- Describe the labeling systems used.
- Describe procedures for updating container label information when necessary.
- Comply with the following labeling requirements:
  1. Label each container received at a facility.
  2. Label all in-house secondary containers that contain hazardous chemicals with the chemical name, manufacturer information, and associated hazard information.
  3. Ensure that labels identify the chemical name, associated hazards, and appropriate personal protective equipment (PPE).
  4. Label pipes containing hazardous chemicals, such as refrigerants. (Postal Service standards for labeling pipes and plumbing and sewage systems are set forth in Handbook MS-1, *Operation and Maintenance of Real Property*, available at <http://www.mtsc.usps.gov/Msbooks/pdfpage/pdf/ms1/index.html>.)

#### **Exceptions**

Manufacturers design storage containers for the safe shipping, handling, and compatibility of the substance. The transfer, use, and handling of hazardous chemicals may require other precautions, such as adherence to MI EL-810-2001-1, *Personal Protective Equipment and Respiratory Protection Programs*.

A label is not required on a portable container that is intended only for immediate use by an employee who transfers the hazardous chemical into a portable container, such as a hand-held spray bottle. The following guidelines apply:

- The employee must maintain control over the containers at all times and use all of the hazardous chemical transferred in this manner during the work shift in which it was transferred. The

employee must transfer any remaining hazardous chemical back to the original container or dispose of it properly. This will be documented in a job safety analysis (JSA) for the process.

- Employees must avoid transferring hazardous chemicals from one container to another whenever possible. Do not mix chemicals in portable containers.

Notwithstanding the above, avoid transferring chemicals into other containers when feasible and affix a label to any portable container used in this manner.

## **Material Safety Data Sheets**

### **Description**

An MSDS provides information on a specific hazardous chemical, including its physical and chemical properties, potential hazardous effects, and recommendations for appropriate PPE. (See *Reviewing Chemical Products for Hazards*, page 9.)

Manufacturers, importers, and distributors must provide MSDSs with the hazardous chemicals they produce or import.

A supplier may avoid providing information on an MSDS by stating that the information is proprietary. If further review indicates that a product may be hazardous, the Postal Service can request disclosure of ingredients through a medical officer or industrial hygienist, in accordance with the OSHA HazCom standard.

### **Requirements**

Postal Service managers must:

- Designate personnel to be responsible for procuring hazardous chemicals, obtaining and maintaining MSDSs, and determining how MSDSs will be reviewed.
- Develop procedures for maintaining MSDSs and making them readily accessible to employees (e.g., notebooks in work area, computer files).
- Maintain the MSDS for the period the hazardous chemical is in use or stored on-site. Maintain at least one current paper copy in a centrally located file. (See *Avoiding Hazardous Chemical Accumulation*, page 9.)
- Develop procedures for action when the appropriate MSDS is not included in the first shipment of a chemical product.
- Review the MSDS and product label for precautions, special handling procedures, spill response, and PPE requirements.

Postal Service employees who review MSDSs are not responsible for their contents. The material manufacturer, importer, or distributor is responsible for the accuracy of the data in its MSDSs. However, designated persons reviewing MSDSs:

- Must be familiar with basic MSDS terms, such as health and physical hazards and PPE requirements associated with the chemical (see Definitions, page 23); or
- They may consult with a knowledgeable person (e.g., safety, environmental, maintenance).

A chemical must not be purchased if this information is not provided on its MSDS.

**Note:** Several Web sites provide MSDSs. The Postal Service is not responsible for the content of these resources. Consult the responsible environmental or safety specialist for information.

### **Make the HazCom Written Program Available**

Develop procedures for making the HazCom written program, including chemical inventory lists and MSDSs, available and accessible to employees.

## **3. Training Plan**

Employees who work with hazardous chemicals or work in areas where such chemicals are used must receive HazCom training in the following situations:

- During initial assignment when previous training has not been performed or is no longer applicable.
- When a new hazardous chemical that may create a physical or health hazard for which employees have not been previously trained is introduced into the work area.
- When an employee receives Hazardous Waste Operations and Emergency Response (HAZWOPER) First Responder — Operations Level training.

