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Subcontractors	Program Requirements Document	For Additional Info: http://EDMS	Effective Date: 06/27/23
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Manual: Subcontractor Requirements

Change Number: 377918

*The current revision can be verified on EDMS.

1. PURPOSE

This document provides guidance for the implementation of controls for work involving the disturbance of installed asbestos-containing materials to ensure worker safety and health. This document implements 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 involving the disturbance of asbestos or asbestos-containing materials, as specified in their contract with the ICP 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 The subcontractor will meet all regulatory requirements for asbestos work, including controls, personal protective equipment, medical surveillance, worker training, regulated areas, and exposure limits found in 29 *Code of Federal Regulations (CFR)* 1926.1101, "Asbestos," or 29 CFR 1910.1001, "Asbestos," as applicable to the work being performed.

3.2 General Requirements

- 3.2.1 An asbestos competent person shall be assigned to monitor work in compliance with the standard.
- 3.2.2 Personnel assigned to work on an asbestos project shall be trained per 29 CFR 1926.1101/1910.1001 before performing work.
- 3.2.3 Personnel working with asbestos, as described in 29 CFR 1926.1101/1910.1001, shall be enrolled in a medical surveillance program.

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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 asbestos.
- 3.3.2 Affected employees or designated representatives shall be allowed to observe any monitoring of employee exposure.
- 3.3.3 The occupational exposure limits, including both the 8-hour time-weighted average and 30-minute excursion limit, listed in 29 CFR 1926.1101/1910.1001 shall apply.
- 3.3.3 Appropriate sampling, monitoring and analytical analysis shall be conducted.
 - 3.3.3.1 Analysis of all samples shall be by an American Industrial Hygiene Association (AIHA)/National Voluntary Laboratory Accreditation Program (NVLAP)-accredited laboratory, as appropriate.
- 3.3.4 Air samples collected for determination of worker exposure shall be collected at a flowrate between 0.5 and 2.5 liters per minute.
- 3.3.5 Perimeter monitoring shall be conducted whenever Class I, II, or III asbestos activities are conducted adjacent to occupied work areas.
- 3.3.6 Final air monitoring and perimeter monitoring shall have results of less than 0.01 fibers per cubic centimeter taken with a minimum volume of 1,200 liters of air at a maximum flow rate of 10 liters per minute. Final air monitoring for areas not requiring reoccupancy, such as buildings for demolition, may be subject to final sampling, depending on the terms of the contract.

3.4 Work Control

- 3.4.1 Airborne fiber levels shall be controlled to the lowest feasible level using engineering controls, then administrative controls, and then personal protective equipment.
- 3.4.2 High-efficiency particulate air (HEPA)-filtered ventilation systems shall be used when required by regulation and feasible.
- 3.4.3 Employees shall use engineering controls provided and shall report any problems with the engineering controls to their supervisor.
- 3.4.4 The use of employee rotation as a means to reduce exposure shall not be permitted.

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- 3.4.5 Work practices and engineering controls shall be those specified in 29 CFR 1926.1101 for the applicable Occupational Safety and Health Act (OSHA) class (I, II, III or IV) of work being performed.
- 3.4.6 Unclassified asbestos activities shall be performed in compliance with 29 CFR 1926.1101 paragraphs (g)(1) [except (g)(1)(i)], (g)(2) and (g)(3) that describe engineering and work practice controls for unclassified work.
- 3.4.7 Work activities covered by 29 CFR 1910.1001 shall employ controls and personal protective equipment specified in the OSHA standard for the covered work.
- 3.4.8 When airborne concentrations of asbestos are expected to exceed the permissible exposure level or excursion level as listed in 29 CFR 1926.1101/1910.1001 during a work activity, a written compliance plan shall be provided to describe how the applicable elements in 29 CFR 1926.1101/1910.1001 will be met. Documents that comprise the compliance plan may include work orders, job safety analyses, exposure assessments, and the contractor's standard operating procedures.

3.5 Respiratory Protection

- 3.5.1 Respiratory protection shall be in accordance with 29 CFR 1910.134, "Respiratory Protection," with the protection factors invoked by specific requirements for asbestos.
- 3.5.2 The appropriate level of respiratory protection shall be selected in accordance with PRD-2109, "Respiratory Protection," and 29 CFR 1926.1101/1910.1001, when necessary.

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 and Engineering Controls

- 3.7.1 Housekeeping methods shall minimize generation of airborne fibers.
- 3.7.2 Air movers and vacuums used for asbestos fiber control shall be equipped with HEPA filters.

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3.7.3 Dry sweeping and use of compressed air in an asbestos work area shall be prohibited at all times.

3.8 Hygiene Practices

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

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 the asbestos standard.

3.9.2 Employees occupationally exposed to asbestos shall participate in a medical surveillance program as required by 29 CFR 1926.1101/1910.1001.

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

Contractor. Idaho Environmental Coalition (IEC), LLC, and all of its duly authorized representatives acting in their professional capacity, in the performance of work at ICP at the Idaho National Laboratory.

5. REFERENCES

29 CFR 1910.134, "Respiratory Protection"

29 CFR 1910.1001, "Asbestos"

29 CFR 1926.1101, "Asbestos"

40 CFR 763, "AHERA, Model Accreditation Program"

PRD-2022, "Safety Signs, Color Codes and Barriers"

PRD-2030, "Occupational Medicine"

PRD-2101, "Hazard Communication"

PRD-2109, "Respiratory Protection"

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6. APPENDIXES

None