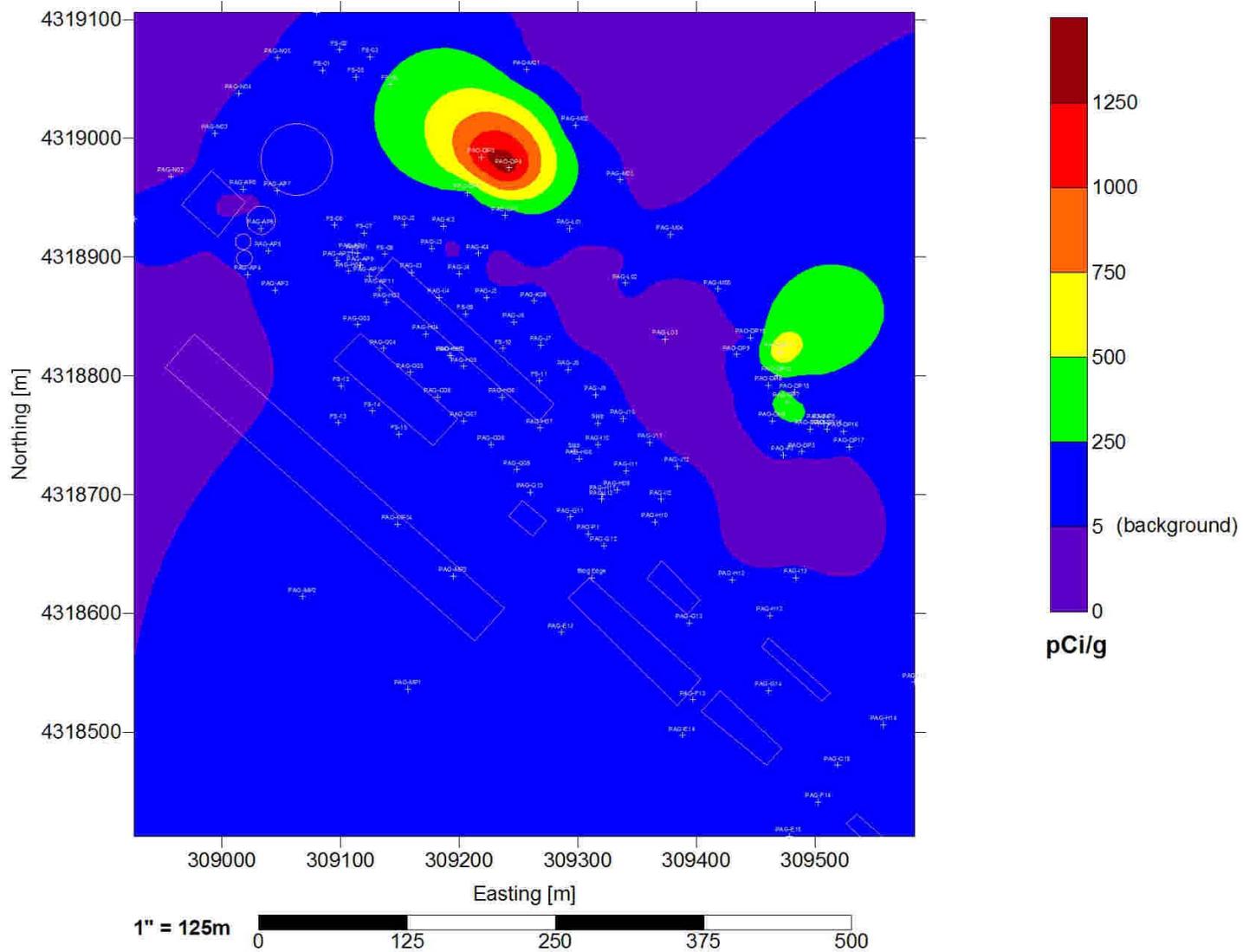
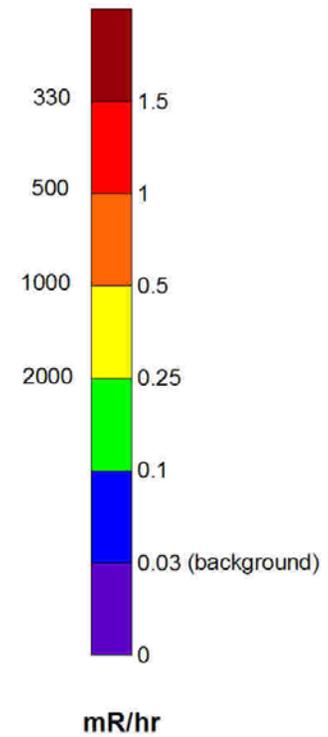
