KENNEDY PAINTING

INTERIOR & EXTERIOR

Safety Manual

National Safety CONSULTING

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Kennedy Painting

Safety Manual Table of Contents

Section 1: SAFETY POLICY

A. Company Policy

Kennedy Painting is dedicated to providing a safe and healthy work environment for all of our employees. The Company shall follow operating practices that will safeguard employees, the public and Company operations. Furthermore, compliance with all Federal, State, and local safety and health regulations is mandatory. "**We believe all incidents are preventable and want everybody to go home safely every night."**

B. Management Commitment to Safety

Management is committed to the safety of its employees. Incidents, unsafe working conditions, and unsafe acts jeopardize both employees and Company resources. Injuries and illnesses result in discomfort, inconvenience and possibly reduced income for the employee.

C. Assignment of Responsibilities

Safety is everyone's responsibility. Everyone should have a safe attitude and practice safe behavior at all times. To best administer and monitor our safety policies, the following responsibilities are stated. This list should not be construed as all-inclusive and is subject to change as needed.

1. Management Responsibilities

   Management has the responsibility for incident prevention in the performance of all company activities.

   a. Management is responsible for assuring that all operations comply with applicable government regulations and company policies.
   b. Management displays its concern for the well-being of its employees through its active participation and support of the incident prevention program.
   c. Management has an obligation to support and when necessary to direct all supervisory personnel and the company's safety coordinator in the execution of their duties.

2. Supervisor Responsibilities

   a. The Supervisor must consider both existing and anticipated safety hazards associated with the work place.
   b. The Supervisor must make provisions for employee safeguarding, by allowing for the procurement of personal protective equipment, and safe tools and equipment.
   c. The Supervisor must take into consideration the protection of the public and the protection of the owner's private property.
   d. It is the Supervisors responsibility to plan and conduct all operations with full regard to safety and shall insure compliance with all federal, state, and local safety regulations, all jobsite rules and operating procedures, and implement additional rules and procedures as required to further incident prevention at the worksite and hold the responsibility for incident prevention within their crew.
   e. The Supervisor shall participate in incident investigations, safety meetings, site inspections and general safety awareness.

3. Employee Responsibilities

   a. Employees are responsible for complying with all job safety rules and regulations.
   b. Employees are responsible for reporting all incidents and for correcting and/or reporting any unsafe acts or conditions to their Supervisor.
   c. Employees are encouraged to participate fully in the incident prevention program.

d. Employees have an obligation to question management and Supervisors concerning any direction(s) or safety precaution(s) they do not understand.

e. Employees must attend all training sessions to reinforce the skills needed to perform their jobs in a safe manner in and around their work area.

4. Safety Coordinator Responsibilities

a. The Safety Coordinator will provide safety meeting topics (tool box talks) to the Supervisor to be read and signed at the safety meetings.

b. The Safety Coordinator is responsible to consult on matters in developing the objectives for jobsite incident prevention programs and their implementation.

c. The Safety Coordinator shall consult with the company and Supervisors on safety-related matters, keeping both groups current with inspection results, incident reports, corrective actions, general incident statistics, trends, changes in government safety regulations, (OSHA), and other pertinent information.

d. The Safety Coordinator will help monitor the completion of the OSHA 300 Injury Log.

D. Accountability for Safety

Everyone is accountable for safety. Management will establish safety objectives and develop and direct incident prevention activities. All employees shall strive to reach those objectives and will be evaluated accordingly.

Section 2: GENERAL SAFETY

A. Emergencies & Evacuation (29 CFR 1926.35)

1. Emergency Procedures

   Our goal is to provide prompt and immediate action in any emergency to protect life, property, and equipment. In case of an emergency, the employee nearest the stricken person should call 911 (or the emergency phone number posted in your area) and direct a fellow employee to:

   a. Notify the nearest Supervisor to come to the scene; and simultaneously dispatch available employees to quickly retrieve the first aid kit. The Supervisor or Management will decide whether or not to evacuate, inspect or shut down the work site.

   b. After an ambulance has been dispatched, all major injuries that must be reported to OSHA will be reported within 24 hours.

