

US EPA ARCHIVE DOCUMENT

ATTACHMENT 3

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WORKPLACE CONTROLS FOR INTRUSIVE ACTIVITIES AT THE REPUBLIC ENGINEERED PRODUCTS, INC. CANTON HOT ROLLED BAR OPERATIONS – CANTON, OHIO

1.0 BACKGROUND

The Republic Engineered Products Inc. Canton Hot Rolled Bar Operations in Canton, Stark County, Ohio (Republic) is subject to the requirements of the Resource Conservation and Recovery Act (RCRA) Section 3008(h). Republic has completed the characterization of the site soils and groundwater on the property and assessed the potential for risks to human health from these conditions via certain exposure pathways. Selected locations at the facility, identified on Figure 10, have been defined as areas which require additional precautions for certain work activities. These precautions are based upon the concentrations of the chemicals identified in the soils and the assumptions required by USEPA Region V in analyzing the potential for human health risks.

Republic has taken action at selected Target Areas, SWMUs, and AOCs at the site to reduce the potential for human health exposures. These actions have included removal and disposal of impacted soils and the placement of barriers on and around selected locations to restrict access to the area and reduce the potential for employee and construction worker exposures. Selected Target Areas, SWMUs and AOCs remain at the facility, which require precautions for certain intrusive activities, such as excavation and trenching. These precautions, in connection with the existing worker health and safety practices employed by Republic and the applicability of Occupational Health and Safety Administration requirements, establish health and safety practices and procedures which are protective to the workers and employees and reduce the risks to human health from extended work periods in these areas. These locations represent approximately 10% of the total Republic property.

2.0 HEALTH AND SAFETY PRACTICES

Republic is subject to the requirements of the Occupational Safety and Health Act (OSHA) and has developed safety policies, practices and procedures which are designed to support the requirements of OSHA and to implement the corporate policy of Republic to maintain a safe workplace.

All Republic employees and contractors performing work at the site are required to use the following personal protective equipment (PPE):

- Hard hat
- Safety glasses
- Steel toed safety shoes

- Long pants
- Shirts
- Hearing protection – designated areas
- Other PPE, such as flame retardant clothing, face shields, etc. specific to the work activities being performed and determined by Republic to be necessary.

In addition to the PPE, the following workplace safety provisions are provided for the workers and contractors:

- First aid stations
- Locker rooms and showers
- Sanitary facilities
- Lunch rooms
- Joint Safety and Health Committee

These facilities and committees are designed to provide the infrastructure needed to promote a safe workplace and provide management of safety issues which may arise at the facility and provide a forum to implement new safety policies and procedures.

Contractors are also required to conform to the Republic Contractor Guideline Procedures. These procedures, in general, require contractors working at the Canton facility to implement health and safety plans which satisfy both OSHA and Republic requirements

The management of environmental health and safety issues by Republic is further implemented through safety guidelines, job safety analysis (JSA) and procedures, designed to assess potential workplace hazards, provide for special precautions and include a method to reduce potential hazards of the work activities. Some of the selected programs and procedures in place at Republic include:

- Confined Space Entry
- Lead Exposures Controls
- Excavation
- Respiratory Protection
- Use of Work Gloves
- Vehicles and Mobile Equipment
- Construction and Maintenance Activities
- Excavation Permits
- Hazardous Materials Communication Program
- Materials Safety Data Sheets
- Emergency Response Information Document

To address the potential human health risks associated with impacted soils within selected Target Areas, SWMUs and AOCs at the site, Republic will modify appropriate guidelines and JSA for

intrusive activities. These modifications will be designed to address both contractors and in-house maintenance activities. These modifications, plus the established requirements for PPE, the safety infrastructure and facilities provided for employees and contractors and the communication of environmental conditions at selected locations through the hazard communication program, will be the management elements which will assist in reducing the human health risks.

3.0 CONTRACTOR RESPONSIBILITIES

The following discussion presents the potential site hazards and recommended levels of protection and represents the minimum health and safety controls that must be enforced by all personnel during the performance of intrusive activities. The recommended levels of protection and engineering controls have been developed for guidance and specification only. All contractor personnel must develop a site-specific Health and Safety Plan (HASP) which addresses the contractors work activity, equipment, and personnel.

