

# Management Instruction

## Hazard Communication (HazCom) Program

This management instruction (MI) does the following:

- 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.
- 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.

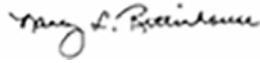
## Scope

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.
- 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*).

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*Nancy Rettinhouse  
Vice President  
Employee Resource Management*

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## Regulatory Requirements

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The HazCom standard promulgated by OSHA requires the following:

- Chemical manufacturers and importers will evaluate and provide hazard classifications for the chemicals they produce or import.
- Chemical manufacturers, importers, and distributors of hazardous chemicals will provide appropriate labeling utilizing requirements under the Globally Harmonized System (GHS), and provide Safety Data Sheets (SDSs) for hazardous chemicals they produce.
- Employers will communicate information concerning chemical hazards in the workplace to their employees.

For more information, review the OSHA HazCom standard at <https://www.osha.gov/dsg/hazcom/HCSFinalRegTxt.html>.

## 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, use the following click through instructions:

- Go to <http://blue.usps.gov>.
- Click on the *Essential Links* tab.
- Then click on *Safety resources*.
- Then select *A to Z Index*.
- Finally, select *HazCom*.

The following resources are available:

- Hazard Communication Program Guide.
- Hazard Communication Decision Tree.
- Hazard Communication Program Template.
- Documents to support the written program:
  - Hazardous Chemical Inventory Worksheet.
  - Safety Talks.
  - Labeling of Secondary Containers.

## **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.

## **Hazardous Chemical Inventory**

### **The Steps**

Developing a hazardous chemical inventory consists of the following steps:

- Survey the facility.
- Review SDSs 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**

When you survey a facility, include the following items:

- Chemicals present in the facility. Most chemicals in a workplace have some hazard potential.
- Chemicals in all physical forms, such as liquids, solids, gases, vapors, fumes (e.g., from welding), and mists (e.g., from spraying operations).
- 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 Safety Data Sheets and Product Labels**

When reviewing Safety Data Sheets (SDSs) and product labels, do the following:

- Include products that have hazardous chemical ingredients listed on their SDSs or product labels; include the SDS in the hazardous chemical inventory.

- Maintain an SDS for every hazardous chemical while it's used on-site, as well as for 30 years after product use ends. You do not need to maintain an SDS for a product that does not contain hazardous ingredients.

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

Refer to [Roles and Responsibilities](#).

### **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](#).)

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

## **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.
- Safety Data Sheets.
- Labels and other forms of warning for nonroutine tasks.
- Information and training.
- Contractors and suppliers.

A written program template can be found on the Safety Resources HazCom page at <http://safetytoolkit.usps.gov:12/hazcomghs.aspx>.

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

Chemical manufacturers, importers, and distributors are required to label containers shipped with hazardous chemicals following the GHS guidelines set forth by OSHA.

### **Requirements**

Postal Service managers must do the following:

- 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 GHS labeling requirements:
  - Ensure that each container received at a facility is properly labeled according to the Hazard Communication Standard (20 CFR 1910.1200(f)).
  - Label all in-house secondary containers that contain hazardous chemicals with the chemical name, pictures, symbols or a combination of these to provide at least general information regarding the hazards of the chemical. See <http://safetytoolkit.usps.gov:12/hazcomghs.aspx> for guidance on preparing labels for secondary containers.
  - 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/dynamicindex.cfm?hbk\\_msno=1#](http://www.mtsc.usps.gov/msbooks/dynamicindex.cfm?hbk_msno=1#).)

### 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-810-2009-4, *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 the portable container, such as a hand-held spray bottle. The following guidelines apply:

- The employee must maintain control over the container at all times and use all of the hazardous chemical transferred in this manner during the work shift in which it was transferred.
  - If there is any remaining chemicals in the container at the end of the shift, transfer it back to the original container or dispose of it properly. This will be documented in a job safety analysis (JSA) for the process.
  - See the Safety Resources JSA page for assistance in completing a JSA <http://safetytoolkit.usps.gov:12/jsa.aspx>.
- Employees must avoid transferring hazardous chemicals from one container to another whenever possible. Do not mix chemicals in portable containers.
- If you must transfer chemicals into a secondary container, you must affix a label with information from the Safety Data Sheet.

### Description

A SDS provides information on a specific hazardous chemical, including its physical and chemical properties, potential hazardous effects, and recommendations for appropriate personal protective equipment (PPE). (See [Reviewing Chemical Products for Hazards](#).)