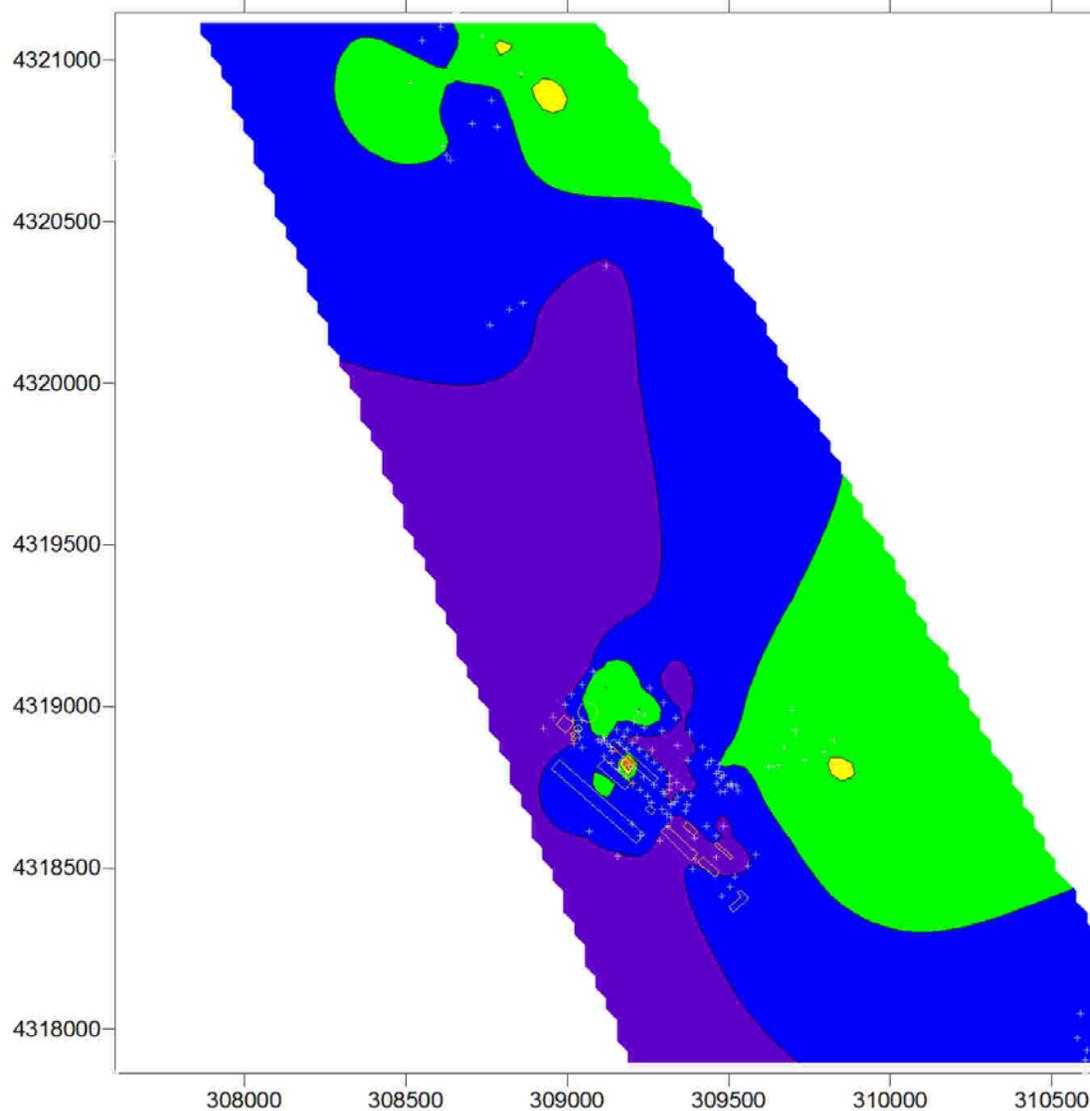