Contractors performing work on the property are responsible for compliance with all federal, state and local statutes, ordinances, or regulations regarding health and safety, including all applicable requirements of part 1910 and part 1926 of Title 29 of the Code of Federal Regulations.

All contractors shall identify a lead individual responsible for health and safety compliance for each of their employees, subcontractors and consultants. This person will be responsible for reporting to Republic representatives and demonstrating compliance of the procedures outlined in their approved HASP.

4.0 HEALTH AND SAFETY PLAN MINIMUM REQUIREMENTS

The contractor must prepare a site-specific HASP which must be kept onsite, shall address the safety and health hazards of each phase of site operation, and include the requirements and procedures for employee protection.

Elements of the site HASP, at a minimum, shall address the following;

1. Names of personnel and alternates responsible for both site safety and response during health-related emergencies, especially those who are responsible for enforcing the plan.
2. Define the medical monitoring requirements which must be met to work on the site.
3. Statement of minimum training requirements for each level of personnel.
4. Evaluation of risks associated with the nature of the site and each work operation to be conducted.

5. Description of all levels of personal protection (equipment and clothing) to be worn for each task or operation.
6. Designated work zones (exclusion, contamination-reduction, and support zones).
7. Description of control measures (security) to prevent access to the site by unauthorized personnel.
8. Description of ambient air monitoring and personal monitoring and action levels which might trigger specific responses (e.g., upgrades or downgrade of respiratory protection). Frequency of monitoring (e.g., continuously, hourly, etc.) is to be included.
9. Description of actions taken to mitigate hazards (e.g., engineering controls for dust suppression and/or forced ventilation, removal of contaminated material, work cessation, etc.).
10. Decontamination procedures for personnel and equipment (tools and heavy equipment).
11. Description of site emergency procedures such as escape routes, signals for evacuating work area, fire/explosion procedures, etc.
12. Confined space entry/rescue procedures.
13. Description of Standard Operating Procedures (SOPs) (e.g., equipment calibration, respirator fit testing, etc.).
14. Description of procedures to inform personnel of potential hazards (e.g., daily site safety briefings).
15. Plan for site safety audits/inspections by site safety personnel.
16. Instructions for site workers to contact the Republic representative should they encounter obviously-contaminated materials that were not previously expected.

5.0 KNOWN CHEMICALS ONSITE AND HAZARD ASSESSMENT

An evaluation of site conditions has been performed to determine the potential effect upon site personnel during routine industrial and construction activities. The potential exposure is greatest during excavation of the onsite fill materials, utility installation, and site grading in the selected Target Areas, SWMUs and AOCs. Information from subsurface investigations indicates that subsurface soils in several locations onsite contain levels of metals and polynuclear aromatic hydrocarbons (PAHs) that exceed USEPA Preliminary Remediation Goals and also present conditions, based on the exposure assumptions that include calculated hazard indices greater than 1.0. Excavation, grading, and other soil handling activities typically require personnel to be in close contact with potentially hazardous materials.

The possible routes of exposure are inhalation, ingestion, and dermal contact. The Human Health Risk Assessment identified the primary routes of exposure that presented risks, including ingestion and dermal contact. Potential exposure to site workers exists at the areas shown on Figure 10. A minimum of Level D protection will be required for onsite construction activities in these areas.

To communicate the potential hazards associated with intrusive and excavation activities in the selected Target Areas, SWMU and AOCs, Republic will utilize Safety Data Sheets. These Safety Data Sheets will be prepared for each area requiring workplace controls. The Safety Data Sheets will include a summary of the known contaminants and their concentrations at the surface (0-2 ft) and subsurface (> 2 ft below ground surface). The data for completing the safety data sheets will be obtained from the information included in the RFI.

The potential for public exposure is limited and the site is under 24-hour security provisions, which include security guards at access gates, patrols of the grounds, and fences along the site perimeter.