

Standard Operating Procedures Handling and Processing of Hazardous Materials

USPS-Approved Postal Providers



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Table of Contents

PART 1	3
Section 1 INTRODUCTION	3
Section 2 APPLICABILITY.....	3
Section 3 DEFINITION OF HAZMAT.....	4
Section 4 BASIC INFORMATION.....	4
401 General Mailability	4
402 Mailable and Nonmailable HAZMAT.....	5
403 Reused Packaging	6
404 Air Transportation.....	7
405 Surface Transportation.....	7
Section 5 HAZMAT MAILABILITY	7
501 Consumer Commodity – Limited Quantity – Other Regulated Material (ORM-D)	7
502 Infectious Substances.....	8
503 Sharps and Regulated Medical Waste.....	9
504 Used Health Care Products	9
505 Other Nonregulated Materials.....	10
505.1 Forensic Material	10
505.2 Nonregulated Materials.....	10
505.3 Exempt Human or Animal Specimens.....	10
506 The International Biohazard Symbol	10
Section 6 UNIVERSAL REQUIREMENTS	11
601 HAZMAT Placards.....	11
602 HAZMAT Staging Area	11
603 Posters.....	11
Section 7 HAZMAT HANDLING	12
701 General HAZMAT Handling Procedures	12
702 Receipt of HAZMAT.....	12
703 Dispatch of HAZMAT.....	12
704 Disposition	12
PART 2	13
Section 8 SPECIFIC PROCEDURES	13
801 Acceptance procedures	13
802 Disposal of Hazardous Materials.....	13
803 Leaking Packages.....	14
804 Customer Notifications.....	14
Section 9 HAZMAT SPILLS, RELEASES, INCIDENTS, AND EMERGENCIES.....	14
Section 10 RESPONSIBILITIES	14
1001 Compliance	14
Section 11 EXISTING POLICY, REFERENCES AND RESOURCES.....	15
PART 3	16
Appendix A: Sample Documents.....	16
HAZMAT Standard Placard – Template – Figure A-1	17
HAZMAT Identification & Segregation Checklist – Figure A-2.....	18

Standard Operating Procedures for the Handling, Processing and Transporting of Hazardous Materials

USPS-Approved Postal Providers

PART 1

Section 1 INTRODUCTION

The United States Postal Service (USPS) is dedicated to providing a safe working environment for employees, protecting the general public, and maintaining the reliability and security of the mail. Improperly accepted, handled, and transported hazardous materials (HAZMAT) represent a significant threat to these goals.

These standard operating procedures (SOP) have been developed exclusively to assist USPS-Approved Postal Providers (Approved Postal Providers) responsible for accepting, handling, and dispatching mail containing, or believed to contain, hazardous materials. They provide detailed instructions for the actions that must be taken by Approved Postal Providers to minimize potential risks related to hazardous materials. These procedures are effective immediately and may not be altered in any way. A copy of these procedures must be easily accessible at all times to all Approved Postal Providers, and their employees, who handle hazardous materials.

Section 2 APPLICABILITY

This SOP applies only to Approved Shippers, Contract Postal Units, Community Post Office, Village Post Office, and Commercial Mail Receiving Agencies that accept mail intended for USPS networks. Throughout this SOP, the term “Approved Postal Provider” applies to Approved Shippers, Contract Postal Units, Village Post Office units and the Commercial Mail Receiving Agencies described above.

An Approved Postal Provider is a private retailer with a packaging and shipping operation that may also provide a variety of shipping services including postal services and competitor services, (i.e., FedEx, UPS). The Approved Postal Provider program expands customer access to postal services and offers additional hours to customers where they live, work and shop.

Through a license agreement or contract, Approved Postal Providers are authorized to display postal signage promoting the availability of U.S. Postal Service products and services.

This SOP provides guidance to all Approved Postal Providers. For other questions or further assistance, contact the Inspection Service, Homeland Security Coordinator (HSC) for your district. A directory of HSCs can be obtained from the Approved Shipper’s USPS district liaison.