2. Evacuation Procedures

   a. When alerted by alarm or by the Supervisor to evacuate, employees should:

   b. Properly secure all materials/tools/equipment in their possession and assure all hazardous containers and areas are properly locked.
   c. Proceed to the nearest exit and wait in a safe location at the rally point away from the danger.
   d. Remain in the rally point until role call is complete and instructions are provided.

B. Safe Operating Procedures (29 CFR 1926.20)

All employees are responsible for safety. The following applies to all activities on the work site:

1. Rules

   a. Comply with all established safety rules, regulations, procedures, and instructions which are applicable to your own actions and conduct

   b. Promptly report all incidents, hazards, incidents, and near-miss occurrences to the Lead Supervisor, regardless of whether or not injury or property damage was involved.

   c. Do not visit, talk to, or distract another employee who is operating a machine, or who is engaged in a work activity where the possibility of injury exists.

   d. Do not participate in horseplay, scuffling, pushing, fighting, throwing things, or practical jokes.

   e. Observe all no-smoking signs and regulations.

   f. Do not run on work site premises except during emergencies.

   g. Use handrails on steps, elevated platforms, scaffolds, or other elevations.

   h. Assist others and ask for assistance in lifting and carrying heavy or awkward objects.

   i. Firearms, ammunition, and explosives are prohibited on work site premises.

   j. Personal stereos with headphones, e.g. Walkman/IPods, are not permitted to be worn in the work site.

   k. Alcohol and drug use and possession at work site are prohibited.

2. First Aid (29 CFR 1926.23)

   A person properly trained in CPR/First Aid shall be present at each jobsite any time work is being performed in order to render prompt medical attention. A first aid kit of adequate size shall be kept on the job site containing the following supplies:

a. Rubber gloves
b. Surgical style mask
c. Eyewash solution
d. Bandage gauze
e. Adhesive tape
f. Band aids
g. Aspirin
h. Antibacterial salve
i. Burn ointment
j. Rubbing alcohol
k. Hydrogen Peroxide

3. Housekeeping (29 CFR 1926.25)
    a. Unless otherwise specified, waste material and scrap must be put in the proper containers and/or central location to be removed from the work site.
    b. Materials should be stored in an orderly manner. Work site storage areas and walkways must be maintained free of dangerous depressions, obstructions, and debris.
    c. The entire work site should be orderly and debris must be disposed of in dumpsters, or off site, in accordance with all EPA regulations.
4. Machine Guarding (29 CFR 1926.300)
    a. It is the responsibility of the operators to see that guards are on machines where needed.
    b. Employees should report any malfunctions of the guards to the Supervisor.
        i. Machines with guard malfunctions will not be used.
    c. The Supervisor should determine if the machine should be locked and tagged-out until the guard can be fixed or replaced.
    d. The guards increase safety on the machine. Machinery with the guards removed shall not be used.
5. Material Handling & Back Safety (29 CFR 1926.250)
    a. Know the approximate weight of your load and make certain your equipment is rated to handle it. (Never exceed the manufacturer's recommended safe working load).
    b. Lift heavy objects as instructed, with the leg muscles and not with the back.
    c. Call for assistance as needed for handling heavy or bulky objects or materials.
    d. Use an appropriate, approved lifting device (i.e. special trucks, racks, hoists, and other devices) for lifting very heavy, bulky, large or unyielding objects.
    e. All ropes, chains, cables, slings, etc., and other hoisting equipment must be inspected each time before use.
    f. A load should never be lifted and left unattended.
    g. Wear safety gloves when handling materials.
    h. Properly stack and secure all materials prior to lifting or moving to prevent sliding, falling, or collapse.

