

Department of Environmental Protection
Field Operations Deputate

TITLE:

DEP Medical Monitoring Policy Guidance and Field Operations Hazardous Material and Hazardous Atmosphere Safety Policy Guidance

Effective Date: November 14, 2008

FIELD OPERATIONS MEDICAL SCREENING REQUIREMENTS CLARIFICATION:

35. All Field Operations employees are covered under the DEP Medical Monitoring Policy, as it pertains to medical screening for accidental exposures. Only employees authorized to enter contaminated areas above the permissible exposure limits (PEL) are required to have an annual medical screening. Vector Management employees will be medically evaluated for respirator use in accordance with OSHA 1910.134.
36. The term "potentially contaminated" in the Department's Medical Monitoring Policy has not been specific enough for Regional supervisors to determine properly who should be included in medical monitoring. Potentially contaminated is defined as any site with a known release which has not been characterized and/or any site exhibiting evidence of a release or prior release which has not been investigated and characterized. Furthermore, potential exposure shall mean working in or adjacent to an area with an uncontrolled release of a hazardous material/waste where no physical barrier separates the two areas and where engineering and/or administrative controls are not in place to control the contaminant or the exposure. Conducting inspections next to or near tanks, totes, carboys, drums, pipelines, cylinders, etc. containing hazardous materials does not constitute a potential exposure.
37. For that reason, the following clarifications have been included for use by Regional Supervisory and Management personnel when determining which employees should be included in the Hazardous Waste Authorization process. The employee must be assigned and required to wear DEP respiratory protection equipment and chemical protective clothing (PPE), by either the employee's supervisor or the Regional Environmental Emergency Response Manager and the employee must be actively engaged in work activities on sites that meet at least one of the following criteria:
38. The employee actively conducts on site spill investigations of hazardous materials, hazardous wastes and/or hazardous substances that are above the Permissible exposure limits for those substances.
39. The employee investigates incidents and/or performs cleanup operations of hazardous materials, hazardous wastes and/or hazardous substances that are above the Permissible exposure limits for those substances. (Performing cleanup operations is not synonymous with overseeing cleanup operations. Performing cleanup means actually physically engaged in containing, controlling and/or cleaning up a spill.)
40. The employee samples hazardous materials, hazardous wastes and/or hazardous substances in concentrations above the Permissible exposure limits for those substances.
41. The employee handles uncontrolled hazardous materials, hazardous wastes and/or hazardous substances in concentrations that are above the Permissible exposure limits for those substances.
42. The employee inspects reclamation sites that use hazardous materials foreign to the site, hazardous wastes and/or hazardous substances that are above the Permissible exposure limits for those substances.
43. Any other job duties, not specifically mentioned, that exposes the employee to hazardous materials, hazardous wastes and/or hazardous substances on uncontrolled hazardous waste sites or emergency incidents above the Permissible exposure limits for those substances as determined by the Program Manager in consultation with the Regional Safety Officer and the Medical Monitoring Coordinator.
44. Annual Medical Surveillance is required for Hazardous Waste Authorized employees physically working in contaminated areas above the Permissible Exposure Limit. i.e.:
45. Clean-up Operations on sites containing National Priority Listed substances where DEP Hazardous Waste Authorized employees are required to use respirators and PPE to do their work.
46. RCRA Corrective Action sites where DEP Hazardous Waste Authorized employees are required to use respirators and PPE to do their work.
47. Voluntary clean ups at hazardous waste sites (Act 2 sites) where DEP Hazardous Waste Authorized employees are required to use respirators and PPE to do their work.
48. Operations at TSD facilities where DEP Hazardous Waste Authorized employees are required to use respirators and PPE to do their work.
49. Emergency Responses to uncontrolled hazardous material/waste releases where DEP Hazardous Waste Authorized employees are required to use respirators and PPE to do their work.