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

A supplier may avoid providing information on an SDS 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 SDSs, and determining how SDSs will be reviewed.
- Develop procedures for maintaining SDSs and making them readily accessible to employees (e.g., notebooks in work area, computer files).
- Maintain the SDS 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](#).)
- Develop procedures for action when the appropriate SDS is not included in the first shipment of a chemical product.
- Review the SDS and product label for precautions, special handling procedures, spill response, and PPE requirements. In addition, Postal Service policy prohibits the procurement and use of products containing any of the 13 “USPS Targeted Chemicals”, with very limited exceptions. Do not acquire or use products containing any of these chemicals. See page [10](#) for more information.

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

- Be familiar with basic SDS terms, such as health and physical hazards and PPE requirements associated with the chemical (see [Definitions](#)).
- Consult with a knowledgeable person (e.g., safety, environmental, maintenance).

**Note:** Many websites provide SDSs. The Postal Service is not responsible for the content of these resources. Make every effort to obtain the most current SDS from the manufacturer or supplier.

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

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

### **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.

Employees are required to have various levels of HazCom training depending on the duties they perform. See the Safety Training Matrix at <http://safetytoolkit.usps.gov:12/safetytraining.aspx> for more information on required HazCom training for various employees.

## 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 Learning Management System (LMS). Training is available as follows:

- Via the postal LMS.
- In field partnership offerings.

NCED course listings and information are available in the Safety Training Matrix as well as in LMS by searching under “hazard communication” or “GHS”.

### 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. Locally developed training for employees, covering the hazards of the materials and protective measures, must be provided in the following situations:

- When new hazardous chemicals are introduced into their work area.
- 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](#).)

### 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 SDSs available for the hazardous chemicals they use at Postal Service facilities. For more information, see Handbook EL-800, *Managing Contract Safety and Health Compliance*.
- Procedures for making facility HazCom program information, chemical inventories, and SDSs available to contractors and

suppliers when they may come in contact with hazardous chemicals or when hazardous chemicals may be present in their work areas.

- Procedures for making facility HazCom program information, chemical inventories, and SDSs 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 more 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 the availability of SDSs. 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, do the following:

- Review the hazardous chemical inventory to avoid unnecessary accumulation of chemical products.
- Evaluate the procurement, storage, use, and management of chemical products. Failure to properly dispose of 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.
- Dispose of obsolete chemical products in accordance with local, state, and federal regulations. Consult the responsible environmental specialist about local disposal requirements — see link to environmental specialist contact list in the Responsibilities section.
- 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.
- Consult with your safety specialist for help in determining whether any chemical ingredient poses a hazard during use, storage, or transportation.



## Substituting Environmentally Preferable Products for Hazardous Chemical Products

To promote the purchasing of environmentally preferable products and minimize employee exposure to hazardous chemicals, the Postal Service prohibits the procurement or use of products containing “Targeted Chemicals”, with very limited exceptions. Refer to [http://blue.usps.gov/sustainability/environmental/\\_pdf/TargetedChemicalsPolicy.pdf](http://blue.usps.gov/sustainability/environmental/_pdf/TargetedChemicalsPolicy.pdf) for the Targeted Chemicals policy. Contact the responsible Safety or Environmental Specialist for a copy if you have limited access to Blue and cannot access this document. Additionally, the following table provides a list of the USPS Targeted Chemicals and allowable exceptions.

Table 1  
**USPS Targeted Chemicals**

Targeted Chemical	Prohibited In (Common products to be avoided if they contain Targeted Chemicals)	Approved In (Excepted products containing Targeted Chemicals)
1,1,1-Trichloroethane (Methyl chloroform, methyltrichloromethane, trichloromethylmethane, and alpha-trichloromethane)	Solvents, Degreasers, Glues, Aerosols, Spot Cleaners <b>Note:</b> This chemical is uncommon due to banned production in the United States.	None
1,2,4-Trichlorobenzene	Solvents, Degreasers, Herbicides, Lubricants	None
Benzene	Lubricants, Pesticides, Detergents, Plastics	Gasoline
Lead	Wheel Weights, Paint, Solder Flux	Batteries, Pipes, Building and Roofing Materials, Electronics
Mercury	*See exceptions	Fluorescent Lamps, Thermostats, Thermometers, Electronics
Methylene chloride (dichloromethane)	Solvents, Paint Strippers, Aerosols, Pesticides, Degreaser	None
Methyl ethyl ketone (MEK, 2-butanone)	Paints, Glues, Cleaners, Paint Thinners, Adhesives, Dyes, Inks, Lacquers, Varnishes	None
Methyl isobutyl ketone (MIBK, MIK, hexone)	Paints, Varnishes, Lacquers, Cleaners, Greases, Dyes, Inks, Insecticides	None
Naphthalene	Dyes, Insecticides, Solvents, Lubricants	None

