

Environmental, Health and Safety Contractor Resource Manual

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Lead

A. Hazard

- 1. Lead is a potential hazard to personnel by inhalation of airborne lead. It is also a hazard by ingestion from contact with surfaces contaminated with lead. Furthermore, lead is a hazard to the environment. Lead is found in various types of nuclear shielding as well as in many paints.
- Contractors that may work with or on these materials at NNS shall identify to their employees those specific situations where they may encounter lead in NNS facilities or on ships at NNS. Contractors shall obtain from their Contractor Coordinator specific information about lead hazards in the area where their contractor employees will be working.
- 3. During the NNS pre-approval process (see General Information), each contractor whose personnel may be exposed to lead above the action level (30 μ g/m³), must provide to the NNS EH&S Department a copy of their Lead Safety Program. This document must describe the contractor's program for complying with each element of the applicable OSHA standard(s). The contractor shall provide a copy of any changes.

B. Regulations

- 1. Where there is potential personnel exposure to lead, OSHA requires each employer to determine the extent of exposure. If exposures may be above the action level (30 μ g/m3) the employer must establish and implement a written compliance program and comply with other requirements of the applicable regulations:
 - a. 29 CFR 1910.1025 (for general industry and maritime activities)
 - b. 29 CFR 1926.62 (for construction activities).

C. Reference and Requirements

- 1. The requirements listed here are taken from Volume II, Chapter 31 of the NNS Health and Safety Manual, which is the primary NNS reference. These requirements will be updated as necessary when the primary reference is changed.
- 2. The contractor shall ensure that lead is handled and disposed of in accordance with applicable OSHA regulations and NNS environmental permits. Where there is potential for inadvertent exposure to lead, each NNS contractor shall ensure their contractor employees do not disturb lead materials unless their work



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specifically requires it and shall immediately stop work if potential exposure to lead is suspected in order to have the situation evaluated.

- 3. Contractors performing lead work at NNS shall:
 - a. Maintain current license(s) as required by the Commonwealth of Virginia, and/or the federal EPA.
 - b. Use the same colors, format and wording for ropes and signs as NNS personnel use to identify their lead work areas. These shall be obtained from the contract coordinator.
- 4. Contractors shall develop and submit to the Contractor Coordinator a written lead work plan:
 - a. This plan must detail how the contractor will perform lead operations and maintain compliance with applicable regulations.
 - b. The contractor must have this plan approved by NNS, department O27 prior to the beginning of lead work.
- 5. Contractors shall ensure unprotected personnel are not exposed to:
 - a. Airborne levels of lead above the action level, or
 - b. Surfaces contaminated with lead, which may present a health hazard to unprotected personnel.
- 6. Contractors shall ensure that all lead and zinc material (e.g., blocks, shavings, turnings, scrap or components assembled with lead or zinc materials) are protected from contact with storm water, by ensuring the following:
 - a. Materials are stored up off the ground, and
 - b. Materials are covered with firmly anchored tarps, a covered structure or equal protection which:
 - 1) Completely shields the lead or zinc from contact with storm water, and
 - 2) Is maintained in good repair.