## **Requirements**

### **Training Topics**

HazCom training must include required topics that have been incorporated into the training materials prepared by the National Center for Employee Development (NCED). Training records must be maintained in the NCED National Training Database and must include, at a minimum, the employee's name, dates of training, and training subject. These materials are available as follows:

- Via the Postal Satellite Training Network (PSTN).
- On CD-ROM.
- In field partnership offerings.

NCED course listings and information are available at: <http://nced.usps.gov/environ/index.php>.

#### **Facility Procedures — Training Requirements**

Requirements for HazCom training must be included in the facility written HazCom program. Employees must receive HazCom training at the time of their initial assignment and in the following situations:

- When new hazardous chemicals are introduced into their work areas (training must include necessary protective measures).
- When contractors or other non-Postal Service personnel might introduce hazardous chemicals into the workplace (for example, during renovation and repair projects).
- When there is information on the risks of exposure to hazardous chemicals when performing nonroutine tasks, such as infrequently performed tasks that may require use of hazardous chemicals. (See Labels and Other Forms of Warning, page 5.)

#### **4. Requirements for Contractors and Suppliers**

HazCom program requirements for contractors and suppliers at Postal Service facilities must include the following:

- Designation of responsible liaison personnel for contractors and suppliers in Postal Service facilities.
- Procedures for contractors and suppliers to make MSDSs available for the hazardous chemicals they use at Postal Service facilities. (For further information, see Handbook EL-800, *Managing Contract Safety and Health Compliance*.)
- Procedures for making facility HazCom program information, chemical inventories, and MSDSs available to contractors and suppliers when they may come in contact with hazardous chemicals or when hazardous chemicals (such as asbestos or lead that could be disturbed) may be present in their work areas.
- Procedures for making facility HazCom program information, chemical inventories, and MSDSs available to contractors and suppliers when the Postal Service provides them with materials (such as custodial supplies) that may contain hazardous chemicals.
- Requirement that every contractor and supplier must have an established HazCom program for its employees who use hazardous chemicals at Postal Service facilities. (For further information, see handbook EL-800.)



## Program Evaluation

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During each annual program evaluation, the responsible safety specialists and facility safety coordinators must evaluate implementation of the facility's HazCom program to ensure that it is current and in compliance with the HazCom standard.

Managers and supervisors who are responsible for tasks involving the use of hazardous chemicals must routinely check labeling, use of safe work practices and PPE, and the availability of MSDSs. They must also ensure that HazCom training is provided.

## Reviewing Chemical Products for Hazards

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### **Avoiding Hazardous Chemical Accumulation**

To avoid accumulation of hazardous chemicals:

- Use the hazardous chemical inventory to avoid unnecessary accumulation of chemical products.
- Evaluate the procurement, storage, use, and management of chemical products. (Failure to discard leftover and out-of-date products, such as ink, and changes in procurement can result in the storage of hazardous products and chemicals that are no longer needed.)
- Discard obsolete chemical products in accordance with local, state, and federal regulations. (Consult the responsible environmental or safety specialist about local disposal requirements.)
- Review the facility's hazardous chemical inventory annually to identify chemical products that are obsolete or no longer needed, so they can be removed from inventory or disposed of.
- Consult with your environmental or safety specialist for help in determining whether any chemical ingredient poses a hazard during use, storage, transportation, or disposal.

### **Substituting Environmentally Preferable Products for Hazardous Chemical Products**

To promote the purchasing of environmentally preferable products, the Postal Service has designated a list of target chemicals that should be avoided where feasible. Avoid products that contain the targeted chemicals listed in this table.

<b>USPS Targeted Chemicals to Be Avoided</b>	<b>Commonly Found In</b>
1,1,1-Trichloroethane (Methyl chloroform, methyltrichloromethane, trichloromethylmethane, and alpha-trichloromethane)	Solvents, Glues, Aerosols, Spot Cleaners
1,2,4-Trichlorobenzene	Solvents, Degreasers, Herbicides
Benzene	Gasoline
Lead	Batteries, Pipes, Roof Materials, wheel weights
Mercury	Fluorescent Lamps, Thermostats
Methylene chloride (dichloromethane)	Solvents, Paint Strippers
Methyl ethyl ketone (MEK, 2-butanone)	Paints, Glues, Cleaning Agents
Methyl isobutyl ketone (MIBK, MIK, hexone)	Paints, Varnishes, Lacquers
Naphthalene	Dyes, Insecticides
Tetrachloroethylene (tetrachloroethene, perchloroethylene, PCE, PERC)	Degreasers, Dry-cleaning
Toluene	Gasoline, Paints, Thinners, Adhesives
Trichloroethylene (TCE)	Solvents, Paint Removers, Adhesives
Xylenes	Solvents, Cleaning Agents, Gasoline

