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Report/Article Title Memorandum: From Aubry Dupuy, Jr., Acting Manager, Toxicant Analysis Center, United States Environmental Protection Agency (EPA), To Jerry Hlass, Manager, NASA-NSTL Site, regarding EPA- TAC Safety Regulations and Procedures, dated May 15, 1980

Journal/Book Title

Year 1980

Month/Day May 15

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Description Notes

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: May 15, 1980

SUBJECT: EPA - TAC Safety Regulations and Procedures

FROM: Aubry Dupuy, Jr., Acting Manager *Aubry Dupuy, Jr.*
Toxicant Analysis Center

TO: Jerry Hlass, Manager
NASA - NSTL Site

In compliance with a previous request from your office, Dr. Frederick Kutz of EPA's Survey and Analysis Division in Washington, D. C., has requested that I forward to you the following materials. A copy of the Toxicant Analysis Center's General Safety Regulations and a copy of the Emergency Dioxin Spill Procedures. These regulations and procedures have been reviewed by our EPA - Office of Occupational Health and Safety and by Mr. Gene Burke of the NASA/NSTL Safety Office.

We are looking forward to working with you in reopening our Chlorodioxin Section as soon as possible.

Please contact Dr. Kutz at FTS 755-8060 or me at ext. 3212, if we can be of any further assistance to you.

cc: w/enclosure

Milas Blaylock
Frederick Kutz
Sam Wastler
Betsy Bowie

Mark/Gene:

need to provide attached material to Doctor Young & Dr. Futrell for evaluation

JH.

5/16

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General Safety Regulations

I. Responsibilities

A. TAC Safety Officer

- o Maintains records of work areas where carcinogens and other specified substances are used and a listing of specific materials or classes of materials used in each location;
- o keeps a listing of personnel authorized to work in such areas; and
- o investigates all accidents, including those involving carcinogens.

B. Project leaders

- o Select appropriate control practices for handling chemical carcinogens and other specified toxic substances, in accordance with EPA and OSHA regulations;
- o follow and advise cadres in following procedures for preventing and dealing with accidents;
- o report to Safety Officer, 1) a listing of personnel authorized to work in controlled areas and, 2) an inventory of stock quantities of chemical carcinogens to be kept in work areas;
- o instruct and train the program and support staff in the proper safety practices;
- o supervise the performance of the staff to ensure required safety practices are used; and
- o assist the Safety Officer in the investigation of accidents.

C. Laboratory Employees

- o Comply with all oral and written safety rules and procedures; and
- o report to project leaders all accidents which result in any exposure to carcinogens.

II. Personnel Practices

A. Eating, Drinking and Smoking

- o No eating, drinking, smoking, chewing of gum or tobacco, application of cosmetics, or storage of food and drink shall be allowed in areas where carcinogens are, or have been, present.

B. Protective clothing

- o All employees handling carcinogens and other specified substances or in the same laboratory with those handling carcinogens and other specified substances must wear full protective clothing, i.e., disposable white coveralls, gloves, and eye protection. Under certain conditions, head, foot and respiratory protection may also be necessary.
- o Contaminated clothing or clothing suspected of being contaminated must be decontaminated or disposed of.
- o Other laboratory employees, not ordinarily handling carcinogens and not ordinarily in the vicinity of those handling carcinogens, should wear lab coats and gloves when entering such areas. For others, such as visitors, cleaning personnel, etc., this precaution also applies.

C. Personal Hygiene

- o All lab employees who have worked with carcinogens should wash or discard their gloves after removal of coveralls, and then wash their hands and face before leaving the area.

III. Operational Practices

A. Work Area Identification

- o Entrances to work areas where carcinogens are present shall be posted with signs which read:

DANGER
CANCER PRODUCING MATERIALS IN USE
Authorized Personnel Only

In other areas, post similar signs substituting "Extremely Hazardous Materials in Use" or "Dangerous Toxicants in Use", as appropriate.

B. Access Control

- o Doors on restricted areas will be locked to prevent access by anyone except authorized personnel, who will be appropriately attired and will exercise proper precautions.
- o Either combination locks or keys will be adequate.