    Note: *If lifting stacked materials, materials should be carefully piled and stable. Piles should not be stacked as to impair your vision or unbalance the load. Materials should not be stacked on any object (i.e. floor, scaffold) until the strength of the supporting members have been checked.*
6. Powered Industrial Truck Safety (29 CFR 1926.602)

    The following are the minimum safety practices for the operation of powered industrial trucks:
    a. Only trained and authorized operators are permitted to operate a powered industrial truck.
    b. Passengers are not permitted on powered industrial trucks.

c. Powered industrial trucks should never be left unattended without first shutting off power, neutralizing controls, setting brakes, and lowering forks. Do not park on an incline.

d. Always look in the direction equipment is traveling, looking backward when backing up, even for a short distance. Keep a clear view of the path. When forward vision is obstructed, drive in reverse.

e. When traveling, with or without a load, keep forks as low as possible.

f. Avoid following pedestrians or other vehicles too closely, especially when operating on inclines or in noisy areas.

g. Ascend/descend all ramps and inclines slowly. Wait for passengers to exit the ramp before attempting to ascend/descend. When descending, always use low gear and the slowest speed control. Do not descend ramps with the load at the front of the lift. Never ascend in reverse. When ascending, loaded powered industrial trucks should be driven with the load upgrade.

7. Electrical (29 CFR 1926.400)

a. All electrical work shall comply with the National Electrical Code and all Federal, State, and local codes. Any electrical work not in compliance should be brought to the Supervisor's attention immediately.

b. Only knowledgeable, certified electricians are to perform electrical work.

c. Proper high energy PPE shall be worn when working with live electrical circuits.

d. Employees should not work close to any unprotected electrical power circuit unless that circuit is de-energized and grounded.

e. All switches must be enclosed and grounded. Panel boards must have provisions for closing and locking the main switch and fuse box compartment. Access to electrical panels must be kept clear from obstructions.

f. Extension cords used with portable electric tools and appliances must be heavy duty (no less than 12 gauge conductors) of the three wire grounding type, and must conform to OSHA standards. NO FLAT ELECTRICAL CORDS ARE ALLOWED ON WORK SITE.

g. All electrical tools and cords must be protected by a ground fault circuit interrupter (GFCI), when applicable.

h. Voltages must be clearly labeled on all electrical equipment and circuits. Circuits must also be clearly marked for the areas of service they provide.

i. Prior to performing any work, a qualified employee must "lockout and tag-out" the equipment or machinery. The only exception is when power is required for "megging" circuits.

j. Electrical cords and trailing cables should be covered, elevated or otherwise protected from damage. Any exposed wiring and cords with frayed or deteriorated insulation must be reported immediately and taken out of service, if possible.

k. Extension cords should be used for temporary use only and all plugs must be the dead front type.

l. Working spaces, walkways, and similar locations must be kept clear of cords.

m. Electrical tools and equipment must be appropriately protected when used in wet or damp areas.

n. To avoid contacting overhead power lines, obtain prior approval from the Safety Director before bringing any equipment over 18 feet high on site. Any wide load over ten feet requires an escort. A power outage approval must also be obtained.

8. Small Tools (29 CFR 1926.301)
    a. Provide proper storage for all tools.
    b. Repair all damaged or worn tools promptly. Temporary and makeshift repairs are prohibited. Tools that can't be properly repaired should be discarded immediately.
    c. All equipment must conform to OSHA Safety and Health Regulations for General Industry Part 1910.
    d. Power tools should not be used if safety equipment has been removed.
    e. Employees using tools that cause objects to be thrown should wear personal protective gear, including proper eye and hearing protection.
    f. Gas powered tools should not be used in unventilated areas and gas should be dispensed from U.L. approved cans only. All gas-powered tools must be turned off before being refueled.
    g. Portable grinders must have hood-type guards and side enclosures that cover the spindle and at least 50% of the wheel. All wheels should be inspected regularly for fractures, etc. Defects should be promptly reported to the Job Site Lead / Supervisor.
    h. Bench grinders should have deflector shields and side cover guards. The maximum clearance for the tool rest is 1/8" from the wheel and for the tongue guard is ¼".
    i. Air-supply lines should be inspected regularly and maintained in good condition.
    j. To prevent "whipping" in the event of hose separation or failure, air sources supplying hoses should be protected with an excess flow valve. Completely bleed all air from tools before disconnecting them.
    k. Only trained employees are to use powder-actuated tools, and all spent shells will be removed by the end of the shift.
    l. Do not raise or lower power tools by their electrical cord or pneumatic line.
9. Fire Prevention (29 CFR 1926.150)
    a. Good housekeeping is the first rule of fire prevention. Oily rags, paper shavings, trim, etc. should be cleaned up and placed in proper trash receptacles.
    b. Welding or cutting should not take place near locations where flammables or combustibles are present. When welding or cutting occurs, the area should be protected with fire resistant blankets. An approved fire extinguisher should also be located at each welding or cutting facility.
    c. All flammable liquids should be stored in an approved manner and dispensed in approved safety containers. Store welding gas cylinders in an isolated area.
    d. Open fires of any kind are not permitted.
    e. Combustible materials or equipment in combustible containers should be stored properly. Fire extinguishers should be kept within close proximity to any combustible container.
    f. Fire extinguishers should be recharged and inspected regularly. A tag indicating the date of recharging should be affixed to each extinguisher.
    g. Access to fire hydrants should be maintained at all times. Fire hydrants should never be blocked or obstructed in any way.
    h. This is a non-smoking work site; Smoking is prohibited in the building and around hazardous equipment and materials. A smoking area may be provided as designated by the Management.
    i. No material should be stored within three feet of an electrical panel, outlet, or fire suppression equipment.

