

**Administrative Procedure, Level 1 - Company Wide**

# **CPCC-PRO-SH-54824**

## **Abnormal Odor Response**

Revision 1, Change 0

Published: 11/09/2022

Effective: 11/14/2022

Periodic Review Due Date:

Program: Occupational Safety and Industrial Hygiene

Topic: Occupational Safety and Industrial Health

Technical Authority: Linklater, Carson K

Functional Manager: Steelhammer, Jacob G

# **Use Type: Administrative**



USQ Facility	USQ Review	Screeners
Solid Waste Operations Complex	GCX-7 (Minor Change)	Jacobs, Orvil
Canister Storage Building/Interim Storage Area	GCX-8 (Not in Safety Basis Compliance Matrices)	Garrett, Robert
Central Plateau Surveillance and Maintenance	GCX-8 (Not in Safety Basis Compliance Matrices)	Griebel, Scott
Waste Encapsulation Storage Facility	GCX-8 (Not in Safety Basis Compliance Matrices)	Garrett, Robert
Plutonium Finishing Plant	GCX-8 (Not in Safety Basis Compliance Matrices)	Griebel, Scott
Transportation	<b>Exclusion Reason:</b> <i>N/A per Section 1.3</i>	
Capsule Storage Area	<b>Exclusion Reason:</b> <i>Per App B (new safety basis being developed per DOE-STD-1189)</i>	
105 KW Facility	GCX-8 (Not in Safety Basis Compliance Matrices)	Meyer, Matthew
324 Building	GCX-8 (Not in Safety Basis Compliance Matrices)	Garrett, Robert

**JHA:** Administrative

**Periodic Review Due Date:** 11/09/2027

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## Change Summary

### Description of Change

The changes clarify differing conditions that warrant entry into CPCC-PRO-EM-40325, "Radiological/ Chemical Hazard Event Response" from conditions that utilize this procedure. Changes are based on issues identified in the field (DOE-ASMT-2022-4629, CPCC-CR-2022-1692).

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**1.0 INTRODUCTION****1.1 Purpose**

This procedure identifies the immediate actions to be taken at the project level by workers, investigative actions to be completed by Industrial Hygiene (IH), and conditions that shall be met for continued work in the event an abnormal odor is encountered.

Anticipated odors associated with various Central Plateau Cleanup Company (CPCCo) work activities (e.g., excavation activities, shop work, chemical use, legacy chemicals) are expected.

Odors are not inherently hazardous (see Appendix A, "Glossary").

**1.2 Scope**

This procedure applies to all CPCCo activities when abnormal odors are encountered.

Response to unplanned, significant events involving chemical hazardous conditions that require a time-urgent response and utilize Hazards Assessor subject matter expert (SME) experience to directly support hazard control decisions are detailed in CPCC-PRO-EM-40325, *Radiological/ Chemical Hazard Event Response*, and are not within the scope of this procedure.

Roles and actions required by the Chemical Hazards Assessor (CHA) and IH for chemical emergencies are detailed in CPCC-PRO-EM-40325 and are not within the scope of this procedure.

Time-urgent responses are those that are necessary to rescue personnel, save valuable property, or protect personnel outside the immediate affected site, facility, or area of the incident.

**1.3 Applicability**

This procedure is to be used upon the recognition of an abnormal odor. This procedure may be used in conjunction with facility-, site-, or activity-specific procedures or work packages, or independently when no specific procedure or work instructions exists.

**1.4 Implementation**

This procedure is effective upon the date identified in the document header.

**2.0 RESPONSIBILITIES**

Responsibilities associated with this procedure are identified in Section 3.0.

