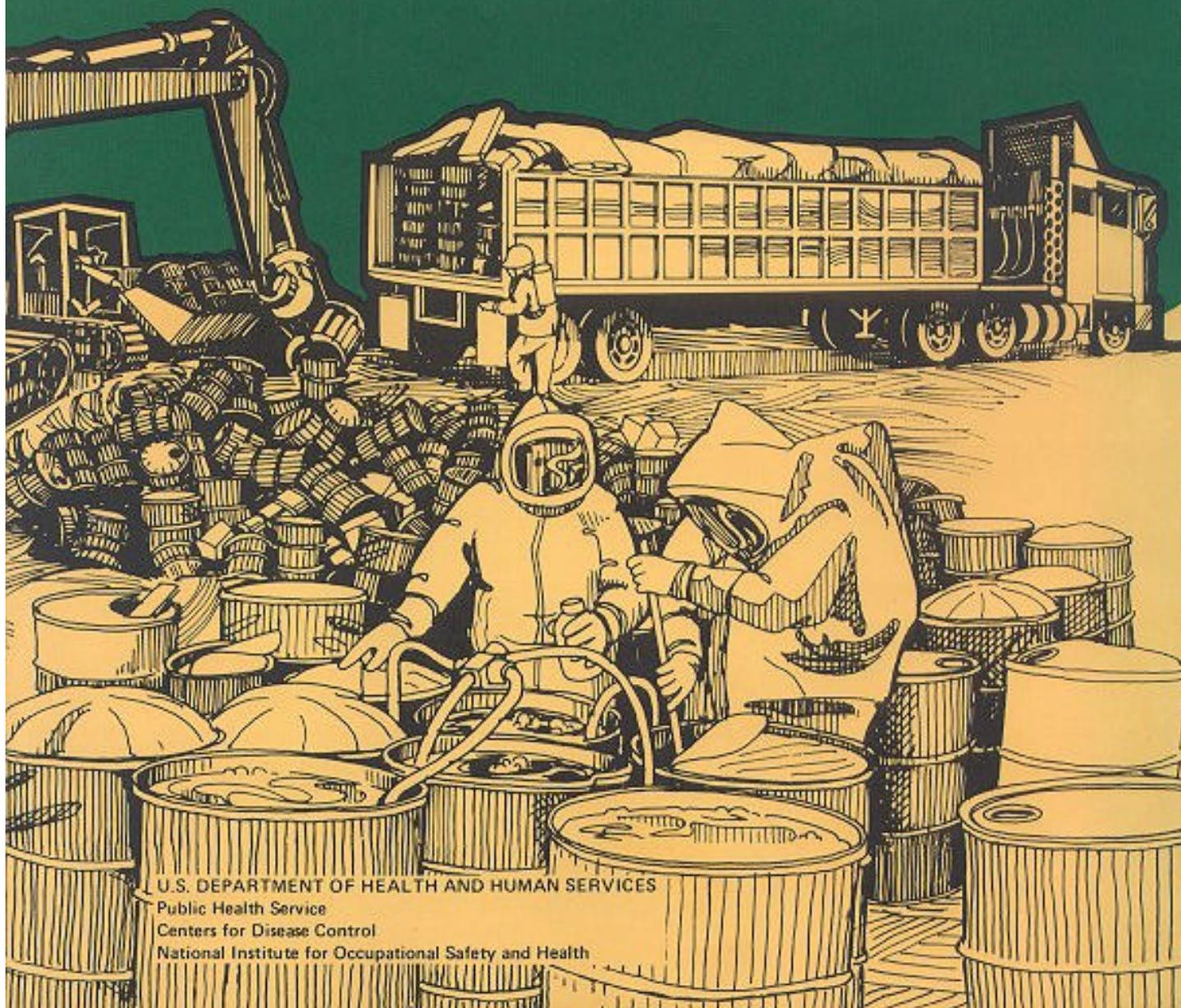


**NIOSH/OSHA/USCG/EPA**

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# **Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities**



