

GUIDELINES

Dealing With Questionable, Unknown Substances

This guide is to help state agencies deal with unknown substances of uncertain origin in their workplaces. Most recently, anthrax or white powder hoaxes have been the concern, but this guideline can be applied to other situations.

Know Your Agency's Basic Hazardous Materials Plan

Your agency already has an emergency plan for any hazardous material spill. It probably covers some biological hazards. If not, it can still be adapted to your problem, whether high-risk, low-risk, or no-risk.

Act Now: *If your office does not have an emergency plan for hazardous material spills, call your safety officer or agency head for further guidance. DAS-Risk Management Division can provide information on plan development to your agency head or designee (503 373-7475).*

Generic plan: Assess the risk before deciding it is an emergency. Unknown substances in state offices have virtually always turned out to be low-risk or no-risk. But, that does not mean they will always be so. Therefore, the correct approach is to *quickly and carefully assess the situation and then manage the substance according to the risks that you find*. Assess each situation on its own. Base your decisions and actions on the full circumstances that you find.

Generic plan for high-risks. If you do decide that a substance poses a serious, immediate hazard, then *follow your agency's emergency procedures for hazardous materials*. Follow the procedure that fits materials with similar physical characteristics (fluid, powder, gas, aerosol, causing burning or causing no symptoms, contained or spreading). A generic plan may tell you the following:

- Isolate the material, move away from the apparent danger, keep others away from it, and immediately call 9-1-1. Follow their instructions.
- Anyone who may have made contact with the substance should wash with soap and water. Record the names of everyone who may have had contact.
- Report the 9-1-1 call (or the decision not to call) up your management chain or to your safety officer as soon as possible.

Act Now: *Prepare for real hazardous materials by teaching all employees your agency's emergency plan for hazardous materials.*

Generic plan for self-managed, non-emergency cases. If you decide a substance is not a credible threat and poses only a low-risk, look at your agency's plan anyway. It should already have procedures and materials to deal with common spills that are not emergencies but might be hazardous if not properly managed. These procedures and materials are used to safely clean up urine, blood, vomit, or a minor spill of an office chemical or cleaning product. The standard procedures can be adapted to manage many unknown but low-risk substances, including powder hoaxes.

Generic plan for no-risk cases. What if your assessment of the situation tells you the substance is lunch or snack residue or paper dust from the printer? Your agency's emergency plan won't have the instructions for simple, no-risk cleaning.

Beyond The Generic Plan

The following pages are advice on applying an agency emergency plan to white powders or other questionable, unknown substances.

White Powder Risk Assessment

First, remember that an unknown substance that just "appears" in your normal workplace is unlikely to be dangerous. So, assess the situation before concluding there is danger. However, always take reasonable precautions with exposed white powders while assessing the risk.

- If practical, cover the substance with a clear plastic sheet to limit spread of powder.
 - Notify the manager or safety officer at once (as your agency plan provides).
 - Keep other staff away until a supervisor or safety officer does the initial risk assessment.
 - Wash your hands with soap and water.
1. **Assessing envelopes and packages.** Was the suspect substance delivered or found in an envelope or package? If it was, then immediately follow the ***State of Oregon Guidelines & Procedures For Handling Suspicious Letters or Parcels***. This guide is on-line at the Department of Administrative Services homepage at <http://www.das.state.or.us/images/GUIDELINES&PROCEDURES.pdf>.
 2. **Physical Assessment of a hazardous material emergency.** Here are some physical indicators that an unknown substance in your workplace is a serious, immediate hazard. A substance that is **not** causing effects like these is one you can afford to assess further.
 - The substance is producing physical effects. As examples, it might produce sound, sparks, fumes, clouds, or smoke. It might melt or alter the surfaces it touches.
 - It is causing any kind of symptoms, illness, or distress to anyone present.
 - It is spreading beyond your ability to manage with your routine plans.
 3. **Threat Assessment: Evidence of a deliberately harmful substance.** Is it likely that the substance is a deliberate attempt to harm people? Your assessment should include a criminal threat assessment. The following are indicators of possible criminal threat:
 - The substance was found where someone seeking to do harm reasonably could have placed it. Strangers were seen in the area.
 - The substance appears to have been placed to cause harm. It could not be easily seen and avoided. It was on or in a package, envelope, briefcase, or the like, which is of unknown origin.
 - The substance is accompanied by a specific written or spoken warning or threat. Or the apparent target person, unit, or program has been receiving threats.
 - The person, unit, or program recently did something that would have angered someone. Or, it receives many threats of harm or retaliation because of the nature of its work.
 - The person, unit, or program is frequently or was recently in the news in a controversial matter or is a high-profile symbol of government.
 - The person, unit, or program knows of an unstable individual who might do harm.
 4. **White powder indicators of no emergency or no credible threat.** You don't want to call emergency responders for powdered sugar, powdered creamer, flakes of dried paint or glue or white-out correction fluid, or paper dust from a copier or printer or old files. So, ask yourself what could the substance be? How might it have gotten to where it was found? Is there a mess in the nearest waste container that shows donut wrappers, more paper dust, or other evidence that your problem is just a messy co-worker?

