



**COMPANY
HEALTH & SAFETY
PROGRAM**

Issue: A
Date: 4/20/2009
Rev. 3
Date: 7/16/18
Authorized: *MJM*

Title: Cadmium Policy

Section No: 7

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1.0 PURPOSE

The purpose of this section is to communicate to employees and other interested persons that this company is not in the business of abating cadmium hazards, or of working with cadmium or cadmium containing materials.

2.0 SCOPE

This section provides a general means by which this company intends to keep employees safe from cadmium hazards and be in compliance with government regulations. Procedures other than provided in this section will require a site-specific cadmium compliance plan.

3.0 INDEX TO SECTION

- 1.0 Purpose
- 2.0 Scope
- 3.0 Index
- 4.0 Overview
- 5.0 Procedures
- 6.0 Written Compliance Program
- 7.0 Emergency Situations
- 8.0 Medical Surveillance
- 9.0 Responsibilities

4.0 OVERVIEW

PPP intends to comply with “29 CFR 1926.1127 Cadmium” and “MIOSHA Occupational Health Standards Part 309. Cadmium” by ensuring that no employee is exposed to cadmium at airborne concentrations greater than 5 micrograms per cubic meter of air averaged over an 8-hour period.

This shall be accomplished by:

1. Hazard communication;
2. Required and prohibited work practices; and



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3. Hazard awareness training.

5.0 PROCEDURES

General procedures are as follows:

1. When communication of potential cadmium hazards on a jobsite is received, it shall be determined by qualified people whether or not a hazard actually exists. This shall be done prior to PPP employees being directed further in the suspect areas.
2. If PPP is the responsible contractor for having exposure assessments made or abatement work done, the work will be subcontracted to a company licensed to do such work with properly trained and qualified people.
3. Procedures will be developed and implemented to minimize employee exposure to cadmium when maintenance of ventilation systems and changing of filters.
4. When known cadmium hazards exist on a jobsite, PPP shall:
 - a. Provide site employees with cadmium awareness training prior to initial assignment and annually thereafter;
 - b. Prohibit employees from entering controlled areas where cadmium work is being performed;
 - c. Allow employees to enter only areas that have been deemed safe or abated by a qualified person through means of exposure assessments and monitoring;
 - d. Require employees to report to their supervisor immediately any suspicions of potentially hazardous cadmium containing materials in their work areas; and



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- e. Implement a written compliance program when the action level of 2.5 micrograms per cubic meter of air calculated as an 8-hour time weighted average is reached or exceeded

6.0 WRITTEN COMPLIANCE PROGRAM

1. PPP shall established and implement a Written Compliance program that describes how the company will reduce employee exposure to the PEL or below by the use of engineering and work practice controls and by the use of respiratory protection [meeting criteria found in 1910.134](#) where permitted.
2. The written compliance program shall be reviewed and updated [annually](#) and as promptly as necessary to reflect any significant changes in the company's compliance status.
3. A designated "competent person" shall review the compliance program, initially and after each change, to ensure that the written program offers adequate employee protection from occupational exposure to cadmium.
4. Upon request, the written compliance program will be made available for examination and copying to the Assistant Secretary for OSHA, MIOSHA, the Director of the National Institute for Occupational Safety and Health (NIOSH), and affected employees and their designated representatives.
5. [The written compliance program will include at least the following:](#)
 - a) [A description of each operation in which cadmium is emitted; e.g., machinery used, material processed, controls in place, crew size, employee job responsibilities, operating procedures, and maintenance practices;](#)
 - b) [A description of the specific means that will be employed to achieve compliance, including engineering plans and studies used to determine methods selected for controlling exposure to cadmium, as well as, where necessary, the use of appropriate respiratory protection to achieve the PEL;](#)
 - c) [A report of the technology considered in meeting the PEL;](#)
 - d) [Air monitoring data that document the sources of cadmium emissions;](#)



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- e) A detailed schedule for implementation of the program, including documentation such as copies of purchase orders for equipment, construction contracts, etc.;
- f) A work practice program.
- g) A written plan for emergency situations.
- h) Other relevant information

7.0 EMERGENCY SITUATIONS

1. As dictated by job site condition PPP shall develop and implement a written plan for emergency situations involving substantial releases of airborne cadmium.

8.0 MEDICAL SURVEILLANCE

1. PPP shall provide medical surveillance to employees who are exposed above action level or the PEL for 30 days or more per year or exposed in an emergency.
2. Medical surveillance shall be provided when an employee experiences signs or symptoms of the adverse health effects of Cadmium (dermatitis, asthma, bronchitis, etc.). Medical evaluations will be provided at no cost to employees.
3. Examinations will be performed by or under the supervision of a physician or other licensed health care professional.

9.0 RESPONSIBILITIES

1. It is every employee's responsibility to report suspicions of cadmium in the workplace.
2. The PPP project supervisor shall enforce required and prohibited work practices, and communicate known hazards and potential hazards to employees, the project manager, the safety director, the general superintendent and subcontractors.
3. The PPP safety director shall provide hazard awareness training when required as per this policy, and institute a specific training program for all employees who are potentially exposed to cadmium. The program



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shall assure employee participation is documented and recorded.
Training shall be provided prior to initial assignment and at least annually.

10.0 Training Topics

- A. The health hazards associated with cadmium exposure including information provided in Appendix A of the Cadmium Standard, 1910.1027.
- B. Quantity, location, manner of use, release and storage of cadmium in workplace. Operations with exposure to cadmium are also discussed.
- C. Engineering controls and work practices associated with employee's job assignment.
- D. Measures employees can take to protect themselves from exposure to cadmium including proper personnel hygiene practices. Procedures the Company has taken to protect the employee from cadmium exposure including work practices, emergency procedures and personal protective equipment assigned.
- E. Purpose, proper selection, fitting, proper selection and limitations of respirators and personal protective equipment assigned to the employee.
- F. Purpose and description of the medical surveillance program.
- G. Contents of the employee information and training section and Cadmium Standard and Appendices.
- H. Employee's rights to access medical and exposure information under OSHA Standard 1910.1020.

Note-The employer must certify that the training has been conducted by preparing a record that includes (1) Identity of employee trained, (2) The signature of the person who conducted the training and (3) Date of the training. records must be kept 1 year.



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REVISION HISTORY

Revision number	Description of change	Written by	Checked by	Effective date
1	5.0-a add prior to initial assignment and annually thereafter 7.0-3 add Documented and recorded. 6.0 WRITTEN-COMPLIANCE PROGRAM 7.0 EMERGENCY SITUATIONS 8.0 MEDICAL SURVEILLANCE	George Newton	Safety	03/2/2012
	Program reviewed and Revision History added		GMN	10/20/2014
2	Revised 6.0 Added 10.0	Mike McCaffrey	MJM	11/14/17
3	Revised 6.0-review annually	Mike McCaffrey	MJM	7/16/18