U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES  
Public Health Service  
Centers for Disease Control  
National Institute for Occupational Safety and Health

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# **Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities**

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# Acknowledgments

The *Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities* is a result of the collaborative efforts of individuals representing the National Institute for Occupational Safety and Health (NIOSH), the lead agency, and the Occupational Safety and Health Administration (OSHA), the U.S. Coast Guard (USCG), and the U.S. Environmental Protection Agency (EPA). Agency representatives on the steering committee for this project were:

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Jan Connery of Eastern Research Group, Arlington, Massachusetts, edited and coordinated production of the manual. Over 100 individuals and organizations also contributed substantially to the development of this manual by providing technical information and review. Although they are too numerous to name individually, the steering committee gratefully acknowledges their valuable contributions.

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# 1. Introduction

In the past decade, industry, government, and the general public have become increasingly aware of the need to respond to the hazardous waste problem, which has grown steadily over the past 40 years. In 1980, Congress passed the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) -- the Superfund law-to provide for "liability, compensation, cleanup, and emergency response for hazardous substances released into the environment and the cleanup of inactive waste disposal sites."

This manual is a guidance document for managers responsible for occupational safety and health programs at inactive hazardous waste sites. It assumes a basic knowledge of science and experience in occupational safety and health. It is the product of a four-agency committee (the National Institute for Occupational Safety and Health [NIOSH], the Occupational Safety and Health Administration [OSHA], the U.S. Coast Guard [USCG], and the U.S. Environmental Protection Agency [EPA]) mandated by CERCLA section 301(f) to study the problem of protecting the safety and health of workers at hazardous waste sites, and by CERCLA section 111(c)(6) to develop a program to protect the health and safety of employees involved in response to hazardous substance releases, removals, or remedial actions.

This manual is intended for federal, state, and local officials and their contractors. It may be used:

- As a planning tool by government or private individuals.
- As a management tool by upper level or field managers.
- As an educational tool to provide a comprehensive overview of all aspects of safety and health protection at hazardous waste sites.
- As a reference document for site personnel who need to review important aspects of health and safety.

This document is *not* a detailed industrial hygiene textbook or a comprehensive source book on occupational safety and health. It provides general guidance and should be used as a preliminary basis for developing a specific health and safety program. The appropriateness of the information presented should always be evaluated in light of site-specific conditions. Other sources and experienced individuals should be consulted as necessary for the detail needed to design and implement occupational safety and health programs at specific hazardous waste sites.

Although this manual cites federal regulations, it is not a definitive legal document and should not be taken as such. While it represents a cooperative effort of the four agencies to develop a document that blends their widely differing mandates, policies, and procedures in specific areas, the manual may not include elements of each agency's policies that should be considered when developing occupational safety and health programs for hazardous waste sites. Individuals who are responsible for the health and safety of workers at hazardous waste sites should obtain and comply with the most recent federal, state, and local regulations relevant to these sites, and are urged to consult with OSHA, EPA, and other appropriate federal, state, and local agencies.

This manual will be updated regularly. Please send comments and suggested revisions to any of these four organizations:

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OSHA  
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Washington, DC 20593

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401 M Street, SW  
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A separate manual that specifically addresses response to hazardous substances emergencies will be published at a later date. In the meantime, much of the information in this manual can be used in planning for response to emergencies involving hazardous substances.

## 2. Hazards

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### Introduction

Hazardous waste sites pose a multitude of health and safety concerns, any one of which could result in serious injury or death. These hazards are a function of the nature of the site as well as a consequence of the work being performed. They include:

- Chemical exposure.
- Fire and explosion.
- Oxygen deficiency.
- Ionizing radiation.
- Biologic hazards.
- Safety hazards.
- Electrical hazards.
- Heat stress.
- Cold exposure.
- Noise.

Several factors distinguish the hazardous waste site environment from other occupational situations involving hazardous substances. One important factor is the uncontrolled condition of the site. Even extremely hazardous substances do not endanger human health or safety if they are properly handled. However, improper control of these substances can result in a severe threat to site workers and to the general public.