Risk Assessment Conclusions

Level I (low or no risk):

- Letter and parcel handling guides indicate low-risk or no-risk
- Clear evidence indicates the substance is harmless (food or office residue, etc.).
- No significant criminal threat indicators are present.

If the manager, safety officer, or designee determines the substance to be a Level I risk, proceed with cleanup procedures provided later in this guide.

Level II (warrants emergency action):

- The letter or parcel guide indicates the substance is a probable risk.
- The physical assessment indicates an immediate emergency.
- The threat assessment indicates a probable risk.

If the manager, safety officer, or designee determines that the substance presents a Level II risk, call 911 immediately. If the local authorities advise that a **risk does not appear to exist** then:

- Communicate the local authority's response to all staff.
- Clean up the substance as provided in this guide.
- Document the incident, action, and outcome and promptly report it up the management chain.

Clean Up Procedures

No-risk cleanup. If you decide you know what the substance is and that it is harmless, like powdered creamer on a coffee tray, clean it up as you would normally do.

Risks with emergency-calls. If the suspect substance prompted you to make an emergency call, the local fire department or hazardous materials responder will advise you on whether the clean up should be performed by a skilled hazardous material response team or firm. Or, they may advise you that the material is low-risk or no-risk. Follow their advice.

Low-risk cleanups. If your assessment (or that of emergency responders) is that the substance is not high-risk, but you are not really sure what the substance is, this is a recommended cleaning method.

Assume that the substance poses a low risk, such as a cleaning powder that may cause irritation. Your agency should have the materials and procedures at-hand to do a safe clean up of low risk material. Just use the basic first-aid procedures called *Universal Precautions*. Get these materials from your first-aid *Blood Borne Pathogen or Body Fluid Spill Kit*.

- Clear plastic, closable bags
- Non-latex disposable gloves
- Disposable disinfectant wipes
- Dust or particulate mask (*not in the kit, but good to provide for employee comfort*)

Take these steps with your *Blood Borne Pathogen or Body Fluid Spill Kit*:

- Put on gloves and mask.
- Use disinfectant wipe to gently push material into a clear plastic bag along with any other contaminated materials (papers, etc.).
- Wipe down the surrounding surfaces. Remove gloves and mask and place in the clear plastic bags along with wipes. Put the bags in a second, clean bag. Tag these with the date and a copy of your Incident Report. Keep them in a secure area for 60 days, then dispose of them in the regular trash. If papers, mail, checks or money is essential for your business, monitor for 60 days. If no illness or credible contamination is reported, you may remove and process as usual.
- Wash your hands with soap and water.
- **Do not use** the absorbent powder contained in many kits. It is there for liquid spills like body fluids, not for powders.
- **Do not use** the red biohazard bag. The red biohazard bag is only for known or likely biohazards or body fluids.
- Replenish your *Blood Borne Pathogen or Body Fluid Spill Kit* IMMEDIATELY so it will be ready in your first-aid kit.

Appendix A: Labor Issues

Employees will have varying levels of comfort in dealing with these situations. They will have a broad range of perceptions about what is safe and what is not. A manager may allow a particularly frightened or nervous employee to take appropriate leave time (sick leave in the case of illness otherwise vacation, compensatory or personal leave time). The manager should consider referring the employee to EAP.

However, collective bargaining agreements generally lay out a process for resolving leave issues in these situations with represented employees. In these times of threat and fear, a supervisor may not want to hold a fearful employee to every formal detail of the contract. It may be helpful to consult the contract and the agency personnel staff. Obviously, it is wise to call in the agency Safety Officer at once.

If a building is evacuated and the employees are not allowed to re-enter, the situation is similar to inclement weather or hazardous conditions closures. Employees are paid for the remainder of their work shift. If closure continues, non-FLSA-exempt employees are given advance notice of the continuing closure through available means (telephone, radio etc.). They must then use appropriate leave to cover the absence. Exempt employees are compensated for the remainder of the workweek unless the closure is for the full workweek.