Section 3 DEFINITION OF HAZMAT

The USPS defines hazardous material as any article or substance designated by the U.S. Department of Transportation (DOT), as being capable of posing an unreasonable risk to health, safety, and property during transportation. In international commerce, hazardous materials are known as "dangerous goods."

This definition is very broad and includes many common, every-day-use items, including but not limited to:

- Batteries (lithium, wet cell)
- Fuels (gasoline, butane, propane, etc.) and items containing fuel (cigarette lighters, camp stoves)
- Perfumes, aftershaves, and colognes
- Cosmetics (nail polish, nail polish remover, astringent)
- Aerosols (spray paint, hairspray)
- Mercury and items containing mercury (some thermometers, CFLs)
- Cleaning supplies (ammonia, bleach, lye)
- Household solvents (turpentine, acetone, mineral spirits)
- Paints (oil and solvent based) and paint thinners
- Pesticides (e.g. flea collars), herbicides, and rodenticides
- Strike Anywhere Matches
- Pool chemicals
- Alcohol

Many hazardous materials are relatively safe in common use, but may exhibit potentially dangerous characteristics under certain circumstances, such as careless handling, exposure to extreme temperatures, excessive vibration during transport, improper packaging, or storage in proximity to incompatible materials.

Section 4 BASIC INFORMATION

401 General Mailability

Under the United States Code (39 USC 3001 & 18 USC 1716), all matter that is outwardly, or is of its own force dangerous or injurious to life, health, or property is nonmailable. However, some hazardous materials and otherwise restricted or perishable matter are permitted to be mailed when USPS requirements specified in the International Mail Manual (IMM) Sections 135 and 136, and Publication 52, *Hazardous, Restricted, and Perishable Mail*, (PUB 52) are satisfied. (These publications can be found on the Postal Explorer website at pe.usps.com.) These requirements include quantity and concentration limitations, and specific packaging, labeling, and declaration procedures. Certain items also have specific mail class requirements that must be met to allow mailability. These requirements are mandatory and any mailpiece not meeting all of these requirements is considered nonmailable.

The USPS maintains stricter requirements for hazardous materials transported by air with additional quantity restrictions, packaging, labeling, marking, and documentation requirements. Many hazardous materials acceptable for mailing may not be transported by air.

International shipments are generally more restrictive than those for domestic mail. Mailers must comply with the requirements provided in the Individual Country Listings in the IMM prior to mailing. Each country provides specific prohibitions and restrictions, including the class of mail and Extra Services that can be used.

In general, the IMM and PUB 52 are excellent mailability resources and should be consulted whenever there are questions pertaining to mailability, packaging, and markings.

402 Mailable and Nonmailable HAZMAT

Mailable HAZMAT

The Postal Service accepts a small number of hazardous materials for mailing. The quantities allowed are small enough to present a minimal hazard to life, health or property. Mail containing hazardous materials within USPS quantity and concentration limitations that is properly packaged, marked, declared by mailers, and properly accepted by the USPS in accordance with the IMM and PUB 52 is mailable. Mailpieces containing hazardous materials must be identified by appropriate hazard warnings, labels, or markings placed on the outer packaging. All labels and markings must be displayed exactly as specified in PUB 52 and may include: "Magnetized Material;" "Dry Ice;" "Biological Substance, Category B;" "ORM-D" or DOT-approved Square-on-Point; specified DOT hazard warning labels or similar markings.

Only HAZMAT meeting all USPS requirements is considered mailable.

Nonmailable HAZMAT

Any parcel suspected of containing hazardous materials as described in IMM Section 136 and PUB 52, which is not properly labeled or identified as such (undeclared), or containing prohibited hazardous materials is nonmailable. Mail, especially parcels containing undeclared and nonmailable HAZMAT may exhibit some of the following characteristics:

- Sound of broken glass or contents
- Stains, leakage or unusual odor
- Delivery or return address information (e.g. chemical company, laboratory, medical facility)
- Preprinted markings on the box (e.g. aerosol, hair spray, bleach, etc.)
- Manufacturer's name (i.e. Joe's Chemicals, Butane Lighters 'R Us)
- A shifting weight or liquid sound
- Wrapped in tape or plastic
- Prohibited DOT labels and markings

Not all mail with these characteristics actually contains hazardous materials. Mail with delivery or return addresses indicating the potential to contain hazardous materials must be closely examined for other potential indicators of hazardous materials and handled accordingly.