Another factor is the large variety and number of substances that may be present at a site. Any individual location may contain hundreds or even thousands of chemicals. Frequently, an accurate assessment of all chemical hazards is impossible due to the large number of substances and the potential interactions among the substances. In addition, the identity of the substances on site is frequently unknown, particularly in the initial stages of an investigation. The Project Team Leader (see Chapter 3, *Planning and Organization*) will often be forced to select protective measures based on little or no information. Finally, workers are subject not only to the hazards of direct exposure, but also to dangers posed by the disorderly physical environment of hazardous waste sites and the stress of working in protective clothing.

The combination of all these conditions results in a working environment that is characterized by numerous and varied hazards which:

- May pose an immediate danger to life or health.
- May not be immediately obvious or identifiable.
- May vary according to the location on site and the task being performed.
- May change as site activities progress.

General categories of hazards that may be present at a site are described in this chapter. In approaching a site, it is prudent to assume that all these hazards are present until site characterization has shown otherwise. A site health and safety program, as described in the subsequent chapters of this manual, must provide comprehensive protection against all potential hazards and specific protection against individual known hazards. It should be continuously adapted to new information and changing site conditions.

## Chemical Exposure

Preventing exposure to toxic chemicals is a primary concern at hazardous waste sites. Most sites contain a variety of chemical substances in gaseous, liquid, or solid form. These substances can enter the unprotected body by inhalation, skin absorption, ingestion, or through a puncture wound (injection). A contaminant can cause damage at the point of contact or can act systemically, causing a toxic effect at a part of the body distant from the point of initial contact.

Chemical exposures are generally divided into two categories: acute and chronic. Symptoms resulting from acute exposures usually occur during or shortly after exposure to a sufficiently high concentration of a contaminant. The concentration required to produce such effects varies widely from chemical to chemical. The term "chronic exposure" generally refers to exposures to "low" concentrations of a contaminant over a long period of time. The "low" concentrations required to produce symptoms of chronic exposure depend upon the chemical, the duration of each exposure, and the number of exposures. For a given contaminant, the symptoms of an acute exposure may be completely different from those resulting from chronic exposure.

For either chronic or acute exposure, the toxic effect may be temporary and reversible, or may be permanent (disability or death). Some chemicals may cause obvious symptoms such as burning, coughing, nausea, tearing eyes, or rashes. Other chemicals may cause health damage without any such warning signs (this is a particular concern for chronic exposures to low concentrations). Health effects such as cancer or respiratory disease may not become manifest for several years or decades after exposure. In addition, some toxic chemicals may be colorless and/or odorless, may dull the sense of smell, or may not produce any immediate or obvious physiological sensations. Thus, a worker's senses or feelings cannot be relied upon in all cases to warn of potential toxic exposure.

The effects of exposure not only depend on the chemical, its concentration, route of entry, and duration of exposure, but may also be influenced by personal factors such as the individual's smoking habits, alcohol consumption, medication use, nutrition, age, and sex (see Chapter 5, *Medical Program*).

An important exposure route of concern at a hazardous waste site is inhalation. The lungs are extremely vulnerable to chemical agents. Even substances that do not directly affect the lungs may pass through lung tissue into the bloodstream, where they are transported to other vulnerable areas of the body. Some toxic chemicals present in the atmosphere may not be detected by human senses, i.e., they may be colorless, odorless, and their toxic effects may not produce any immediate symptoms. Respiratory protection is therefore extremely important if

there is a possibility that the work-site atmosphere may contain such hazardous substances. Chemicals can also enter the respiratory tract through punctured eardrums. Where this is a hazard, individuals with punctured eardrums should be medically evaluated specifically to determine if such a condition would place them at unacceptable risk and preclude their working at the task in question.