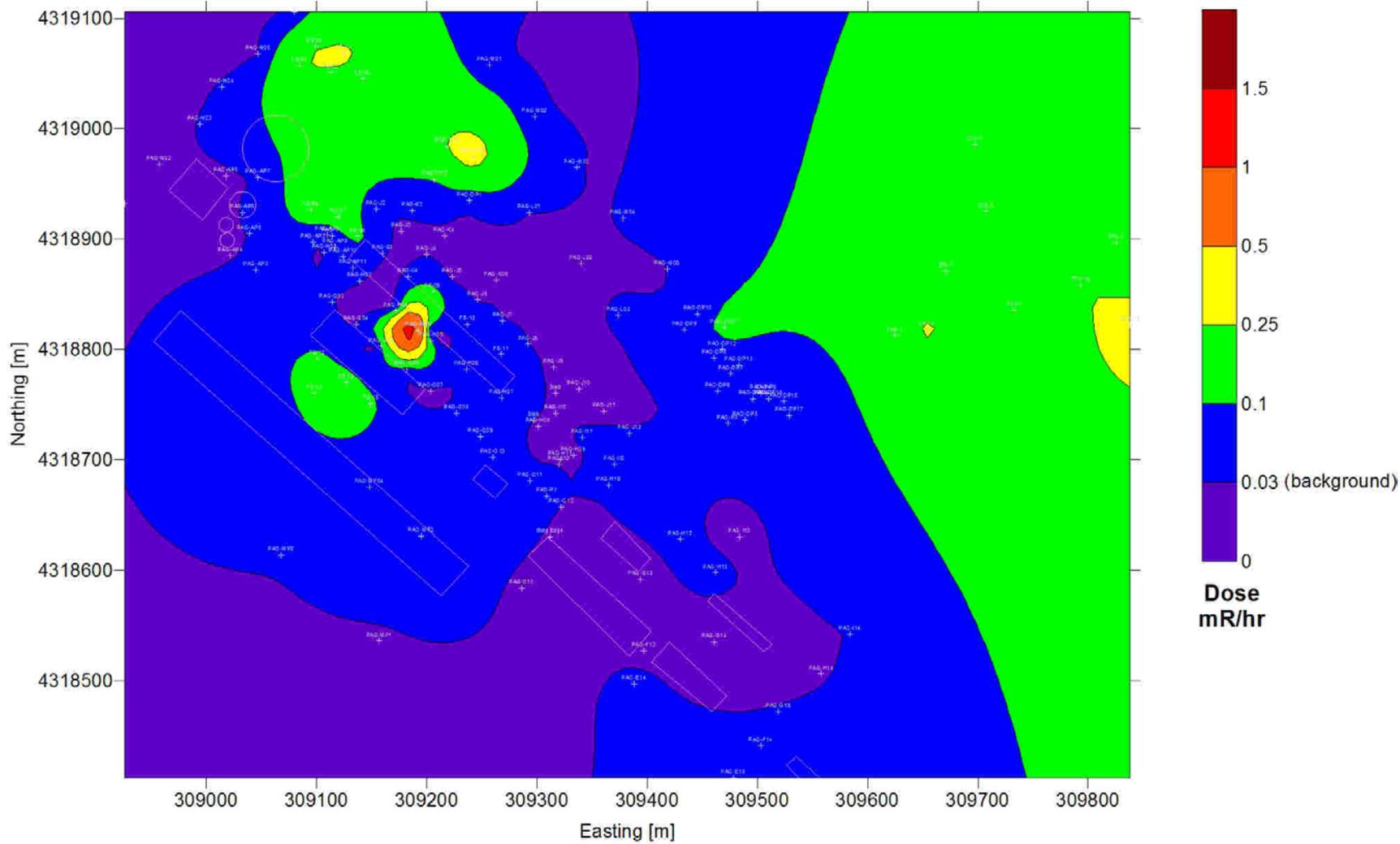
**Yerington Gross Alpha radiation [pCi/g]
June 2004**