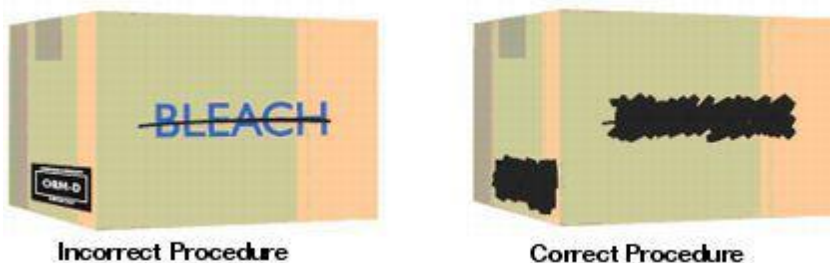
Mail should not be removed from the mailstream solely on the basis of a delivery or return address. Before removing any items from the mailstream, Approved Postal Providers must contact their local Postmaster for instructions.

It is the responsibility of the mailer to comply with all postal and non-postal regulations regarding the mailing of hazardous materials. However, all Approved Postal Providers are required to inspect mail for evidence of hazardous materials and to ask the mailers if their mail contains anything potentially hazardous. This action helps prevent nonmailable items from entering the mailstream. All Approved Postal Providers share the responsibility to look for nonmailable hazardous materials and remove them from the mailstream, when authorized by the USPS.

Any Approved Postal Provider suspecting that a mailpiece contains nonmailable hazardous materials must treat the mailpiece as though it contains hazardous materials and proceed in accordance with their Approved Shipper License Agreement and this SOP.

403 Reused Packaging

As stated in PUB 52, Section 227, a container improperly identified by content is not acceptable for mailing. Therefore, reused packaging, boxes, and containers bearing inapplicable markings or labels associated with hazardous, prohibited, or restricted materials are prohibited in the mailstream unless these markings have been removed or completely obliterated. If these labels or markings can still be read or identified, they are not sufficiently obliterated.



Examples of commonly-encountered reused boxes include liquor/wine/beer boxes, cosmetics boxes, cleaning supply boxes, etc. Certain potentially hazardous, restricted and prohibited matter is nonmailable by statute or regulation. Approved Postal Providers must assume that all markings and labels on a package identify the actual contents.

If markings and labels on a parcel have not been properly obliterated, the parcel must be handled as though it contains the indicated contents. In most cases, these types of parcels must

be handled as undeclared HAZMAT. Packages of this nature must be isolated and removed from the mailstream, with authorization by the USPS.

Approved Postal Providers must not remove, cross out, or obliterate markings or labels on a mailpiece, even if directed to do so by a mailer. Only the mailer or the mailer's authorized representative may perform these actions.

404 Air Transportation

All hazardous materials accepted for mailing as Priority Mail Express, Priority Mail, First-Class Mail, and First-Class Package Service must meet air transportation mailability requirements.

405 Surface Transportation

All hazardous materials accepted as Standard Mail, Standard Post, Parcel Select, or Package Services must meet the surface transportation mailability requirements.

Section 5 HAZMAT MAILABILITY

501 Limited Quantity – Consumer Commodity – Mailable Limited Quantity – Other Regulated Material (ORM-D)

Limited quantity is the maximum amount of a specific hazardous material that is exempted from the labeling or packaging requirements in 49 CFR. Almost all limited quantity materials are nonmailable. Most hazardous material permitted to be shipped as a limited quantity does not qualify under the Consumer Commodity, Mailable Limited Quantity, or ORM-D categories.

Consumer commodity is a hazardous material that is packaged and distributed in a quantity and form intended or suitable for retail sale and designed for consumption by individuals for their personal care or household uses. This term can also include certain drugs or medicines. Not all hazardous material permitted to be shipped as a limited quantity can qualify as a consumer commodity. The consumer commodity category does not apply to materials intended for air transportation in hazard Classes 4, 5, and 8, and portions of hazard Class 9.

