



Council on Safe Transportation of Hazardous Articles

September 2, 2020

Mr. Dale Kennedy
Manager, Product Classification
U.S. Postal Service
475 L'Enfant Plaza SW, Room 4446
Washington, DC 20260-5015
Via email: PCFederalRegister@usps.gov

Re: New Mailing Standards for the Separation of Hazardous Materials

The Council on Safe Transportation of Hazardous Articles, Inc. (COSTHA) hereby submits comments to the Proposed Revision; request for comment published August 3, 2020. The notice requests input on the proposed amendments to Publication 52, Hazardous, Restricted, and Perishable Mail (Pub. 52) to require mailers separate all air-eligible hazardous materials (hazmat) from non-hazardous materials and surface only hazmat tendered for domestic mail. COSTHA members generally support this initiative and note USPS current Hazmat handling procedures already require hazmat parcels be separated from other mail items (Inspection Service - Hazmat Handling and Processing SOP, Section 701).

COSTHA is a not-for-profit organization representing manufacturers, shippers, distributors, carriers, freight forwarders, trainers, packaging manufacturers and others associated with the hazardous materials transportation industry. In addition to promoting regulatory compliance and safety in hazardous materials transportation, COSTHA assists its members and the public in evaluating the practicality and efficacy of laws, rules and regulations for the safe transportation and distribution of hazardous materials. Among our members, COSTHA proudly represents air carriers, representing the majority of carriers involved in the domestic and international carriage of passengers and cargo by aircraft. In order to meet the specific needs of these members we sponsor an Air Carriers Roundtable (ACR) comprised of fifteen (15) passenger and cargo carriers which serves as a forum for discussion of issues which relate specifically to the airline industry and their customers, many of whom are also COSTHA members.

The process of keeping hazardous materials parcels separated from other non-hazardous parcels is vital for the USPS contract air carriers to have visibility to the hazard class categories of the materials being tendered for transport. Carriers are charged with ensuring a safe operation and applying Safety Management Systems to identify risk and put processes in place to mitigate any identified risks. This includes ensuring incompatible materials are separated when loaded in a cargo hold. This critical function cannot be implemented without prior communication of the hazards in the parcels and separation of parcels for identification and handling.

Council on Safe Transportation of Hazardous Articles

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The US Postal Inspection Service “Hazmat Handling and Processing SOP”, Section 602 requires USPS employees separate mailable and nonmailable Hazmat in the staging area(s). USPS relies of hazmat parcels being identified by marks/labels on the address side of the mailpiece. Section 801.1 requires hazmat be tendered to air carriers separately; the air carrier must be notified at least two hours prior to the flight and a manifest provided.

Hazmat that is not separated from non-hazmat increases the risk of non-compliance including, surface only hazmat being redirected for air transport, hazmat restricted to cargo aircraft only such as lithium batteries (UN3480, UN3090) being tendered to passenger carriers, and hazmat being tendered to air carriers that do not accept hazmat in the mail.

The number of parcels moving through the mailstream has increased exponentially due to the growth of Ecommerce distribution and even more due to the Coronavirus (COVID-19) Pandemic. Identification of these hazardous materials marks and labels can easily be missed especially as the size of the marks are reduced (e.g. reduction of the limited quantity mark). Mailers separating the hazardous materials when tendered to USPS allows for these parcels to remain separated throughout the transport chain.

Ultimately, a technology solution to allow for automated controls is the preferred option for sortation and staging for contact carriers. However, before a technology solution is realized, separation of hazmat parcels is a good first step in identifying these parcels and ensuring their appropriate handling.

COSTHA appreciates the opportunity to provide these comments on this Proposal. If you have any questions regarding our comments, please do not hesitate to contact us.

Sincerely,

A handwritten signature in cursive script that reads "L'Gena L. Shaffer". The signature is written in black ink and is positioned above the typed name and title.

L'Gena Shaffer
Senior Technical Consultant
COSTHA