**Yerington Process Area Gross Alpha radiation [pCi/g]
June 2004**



**Yerington radiation dose measurements [mR/hr]
taken on-site by Walker & Associates in June/July 2004**



**Yerington radiation dose measurements [mR/hr]
taken on-site by Walker & Associates in June/July 2004**

APPENDIX F

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

WASHINGTON, D.C. 20240

September 27, 2002

In Reply Refer To:
1703 (360) N
Ref. IM No. 93-106 and
IM No. 2002-138

EMS TRANSMISSION 10/07/2002
Instruction Memorandum No. 2003-008
Expires: 09/30/2004

To: II Washington Office and Field Officials

From: Assistant Director, Minerals, Realty and Resource Protection

Subject: Policy for Entry of BLM Personnel onto Sites with Potential or Known Hazardous Substance Releases

Program Area: Protection and Response, Field Operations Safety

Purpose: This Instruction Memorandum (IM) provides guidance for all BLM employees who enter sites with potential or known hazardous substances for specific purposes within their job responsibilities. The goals of this policy are to protect the health and safety of all BLM employees, minimize potential liability for BLM, and emphasize compliance with regulations under the Occupational Safety and Health Administration (OSHA), which apply to all BLM employees.

This policy does not apply to situations where BLM employees enter active industrial operations that are permitted or authorized to be on public lands, and which are in compliance with environmental and safety regulations of other agencies. For example, active aboveground and underground mines are subject to the regulations and standards enforced by the Mine Safety and Health Administration (MSHA). Oil and gas surface operations and facilities on rights of way (e.g., power plants) are subject to the regulations and standards enforced by OSHA. Entry onto sites not regulated by industry-specific safety requirements such as these is subject to the guidance contained in this policy.

Policy/Action: This IM establishes conditions under which it is permissible for an authorized BLM employee to enter known or potential hazardous substance release sites for specific purposes within the scope of their job responsibilities. **This policy does not impose any**

additional requirements on any BLM employee to enter hazardous substance sites. Rather, it is intended to clarify requirements for those who currently are authorized to enter such sites. Furthermore, this policy provides flexibility for each State to determine which employees, if any, will be authorized to enter such sites, and the responsibility for these determinations remains with each State Director.

A hazardous substance release site involves the spilling, leaking, emptying, dumping or disposing of hazardous substances into the environment. The term “hazardous substance” is an inclusive term, encompassing substances identified in several environmental statutes. Definitions of these terms are provided in Attachment 1. Any disposal of hazardous wastes on the public lands becomes, by definition, a hazardous substance release.

EPA has identified four categories of personal protective equipment (PPE), ranging from Level D to Level A, with Level A as the most protective (these categories are summarized in Attachment 2). In general, most BLM field employees encounter situations that require a minimal level of personal protective equipment, or Level D. However, in some limited situations, BLM employees do enter sites utilizing Level C or B PPE. Such trained employees may be members of hazardous materials response teams, or technical experts providing on-site assistance, who utilize Level B PPE as a greater measure of protectiveness when dealing with unknown substances. This policy accommodates a range of response strategies that may be implemented by the States, however, two limitations on site entry are contained in this policy:

1. Once a site-specific decision is made that Level B protection is warranted and necessary to perform on-site activities, all BLM employees are to withdraw, and rely on contractor or other hazmat response team support (e.g., County hazmat team) to conduct such activities.
2. Under no circumstances are BLM employees to enter a site that has been determined to require Level A protection. Level A is excluded from this site entry policy.