Direct contact of the skin and eyes by hazardous substances is another important route of exposure. Some chemicals directly injure the skin. Some pass through the skin into the bloodstream where they are transported to vulnerable organs. Skin absorption is enhanced by abrasions, cuts, heat, and moisture. The eye is particularly vulnerable because airborne chemicals can dissolve in its moist surface and be carried to the rest of the body through the bloodstream (capillaries are very close to the surface of the eye). Wearing protective equipment, not using contact lenses in contaminated atmospheres (since they may trap chemicals against the eye surface), keeping hands away from the face, and minimizing contact with liquid and solid chemicals can help protect against skin and eye contact.

Although ingestion should be the least significant route of exposure at a site, it is important to be aware of how this type of exposure can occur. Deliberate ingestion of chemicals is unlikely, however, personal habits such as chewing gum or tobacco, drinking, eating, smoking cigarettes, and applying cosmetics on site may provide a route of entry for chemicals.

The last primary route of chemical exposure is injection, whereby chemicals are introduced into the body through puncture wounds (for example, by stepping or tripping and falling onto contaminated sharp objects). Wearing safety shoes, avoiding physical hazards, and taking common sense precautions are important protective measures against injection.

## Explosion and Fire

There are many potential causes of explosions and fires at hazardous waste sites:

- Chemical reactions that produce explosion, fire, or heat.
- Ignition of explosive or flammable chemicals.
- Ignition of materials due to oxygen enrichment.
- Agitation of shock- or friction-sensitive compounds.
- Sudden release of materials under pressure.

Explosions and fires may arise spontaneously. However, more commonly, they result from site activities, such as moving drums, accidentally mixing incompatible chemicals, or introducing an ignition source (such as a spark from equipment) into an explosive or flammable environment. At hazardous waste sites, explosions and fires not only pose the obvious hazards of intense heat, open flame, smoke inhalation, and flying objects, but may also cause the release of toxic chemicals into the environment. Such releases can threaten both personnel on site and members of the general public living or working nearby. To protect against the hazard: have qualified personnel field monitor for explosive atmospheres and flammable vapors; keep all potential ignition sources away from an explosive or flammable environment; use non-sparking, explosion-proof equipment; and follow safe practices when performing any task that might result in the agitation or release of chemicals.

## Oxygen Deficiency

The oxygen content of normal air at sea level is approximately 21 percent. Physiological effects of oxygen deficiency in humans are readily apparent when the oxygen concentration in the air decreases to 16 percent. These effects include impaired attention, judgment and coordination, and increased breathing and heart rate. Oxygen concentrations lower than 16 percent can result in nausea and vomiting, brain damage, heart damage, unconsciousness, and death. To take into account individual physiological responses and errors in measurement, concentrations of 19.5 percent oxygen or lower are considered to be indicative of oxygen deficiency.

Oxygen deficiency may result from the displacement of oxygen by another gas, or the consumption of oxygen by a chemical reaction. Confined spaces or low-lying areas are particularly vulnerable to oxygen deficiency and should always be monitored prior to entry. Qualified field personnel should always monitor oxygen levels and should use atmosphere-supplying respiratory equipment (see Chapter 8, *Personal Protective Equipment*) when oxygen concentrations drop below 19.5 percent by volume.

## Ionizing Radiation

Radioactive materials emit one or more of three types of harmful radiation: alpha, beta, and gamma. Alpha radiation has limited penetration ability and is usually stopped by clothing and the outer layers of the skin. Alpha radiation poses little threat outside the body, but can be hazardous if materials that emit alpha radiation are inhaled or ingested. Beta radiation can cause harmful "beta burns" to the skin and damage the subsurface blood system. Beta radiation is also hazardous if materials that emit beta radiation are inhaled or ingested. Use of protective clothing, coupled with scrupulous personal hygiene and decontamination, affords good protection against alpha and beta radiation.

Gamma radiation easily passes through clothing and human tissue and can also cause serious permanent damage to the body. Chemical-protective clothing affords no protection against gamma radiation itself; however, use of respiratory and other protective equipment can help keep radiation-emitting materials from entering the body by inhalation, ingestion, injection, or skin absorption.