The Safety and Environmental Resources Web site provides information about environmentally preferable products. Go to <http://blue.usps.gov>. In the left column, click on *Safety and Environmental Resources*, and then click on *Environmental Home*. Under “Environmental Reference Library,” click on *Environmental InfoPaks and Fact Sheets*. Useful fact sheets include:

- Green Product Fact Sheets.
- Screening for Targeted Chemicals.
- Use of Green Products.

## **Reviewing Material Safety Data Sheets and Product Labels for Potential Hazards**

MSDSs and product labels can be difficult to interpret, causing uncertainty in determining which chemicals pose potential hazards. MSDSs:

- Are not required to follow any specific format.
- Sometimes provide incomplete information.

- Often use different names for the same chemical (trade name, common name, or chemical name).

The Postal Service has developed some general guidelines and resources for reviewing potentially hazardous chemicals, as shown in this table:

<b>Chemicals, Materials, and Signal Words</b>	<b>Description</b>
Chemicals on the <i>USPS Targeted Chemicals List</i>	<ul style="list-style-type: none"> <li>■ Chemicals on this list can potentially have health and environmental effects.</li> <li>■ Avoid purchase of products containing these chemicals; where feasible, substitute an environmentally preferable product or a chemical with less hazard potential.</li> </ul>
Liquid flammable materials and mixtures	<ul style="list-style-type: none"> <li>■ These chemicals can pose fire and explosion hazards, are difficult to store, and frequently are not available.</li> <li>■ Regulations vary, but any material with a flash point below 100°F, such as acetone or methyl ethyl ketone, is considered flammable.</li> </ul>
Highly corrosive or irritating materials	<ul style="list-style-type: none"> <li>■ These chemicals may include materials with highly acidic and basic chemical properties, e.g., concentrated sulfuric acid and sodium hydroxide (basic) products and hydrofluoric acid in any concentration.</li> <li>■ A pH between 4 and 11 is usually an indication of lower risk.</li> </ul>
Highly toxic or carcinogenic chemicals.	<ul style="list-style-type: none"> <li>■ The National Fire Protection Association's Hazard Rating System and the Department of Labor's Hazardous Materials Information System use a scale from 0 (none) to 4 (severe) to rate the health hazards of these materials.</li> <li>■ A rating of zero or 1 is preferable.</li> <li>■ See References, page 22, for Web sites that provide information on hazardous, toxic, and carcinogenic substances and their properties.</li> </ul>

Chemicals, Materials, and Signal Words	Description
Chemicals potentially regulated under environmental laws and regulations	<ul style="list-style-type: none"> <li>■ Limit procurement and use of these chemicals to prevent pollution and reduce regulatory requirements.</li> <li>■ These include solvents with high volatile organic content and low flash points, including alcohols, mineral spirits, oil-based paints, stains and varnishes, and brake and part washers that may be regulated by the Clean Air Act and the Resource Conservation and Recovery Act as hazardous air pollutants or hazardous wastes.</li> <li>■ Substitute water-based (aqueous) alternatives for these products where feasible.</li> <li>■ Consult with the responsible environmental specialist for guidance on the application of environmental regulations to these products.</li> <li>■ See MI-EL-890-2007-5, <i>Integrated Waste Management</i>; and MI-890-2007-1, <i>Air Quality Management</i>, for more information.</li> </ul>
Industrial Hygiene Requirements	<ul style="list-style-type: none"> <li>■ Review products and chemicals for appropriate hygiene practices, PPE and respirator requirements, training, engineering controls (e.g., local exhaust), cleanup and spill response requirements, and other recommended precautions. Avoid products that require respiratory protection. In general, chemicals with minimal or no PPE requirements pose a reduced potential hazard.</li> </ul> <p><b>Note:</b> See also the current MI on <i>Personal Protective Equipment and Respiratory Protection</i> available at <a href="http://blue.usps.gov/cpim/miid.htm">http://blue.usps.gov/cpim/miid.htm</a>.</p>