Mailable Limited Quantity is a hazardous material in hazard Classes 4, 5, 8 and portions of 9 that presents a limited hazard during transportation (specifically air transport), and is mailable in USPS air networks under certain conditions and in limited quantities.

ORM-D is a limited quantity of a hazardous material that presents a low risk of hazard during transportation due to its form, quantity, and packaging; and is permitted in domestic surface mail only. ORM-D materials are potentially mailable, but are subject to USPS quantity and packaging standards. Not all hazardous materials are permitted to be shipped as ORM-D materials.

The Department of Transportation (DOT) has amended the 49 CFR regulations regarding the ORM-D classification. The ORM-D category has already been eliminated for materials intended for air transportation. The ORM-D classification for surface mail is being eliminated through a phased-out approach. The DOT (and USPS) expects the ORM-D category to be completely eliminated effective December 31, 2020.

Materials that previously met the eligibility criteria for classification as an ORM-D consumer commodity, while also meeting the more stringent USPS standards for air transportation, may be classified as either consumer commodity materials or mailable limited quantity materials. They are permitted to be transported by air if accompanied by a completed shipper's declaration.

A limited quantity package containing a consumer commodity may be renamed "Consumer Commodity" and reclassified as ORM-D **for surface transportation only**.

However, the former ORM-D-AIR material offered **for air transportation**, and re-categorized as described above, must now use the square-on-point "Y" label shown below.

Examples of limited quantity labels for air transportation and surface transportation are displayed below.

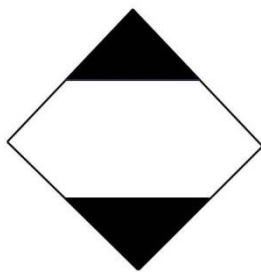
Only ORM-D, mailable limited quantity and consumer commodity materials that meet USPS quantity limitations and packaging requirements are mailable in domestic mail (PUB 52, section 325)

Graphic ORM-D
(Surface only)



(until December 31, 2020)

Surface



Air



502 Infectious Substances

Infectious substances are any human or animal material, including excreta, secretions, blood and its components, tissue, and tissue fluids known or reasonably expected to contain a pathogen. A pathogen is a microorganism that can cause disease in humans or animals. Examples of pathogens include bacteria, viruses, fungi, and other infectious agents.

Infectious substances must be assigned to either Category A or Category B, as appropriate. Category A infectious substances are transported in a form capable of causing permanent

disability or life threatening or fatal disease in otherwise healthy humans or animals when exposure occurs. **All Category A materials are nonmailable. This includes all materials required to be classified under UN2814 or UN2900.**

All infectious substances not meeting the definition of Category A are classified as Category B. Category B infectious substances with a proper shipping name "Biological Substance, Category B" (UN3373) are permitted in the mail only when they are prepared according to PUB 52, Section 346, and the applicable packaging instruction.

503 Sharps and Regulated Medical Waste

Sharps Medical Waste includes medical waste objects that are capable of cutting or penetrating skin or packaging material and are contaminated with a pathogen or may become contaminated with a pathogen derived from the medical treatment, diagnosis, immunization, or biomedical research of a human or animal. Sharps include used medical waste such as needles, syringes, scalpels, broken glass, culture slides, culture dishes, broken capillary tubes, broken rigid plastic, and exposed ends of dental wires.

<p style="text-align: center;">Sharps Medical Waste containing a suspected Category A infectious substances is not mailable.</p>

Regulated Medical Waste means a soft waste material (other than a sharp) derived from the medical treatment, diagnosis immunization, or biomedical research of a human or animal. Soft medical waste includes items such as used rubber gloves, swabs, gauze, tongue depressors, and other similar material.

Sharps and Other Regulated Medical Waste containing a Category B infectious substance is permitted for mailing only using Merchandise Return Service with First-Class Mail or Priority Mail service, and is subject to the requirements in PUB 52, Section 346.322. Mailpieces must be marked with identification number UN3291.

