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Subcontractors	Program Requirements Document	For Additional Info: http://EDMS	Effective Date: 07/31/17
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Manual: Subcontractor Requirements

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*The current revision can be verified on EDMS.

1. PURPOSE

This document provides requirements for the implementation of the 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) Core 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 Core shall use ICP Core-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 non-radioactive airborne hazards requiring respiratory protection.

Subcontractor use of respirators in accordance with subcontractor's respiratory protection program may be allowed on a case-by-case basis, following review and approval by the ICP Core Respiratory Protection Program Administrator (RPPA) of 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 Core RPPA via the Subcontractor Technical Representative.

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

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3. REQUIREMENTS**3.1 Program Administration**

3.1.1 Each subcontractor shall have a written Respiratory Protection Program that complies with all requirements of 29 CFR 1910.134, “Respiratory Protection,” and the American National Standards Institute (ANSI) Z88.2, 1992, “Respiratory Protection.”

3.2 Selection

3.2.1 Respiratory equipment shall be selected in accordance with 29 CFR 1910.134 and ANSI Z88.2, 1992.

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 Z88.2 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 does not exist.

3.2.5 Respirators shall be selected by:

A. Evaluating respiratory hazards in the work place

B. Identifying relevant workplace and user factors.

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.

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3.3.2 Only persons who are medically fit, trained, and fit tested in accordance with 29 CFR 1910.134 for the respirator to be worn 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. Airline hoses shall be as specified by the respiratory protection equipment manufacturer.

3.3.5 The issuance of respiratory equipment shall be documented.

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 three 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 have Grade D certificates of analysis from the supplier.

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.

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- 3.5.2 Respirators used for non-radiological 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 disinfection to remove gross contaminants such as asbestos, lead, and other hazardous substances.
- 3.5.2.2 On-site stations for inspecting, cleaning, disinfecting, and overnight air drying shall be approved by an ICP Core-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 (SCBAs) shall be returned to a qualified test facility or the manufacturer for maintenance and testing as recommended by the manufacturer; 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 Z88.2.
- 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.
- 3.6.4 Emergency-use respirators shall be inspected, used, and available in accordance with 29 CFR 1910.134.

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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

See LST-27, "Glossary"

5. REFERENCES**5.1 Source Documents**

29 CFR 1926.103, "Respiratory Protection"

29 CFR 1910.134, "Respiratory Protection"

ANSI Z88.2, 1992, "Respiratory Protection"

ANSI Z88.6, "Respiratory Protection: Respirator Use Physical Qualifications for Personnel"

CGA G7.1, 1997, "Commodity Specification for Compressed Breathing Air"

PRD-2030, "Occupational Medicine"

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5.2 Related Requirements

The following documents may also contain requirements that apply to this activity:

None

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 are 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 air that is comprised of 'synthesized' air (oxygen and nitrogen) shall be generated using gases that meet the United States Pharmacopoeia requirements for medical-grade gases.
3. Breathing air quality must have a certification of analysis showing compliance with Compressed Gas Association pamphlet G-7.1 for Grade D air (A-D) 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; and
 - F. Moisture content that does not exceed a dew point of -50°F.