Chemicals, Materials, and Signal Words	Description
Product Label <i>Signal Words</i>	<ul style="list-style-type: none"> <li>■ <i>Signal words</i> on product labels help to identify and compare the hazard potential of chemicals. Review product and material labels for signal words intended to draw attention to the presence of hazards and the degree of severity. For instance: <ul style="list-style-type: none"> <li>— <b>DANGER</b> is printed on a red background and identifies a high degree of hazard.</li> <li>— <b>WARNING</b> is printed on an orange background and identifies a moderate degree of hazard.</li> <li>— <b>CAUTION</b> is printed on a yellow background and identifies a reduced hazard.</li> </ul> </li> </ul>

# Roles and Responsibilities

## Headquarters

This person or organization...	is responsible for...
Vice President, Employee Resource Management (ERM), Human Resources (HR)	<ul style="list-style-type: none"> <li>■ serving as the Chief Environmental Officer for the Postal Service.</li> <li>■ communicating safety and environmental policies, including those pertaining to HazCom.</li> </ul>
Director, Safety and Environmental Performance Management (SEPM), ERM, HR	<ul style="list-style-type: none"> <li>■ establishing strategic direction and overseeing the Postal Service's environmental and safety programs, including HazCom programs.</li> </ul>
Manager, Environmental Policy and Programs (EPP), SEPM, ERM, HR	<ul style="list-style-type: none"> <li>■ developing policies and procedures to provide technical guidance on hazardous chemicals, including environmental hazards, disposal, and pollution prevention.</li> </ul>
Manager, Maintenance Policies and Programs, Engineering	<ul style="list-style-type: none"> <li>■ establishing procedures for implementing HazCom programs for plant maintenance operations, such as maintenance management orders (MMOs).</li> </ul>
Manager, Vehicle Operations, Delivery and Retail	<ul style="list-style-type: none"> <li>■ establishing procedures for implementing HazCom programs for vehicle maintenance operations.</li> </ul>
Manager, Category Management Centers, Supply Management	<ul style="list-style-type: none"> <li>■ developing, deploying, and managing product and service contracts, including chemical supply contracts and service contracts that require the use of chemical products.</li> <li>■ implementing processes to ensure that contracting actions are consistent with safety and environmental policies.</li> <li>■ ensuring that suppliers are tasked to comply with HazCom requirements (e.g., providing MSDSs).</li> </ul>

<b>This person or organization...</b>	<b>is responsible for...</b>
National Center for Employee Development (NCED)	<ul style="list-style-type: none"> <li>■ providing HazCom training and resources.</li> <li>■ updating HazCom training programs.</li> </ul>

## Areas

<b>This person or organization...</b>	<b>is responsible for...</b>
Managers, Human Resources	<ul style="list-style-type: none"> <li>■ monitoring and evaluating field HazCom programs.</li> <li>■ providing guidance and technical support on HazCom program issues.</li> <li>■ providing guidance on purchasing chemicals with the least potential health hazard when the use of hazardous chemicals is necessary or unavoidable and no feasible alternative is available. (See Reviewing Material Safety Data Sheets and Product Labels for Potential Hazards, page 10.)</li> </ul>
Managers, Safety	
Environmental Specialist	<ul style="list-style-type: none"> <li>■ providing guidance on environmental issues associated with hazardous chemicals, including environmental impacts and regulatory requirements for use, storage, and disposal.</li> <li>■ providing guidance on avoiding the purchase and use of hazardous chemicals and, where feasible, substituting non-hazardous chemicals or environmentally preferable chemicals. (See Substituting Environmentally Preferable Products for Hazardous Chemical Products, page 9.)</li> </ul>