504 Used Health Care Products

Used Health Care Products are medical, diagnostic, or research devices or pieces of equipment, or a personal care products used by consumers, medical professionals, or pharmaceutical providers, that does not meet the definition of a diagnostic specimen, biological product, regulated medical waste, or sharps waste, are contaminated with potentially infectious body fluids or materials, and are not decontaminated or disinfected to remove or mitigate the infectious hazard prior to transport.

A Used Health Care Product known or reasonably suspected to contain a Category A material is nonmailable. A Used Health Care Product not suspected to contain an infectious material, or that is known or suspected to contain a Category B infectious substance and is being returned to the manufacturer or manufacturer's designee, is mailable by Priority Mail Express, Priority Mail, or First-Class Mail subject to the requirements in PUB 52, Section 343.323 and Packaging Instruction 6E.

505 Other Nonregulated Materials

505.1 Forensic Material

Forensic material containing biological material, such as tissue, body fluid, excreta, or secreta, sent on behalf of a federal, state, local, or Indian tribal government agency can be mailed as a nonregulated material, using PUB 52 Packaging Instruction 6F. However, forensic material known or suspected to contain a Category A infectious substance is nonmailable. Forensic material known or suspected to contain a Category B infectious substance as identified in PUB 52, Section 346.321 is mailable with Priority Mail Express, Priority Mail or First-Class Mail subject to the requirements in PUB 52, Section 346.324 and Packaging Instruction 6F.

505.2 Nonregulated Materials

Nonregulated materials as defined in PUB 52, Section 346.325 are not subject to regulation as hazardous materials but must be properly packaged when presented for mailing. PUB 52, Packaging Instruction 6G, “Nonregulated Infectious Materials,” provides mailing instructions for biological products, blood collected for the purpose of blood transfusion, blood products and blood components collected for the purpose of transfusion, dried blood spots or forensic material not known or suspected of containing a Category A or Category B infectious substance.

505.3 Exempt Human or Animal Specimens

Exempt human or animal specimens are human or animal samples (including, but not limited to, secreta, excreta, blood and its components, tissue and tissue fluids, and body parts) transported for routine testing not related to the diagnosis of an infectious disease. Typically, exempt human specimens are specimens for which there is a low probability that the sample is infectious, such as specimens for drug or alcohol testing; cholesterol testing; blood glucose level testing; prostate-specific antigens (PSA) testing; testing to monitor heart, kidney, or liver function; pregnancy testing; and testing for diagnosis of noninfectious diseases such as cancer biopsies.

Exempt human or animal specimens, as described in PUB 52, Section 346.326 are not subject to regulation as hazardous materials and are permitted in the mail when prepared according to PUB 52 Packaging Instructions 6H.

506 The International Biohazard Symbol

The International Biohazard Symbol can be used on the inner primary receptacle, the outer shipping package, or on both locations. The uses of the International Biohazard Symbol are described in PUB 53, 346.321 and Appendix C.



Section 6 UNIVERSAL REQUIREMENTS

The following items are required at all facilities.

601 HAZMAT Placards

Mail Transport Equipment (MTE) containing hazardous materials is required to bear placards on all sides indicating the presence of hazardous materials at all times, including containers that are staged for dispatch or in transit between facilities.

Approved Postal Providers must make photocopies of the HAZMAT placard in Appendix A to fulfill this requirement.

602 HAZMAT Staging Area

All Approved Postal Providers are required to establish at least one HAZMAT staging area for USPS shipments containing or suspected to contain hazardous materials. The purpose of the HAZMAT staging area is to provide a safe, segregated area to stage hazardous materials awaiting transportation and nonmailable mailpieces awaiting disposition. Mailable and nonmailable HAZMAT should be separated in the staging area(s). The location of the staging area(s) must be away from traffic flows where hazardous materials will be protected from accidental damage. Do not locate HAZMAT staging areas near break rooms, cafeterias, air intakes, or battery charging rooms.

