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Construction Project Management	Program Requirements Document	For Additional Info: <a href="http://EDMS">http://EDMS</a>	Effective Date: 08/28/23
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Manual: Subcontractors Requirements

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\*The current revision can be verified on EDMS.

## 1. PURPOSE

This document provides the requirements for performing and documenting *exposure assessments* (see def.) for all subcontracted construction activities at the Idaho Cleanup Project (ICP). Exposure assessments are used to collect information to adequately identify and characterize existing or potential employee exposure to *hazardous agents* (see def.). Once hazardous agents are identified and characterized, the information is used to select controls, evaluate the effectiveness of controls, prioritize further exposure sampling, and evaluate compliance with applicable occupational exposure levels. All applicable regulatory requirements must be met, in addition to any of the subcontractor's requirements, with the requirement that is most protective of the worker being met.

## 2. APPLICABILITY

This document applies to all subcontractors performing work for the ICP contractor at the Idaho National Laboratory (INL) as specified in their contract. Stricter requirements may be imposed by subcontractors upon their employees or sub tier contractors. The requirements of this document must be followed by subcontractors; the means of implementation may be determined by the subcontractor.

## 3. REQUIREMENTS

### 3.1 General

- 3.1.1 Perform initial surveys of all work areas or operations to identify, evaluate and mitigate potential exposures to hazardous chemical, physical, and biological agents and ergonomic stressors through the use of engineering and/or administrative controls and/or the use of personal protective equipment.
- 3.1.2 If the subcontractor determines that an employee's exposure may exceed an *action level* (see def.), then the work activity must be initially monitored for exposures using accepted industrial hygiene sampling techniques, (such as those listed by National Institute for Occupational Safety and Health [NIOSH] or Occupational Safety and Health Act [OSHA]).
- 3.1.3 Perform exposure assessments using recognized exposure assessment methodologies. Document exposure assessments and maintain records in accordance with 29 *Code of Federal Regulations* (CFR) 1910.1020, "Access to Employee Exposure and Medical Records."

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- 3.1.4 Perform periodic reassessments and/or exposure monitoring as appropriate to determine the effectiveness of controls used to reduce employee exposures or as required to comply with regulatory requirements. When exposure sampling is performed, results shall be compared to the most protective occupational exposure limit (OEL) listed in either the American Conference of Governmental Industrial Hygienists (ACGIH), “Threshold Limit Values for Chemical Substances and Physical Agents and Biological Exposure Indices,” 2016 edition, and the OSHA permissible exposure limits (PELs). The most protective (lower) limit shall apply.
- 3.1.5 When an ACGIH threshold limit value (TLV) is the most protective OEL, subcontractors shall comply with all other provisions of the applicable OSHA regulation.
- 3.1.6 Laboratories performing sample analysis must be accredited by the American Industrial Hygiene Association (AIHA) and participate in the proficiency analytical testing (PAT) program for the type(s) of analysis requested.
- 3.1.7 If sampling results indicate that employee exposures were greater than the applicable PEL or TLV, the subcontractor shall notify the employee sampled of the results, and the ICP contractor’s point of contact shall be notified within 2 hours of knowledge of that exposure.
- 3.1.8 If sampling results indicate an employee exposure at or above an action level, the contractor’s point of contact shall be notified within 2 working days. Work activities must be reviewed to evaluate the effectiveness of controls that are in place and ensure that the PEL or TLV is not reached without the proper employee protection.
- 3.1.9 Subcontractor shall provide sampling data including sampling method, analytical results, and calculations to the ICP contractor point of contact within 2 working days of request.

#### **4. DEFINITIONS**

See LST-27, “Glossary”

#### **5. REFERENCES**

29 CFR 1910.1020, “Access to Employee Exposure and Medical Records”

29 CFR 1926 Subpart Z, “Toxic and Hazardous Substances,” Sections 1101-1148

ACGIH, “Threshold Limit Values for Chemical Substances and Physical Agents and Biological Exposure Indices” (2016)

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**6. APPENDIXES**

None