## Performance Clusters

This person or organization...	is responsible for...
District Managers	<ul style="list-style-type: none"> <li>■ ensuring that HazCom programs are established and implemented.</li> </ul>
Installation Heads	<ul style="list-style-type: none"> <li>■ ensuring that requirements, policies, and procedures for HazCom programs are implemented, maintained, and evaluated.</li> <li>■ providing sufficient funding and personnel to implement HazCom programs effectively.</li> </ul>
District Manager, Safety	<ul style="list-style-type: none"> <li>■ guiding, supporting, and monitoring HazCom programs.</li> <li>■ assisting and supporting managers, supervisors, and safety personnel to implement and administer the HazCom written programs.</li> </ul>
District and Plant Safety	<ul style="list-style-type: none"> <li>■ providing guidance on purchasing chemicals with the least potential health hazard when the use of hazardous chemicals is necessary or unavoidable and no feasible alternative is available. (See Reviewing Material Safety Data Sheets and Product Labels for Potential Hazards, page 10.)</li> <li>■ providing guidance on avoiding the purchase and use of hazardous chemicals and, where feasible, substituting non-hazardous chemicals or environmentally preferable chemicals. (See Substituting Environmentally Preferable Products for Hazardous Chemical Products, page 9.)</li> <li>■ providing technical support and guidance on HazCom program issues, to include reviewing MSDSs and performing chemical inventories.</li> </ul>



<b>This person or organization...</b>	<b>is responsible for...</b>
District and Plant Safety (Cont'd)	<ul style="list-style-type: none"> <li>■ supporting and assisting managers and supervisors to develop, implement, and administer HazCom programs.</li> <li>■ supporting and assisting with HazCom program training and monitoring integrity of the training program.</li> <li>■ inspecting to ensure that HazCom program requirements, such as container labeling and MSDS precautions (i.e., handling, PPE requirements), are implemented; reporting deficiencies to responsible managers and supervisors immediately.</li> <li>■ notifying appropriate managers and supervisors when, during routine inspection, they observe the storage of chemicals that are no longer necessary or are obsolete. (See Avoiding Hazardous Chemical Accumulation, page 9.)</li> <li>■ monitoring to ensure that HazCom training records are entered into the national training database by the responsible manager and supervisor.</li> <li>■ supporting and assisting with facility HazCom procedures and requirements for contractors and suppliers.</li> <li>■ supporting and assisting in evaluating the HazCom program annually or as necessary. (The HazCom self-evaluation checklist is available on the Postal Service Environmental Resources Web site.)</li> <li>■ supporting and assisting with the review and update of the facility written HazCom program annually or as necessary.</li> </ul>

<b>This person or organization...</b>	<b>is responsible for...</b>
Managers and Supervisors, Maintenance	<ul style="list-style-type: none"> <li data-bbox="963 268 1427 569">■ avoiding the purchase and use of hazardous chemicals and, where feasible, substituting non-hazardous chemicals or environmentally preferable chemicals. (See Substituting Environmentally Preferable Products for Hazardous Chemical Products, page 9.)</li> <li data-bbox="963 579 1427 882">■ giving preference to chemicals with the least potential health hazard when the use of hazardous chemicals is necessary or unavoidable and no feasible alternative is available. (See Reviewing Material Safety Data Sheets and Product Labels for Potential Hazards, page 10.)</li> <li data-bbox="963 892 1427 989">■ complying with the current MMO on <i>Hazardous Communication and Material Safety Data Sheets</i>.</li> <li data-bbox="963 999 1427 1268">■ ensuring that a hazardous chemical inventory is performed, maintained, and reviewed annually or as necessary and discarding chemicals that are no longer necessary or are obsolete. (See Avoiding Hazardous Chemical Accumulation, page 9.)</li> <li data-bbox="963 1278 1427 1375">■ ensuring that a HazCom written program is established where applicable.</li> <li data-bbox="963 1386 1427 1549">■ ensuring and periodically checking that product container label standards are maintained in accordance with the requirements of this MI.</li> <li data-bbox="963 1560 1427 1753">■ ensuring that MSDSs are maintained for products with hazardous ingredients and that the appropriate MSDSs are readily accessible at the work site or nearby.</li> </ul>