If MTE is not available, HAZMAT mailpieces may be staged in properly placarded flat trays (tubs) while awaiting dispatch or delivery. When the use of flat trays is authorized, Approved Postal Providers must apply a HAZMAT placard directly to parcels too large to fit in a flat tray. HAZMAT parcels must never be staged directly on the floor or in otherwise unprotected locations. The staging area must be clearly identified, and contain a copy of this SOP and a supply of Label 127, *Surface Transportation Only*. These labels can be obtained from the Approved Postal Provider's local Post Office.

In addition to the materials listed above, it is recommended that Approved Postal Providers have online access to the IMM and Pub 52. These documents can be found on Postal Explorer at pe.usps.com. The Approved Shipper is responsible for ensuring that their employees know how to access these documents.

603 Posters

It is recommended that each facility display Poster 298, *Department of Transportation Domestic Hazardous Materials Warning Labels*, in a location where it will be viewed on a regular basis by employees responsible for handling mail. Poster 318, *Civil Penalty Notice and* Poster 37, *Is Your Package Safe to Mail?*, should be displayed in a prominent location near the retail counter.

Poster 702, *Prohibited International Mail, Dangerous Goods Warning Labels*, is the international equivalent to the domestic Poster 298, and is also a good resource.

These posters can be obtained from the Approved Postal Provider's local Post Office.

**Approved Postal Providers may obtain all forms, posters, notices, manuals,
and publications from their local Post Office.**

Section 7 HAZMAT HANDLING

701 General HAZMAT Handling Procedures

Guidelines for Handling Parcels Containing Hazardous Materials

- Do not throw, drop, or slide parcels containing hazardous materials
- Separate HAZMAT parcels from other mail items
- Separate mailable HAZMAT parcels from nonmailable HAZMAT parcels at the HAZMAT staging area
- Separate nonmailable HAZMAT parcels during staging by placing them in a flat tray that will contain potential leakage. Line the flat tray with a plastic bag, if necessary
- Do not place HAZMAT parcels in sacks.

702 Receipt of HAZMAT

Approved Postal Providers that receive incoming mail intended for delivery must also examine each HAZMAT item for proper markings, labels, and packaging, and inspect the items for damage and/or leakage.

703 Dispatch of HAZMAT

Authorized Postal Providers should remain aware that most HAZMAT is not allowed in air transportation per PUB 52. Only air-eligible HAZMAT may be dispatched for air transport.

Prior to dispatch via USPS transportation, the driver (or mail carrier) must be notified that the shipment contains HAZMAT.

704 Disposition

HAZMAT parcels must have a disposition **before** close of business each day. HAZMAT staging areas must be cleared of all mailable HAZMAT prior to close of business.

PART 2

Section 8 SPECIFIC PROCEDURES

801 Acceptance procedures

Approved Postal Providers must take the steps necessary to effectively screen mailpieces for the presence of HAZMAT. These procedures must be followed when Approved Postal Providers, and their employees or agents, accept all parcels and bulky flat mail:

- a. Conduct a thorough examination of the mailpiece.
 - Check the delivery and return address
 - Conduct a visual inspection of all six sides of the mailpiece using these guidelines:
 - Look for HAZMAT labels (diamond shaped DOT labels, square-on-point, ORM-D, biohazard, etc.)
 - Look for characteristics of HAZMAT (listing provided in section 402)
 - Look for reused HAZMAT packaging
 - Refer to Poster 138, *Keep the Mail Safe*, for a list of common HAZMAT items
- b. Ensure that the mailer responds to the question, “Does this parcel (item, article) contain anything fragile, liquid, perishable, or potentially hazardous, such as lithium batteries or perfume?”
 - If the parcel contains HAZMAT, refer the customer to the applicable resource material to determine if the item is mailable
 - Refer to PUB 52 or the IMM to determine mailability of the material and required packaging, labeling, documentation, and mail class restrictions
 - Use Notice 107, *Let's Keep the Mail Safe*, to help explain why the material is not mailable or properly packaged and provide them with a copy of PUB 52, Section 323
 - If mailability of the material cannot be determined, contact your local Postmaster for additional help

<p>Under no circumstances are hazardous materials to be re-mailed without confirmation that the materials meet USPS mailability, packaging and marking requirements.</p>

802 Disposal of Hazardous Materials

The disposal of hazardous materials is strictly regulated by federal, state, and local agencies. The improper disposal of hazardous materials, including disposal in dumpsters, facility garbage, or pouring them down the drain, may result in fines and/or criminal penalties.