<b>Targeted Chemical</b>	<b>Prohibited In (Common products to be avoided if they contain Targeted Chemicals)</b>	<b>Approved In (Excepted products containing Targeted Chemicals)</b>
Tetrachloroethylene (tetrachloroethene, perchloroethylene, PCE, PERC)	Degreasers, Solvents, Paint, Spot Cleaners, Glues	None
Toluene	Paints, Paint Thinners, Lacquers, Adhesives, Inks, Cleaners, Disinfectants	Gasoline
Trichloroethylene (TCE)	Solvents, Degreasers, Paint Removers, Adhesives, Cleaners	None
Xylenes	Solvents, Cleaners, Paint Thinners, Pesticides	Gasoline

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

The Hazard Communication Standard requires chemical manufacturers, distributors or importers to provide SDSs, formerly known as MSDSs, to communicate the hazards of chemical products. SDSs are required to be uniform in format, and follow the GHS guidelines set forth by OSHA. The Postal Service has developed some general guidelines and resources for reviewing potentially hazardous chemicals, as shown in this table:

Table 2  
**Reviewing Potentially Hazardous Chemicals**

<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 adverse 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 (See <a href="#">Table 1</a> for the current list of Targeted Chemicals).</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>

<b>Chemicals, Materials, and Signal Words</b>	<b>Description</b>
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 <a href="#">References</a> for websites that provide information on hazardous, toxic, and carcinogenic substances and their properties.</li> </ul>
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 corrosives, reactive chemicals such as peroxides, and solvents with high volatile organic content and low flash points (less than 140°F), 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 applicability of environmental regulations to these products.</li> <li>■ See the Environmental Website for more information at: <a href="http://blue.usps.gov/sustainability/environmental.htm">http://blue.usps.gov/sustainability/environmental.htm</a>.</li> </ul>

Chemicals, Materials, and Signal Words	Description
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 MI EL-810-2009-4, <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>
Product Label Signal Words	<ul style="list-style-type: none"> <li>■ Signal words on product labels help to identify and compare the hazard potential of chemicals.</li> <li>■ 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 severe hazard.</li> <li>■ <b>WARNING</b> is printed on an orange background and identifies a less severe 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>■ Administering and evaluating the national safety and health program.</li> <li>■ Communicating safety policies, including those pertaining to HazCom.</li> </ul>
Manager, Safety and OSHA Compliance Programs (SOCP), ERM, HR	<ul style="list-style-type: none"> <li>■ Establishing strategic direction and overseeing the Postal Service's safety programs, including HazCom programs.</li> </ul>
Manager Safety, Research, and Development SOCP, ERM, HR	<ul style="list-style-type: none"> <li>■ Developing policies and procedures to provide technical guidance on hazardous chemicals, including HazCom programs.</li> </ul>

<b>This person or organization...</b>	<b>is responsible for...</b>
Office of Sustainability (see <a href="http://blue.usps.gov/sustainability/contact.htm">http://blue.usps.gov/sustainability/contact.htm</a> for contacts)	<ul style="list-style-type: none"> <li>■ Developing policies and guidance on environmental issues associated with hazardous chemicals, including environmental regulatory requirements for use, storage, and disposal.</li> <li>■ Developing policies and guidance on avoiding the purchase and use of hazardous chemicals and substituting non-hazardous chemicals or environmentally preferable chemicals.</li> </ul>
Manager, Maintenance Operations	<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 Post Office Operations	<ul style="list-style-type: none"> <li>■ Establishing procedures for implementing HazCom programs for vehicle maintenance operations.</li> </ul>
Manager, Commercial Products and Services Portfolio, 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 policies.</li> <li>■ Ensuring that suppliers are tasked to comply with HazCom requirements (e.g., providing SDSs).</li> </ul>
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> </ul>
Managers, Safety	<ul style="list-style-type: none"> <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 <a href="#">Reviewing Safety Data Sheets and Product Labels for Potential Hazards.</a>)</li> </ul>