<b>This person or organization...</b>	<b>is responsible for...</b>
Managers and Supervisors, Maintenance (Cont'd)	<ul style="list-style-type: none"> <li>■ ensuring that appropriate HazCom training is performed for employees who work with hazardous chemicals or who work in areas where hazardous chemicals are used.</li> <li>■ ensuring that employee HazCom training records are entered into the national training database.</li> <li>■ ensuring that product labels and MSDS precautions are reviewed for applicability (i.e., handling, PPE requirements) and followed.</li> <li>■ ensuring that HazCom procedures for contractors and suppliers are accessible.</li> <li>■ ensuring that contractors and suppliers have established HazCom programs. (For further information, see handbook EL-800.)</li> <li>■ ensuring that HazCom programs are evaluated annually or as necessary. (The HazCom self-evaluation checklist is available on the Postal Service Environmental Resources Web site.)</li> <li>■ ensuring that the facility written HazCom program is reviewed and updated annually or as necessary.</li> </ul>
Local Officials Responsible for Procuring Chemicals Used for Any Purpose (e.g., Cleaners, Finishes, and Solvents)	<ul style="list-style-type: none"> <li>■ avoiding the purchase and use of hazardous chemicals and, where feasible, substituting non-hazardous chemicals or environmentally preferable chemicals. (See Substituting Environmentally Preferable Products for Hazardous Chemical Products, page 9.)</li> </ul>

<b>This person or organization...</b>	<b>is responsible for...</b>
Local Officials Responsible for Procuring Chemicals Used for Any Purpose (e.g., Cleaners, Finishes, and Solvents) (Cont'd)	<ul style="list-style-type: none"> <li>■ giving preference to chemicals with the least potential health hazard when the use of hazardous chemicals is necessary or unavoidable and no feasible alternative is available. (See Reviewing Material Safety Data Sheets and Product Labels for Potential Hazards, page 10.)</li> <li>■ if uncertain about the hazard potential of a product, coordinating with the local safety and health office and environmental specialist to review MSDSs before purchasing the product.</li> <li>■ ensuring that appropriate labeling and MSDSs are provided by chemical manufacturers and importers with all products purchased or used by the facility.</li> <li>■ complying with facility procedures for notifying suppliers when an MSDS does not accompany the first shipment of a product.</li> <li>■ ensuring that MSDSs for chemical products received by the facility are maintained and available as required by the facility HazCom program.</li> </ul>
All Personnel Who Introduce Chemicals Into the Workplace	<ul style="list-style-type: none"> <li>■ avoiding the purchase and use of hazardous chemicals and, where feasible, substituting non-hazardous chemicals or environmentally preferable chemicals. (See Substituting Environmentally Preferable Products for Hazardous Chemical Products, page 9.)</li> </ul>

<b>This person or organization...</b>	<b>is responsible for...</b>
All Personnel Who Introduce Chemicals Into the Workplace (Cont'd)	<ul style="list-style-type: none"> <li>■ giving preference to chemicals with the least potential health hazard when the use of hazardous chemicals is necessary or unavoidable and no feasible alternative is available. (See Reviewing Material Safety Data Sheets and Product Labels for Potential Hazards, page 10.)</li> <li>■ ensuring that product labels and MSDSs are reviewed (in conjunction with safety and health) before use and that precautions on labels and MSDSs are followed.</li> </ul>
Contractors and Suppliers	<ul style="list-style-type: none"> <li>■ establishing a HazCom program for their employees who use hazardous chemicals at Postal Service facilities.</li> <li>■ notifying the designated facility liaison before using any hazardous chemicals in the workplace.</li> <li>■ providing the designated facility liaison with MSDSs before using any hazardous chemicals in the workplace.</li> <li>■ making MSDSs available to contractors and suppliers for products the Postal Service provides that may contain hazardous chemicals.</li> <li>■ providing MSDSs or appropriate HazCom information to contractors and suppliers at facilities where they may work in areas with or come in contact with hazardous chemicals.</li> </ul>

## References

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### Chemical References

The following Web sites provide information on hazardous, toxic, and carcinogenic substances and their properties:

