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Subcontractors	Program Requirements Document	For Additional Info: http://EDMS	Effective Date: 08/28/23
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Manual: Subcontractor Requirements

Change Number: 379706

*The current revision can be verified on EDMS.

1. PURPOSE

This document provides requirements for the information and training relative to hazardous chemicals for all subcontractor employees and visitors while working at the Idaho Cleanup Project (ICP). All applicable regulatory and contractual requirements must be followed, with the most stringent requirement being met.

2. APPLICABILITY

This document applies to all subcontractors working at the ICP as specified in their contract with the ICP Contractor. Stricter requirements may be imposed by subcontractors upon their employees or sub-tier contractors. The requirements of this document must be followed by subcontractors; however, the means of implementation may be determined by the subcontractor.

3. REQUIREMENTS

3.1 General Administration

- 3.1.1 Each subcontractor shall have a written Hazard Communication program that complies with all requirements of 29 *Code of Federal Regulations* (CFR) 1910.1200, "Hazard Communication," as referenced by 29 CFR 1926.59, "Hazard Communication," and as stipulated by 10 CFR 851.23, "Worker Safety and Health Program."
- 3.1.2 Subcontractors shall create and maintain a chemical inventory list when hazardous chemicals are brought to the ICP.
- 3.1.3 This chemical inventory list shall be provided to the contractor *point of contact* (POC) (see def.) through the contractor vendor data system utilizing Form 432.21, "Subcontractor Reporting Form Chemical Inventory List."
- 3.1.4 Subcontractors shall not leave any of their hazardous chemicals on the job site after the project ends.

3.2 Training

- 3.2.1 Employees shall receive documented hazard communication training in the following areas before working with hazardous agents:
 - A. General hazard communication orientation
 - B. Area/facility-specific training

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- C. Job-specific training based on the hazards
- D. Hazards associated with non-routine tasks
- E. Location and contents of hazard communication directories (this may be documented in a safety meeting)
- F. New hazards as they are introduced into the workplace.

3.3 Container Labeling

- 3.3.1 All hazardous materials shall be labeled in accordance with 29 CFR 1910.1200.
- 3.3.2 As container labels become illegible, they shall be replaced.
- 3.3.3 Containers of hazardous agents regulated by the Occupational Safety and Health Administration (OSHA) in a substance-specific health standard shall be labeled in accordance with the requirements of the applicable standard.
- 3.3.4 If containers are too small to accommodate legible labels, or if vessels have multiple uses, an alternative labeling method in accordance with 29 CFR 1910.1200 may be used.

3.4 Carcinogens

- 3.4.1 Containers of carcinogens shall be labeled or marked to identify the contents and warn of the carcinogenic hazard in accordance with 29 CFR 1910.1200.

NOTE: *For the purposes of labeling, IARC 2B carcinogens do not need to be labeled as carcinogens.*

- 3.4.2 Less hazardous substitutes shall be used if an acceptable substitute is available.
- 3.4.3 Subcontractor management shall provide written justification for carcinogen use, which must be approved by the ICP Contractor.
- 3.4.4 Wherever airborne concentrations exceed or can reasonably be expected to exceed one-half the permissible exposure limit (PEL) or threshold limit value (TLV), or exceed the action level if applicable, a regulated area shall be established.
- 3.4.5 Access to regulated areas shall be controlled.

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- 3.4.6 Warning signs shall be posted at all entrances or points of access to regulated areas with wording similar to the following:

CANCER-SUSPECT AGENT

Authorized Personnel Only

- 3.4.7 A personnel log shall be established and maintained for each regulated area. Such log shall contain, as a minimum, personnel names, date and time of entrance and exit, and job duties in the area.
- 3.4.8 Whenever possible, regulated areas shall be maintained under negative pressure with respect to non-regulated areas through the use of controls such as local exhaust ventilation and/or a laboratory hood, or by other means.
- 3.4.9 The following shall be used in conjunction with regulated areas:
- A. Appropriate personnel protective clothing
 - B. Showers, washrooms, or change rooms
 - C. Decontamination zone, as applicable
 - D. Separate carcinogen-free facilities for eating, drinking, smoking, and applying cosmetics
 - E. Non-permeable work surfaces.
- 3.4.10 A program for medical surveillance of employees working with carcinogens shall be available. Employees who will handle or who may be exposed to carcinogens shall be identified in advance and shall be enrolled in the subcontractor's medical surveillance program.
- 3.4.11 Procedures for carcinogen spill control (such as clean-up of spills or accidental releases) shall be written and shall be readily accessible and available for use.

3.5 Safety Data Sheets (SDS)

- 3.5.1 SDSs meeting the requirements of 29 CFR 1910.1200 for all hazardous chemicals brought to the ICP shall be readily available at the job site.

4. DEFINITIONS

See LST-27, "Glossary"

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5. REFERENCES

29 CFR 1910.1200, “Hazard Communication”

29 CFR 1926.59, “Hazard Communication”

American Conference of Governmental Industrial Hygienists (ACGIH), “Threshold Limit Values for Chemical Substances and Physical Agents and Biological Exposure Indices” (2016)

Form 432.21, “Subcontractor Reporting Form Chemical Inventory List.”

6. APPENDIXES

None