Hazardous material disposal must be coordinated by local Environmental Management Policy personnel to ensure that all required procedures are followed. Approved Postal Providers must contact their local Postmaster for instructions regarding the disposal of hazardous materials.

Instructions/assistance provided by Postmasters must be compliant with the hazardous waste disposal policy provided in Management Instruction EL-890-2007-5, *Integrated Waste Management*.

803 Leaking Packages

If a leaking parcel is discovered, it must be treated as a “potential hazardous material release” according to USPS policy. Approved Postal Providers must contact their local Postmaster for instructions regarding a leaking mailpiece that may potentially contain hazardous materials. Postmasters must be compliant with Management Instruction EL-810-2006-3, *Response to Hazardous Materials Releases* when supplying instructions or assistance to Approved Postal Providers for incidents relating to leaking packages.

804 Customer Notifications

Customer notification procedures play an important part in the process of safely handling items containing, or suspected of containing, hazardous materials.

If an Approved Postal Provider is in possession of a nonmailable or damaged parcel suspected of containing hazardous materials, they must contact the mailer or addressee to schedule a time for them to pick up any nonmailable package(s) or to correct any deficiencies in labeling and/or packaging as specified in PUB 52. If an Approved Postal Provider is unable to contact the mailer or addressee, they must contact the local Postmaster for assistance.

Section 9 HAZMAT SPILLS, RELEASES, INCIDENTS, AND EMERGENCIES

Any mailpiece exhibiting characteristics of suspicious mail or leaking an unknown powder, liquid or substance should be handled according to suspicious mail protocols. Approved Postal Providers must contact their local Post Office or the Inspection Service (1-877-876-2455) for instructions and assistance in these circumstances.

Never allow untrained individuals to handle suspicious material.

Section 10 RESPONSIBILITIES

1001 Compliance

Unless specifically stated otherwise, compliance with the procedures outlined in this document is mandatory. Each Approved Postal Provider is responsible for ensuring their facility is in full compliance at all times.

Section 11 EXISTING POLICY, REFERENCES AND RESOURCES

Additional information about the existing USPS hazardous materials procedures and policy can be found in the following postal publications located on Postal Explorer at <http://pe.usps.com>:

- International Mail Manual (IMM), Section 130
- PUB 52, *Hazardous, Restricted, and Perishable Mail*

PART 3

Appendix A: Sample Documents

HAZMAT Standard Placard – Template – Figure A-1

HAZMAT Identification & Segregation Checklist – Figure A-2

HAZMAT Standard Placard – APPD SHPR – Template – Figure A-1

TO: _____

DATE: _____

Departure(s):

HCR/COLLECTION ROUTE #

TRIP #

CONTENTS: HAZMAT

Origin: _____

HAZMAT Identification & Segregation Checklist – Figure A-2

Hazardous Materials (HAZMAT) Identification & Segregation Area Checklist

- Mail containing, or suspected of containing, hazardous materials is away from traffic flow, well ventilated, away from air intakes, and protected from accidental damage.
- Staging area is not located near areas where employees congregate, like break rooms, cafeterias, etc. Staging area is not located near other potentially hazardous areas, such as furnace rooms, etc. The staging area is clearly marked.
- Hazardous Materials are staged and properly placarded metal or plastic mail transport equipment (MTE), or in flat trays (as appropriate).
- Separate placarded containers are provided for mailable and nonmailable hazardous material.
- Hazardous materials transportation placards are readily available.
- IMM 130, and PUB 52 are readily available on the Postal Explorer website at *pe.usps.com*.
- A supply of Label 127, *Surface Transportation Only* is available.
- The SOP, Handling and Processing of Hazardous Materials, Approved Postal Provider* is readily available.