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Subcontractors	Program Requirements Document	For Additional Info: http://EDMS	Effective Date: 02/20/24
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Manual: Subcontractor Requirements

Change Number: 381758

*The current revision can be verified on EDMS.

1. PURPOSE

This document provides requirements for implementing a respiratory protection program to ensure worker safety. This document implements requirements from codes and standards along with *contractor* (see def.) requirements. All 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) as specified in their contract. 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.

Subcontractors performing work at the ICP shall use ICP-provided respirators and follow the current revision of MCP-2726, “Respiratory Protection,” under the following conditions:

- Subcontractors performing work in radiologically contaminated areas requiring respiratory protection
- OR
- Subcontractors performing work in regulated areas with nonradioactive airborne hazards requiring respiratory protection.

Subcontractors may be allowed on a case-by-case basis to use respirators in accordance with the subcontractor’s respiratory protection program in accordance with this procedure. The ICP Respiratory Protection Program administrator must review and approve the subcontractor’s written program and supporting documentation, such as training records, fit tests, and medical certifications. Subcontractors exercising this option must provide a copy of their written program along with supporting documentation to the ICP Respiratory Protection Program administrator via the ICP subcontractor technical representative.

Subcontractor use of respiratory protection is subject to field inspection/verification by ICP personnel to verify subcontractor compliance with requirements.

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3. REQUIREMENTS**3.1 Program Administration**

- 3.1.1 Each subcontractor that does not follow the ICP's respiratory protection program, MCP-2726, "Respiratory Protection," shall have and follow a written respiratory protection program that complies with all requirements of 29 *Code of Federal Regulations* (CFR) 1910.134, "Respiratory Protection," and the American National Standards Institute (ANSI)/American Society of Sanitary Engineering (ASSE) Z88.2-2015, "American National Standard Practices for Respiratory Protection."

3.2 Selection

- 3.2.1 Respiratory equipment shall be selected in accordance with 29 CFR 1910.134 and ANSI/ASSE Z88.2-2015.
- 3.2.2 Respiratory protection required to be worn by subcontractor employees shall be specified in the work control document covering the activity.
- 3.2.3 A documented determination shall be made of the appropriateness of using dust masks.
- 3.2.3.1 Dust masks shall not be considered to meet the ANSI/ASSE Z88.2-2015 definition of a respirator and shall not be treated as such.
- 3.2.3.2 Dust masks do not provide protection from anything other than large particles and shall only be allowed for use as a comfort device.
- 3.2.3.3 The use of dust masks shall be controlled.
- 3.2.3.4 The use of dust masks shall be allowed only when the use or work process has been thoroughly evaluated.
- 3.2.4 Respiratory protection shall be selected conservatively to protect the health of employees in cases where initial monitoring cannot be conducted before the start of the job and representative sampling data do not exist.
- 3.2.5 Respirators shall be selected by:
- A. Evaluating respiratory hazards in the workplace
 - B. Identifying relevant workplace and user factors.

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3.3 Issuance

- 3.3.1 The issuance of respirators shall be controlled by having identified points of issuance and suitably controlled respirator storage areas.
- 3.3.2 Only persons who are medically fit, trained, and fit-tested to wear a respirator in accordance with 29 CFR 1910.134 shall be allowed to use respiratory protection equipment that is specified on a work control document or in a procedure covering the activity.
- 3.3.3 Only those respiratory devices, cartridges, canisters, or other equipment that are specifically identified on the work control document or in the work procedure shall be issued.
- 3.3.4 Respirator equipment shall meet the following requirements:
 - A. All equipment shall be compatible with the respirator system and manufacturer being used
 - B. Air line hoses shall be as specified by the respiratory protection equipment manufacturer.
- 3.3.5 The issuance of respiratory equipment shall be documented.
- 3.3.6 Persons issuing respirators shall receive training appropriate to their assigned responsibilities.

3.4 Use

- 3.4.1 Respiratory protection equipment shall be used in accordance with 29 CFR 1910.134.
- 3.4.2 Respirators will be inspected prior to use.
- 3.4.3 Damaged, dirty, or defective respirators shall not be used.
- 3.4.4 If a respirator-related problem occurs in a hazardous area, the wearer shall immediately evacuate to a safe area.
- 3.4.5 The worker shall guard against damage to the respirator.
- 3.4.6 Before use and/or every 3 months, breathing air compressors shall be tested by a *qualified person* (see def.) to ensure that they meet the in-service breathing-air specifications found in Appendix A, Evaluation of Breathing Air Systems.
- 3.4.7 Purchased breathing air cylinders must be tested in accordance with ANSI/ASSE Z88.2-2015.