C. Storage and Inventory

- o Stock quantities of suspected carcinogens shall be stored in a locked cabinet which is marked:

CANCER SUSPECT
AGENT AREA
Authorized Personnel Only

- o Inventory records should be kept on the quantities of chemical carcinogens acquired.
- o Storage containers should be labelled:

DANGER - CHEMICAL CARCINOGEN

- o Refrigerators or freezers containing carcinogens should be kept locked at all times and clearly marked:

CANCER SUSPECT
AGENT AREA
Authorized Access Only

D. Laboratory Transport

- o Carcinogen-containing samples should be placed in an unbreakable outer container before being transported. The outer container should be labeled:

DANGER: CHEMICAL CARCINOGEN

E. Disposal

- o Disposal containers must be provided for all carcinogenic materials in the laboratory.
- o All carcinogenic solid waste or glass waste must be disposed of in metal cans which are sealed and wrapped in double plastic bags.
- o The disposal containers should be clearly marked as to the hazard involved.

From memo, "Preliminary list of carcinogens", Dr. F. N. Kuty to Hon. Tui (shown Mr. Hulpv), dated Feb. 7, 1960, 2nd



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

11 April 1980

MEMORANDUM

SUBJECT: Accident and Emergency Procedures for Dioxin Spill

TO: Aubrey Dupuy
Toxicant Analysis Center

FROM: Linda Cohen Jonas, *Linda Cohen Jonas*
Coordinator
Office of Occupational Health and Safety

We have reviewed the emergency procedures that you provided in the event of a dioxin spill. We feel the procedures, as presented, are not adequate to insure safe handling of such an emergency. We have enclosed an alternative plan for your consideration. Please provide us with your final plan.

Please contact me at FTS 755-4390 if you have questions or need clarification.

Enclosure

cc(w/enclosure): Milas Blaylock, Safety Designee

Accident and Emergency Procedures for Dioxin Spill

A. Emergencies will be in the nature of spills involving dioxin - containing materials. The following steps should be followed:

1. Vacate the immediate area of the spill.
2. Advise other personnel in the area of the accident and request that they vacate the area also.
3. Notify the SO, Milas Blaylock, or other personnel listed on page 1 of the Safety Plan in Appendix 2 of the Laboratory Safety chapter of the Safety Manual as well as the Principal Investigator, Aubrey Dupuy.
4. Be available to the SO to answer any questions concerning the spill (concentration of dioxin, amount spilled, etc.).
5. Submit to the SO a report of the spill detailing the cause, the area involved, and the measures taken to insure there is no recurrence.
6. The SO will investigate with the Principal Investigator the cause of the accident and measures required to prevent recurrences.

B. Decontamination Procedures

1. General principles

Successful decontamination calls for planned action. A spur-of-the moment action or attempt at decontamination can cause more harm than good. The person responsible for the spill in a contamination accident will usually take the first steps in bringing the situation under control. The first consideration will be personnel safety; persons not involved in the spill will leave the area. Those persons responsible for a spill shall, unless physically incapable, decontaminate the area of concern under the supervision and assistance of the SO. Subsequent considerations should involve the following procedures:

Clean-up personnel must wear protective clothing, gloves, and boots, all coated with polyvinyl alcohol, and a full-face chemical cartridge (dust filter with organic vapor charcoal filter) respirator.

- a. Prevent the spread of contamination by applying absorbent material in the case of liquids and barricading the area.
- b. Allow no one to leave the adjacent area until the person has been checked for contamination.
- c. One person should remain uncontaminated to observe and coordinate the operation. This person must assure that no one enters the area until decontamination is complete.
- d. Clean-up the spill using a Mallinckrodt spill clean-up kit.
 1. Pour spill tamer absorbent over the liquid, continuing until an excess of dry absorbent covers the wet mass to control vaporization.
 2. Working quickly, wipe up the absorbent using paper towels. Transfer absorbent and towels to double plastic bags and then to DOT-approved drum.
- e. Using conservative amounts of alcohol or acetone in plastic squeeze bottle, rinse the area and wipe down the spill area twice with fresh paper towels, transferring first to double plastic bags and then to DOT- approved disposal drum.. Minimize the spread of contamination during the clean up.
- f. For spills which contaminate equipment:
 1. Where possible, wrap the equipment in double layers of plastic or place inside two plastic bags.
 2. For larger equipment; seal off contaminated area as much as possible using double layers of plastic. Notify Fire Department for assistance in decontamination.
- g. After decontamination is complete:
 1. Rinse contaminated boots with solvent while standing in tub to catch rinse solvent.
 2. Remove contaminated clothing, turning gloves and boots inside out during removed, taking care not to touch contaminated surfaces with unprotected skin.

3. Place disposable clothing in DOT-approved disposal drum. Any contaminated street cloths or laboratory coats should be placed in drum for disposal or double bagged for decontamination elsewhere.
4. In the event of skin contact with dioxin, showers must be taken.