In order to enter sites that require any level of protection (Levels D, C, or B), certain health and safety requirements must be met, which are contained in OSHA regulations at 29 CFR 1910.120 (also known as the HAZWOPER regulations), or 40 CFR 311.1 of the National Contingency Plan (NCP). In order to ensure compliance with these regulations, BLM is establishing a system of State Rosters that list the names of those employees who are authorized to enter sites with known or potential hazardous substance releases. These Rosters will be maintained by the State or Center Directors, or their designees (e.g., State Hazardous Materials Program Leads or State Safety Officers), and will be updated as necessary, but at least once a year. The rosters will contain the following information:

§ risk level (i.e., Level D, C, and/or B) for which the employee is authorized by the State Director;

- § medical monitoring that will be conducted for the employee, if any;
- § health and safety training courses completed (including dates); and
- § indication that authorization to enter sites with known or potential hazardous substance releases is included in employee's position description.

As a matter of policy, BLM is requiring those employees authorized to enter sites with Level B protection to receive medical monitoring in the form of an annual physical. State Directors may determine that additional requirements for medical monitoring are appropriate (e.g., evaluations for employees authorized for Levels C and/or D). The annual physical for Level B authorization is a minimum requirement.

Another BLM and OSHA requirement for entering a site with known or potential releases of hazardous substances is preparation of a site-specific Health and Safety Plan (HASP) (see Departmental Manual 1112-1 Safety, Chapter 26, and 29 CFR 1910.120). An outcome of the HASP is that a level of protection (i.e., personal protective equipment required) is assigned to the site/job task. This assessment allows employees and supervisors to use management controls and PPE to reduce risk to an acceptable level. A HASP must be prepared before BLM employees enter a site with known or potential hazardous substances.

Finally, there are situations where BLM personnel who are not authorized to enter hazardous substance release sites (i.e., are not included on the State Roster) may need to visit a site. Such personnel may go onto a hazardous substance release site only if authorized by management, and provided they stay at a designated command post area or off-site area as designated by the site safety officer. Such personnel may not enter areas of contamination if they have not completed required HAZWOPER training.

BLM is developing a manual that will incorporate the guidance contained in this IM. In addition, BLM is consolidating information on existing health and safety requirements to include on the Hazmat website, located at <http://web.blm.gov/internal/wo-300/wo-360/hazmatweb/index.htm>. This website will provide specific information on existing training requirements and personal protective equipment, and include example formats for site-specific Health and Safety Plans.

Timeframe: This IM is effective upon receipt.

Budget Impact: This IM should have no effect upon the budget.

Background: This IM updates IM 93-106. This policy is intended to protect the health and safety of BLM personnel by establishing requirements for personnel who enter sites with known or potential hazardous substance releases for specific purposes within their job responsibilities. BLM also developed a policy for BLM field personnel who encounter suspected

hazardous substances in the course of conducting their job responsibilities (see Hazardous Substance Discovery Policy, IM 2002-138, March 29, 2002).

Manual/Handbook Sections Affected: Manual Section 1703 is affected by this policy.

Coordination: This policy has been coordinated with a wide range of WO offices, including the Fluid Minerals Group, the Solid Minerals Group, the Lands and Realty Group, the BLM Safety Manager, Renewable Resources and Planning, and Law Enforcement. In addition, this policy was distributed for review by all State Offices.

Contact: Questions or comments concerning this policy should be directed to Andrea McLaughlin, Protection and Response Group, at 202-452-7717.

Signed by:
Bob Anderson
Acting Assistant Director
Minerals, Realty and Resource Protection

Authenticated by:
Barbara J. Brown
Policy & Records Group, WO-560

2 Attachments

- 1 - Definitions (2 pp)
- 2 - EPA Standard Levels of Protection (2 pp)