Organization	Web site
Agency for Toxic Substances and Disease Registry (ATSDR)	<a href="http://www.atsdr.cdc.gov/substances/index.html">http://www.atsdr.cdc.gov/substances/index.html</a>
Registry of Toxic Effects of Chemical Substances (RTECS)	<a href="http://www.cdc.gov/niosh/rtecs/RTECSfeatures.html">http://www.cdc.gov/niosh/rtecs/RTECSfeatures.html</a>
The Envirofacts Master Chemical Integrator (EMCI)	<a href="http://www.epa.gov/enviro/html/emci/chemref/">http://www.epa.gov/enviro/html/emci/chemref/</a>
National Institute for Occupational Safety and Health (NIOSH) <ul style="list-style-type: none"><li>■ <i>NIOSH Pocket Guide to Chemical Hazards</i></li><li>■ NIOSH Carcinogen List</li></ul>	<a href="http://www.cdc.gov/niosh/">http://www.cdc.gov/niosh/</a> <a href="http://www.cdc.gov/niosh/npg/default.html">http://www.cdc.gov/niosh/npg/default.html</a> <a href="http://www.cdc.gov/niosh/npotocca.html">http://www.cdc.gov/niosh/npotocca.html</a>
National Toxicology Program (NTP)	<a href="http://ntp.niehs.nih.gov/">http://ntp.niehs.nih.gov/</a>
International Agency for Research on Cancer (IARC)	<a href="http://www.iarc.fr/">http://www.iarc.fr/</a>

### General References

The Safety and Environmental Resources Web site, at <http://safetytool-kit.usps.gov/resources/resources.aspx>, provides information to help you meet the requirements of this MI.

For the PPE Program Guide, go to <http://blue.usps.gov>. In the left column, click on *Safety and Environmental Resources*, then click on *Safety Programs*. In the right column, click on *OSHA Required Written Program Guides*. Click on *PPE Program Guide*.

The following MIs are available at <http://blue.usps.gov/cpim/miid.htm>:

- MI EL-890-2007-1, *Air Quality Management*.
- MI EL-890-2007-5, *Integrated Waste Management*.
- MI EL-810-2000-1, *Personal Protection Equipment and Respiratory Protection*.

Handbook EL-800, *Managing Contract Safety and Health Compliance*, is available at <http://blue.usps.gov/cpim/hbkid.htm>.

The current MMO on *Hazard Communication and Material Safety Data Sheets*, is available at [http://www.mtsc.usps.gov/bulletin/Bulletin\\_Search.cfm](http://www.mtsc.usps.gov/bulletin/Bulletin_Search.cfm).

The OSHA Hazard Communication Standard (29 CFR 1910.1200) is available at <http://www.osha.gov/SLTC/hazardcommunications/index.html>.

## Definitions

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**Acid** — pH less than 7.0. (The pH may indicate whether a substance is corrosive or reactive with incompatible materials.)

**Base** — pH greater than 7.0. Materials or solutions that are *basic* are sometimes referred to as *caustic* or *alkaline*. (The pH may indicate whether a substance is corrosive or reactive with incompatible materials.)

**Chemical** — any element, chemical compound, or mixture of elements and compounds.

**Combustible liquid** — any liquid having a flash point at or above 100°F but below 200°F. Compare this definition to *flammable liquid* which indicates a liquid that is more likely to ignite (flash point below 100°F).

**Container** — any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. Pipes or piping systems, and engines, fuel tanks or other operating systems in a vehicle are not considered to be *containers*.

**Corrosive** — a chemical that causes visible destruction of, or irreversible alterations in, living tissue by chemical action at the site of contact. Corrosive materials can pose serious immediate risk to skin, tissues, eyes, and other parts of the body. *Acids* and *bases* may be corrosive, depending on pH.

**Employer** — person engaged in a business where chemicals are either used, distributed, or are produced for use or distribution, including a contractor or subcontractor.

**Exposure** — an employee *subjected* in the course of employment to a chemical that is a physical or health hazard, and includes potential (i.e., accidental or possible) exposure. *Subjected* in terms of health hazards includes any route of entry (e.g., inhalation, ingestion, skin contact, or absorption).

**Flammable liquid** — any liquid having a *flash point below 100° F*. Proper storage and use of flammable materials is absolutely critical in maintaining a safe workplace. Never use flammable materials near sources of heat, flame, sparks or static discharge (such as direct sunlight, furnaces, or pilot lights) or in unventilated areas.

**Flash point** — the lowest temperature at which a liquid can form an ignitable mixture in air near the surface of the liquid. The lower the flash point, the easier it is to ignite the material. For example, gasoline has a flash point of -40°F and is more flammable than ethylene glycol (anti-freeze) which has a flash point of 232°F.

