

displayed in 3/8-inch red letters on a white background.

- Cabinets must have three 1/4-inch holes drilled through the bottom for venting.
- Cabinets must be locked at all times and must be located above the full-load waterline in a space not subject to temperatures above 100 degrees. They cannot be located in machinery spaces, oil-test-laboratory areas, or berthing spaces.
- Only personnel designated by the medical officer or the engineer officer can issue calcium hypochlorite.
- No more than 48, six-ounce bottles can be stored in any one locker.
- Do not place lockers within 5 feet of any heat source greater than 140 degrees, and never expose calcium hypochlorite to open flame. Make sure the lockers are not subject to condensation or water accumulation. When calcium hypochlorite

contacts high heat or water, it can produce toxic chlorine and phosgene gas.

- Keep oxidizing chemicals away from oils, greases, paints, detergents, and other organic material. Otherwise, there may be a violent reaction or fire.
- Ensure people who use calcium hypochlorite are trained in mixing techniques and precautions. Always wear PPE, including neoprene gloves, protective coveralls, safety splash goggles, and faceshield.
- Clean calcium hypochlorite lockers according to the PMS schedule. ☺

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### For More Info...



<sup>1</sup> These requirements come from NSTM 670, Stowage, Handling, and Disposal of Hazardous General Use Consumables; NavMed P-5010, Manual for Naval Preventive Medicine, Chapter 6; General Specifications for Overhaul of Surface Ships, Section 671; and MIP 6521/601-75.

# Enough Is Enough!

*By HMCS(SW) Richard Bulgin, USN (Ret.)*

**D**o you often find excessive or unauthorized hazmat aboard your ship? Do you know what your hazmat requirements are and how to determine when you have enough? If what we see during safety surveys is any indication, quite a few ships don't have the right answers to these questions.

The most common reason for the problems is that the ship's coordinator hasn't caught up with changes in PMS requirements, or there is confusion caused by different national stock numbers (NSNs) for various brands of items that are generically similar. Many times, an item will be listed in the "prohibited" or "restricted" category because it's slightly different from the item actually required.

A good example of this latter problem involves PD-680, a dry-cleaning fluid. The CD-ROM for the hazardous materials information system (HMIS) lists more than 100 different companies that make some form of this product. However,

there is only one authorized NSN<sup>1</sup> for PD-680, Type II, which is used aboard ship. There are six authorized NSNs for PD-680, Type III<sup>2</sup>.

Problems with hazmat control and management don't end here. No ship will have a valid need for all items on the Ship's Hazardous Material List (SHML). The fact that an item is listed on the SHML does not prove a "valid need." The SHML acts only as a guide so ships can assess their own needs. If a valid requirement exists, and the material is not listed on the SHML, or it's listed with a P (Prohibited) or N (Not Identified), you need to submit an SHML Feedback Report (SFR).

Another problem deals with the open purchase of hazardous materials. In the case where a stock-numbered product proves to be inferior, or the supply system cannot meet the urgency of need, an open purchase may be permitted. The commanding officer (or a designated officer O-5 or above) must sign the SFR, and it must be



When inspectors find this much hazmat aboard your ship, you have more than enough.

attached to the purchase request. Sounds easy, right? Wrong! The major problem with open-purchase items is that commands often fail to obtain an MSDS from the manufacturer before approval and use.<sup>3</sup>

Here's a sea story to illustrate the importance of doing things right with hazmat. My ship had just left one of those exciting little ports in a third-world country—you know, "SBP" (sliders and beer on the pier for five days). The next day, a chief came to me in sickbay, holding a spray bottle and stating—in a not-so-calm manner—that he accidentally had sprayed the contents in his eyes.

"No problem," I thought. Have him do a quick flush in the eyewash while I check the label, get the MSDS, and he'll be good to go—not! The label said it all, or I think it did—I had never attended the University of Baghdad, and my command of the Arabic language wasn't very

good. I knew I wouldn't find an MSDS for what the chief had sprayed in his eyes.

He had gotten the stuff from the ship's barber, who said it was hair spray he had purchased from a local vendor. What I wondered, though, "Is it hair spray for the two-legged or four-legged variety? Does it make the hair stay in place and look cool, or does it remove the hair?"

I think you get the point of this story. The ship's barber did—at the point of the chief's boot, I believe. ☺

*The author was assigned to the Naval Safety Center when he wrote this article. Send comments or questions on the article to [afloat@safetycenter.navy.mil](mailto:afloat@safetycenter.navy.mil).*

#### For More Info...

 <sup>1</sup>PD-680, Type II, is restricted and only for use in the Joint Oil Analysis Program (JOAP) and NavAir requirements.

<sup>2</sup>All other workcenters will be issued PD-680, Type III.

<sup>3</sup>For further guidance about the hazmat-control program, refer to Chapters B3 and C23 of the NavOSH Program Manual for Forces Afloat (OpNavInst 5100.19C), with change 2.