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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 implementation of controls for work with and around *heavy metals* (see def.), as listed below in Section 3, to ensure worker safety and health. This document lists requirements from codes and standards along with *contractor* (see def.) requirements. Any applicable regulatory or contractor requirements must be followed, with the most stringent requirement being met.

2. APPLICABILITY

This document applies to all subcontractors working at the Idaho Cleanup Project (ICP) who perform work with or around heavy metals, as specified in their contract with their contractor. Stricter requirements may be imposed by subcontractors upon their employees or subtier contractors. The requirements of this document must be followed by subcontractors; however, the means of implementation may vary as determined by the subcontractor.

3. REQUIREMENTS

3.1 Code and Standard Requirements

- 3.1.1 Specific requirements for working with heavy metals are listed in codes and standards as listed in Section 3.1.2. The requirements listed in this document are not intended to replace the codes and standards; requirements listed in each code and standard must be met.
- 3.1.2 The heavy metal codes and standards are:
 - 29 *Code of Federal Regulations* (CFR) 1910.1025, “Lead”
 - 29 CFR 1926.62, “Lead”
 - 29 CFR 1910.1018, “Inorganic Arsenic”
 - 29 CFR 1910.1027, “Cadmium”
 - 29 CFR 1926.1127, “Cadmium”
 - 29 CFR 1910.1026, “Chromium (VI)”
 - 10 CFR 850, “Beryllium Rule” (U.S. Department of Energy)

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3.2 General Requirements

- 3.2.1 A *competent person* (see def.) shall be assigned to monitor work in compliance with this document.
- 3.2.2 Personnel who will be assigned to work with heavy metals shall be trained to the appropriate level before performing work (see Appendix A, Training Requirements).
- 3.2.3 Personnel working with heavy metals or who may be exposed on any day at or above the *action level* (see def.) shall participate in a baseline medical surveillance program before initial assignment.

3.3 Exposure Assessment and Monitoring

- 3.3.1 Initial exposure assessments shall be performed for employees who work with or may be exposed to heavy metals per PRD-2111, “Exposure Assessments.”
- 3.3.2 Affected employees or designated representatives shall be allowed to observe any monitoring of employee exposure.
 - 3.3.2.1 Observers shall be provided with appropriate personal protective equipment, training and medical surveillance when observation of monitoring requires entry into a regulated area.
 - 3.3.2.2 Observers shall be provided with the following information:
 - A. Relevant safety and health requirements
 - B. An explanation of the measurement procedures
 - C. An opportunity to observe all steps related to the monitoring process at the place of exposure
 - D. A record of the results obtained or copies of the results when returned by the laboratory.

3.4 Work Control

- 3.4.1 Controls shall be implemented using the hierarchy of controls, i.e., engineering, administrative and personal protective equipment, respectively.
- 3.4.2 Ventilation systems shall be provided when feasible.
- 3.4.3 Employees shall use engineering controls provided and shall report any problems with the engineering controls to their supervisor.

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- 3.4.4 Administrative controls shall be implemented, but not allow use of employee rotation as a means to reduce exposure.
- 3.4.5 When airborne concentrations exceed the permissible exposure limit (PEL) during a work activity, written documents meeting the requirements of a compliance plan required by the codes listed in Section 3.1, shall be provided, this may include using any of the following:
- A. Work order
 - B. Approved procedure
 - C. Exposure assessment
 - D. Job safety analysis
 - E. Any other hazard evaluation.

3.5 Respiratory Protection

- 3.5.1 Respiratory protection shall be in accordance with 29 CFR 1910.134, with the protection factors invoked by specific requirements for the heavy metal.
- 3.5.2 When necessary, the appropriate level of respiratory protection shall be selected in accordance with PRD-2109, “Respiratory Protection,” and the specific codes and standards for each heavy metal.

3.6 Protective Work Clothing and Equipment

- 3.6.1 Protective clothing shall be provided and maintained.
- 3.6.2 Employees shall wear protective clothing and shall use protective equipment as required by work documentation.
- 3.6.3 Contaminated protective clothing and equipment shall be disposed of in designated, labeled containers.

3.7 Housekeeping

- 3.7.1 Housekeeping methods shall be conducted to minimize exposures.

3.8 Hygiene Practices

- 3.8.1 Hygiene practices shall be followed to reduce exposures and eliminate contamination from leaving the work area.

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3.9 Medical Surveillance and Medical Removal Protection

- 3.9.1 The subcontractor’s occupational medical program shall provide for medical surveillance in accordance with specific heavy metal requirements listed in Section 3.1, except that Beryllium medical surveillance shall be provided at the contractor’s medical facility.
- 3.9.2 Employees occupationally exposed to heavy metals may participate in the medical surveillance program as provided for in the requirements listed in Section 3.1.

3.10 Labels and Signs

- 3.10.1 The appropriate signs and labels shall be provided at work areas, regulated areas, and disposal containers.

4. DEFINITIONS

See LST-27, “Glossary”

5. REFERENCES

29 CFR 1910.1025, “Lead”

29 CFR 1926.62, “Lead”

29 CFR 1910.1018, “Inorganic Arsenic”

29 CFR 1926.1118, “Inorganic Arsenic”

29 CFR 1910.1027, “Cadmium”

29 CFR 1926.1127, “Cadmium”

29 CFR 1910.1026. “Chromium”

29 CFR 1926.1126, “Chromium”

40 CFR 850 Beryllium Rule (Department of Energy)

PRD-2030, “Occupational Medicine”

PRD-2022, “Safety Signs, Color Codes, and Barriers”

PRD-2101, “Hazard Communication”

PRD-2109, “Respiratory Protection”

PRD-2111, “Exposure Assessments”

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6. APPENDIXES

Appendix A, Training Requirements

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Appendix A

Training Requirements

Training requirements for employees occupationally exposed to heavy metal.

Level of Exposure	Training Required	Frequency
Incidental, works with solids, or Exposure < action level on any day	Awareness Training, or 29 CFR 1910.1200 or 1926.59, “Hazard Communication“; and As referenced in applicable code and standard.	Initial (before job assignment); When work coordinator, job supervisor, or competent person determines that retraining or additional training is necessary.
Exposure > action level on any day,	Comprehensive Training As referenced in applicable code and procedure; Specific nature of operations which could result in exposure to heavy metal above the action level; Purpose, proper selection, fitting, use, and limitations of respirators; Purpose and description of medical surveillance program; Engineering controls and work practices; Associated contractor procedures; Information on chelating agents; Information on employee's right of access to records.	Initial (before job assignment); and annually, or as required by the applicable standard.