A Guide for Reviewing Contractor Submitted Lead Material Handling Work Plans for Atlantic Division, Naval Facilities Engineering Command Firing Range Renovation/Alteration Projects

23 October 2001

I. Cover / Title Sheet:

a. Contract Name and Number (*Should reflect the contract documents*)
b. Location of project (*Name of state, country, station, and building number/name*)
c. Contractor Name *(Name of Prime contractor and sub as applicable*)
d. Name of the Competent Person (CP) preparing the plan and a signature area for that individual. This individual is required to be an industrial hygienist or safety professional certified for comprehensive practice by the American Board of Industrial Hygiene or by the Board of Certified Safety Professionals.

II. Project summary:

a. This sheet should include a summary of the scope for the project including the materials to be handled. For Range projects that are intended to upgrade the facility but not abate the existing lead dust levels this should be stated to help communicate the project scope with regards to lead materials handling. This is important since most of the range projects are not intended to reduce lead dust to established clearance levels but are designed to not create any additional quantities of lead dust and protect the workers and adjacent occupants as the work is performed. This section should identify that only trained workers in accordance with 29 CFR 1926.62 will be utilized. It should also state that existing lead dust levels on surfaces in and adjacent to the work area are to be determined prior to start of work so that a baseline may be established through swipe sampling. The baseline swipe samples will be used to compare post work dust swipe samples to be taken at the end of the work to assure that no additional contamination was created as a result of the project.

b. Include a description of the eating drinking, smoking and sanitary procedures, interface of trades, sequencing of lead related work, collected waste water and debris disposal plan, air sampling plan, respirators, personal protective equipment, and a detailed description of the method of containment of the operation to ensure that airborne lead dust concentrations of 30 micrograms per cubic meter of air and baseline dust concentrations are not reached or exceeded outside the lead control area. Include occupational and environmental sampling methodology, frequency, duration and qualifications of sampling personnel in the air-sampling portion of the plan.

c. Describe the proposed protective work clothing to be used.

d. Describe the house keeping procedures to be taken in accordance with 29 CFR 1926.62.

III. Bulk Material sampling analysis:

a. A discussion of the actions necessary to classify the in place materials in accordance with 40 CFR 261. This classification is prerequisite to the requirement of special handling, storage, and disposal according to Federal and local hazardous management regulations. This testing involves the material to be disposed of in the case where the contractor is required to perform the disposal portion of the contract. The test delineated by EPA is the Toxicity Characteristic Leaching Procedure (TCLP) test.

b. Obtain from the activity information on lead containing materials.

c. Sample and analyze materials to be handled or disturbed in the work area.

IV. Occupational and environmental sampling.

a. Perform an initial exposure assessment on order to determine the type of controls necessary to protect the adjacent work environment and prescribe the appropriate worker protection. Historical data less than 12 months old may be used provided it is shown that the data reflects the same in kind conditions as those in the project being performed.

b. Perform air monitoring during the handling of lead containing materials within the work area, personal samples, and samples outside the work area as prescribed by the CP and in accordance with 29 CFR 192662. Sample results are to be submitted to the Contracting Officer.

c. If levels are determined to be below the action level during the initial exposure assessment, certain controls may be removed under direct supervision of the CP in accordance with 29 CFR 1926.62.

d. Whenever there has been a change of equipment, process, control, personnel or a new task has been initiated that may result in additional employees being exposed to lead at or above the action level or may

result in employees already exposed at or above the PEL, the employer shall conduct additional exposure assessment monitoring.

V. Material Disposal

a. Discuss the method containerization for the material to be disposed. *In many cases for range projects this may be the responsibility of the station as dictated by the contract. This can be simply stated if this is the case*.

b. Describe the transportation of the removed materials for disposal including the name and qualifications of each contractor that will be transporting, storing, treating, and disposing of the waste if applicable to the contract. *Many times range renovation projects will utilize station resources for this operation outside the scope of the work. If this is the case it should be simply stated in the plan.*

c. Provide the name of the landfill for acceptance of the material is the contract requires the contractor to dispose of the material. *Again this may be the responsibility of the station and should be stated in the plan.*

VI. Control Area Sketch

a. Depict a site specific sketch identifying the location of the physical boundary, the location of the area monitoring devices, washing facilities, and the location of required signage to prevent unauthorized entry.

b. Describe the construction of the physical boundary to protect areas and personnel adjacent to the work area. *(Provide physical boundaries around the lead control area by roping off the area designated in the work plan or providing curtains, portable partitions, or other enclosures to ensure that airborne concentrations of lead will not reach 30 micrograms per cubic meter of air outside the lead control area*).

c. Describe the mechanical ventilation to be used.

d. Describe actions necessary to shut down, lock out, and isolate HVAC systems that supply, exhaust, or pass through the lead control areas.

VII. Medical Surveillance Program

a. Before exposure to lead contaminated dust, provide workers with a comprehensive medical examination as required by 29 CFR 1926.62 and 29 CFR 1926.103. The examination will not be required if adequate record can be submitted showing that the employees have been examined as required by 29 CFR 1926.62 within the last year.

b. Medical records should maintain for the employees by the contractor for a period of at least 30 years or for the duration of employment plus 30 years.

VIII. Training Records

a. Training record certificates shall be provided in the plan for each employee involved in the project that may disturb lead dust. The Competent Person (CP) shall certify the records. Each employee shall be trained in the disposal and air sampling operations prior to the time of the initial job assignment and annually thereafter in accordance with 29 CFR 1926.21, 29 CFR 1926.62 and State and local regulations.

IX. Respiratory Protection Program

a. Furnish each employee required to wear a negative pressure respirator or other appropriate type with a respirator fit test at the time of initial fitting and at least every six months thereafter as required by 29 CFR 1926.62. *As part of the submitted plan fit test records shall be provided for those employees involved in the project required to wear respirators*.

b. Establish and maintain a respiratory protection program as required by ANSI Z88.29, 29 CFR 1926.103, 29 CFR 1926.63, and 29 CFR 1926.55.

X. Pre-Construction Conference

a. Along with the CP meet with the Contracting Officer to discuss in detail the hazardous waste management plan and the leads materials handling plan. Notify the Contracting Officer 15 days in advance of the meeting after the acceptance of the plan.

XI. Manufacturer's Catalog Data

a. Vacuum Filters

b. Respirators

XII. Statements

a. Qualifications of CP

b. Testing Laboratory and consultant qualifications. (*Also submit name, address, and telephone number of the testing laboratory and consultant selected to perform the sampling, testing, and reporting of airborne concentrations of lead. Use a laboratory accredited under EPA National Lead Laboratory Accreditation Program (NLLAP) by either the American Association for laboratory Accreditation (A2LA) or the American Industrial Hygiene Association (AIHA) and that is successfully participating in the Environmental Lead Proficiency Analytical Testing (ELPAT) program to perform sample analysis.*)

c. EPA approved hazardous waste treatment or disposal facility for lead disposal.

d. Hazard Communication Program.

e. Respiratory protection program.