## Districts

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 <a href="#">Reviewing Safety Data Sheets and Product Labels for Potential Hazards.</a>)</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 <a href="#">Substituting Environmentally Preferable Products for Hazardous Chemical Products.</a>)</li> <li>■ Providing technical support and guidance on HazCom program issues, to include reviewing SDSs and performing chemical inventories.</li> <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 SDS 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 <a href="#">Avoiding Hazardous Chemical Accumulation.</a>)</li> <li>■ Monitoring to ensure that HazCom training records are in the LMS.</li> <li>■ Supporting and assisting with facility HazCom procedures and requirements for contractors and suppliers.</li> </ul>

This person or organization...	is responsible for...
District and Plant Safety (Cont'd)	<ul style="list-style-type: none"> <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>
Managers and Supervisors, Maintenance	<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 <a href="#">Substituting Environmentally Preferable Products for Hazardous Chemical Products</a>.)</li> <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 <a href="#">Reviewing Safety Data Sheets and Product Labels for Potential Hazards</a>.)</li> <li>■ Complying with the current MMO on <i>Hazard Communication and Material Safety Data Sheets</i>.</li> <li>■ 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 <a href="#">Avoiding Hazardous Chemical Accumulation</a>.)</li> <li>■ Ensuring that a HazCom written program is established where applicable.</li> <li>■ Ensuring and periodically checking that product container label standards are maintained in accordance with the requirements of this MI.</li> <li>■ Ensuring that SDSs are maintained for products with hazardous ingredients and that the appropriate SDSs are readily accessible at the work site or nearby.</li> <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 SDS 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 more information, see Handbook EL-800.)</li> <li>■ Ensuring that HazCom programs are evaluated annually or as necessary.</li> </ul>

This person or organization...	is responsible for...
Managers and Supervisors, Maintenance (Cont'd)	<ul style="list-style-type: none"> <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 <a href="#">Substituting Environmentally Preferable Products for Hazardous Chemical Products.</a>)</li> <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 <a href="#">Reviewing Safety Data Sheets and Product Labels for Potential Hazards.</a>)</li> <li>■ If uncertain about the hazard potential and disposal issues of a product, coordinating with the local safety and health office and environmental specialist to review SDSs before purchasing the product.</li> <li>■ Ensuring that appropriate labeling and SDSs 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 SDS does not accompany the first shipment of a product.</li> <li>■ Ensuring that SDSs 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 <a href="#">Substituting Environmentally Preferable Products for Hazardous Chemical Products.</a>)</li> <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 <a href="#">Reviewing Safety Data Sheets and Product Labels for Potential Hazards.</a>)</li> <li>■ Ensuring that product labels and SDSs are reviewed (in conjunction with safety and health) before use and that precautions on labels and SDSs are followed.</li> </ul>



This person or organization...	is responsible for...
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 SDSs before using any hazardous chemicals in the workplace.</li> <li>■ Making SDSs available to contractors and suppliers for products the Postal Service provides that may contain hazardous chemicals.</li> <li>■ Providing SDSs 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

### Chemical References

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

Organization	Website
Agency for Toxic Substances and Disease Registry (ATSDR)	<a href="http://www.atsdr.cdc.gov/substances/index.asp">http://www.atsdr.cdc.gov/substances/index.asp</a>
Registry of Toxic Effects of Chemical Substances (RTECS)	<a href="http://www.cdc.gov/niosh/rtecs/default.html">http://www.cdc.gov/niosh/rtecs/default.html</a>
The Envirofacts Master Chemical Integrator (EMCI)	<a href="http://www3.epa.gov/enviro/">http://www3.epa.gov/enviro/</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>■ <i>NIOSH Carcinogen List</i></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/topics/cancer/npotocca.html">http://www.cdc.gov/niosh/topics/cancer/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 Resources website provides information to help you meet the requirements of this MI. Use the following link to get to the website: <http://safetytoolkit.usps.gov:12/homepage.aspx>.

For the PPE Program Guide, use the following click through steps:

- Go to <http://safetytoolkit.usps.gov:12/homepage.aspx>.
- Click on *A to Z index*.
- Click on *P*, then *Personal Protective Equipment (PPE)*.
- Click on *PPE Program Guide*.

MI EL-810-2009-4, *Personal Protection Equipment and Respiratory Protection Programs*, is available at <http://blue.usps.gov/cpim/miid.htm>.

Handbook EL-800, *Managing Contract Safety and Health Compliance*, is available at <http://blue.usps.gov/cpim/ftp/hand/el800.pdf>.

The current MMO on *Hazard Communication and Material Safety Data Sheets* is available at <http://www.mtsc.usps.gov/Bulletins.cfm>. Use the Bulletin Search function and search on hazard communication.

The OSHA Hazard Communication Standard (29 CFR 1910.1200) is available at <http://www.osha.gov/dsg/hazcom/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 substance or mixture of substances.