**Foreseeable emergency** — any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment that could result in an uncontrolled release of a hazardous chemical in the workplace.

**Hazardous chemical** — any chemical that is a physical hazard or health hazard. This includes, at a minimum, chemicals listed by OSHA in 29 CFR 1910Z, Toxic and Hazardous Substances, and chemicals listed by the American Conference of Governmental Industrial Hygienists (ACGIH) in *Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment* (see latest edition).

**Use (of hazardous chemicals)** — to package, handle, react, emit, extract, generate as a byproduct, or transfer.

**Produce (hazardous chemicals)** — to manufacture, process, formulate, blend, extract, generate, emit, or repackage.

**Hazard warning** — any words, pictures, symbols, or combination thereof appearing on a label or other appropriate form of warning that convey the specific physical and health hazards, including target organ effects, of the chemicals in the containers. (See definitions for *physical hazard* and *health hazard* to determine the hazards that must be covered.)

**Health hazard** — a chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees. The term *health hazard* includes chemicals that are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, and neurotoxins, agents that act on the hematopoietic system, and agents that damage the lungs, skin, eyes, or mucous membranes.

**Irritant** — a chemical that is not corrosive, but causes a *reversible* inflammatory effect on living tissue by chemical action at the site of contact. An *irritant* will induce a local inflammatory reaction with normal living tissue upon immediate, prolonged, or repeated contact. Irritants are materials that cause inflammation of the body surface with which they come in contact. The inflammation results from concentrations far below those needed to cause corrosion. Irritants can also cause changes in the mechanics of respiration and lung function.

**Label** — written, printed, or graphic material displayed on or affixed to containers of hazardous chemicals.

**Material safety data sheet (MSDS)** — document designed to provide both workers and emergency personnel with the proper procedures for handling or working with a particular substance. An MSDS includes



information such as physical data, toxicity, health effects, first aid, reactivity, storage, disposal, protective equipment, and spill/leak procedures. MSDS information may be useful if a spill or other accident occurs.

**Mixture** — any combination of two or more chemicals if the combination is not, in whole or in part, the result of a chemical reaction.

**Physical hazard** — substances that threaten physical safety. The most common physical hazards include fire, explosion, and chemical reactivity

**Releases** — any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment of a hazardous or regulated substance. This excludes any release, including releases from mailed materials, to which persons solely within a workplace are exposed, with respect to a claim that such persons may assert against the employer.

**Sensitizer** — a chemical that causes a substantial proportion of exposed people or animals to develop an allergic reaction in normal tissue after repeated exposure to the chemical. The condition of being sensitized to a chemical is also referred to as *chemical hypersensitivity*.

**Solvent** — a substance that dissolves another substance or substances to form a solution. The solvent is the component in the solution that is present in the largest amount or is the one that determines the state of matter (solid, liquid, or gas) of the solution. Solvents are usually, but not always, liquids. The most common solvent is water. Types of solutions and solvents include:

- *Aqueous solution* — a liquid solution with water as a solvent.
- *Non-aqueous solution* — a liquid solution without water as a solvent.
- *Organic solvents* — a common class of non-aqueous solvents. Organic solvents, especially chlorinated organic solvents, are usually flammable and may pose certain physical, chemical, and environmental hazards.

**Toxic** — substance that could potentially or actually be poisonous to the human body.

**USPS Targeted Chemicals** — Chemicals used in processes and operations, individually or as constituents of products that pose an increased risk to human health and the environment. Postal Service policy requires facilities and employees to seek solutions that eliminate or substantially reduce the procurement and use of USPS Targeted Chemicals. (See the list of USPS Targeted Chemicals on page 10.)

**Work area** — room or defined space in a workplace where hazardous chemicals are produced or used and where employees are present.

**Workplace** — establishment, job site, or project at one geographic location containing one or more work areas.

## Acronyms

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CFR	Code of Federal Regulations
EPA	Environmental Protection Agency
HazCom	hazard communication
MI	management instruction
MMO	maintenance management order
MSDS	material safety data sheet
MTSC	Maintenance Technical Support Center
NCED	National Center for Employee Development
OSHA	Occupational Safety and Health Administration
PPE	personal protective equipment
PSTN	Postal Satellite Training Network