10. Environmental (29 CFR 1926.65)
    a. Material Use and Waste Management
        i. Receptacles must be placed around the work area for collection of waste materials.
        ii. All hazardous waste must be stored and collected in special areas.
        iii. No hazardous material is to be abandoned in the work area.
        iv. No waste haulers, disposers, recyclers, or scavengers are allowed on the work site without approval.
        v. All hazardous waste removed from the work site must have authorization. No outside waste is to be disposed of using the company's facilities. Dumpsters are to be inspected frequently and any potentially hazardous material is to be placed in the appropriate storage area.
        vi. No used oil or paint is to accumulate on the work site. All spills are to be cleaned up and disposed of immediately. The Supervisor must be notified of the situation immediately.
11. Employee & Public Protection (29 CFR 1926.20)
    a. Work is not to be performed in any area unless specifically permitted.
    b. Sidewalks, entrances to buildings, lobbies, corridors, aisles, doors or exits must be kept clear of obstructions at all times.
    c. Appropriate warnings and instructional safety signs must be posted.
12. Lockout/Tagout (29 CFR 1926.417) (29 CFR 1910.147)

    The lockout procedure shall be followed to protect workers from injury due to inadvertent startup of power driven equipment. The lockout procedure is to render inoperative electrical systems, pumps, pipelines, valves and all such energy systems that may incidentally be energized or started up while employees are working on them or before they are mechanically ready and released for service. All energy sources shall be locked out and a "DANGER" tag affixed to the equipment or system indicating who installed the lock and the reason the system was locked out.
    a. In most cases, lockout procedures apply to the control of machinery hazards which require complex shutdown procedures. Yet "locked out" machines can still injure or kill anyone working in, on, or around them.
    b. Consider more than electrical energy sources to achieve maximum protection for operating, maintenance or service personnel. Depending on the equipment involved examine other energy sources of:
        i. Hydraulic power
        ii. Compressed air or trapped pressure
        iii. Energy stored in springs, counterweights, etc.
        iv. Potential energy from suspended parts
        v. Any other sources that might cause unexpected mechanical movement or sudden release.
13. Ladders (29 CFR 1926.1053)
    a. Manufactured ladders must comply with OSHA, ANSI, manufacturer and job specifications.
    b. Ladders with broken or missing rungs and/or broken or split side rails should not be used.

c. All portable ladders should be equipped with non-skid safety feet and should be placed on a stable base. All access areas should be kept clear.

d. Wood ladders should not be painted except for an identification mark.

e. Ladders should be maintained free of lines, ropes, hoses, wires, cables, oil, grease, and debris. No objects should be left on ladders.

f. Single portable ladders over 30 feet in length should not be used.

g. Side rails should extend 3 feet above the landings. All ladders in use should be tied, blocked, or otherwise secured to prevent incidental displacement.

h. Always climb and descend facing the ladder (use 3 points-of-contact rule: 2 hands and one foot or 2 feet and one hand).

i. Never stand or sit on the top rung of a step ladder.

j. Never work with another person on the same ladder.