Attachment 1: Definitions

1. The term “release” means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance or contaminant) (National Contingency Plan, 40 CFR 300.5). **Any disposal of hazardous wastes on the public lands becomes, by definition, a hazardous substance release.**
2. The term “hazardous substance” is defined in the Hazardous Waste Operations and Emergency Response regulations (29 CFR 1910.120) as:
 - § Any substance defined under Section 101(14) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), also known as Superfund;
 - § Any biologic agent and other disease causing agent which after release into the environment and upon exposure, ingestion, inhalation, or assimilation into any person, either directly from the environment or indirectly by ingestion through food chains, will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations in such persons or their offspring;
 - § Any substance listed by the U.S. Department of Transportation as hazardous materials under 49 CFR 172.101; and
 - § Hazardous wastes as defined in Department of Transportation regulations at 49 CFR 171.8, and regulations implementing the Resource Conservation and Recovery Act (RCRA) at 40 CFR 261.3.
3. For the purpose of this IM, a hazardous substance release site is defined as:
 - § A location which has been reported to the appropriate authority, including the Coast Guard (hotline), the Environmental Protection Agency (EPA), or to a State agency with competent jurisdiction, or has been entered into the Comprehensive Response, Compensation and Liability Information System (CERCLIS), or placed on the Federal Facilities Docket;
 - A site where conditions require either Level A, B, C, or D protection in accordance with the EPA standard levels of protection (Attachment 2); or

- A site which has not been reported, assessed or investigated, but where past or present land uses or conditions or apparent evidence indicate that a response is warranted under Sections 104 or 106 of CERCLA. When in doubt, assume the worst case until additional information becomes available.

Attachment 2: EPA Standard Levels of Protection

Level A

1. One or more hazardous substances have been identified and the highest level of protection for skin, eyes and the respiratory system is required due to either the measured (or potential for) high concentrations of atmospheric vapors, gases or particulates, or the site operations and work functions involve a high potential for splash, immersion or exposure to unexpected vapors, gases or particulates of materials that are harmful to skin or capable of being absorbed through the skin;
2. Substances with a high degree of hazard to the skin are known or suspected to be present, and skin contact is possible; or
3. Operations are being conducted in confined, poorly ventilated areas, and the absence of conditions requiring Level A protection have not been determined.

Level B

1. The type and atmospheric concentration of substances have been identified and require a high level of respiratory protection, but less skin protection;
2. The atmosphere contains less than 19.5 percent oxygen; or
3. The presence of incompletely identified vapors or gases is indicated by a direct-reading organic vapor detection instrument, but vapors and gases are not suspected of containing high levels of chemicals harmful to skin or capable of being absorbed through the skin.

Level C

1. The atmospheric contaminants, liquid splashes or other direct contact will not adversely affect or be absorbed through any exposed skin;
2. The types of air contaminants have been identified, concentrations measured, and an air-purifying respirator is available that can remove the contaminants; and
3. All criteria for the use of air-purifying respirators are met.

Level D

1. The atmosphere contains no known hazard; and
2. Work functions preclude splashes, immersion, or the potential for unexpected inhalation of or contact with hazardous levels of any chemicals.

**STATE ROSTER for Site Entry Policy
(In compliance with WO IM-2003-008)**

Note: # indicates an employee that is pending training or their training has lapsed and is now out of compliance with the Bureau Site Entry Policy.

Office	Name	Title	Level	24*- 40 hr	8 hr
NSO	Robert Kelso	Envir. Prot. Spec.	D	06/94	05/04
	Chris Ross	Nat. Res. Spec. – AML	D		Pending#
NV010	Deb McFarlane	Geologist	D		05/04
	Frank Bergwall	Geologist	D		03/04
NV020	Rod Herrick	Geologist	D		05/04
NV030	Terry Neumann	Envir. Prot. Spec.	D		Pending#
	Earle Dixon	Envir. Prot. Spec.	D	07/92	05/04
NV040	Dan Netcher	Geologist - Team Lead	D		05/04
	Jeanette Matovich	Envir. Prot. Spec.	D	07/03	05/04
NV050	Mike Moran	Envir. Prot. Spec.	D		05/04
NV060	Steve Drummond	Mining Engineer.	D	05/04	05/04
NV911	Mark Pirtle	Special Agent	D		Pending#
	Brian Richards	Special Agent	D		Pending#
	Randy August (LV)	Special Agent	D		Pending#

rev. 08/11/04