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### 3.0 PROCESS

#### 3.1 Abnormal Odor

Actionee	Step	Action
Worker	1.	<p><u>IF</u> an abnormal odor is detected, <u>THEN TAKE</u> the following actions:</p> <ul style="list-style-type: none"> <li>• <u>IF</u> it is an emergency that requires immediate medical attention, <u>THEN CALL</u> 911 or (509) 373-0911.</li> <li>• STOP work activities in immediate work area.</li> <li>• WARN others.</li> <li>• MOVE a minimum of 25 ft to an upwind direction (when outdoors) or a minimum of one air space away (when indoors).</li> <li>• SECURE (visually) area with at least a 25 ft radius. <ul style="list-style-type: none"> <li>○ For outdoor work, ENSURE personnel downwind are notified and distance expanded to best alert other groups.</li> </ul> </li> <li>• CONTACT the Buyer Technical Representative (BTR)/Field Work Supervisor (FWS).</li> </ul>
		<p><b>NOTE:</b> <i>FWS/BTR should make notifications as promptly as possible and be prepared to answer questions on location, work being performed, any signs or symptoms experienced by the workers, and odor description if possible.</i></p>
BTR/FWS	2.	<p>CONTACT Shift Office and Construction/Project Manager or single point of contact (SPOC).</p> <p>3. CONTACT the Project Occupational Safety &amp; Industrial Hygiene (OS&amp;IH) Manager and/or project IH professional.</p>
Shift Office	4.	<p><u>IF</u> event is determined to be a chemical exposure emergency (refer to Appendix A) or requires a time-urgent response by the Hanford Fire Department, <u>THEN EXIT</u> this procedure <u>AND FOLLOW</u> CPCC-PRO-EM-40325.</p>
		<p><b>NOTE:</b> <i>Monitoring/sampling may include the use of direct reading instruments, air sampling media, and/or the collection of grab (bag or summa) samples.</i></p>
IH	5.	<p>With concurrence of the IH Manager, PERFORM the following:</p> <ol style="list-style-type: none"> <li>a. Based on knowledge of work scope, co-located work activities, and information provided by shift office/FWS/BTR/workers, DETERMINE the IH instrumentation that will be utilized to monitor/sample, including any action level/step back level, and what level of personal protective equipment (PPE)/Respiratory Protection Equipment (RPE) is required for the response.</li> </ol>

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Actionee	Step	Action
IH	b.	<p>DIRECT monitoring/sampling that will be conducted in affected area by IH group (IH, IH technicians, or subcontractor IH personnel) and any action limits/step back values that would terminate the monitoring event.</p> <p>c. COMPLETE the following:</p> <ul style="list-style-type: none"> <li>• COMMUNICATE IH monitoring/sampling results to Project OS&amp;IH Manager and line management.</li> <li>• <u>IF</u> odor is from a well, <u>THEN ENSURE</u> well is properly controlled for future work activities. For other locations, ensure controls specific to work activity/area are incorporated.</li> <li>• COMMUNICATE any additional controls needed for resumption of work to line management.</li> <li>• COMPLETE/UPDATE any IH supporting documentation for the work scope.</li> </ul>
<b>NOTE:</b>		<p><i>All records are managed in accordance with CPCC-PRO-SH-409, Industrial Hygiene Monitoring, Reporting and Records Management.</i></p> <ul style="list-style-type: none"> <li>• ENSURE all data collected is documented in the Site Wide Industrial Hygiene Database (SWIHD) with comments detailing the sampling rationale, actions taken, PPE (including RPE) and action/step back limits. The "Project Directed Odor Response or Upset Condition Sampling Plan" will be designated in SWIHD if a project-specific sampling plan is not available.</li> <li>• COMMUNICATE sample results to affected work group and associated support personnel.</li> <li>• SUBMIT sample/monitoring results to site medical provider if workers report to Occupational Medical Provider (OMP) or if sample results indicate exposure above an occupational exposure limit (OEL). Written notifications will be made to affected individual and to the OMP to be included in employee's files.</li> </ul>
OS&IH Project Manager	6.	<p>DETERMINE if an event report is required in accordance with CPCC-PRO-SH-077, <i>Reporting, Investigating, and Managing Health, Safety and Property/Vehicle Events</i>.</p> <p>7. UPDATE Shift Office of IH monitoring results and any followup actions or controls for the resumption of work.</p> <p>8. DIRECT resumption of work using recommended controls.</p>

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**4.0 FORMS**

None

**5.0 RECORD IDENTIFICATION**

None

**6.0 SOURCES**

**6.1 Requirements**

10 CFR 851, *Workers Safety and Health Program*

**6.2 References**

CPCC-PRO-EM-40325, *Radiological/Chemical Hazard Event Response*

CPCC-PRO-SH-077, *Reporting, Investigating, and Managing Health, Safety and Property/Vehicle Events*

CPCC-PRO-SH-409, *Industrial Hygiene Monitoring, Reporting and Records Management*

**6.3 Bases**

CPCC-PRO-EM-060, *Reporting Occurrences and Processing Operations Information*

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**Appendix A - Glossary**

<i>Term</i>	<i>Definition</i>
<b>Chemical Exposure Emergency</b>	A serious situation or occurrence that happens suddenly and/or unexpectedly, jeopardizing human life and/or property, and demands immediate action (e.g., difficulty breathing, severe coughing, nausea/vomiting, loss of consciousness, chest pain, etc.).
<b>Abnormal Odor</b>	An unexpected odor that has caused symptoms of exposure (e.g., headaches; irritation of skin, eyes, nose, throat, or lungs).
<b>Anticipated Odor</b>	An odor that has been evaluated by Industrial Hygiene (IH) and is expected or has been encountered in the past with no ill effects. However, if an anticipated odor becomes significantly stronger, irritating, or symptoms of exposure are noted, the same actions and investigation will be required as if responding to an abnormal odor.