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- 3.4.8 Emergency-use respirators shall be inspected monthly, and such inspections shall be documented.

3.5 Cleaning and Maintenance

- 3.5.1 Respirators used for radiological activities shall be returned to the issuing facility after each day's use.
- 3.5.2 Respirators used for nonradiological applications shall be inspected, cleaned, and maintained as per the manufacturer's requirements.
- 3.5.2.1 Respirators used in areas that could grossly contaminate the device shall be decontaminated before leaving the work area and before cleaning and disinfecting to remove gross contaminants such as asbestos, lead, and other hazardous substances.
- 3.5.2.2 Onsite stations for inspecting, cleaning, disinfecting, and overnight air drying shall be approved by an ICP-qualified industrial hygienist.
- 3.5.3 Subcontractors shall ensure that repairs or adjustments to respirators are in accordance with 29 CFR 1910.134.
- 3.5.4 Malfunctions of any respiratory protective device shall be investigated to determine the cause, and appropriate corrective measures shall be taken. Any malfunctions must be immediately reported to the contractor's point of contact.
- 3.5.5 Suspected manufacturing defects shall be reported to the manufacturer. Defects must be immediately reported to the contractor's point of contact.
- 3.5.6 Self-contained breathing apparatus shall be returned to a qualified test facility or the manufacturer for maintenance and testing as recommended by the manufacturer; the subcontractor shall provide supporting documentation that required inspections and maintenance are current.

3.6 Storage

- 3.6.1 Respirators shall be stored in accordance with 29 CFR 1910.134 and ANSI/ASSE Z88.2-2015.
- 3.6.2 Used respirators shall be placed in an appropriate receptacle after each use.
- 3.6.3 Respirators shall not be left lying on shelves, table tops, inside vehicles, or hanging on protrusions from equipment or walls.

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3.6.4 Emergency-use respirators shall be inspected, used, and available in accordance with 29 CFR 1910.134.

3.7 Training and Fit-testing

3.7.1 Employees required to use respirators shall receive training and be fit-tested in accordance with 29 CFR 1910.134.

3.8 Monitoring

3.8.1 Exposure monitoring shall be conducted for tasks involving potential chemical or radiological exposures to ensure that appropriate respiratory protection is in use.

3.8.2 Engineering controls shall be used whenever possible to control exposures to airborne contaminants before directing the use of respiratory protection devices.

3.9 Medical Program

3.9.1 Subcontractors shall provide for medical evaluation of employees in accordance with 29 CFR 1910.134.

3.9.2 Users shall report to their management any change in medical status that may impact the employee's ability to wear a respirator safely.

4. DEFINITIONS

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

Qualified person. A professional qualified by education, training, and experience to anticipate, recognize, evaluate, and develop controls for occupational health hazards.

5. REFERENCES

29 CFR 1910.134, "Respiratory Protection"

ANSI/ASSE Z88.2-2015, "American National Standard Practices for Respiratory Protection"

CGA G7.1, "Commodity Specification for Compressed Breathing Air"

MCP-2726, "Respiratory Protection"

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6. APPENDIXES

Appendix A, Evaluation of Breathing Air Systems

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Appendix A**Evaluation of Breathing Air Systems**

1. Inspections of portable and stationary compressors/systems shall be conducted to verify the following:
 - A. Preventive maintenance is performed on purification systems as specified by the manufacturer. The unit must be labeled to indicate the preventive maintenance frequency and due date, as well as the date of the most recent change date for purification components and the signature of the authorized person who made the change.
 - B. Breathing air cylinders must be inspected and hydrostatically tested in accordance with manufacturer's requirements.
 - C. Supplied air devices must be operated at the pressure specified by the manufacturer.
2. Compressed breathing air shall be tested in accordance with American National Standards Institute (ANSI)/American Society of Sanitary Engineering (ASSE) Z88.2-2015, "American National Standard Practices for Respiratory Protection," Section 12, Breathing Gas.
3. Breathing air quality must be tested to show compliance with Compressed Gas Association (CGA) G-7.1, "Commodity Specification for Compressed Breathing Air," for Grade D air as follows:
 - A. Oxygen content, v/v, of 19.5 – 23.5%
 - B. Condensed hydrocarbon content of 5 mg/m³ or less
 - C. Carbon monoxide (CO) content of 10 ppm or less
 - D. Carbon dioxide (CO₂) content of 1000 ppm or less
 - E. Lack of noticeable odor
 - F. Moisture content indicated by a dew point that is at least 10°F lower than the lowest ambient use temperature.
4. A document shall be provided indicating testing results meet the above parameters.