

Manual Section 3	Issue Date 12/1/09	Revision Date 06/15/21	Policy Number LLCP-027
	Resource Conservation Recovery Act		

Purpose

This section describes Company policy for Hazardous Waste Operations/ Resource Conservation Recovery Act.

Scope

All LLC Companies including, Blanchard Industrial, LLC, GIS Engineering, LLC, Grand Isle Shipyard, Inc., and GWIS, Mack Steel, NuWave, Sun Industries; hereafter identified as “Company”.

Responsibilities

The Company will be responsible for:

- Employee notification and training
- Engineering controls
- Exposure Monitoring
- Supplying PPE for Employees
- Medical surveillance/recordkeeping
- Provide hygiene facilities

Training

All employees who may be exposed to hazardous waste shall be provided training at no cost to the employee. Training shall be conducted prior to work beginning, and annually thereafter. The employee will understand the proper use of PPE and the safe use of engineering controls and equipment that will help to minimize hazardous risks. A training certificate will be given and maintained.

Safety and Health

The Company has a written plan for all employees involved in hazardous waste operations. It gives full details of the chain of command, and the task objectives. With it, a properly trained BCI employee will be able to identify, evaluate, control safety, health hazards, and provide for emergency response.

Engineering Controls

The Company shall institute engineering controls and work practices to reduce and maintain exposure to hazardous waste. These controls include the use of pressurized cabs, control booths on equipment, and remote controlled equipment.

Respirators shall be used in the following for circumstances

- Work practice controls
- Work operations
- To reduce exposure in emergencies.

Access shall be limited to authorized employees only. No eating, drinking, smoking, or chewing tobacco will be allowed in these areas.

Warning signs will be posted around these areas as notification to any employees on the danger and the precautions that need to be taken while working in the area.

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Exposure Monitoring

The Company shall perform monitoring of the air to identify and qualify airborne levels of hazardous substances. The monitoring will address initial entry, periodic monitoring, possible IDLH and wherever exposure may be a possibility.

Decontamination

- The Company has a decontamination procedure that has been communicated to all employees before any employee or equipment may enter areas on a site where exposure to hazardous substances may exist.
- All employees leaving a hazardous area shall be decontaminated, leaving all contaminated clothing and equipment to be properly disposed of.
- All decontamination procedures shall be monitored by the site safety and health supervisor to determine their effectiveness. When the procedures are found ineffective, steps shall be taken to correct any deficiencies immediately.
- Decontamination shall be performed in areas that will minimize the exposure of uncontaminated employees or equipment.
- If the decontamination procedure indicates a need for regular showers and change rooms outside of a contaminated area, we shall provide and meet the requirements of 29 CFR 1910.141

PPE

The Company shall provide employees, at no cost, the proper PPE for the job task. Limitations of the PPE can be found in the PPE policy. These items include but are not limited to:

- Coveralls(Tyveck)
- Gloves
- Head coverings
- Foot coverings
- Vented goggles
- Face shields
- Respirators

Removal of work clothes shall be done in change rooms to prevent contamination of the employee's street clothes.

All contaminated PPE and non-impermeable clothing shall be maintained, cleaned, laundered, replaced or disposed of as needed.

No unauthorized employees shall remove protective clothing or equipment from change rooms.

Lunch rooms shall be of the type that have a positive pressure, filtered air supply and are readily accessible by employees.

Smoking areas shall be of the type where employees are not occupationally exposed to Hazardous Waste.

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Housekeeping

Company employees who perform housekeeping activities during and after construction activities shall be covered by the asbestos standard. The work area will have posted signs and labels that meet OSHA requirements.

Medical Surveillance

The Company shall ensure that all medical examinations and procedures are performed by or under the supervision of a licensed physician without cost to an employee. It will be provided to all employees who have been exposed to hazards at or above the established permissible exposure limit. This examination will also be provided to employees who were exposed without regard to the use of respirators for 30 days or more a year.

The Company will provide a copy of the physician's written opinion within 30 days of receipt.

All records and results shall be kept in a central location for at least 30 years.