If levels of radiation above natural background are discovered (see Table 6-2 in Chapter 6), consult a health physicist. At levels greater than 2 mrem/hr, all site activities should cease until the site has been assessed by health physicists.

## Biologic Hazards

Wastes from hospitals and research facilities may contain disease-causing organisms that could infect site personnel. Like chemical hazards, etiologic agents may be dispersed in the environment via water and wind. Other biologic hazards that may be present at a hazardous waste site include poisonous plants, insects, animals, and indigenous pathogens. Protective clothing and respiratory equipment can help reduce the chances of exposure. Thorough washing of any exposed body parts and equipment will help protect against infection.

## Safety Hazards

Hazardous waste sites may contain numerous safety hazards such as:

- Holes or ditches.
- Precariously positioned objects, such as drums or boards that may fall.
- Sharp objects, such as nails, metal shards, and broken glass.
- Slippery surfaces.
- Steep grades.
- Uneven terrain.
- Unstable surfaces, such as walls that may cave in or flooring that may give way.

Some safety hazards are a function of the work itself. For example, heavy equipment creates an additional hazard for workers in the vicinity of the operating equipment. Protective equipment can impair a worker's agility, hearing, and vision, which can result in an increased risk of an accident.

Accidents involving physical hazards can directly injure workers and can create additional hazards, for example, increased chemical exposure due to damaged protective equipment, or danger of explosion caused by the mixing of chemicals. Site personnel should constantly look out for potential safety hazards, and should immediately inform their supervisors of any new hazards so that mitigative action can be taken.

## Electrical Hazards

Overhead power lines, downed electrical wires, and buried cables all pose a danger of shock or electrocution if workers contact or sever them during site operations. Electrical equipment used on site may also pose a hazard to workers. To help minimize this hazard, low-voltage equipment with ground-fault interrupters and water-tight, corrosion-resistant connecting cables should be used on site. In addition, lightning is a hazard during outdoor operations, particularly for workers handling metal containers or equipment. To eliminate this hazard, weather conditions should be monitored and work should be suspended during electrical storms. An additional electrical hazard involves capacitors that may retain a charge. All such items should be properly grounded before handling. OSHA's standard 29 CFR Part 1910.137 describes clothing and equipment for protection against electrical hazards.

## Heat Stress

Heat stress is a major hazard, especially for workers wearing protective clothing. The same protective materials that shield the body from chemical exposure also limit the dissipation of body heat and moisture. Personal protective clothing can therefore create a hazardous condition. Depending on the ambient conditions and the work being performed, heat stress can occur very rapidly --within as little as 15 minutes. It can pose as great a danger to worker health as chemical exposure. In its early stages, heat stress can cause rashes, cramps, discomfort and drowsiness, resulting in impaired functional ability that threatens the safety of both the individual and coworkers. Continued heat stress can lead to heat stroke and death. Avoiding overprotection, careful training and frequent monitoring of personnel who wear protective clothing, judicious

scheduling of work and rest periods, and frequent replacement of fluids can protect against this hazard. For further information on heat stress, see Chapter 8, *Personal Protective Equipment*.

## Cold Exposure

Cold injury (frostbite and hypothermia) and impaired ability to work are dangers at low temperatures and when the wind-chill factor is low. To guard against them: wear appropriate clothing; have warm shelter readily available; carefully schedule work and rest periods, and monitor workers' physical conditions.

## Noise

Work around large equipment often creates excessive noise. The effects of noise can include:

- Workers being startled, annoyed, or distracted.
- Physical damage to the ear, pain, and temporary and/ or permanent hearing loss.
- Communication interference that may increase potential hazards due to the inability to warn of danger and the proper safety precautions to be taken.

If employees are subjected to noise exceeding an 8-hour, time-weighted average sound level of 90 dBA (decibels on the A-weighted scale), feasible administrative or engineering controls must be utilized. In addition, whenever employee noise exposures equal or exceed an 8-hour, time-weighted average sound level of 85 dBA, employers must administer a continuing, effective hearing conservation program as described in OSHA regulation 29 CFR Part 1910.95.