**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 the 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°.

**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.

**Globally Harmonized System of Classification and Labelling of Chemicals (GHS)** — a system for standardizing and harmonizing the classification and labelling of chemicals.

**Hazard category** — the division of criteria within each hazard class, e.g., oral acute toxicity and flammable liquids include four hazard categories. These categories compare hazard severity within a hazard class and should not be taken as a comparison of hazard categories more generally.

**Hazard class** — the nature of the physical or health hazards associated with chemicals, e.g., flammable solid, carcinogen, oral acute toxicity.

**Hazard not otherwise classified (HNOC)** — an adverse physical or health effect identified through evaluation of scientific evidence during the classification process that does not meet the specified criteria for the established physical and health hazard classes. This does not apply to adverse physical and health effects for which there is a hazard class, but the effect either falls below the cut-off value/concentration limit of the hazard class or is under a GHS hazard category that has not been adopted by OSHA.

**Hazard statement** — a statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.

**Hazardous chemical** — any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified.

**Health hazard** — a chemical which is classified as causing one of the following hazardous effects: acute toxicity (any route of exposure); skin corrosion or irritation; serious eye damage or eye irritation; respiratory or skin sensitization; germ cell mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity (single or repeated exposure); or aspiration hazard.

**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** — an appropriate group of written, printed, or graphic information elements about a hazardous chemical that is affixed to, printed on, or attached to the immediate container of a hazardous chemical, or to the outside packaging.

**Label Elements** — the specified pictogram, hazard statement, signal word, and precautionary statement for each hazard class and category.

**Mixture** — a combination or a solution composed of two or more substances in which they do not have a chemical reaction.

**Physical hazard** — a chemical that is classified as causing one of the following hazardous effects: explosive; flammable (gases, aerosols, liquids, or solids); oxidizer (liquid, solid, or gas); self-reactive; pyrophoric (liquid or solid); self-heating; organic peroxide; corrosive to metal; gas under pressure; or when in contact with water emits flammable gas.

**Pictogram** — a symbol plus other graphic elements, such as a border, background pattern, or color, intended to convey specific information about the hazards of a chemical. Eight pictograms are designated under the hazard communication standard for application to a hazard category.

**Precautionary statement** — a phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to, or improper storage or handling of, a hazardous chemical.

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

**Product identifier** — the name or number used for a hazardous chemical on a label or in the SDS. It provides a unique way for the user to identify the chemical. The product identifier permits cross-references to be made among the list of hazardous chemicals, the label, and the SDS.

**Release** — 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.

**Safety Data Sheet (SDS)** — document designed to provide both workers and emergency personnel with the proper procedures for handling or working with a particular substance. An SDS includes information such as physical data, toxicity, health effects, first aid, reactivity, storage, disposal, protective equipment, and spill/leak procedures. SDS information may be useful if a spill or other accident occurs.

**Secondary Container** — any container being used beyond the original manufacturer's container in which the material was shipped. This may include, but is not limited to, spray bottles, portable or working containers, or small storage bottles in "immediate" use (eg. under one person's control for a daily task).

**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*.

**Signal Word** — a word used to indicate the relative level of severity of a hazard and alert the reader to a potential hazard described on the label. The signal words are “danger” and “warning”. “Danger” is used for the more severe hazards, while “warning” is used for the less severe.

**Simple asphyxiant** — a substance or mixture that displaces oxygen in the ambient atmosphere, and can thus cause oxygen deprivation in those who are exposed, leading to unconsciousness and death.

**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 with a solvent other than water.
- *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.

**Substance** — chemical elements and their compounds in the natural state or obtained by any production process, including any additive necessary to preserve the stability of the product and any impurities derived from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition.

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

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

**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 prohibits facilities and employees from procuring or using products containing USPS Targeted Chemicals, with limited exceptions (Refer to [Table 1](#) for the list of Targeted Chemicals and [http://blue.usps.gov/sustainability/environmental/\\_pdf/TargetedChemicalsPolicy.pdf](http://blue.usps.gov/sustainability/environmental/_pdf/TargetedChemicalsPolicy.pdf) for the policy).

**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
GHS	The Globally Harmonized System of Classification and Labeling of Chemicals
HazCom	Hazard Communication
MI	Management Instruction
MMO	Maintenance Management Order
MTSC	Maintenance Technical Support Center
NCED	National Center for Employee Development
OSHA	Occupational Safety and Health Administration
PPE	Personal Protective Equipment
SDS	Safety Data Sheet