14. Personal Protective Equipment (PPE) (29 CFR 1926.95)

a. An assessment of the workplace shall be made to determine the hazards requiring PPE. This assessment shall be reviewed and revised annually, as necessary.

b. Protective eyewear shall be worn when working with tools and equipment which present a hazard to the eye.

c. Hard toed work shoes shall be worn at all times on the job site. Tennis shoes, hush puppies, canvas/soft leather hiking boots, and sandals are not permitted.

d. Approved hearing protection shall be worn in areas with high noise levels. If you cannot carry on a normal conversation with someone within 3 feet of you, hearing protection is needed.

e. Face shields shall be worn when performing any grinding, chipping, drilling or cutting, and welding.

f. Protection for the hands and other parts of the body is required when exposed to cuts, burns electricity, or harmful chemicals/substances.

g. Reflective vests or High Visibility clothing shall be worn by all employees when on an active jobsite.

h. When airborne contaminants exceed permissible limits, appropriate respiratory protection shall be required. This may necessitate a medical evaluation, fit tests, and proper respirator training.

15. Cranes & Riggers (29 CFR 1926.1400)

a. Only trained, qualified employees are permitted to operate any crane or rigging equipment. Training includes an in-depth review of the operating characteristics and limitations of the equipment.

b. All equipment should be inspected daily. This includes inspecting all cables, sheaves and pulleys, booms and boom angles. Report any defects immediately to the office.

c. Equipment should be shut off before any repairs are made or lubricants are applied.

d. Any removed guards must be properly put back into place before the machine is used again.

e. Loads should not exceed equipment rated capacities.

f. Standard signals should be used to direct any moving crane. Employees must have their signal training card in their possession at all times. Only one person can be designated to signal a crane.

g. Cranes and rigging equipment are not permitted to work closer than 20 feet to any power line.

h. Employees are to stay clear of the cranes swing radius at all times. Never turn your back on any load. Cab portion of the crane should be properly blocked off (swing radius when unit is in use).

i. Loads should never be swung over any person.

j. A fire extinguisher is to be kept in the crane's cab at all times and must have a current inspection tag.

k. All rigging devices should have permanently affixed identification stating size, grade, rated capacity, and manufacturer.

l. Any rigging not being used should be removed from the area.

m. "Shop-made" grabs, hooks, clamps, or other lifting devices are prohibited.

n. A licensed engineer must inspect all lifting beams and spreader bars to make sure that they are the proper size for the capacity.

o. Slings should not be shortened by using knots, bolts, or other makeshift designs.

p. Wire rope slings should be padded to protect against damage from sharp corners.

q. Inspection records must be kept with all equipment.

r. Hard hats and proper personal protective equipment should be worn while operating or working close to a crane.

16. Welding & Cutting (29 CFR 1926.350)

a. Welders must be protected from toxic fumes, burns, fires, explosions, electric shock, radiation, noise, and heat stress. Only those trained to operate an electric arc welder should use it.

b. Always check the cables, ground clamp, electrode holder, gauges, and switches to make sure they are all working properly.

c. Report any faulty or defective equipment to your Foreman.

d. Make sure the welder is properly installed and grounded.

e. You must assess the work area before you start. Work in well ventilated areas and use an exhaust system if you weld in a confined space.

f. Use a respirator when welding or cutting hazardous metals or metals with hazardous coatings.

g. Wear all necessary PPE when welding including welding helmets, masks, fire retardant gloves, aprons, and safety footwear.

h. Make sure the work area is fire safe by using fire resistant materials as barriers and removing nearby combustible materials.

i. If a fire watch is required, maintain a fire extinguisher during operations and 30 minutes after welding ceases.

j. Compressed gas cylinders shall be secured in an upright position at all times during storage, use and transportation.

    i. Maintain a distance of at least 20 feet or provide a non-combustible barrier at least five feet high in separating fuel gas cylinders from oxygen cylinders. This applies to indoor and outdoor storage.

k. Valve protection caps shall be in place at all times when a cylinder is not in use, to include while transporting, moving and storing cylinders.

l. Inspect valves, regulators, hoses, torches and cables prior to use.

m. If hot work permit procedures are in effect, follow precautions as listed on permit.

17. Fall Protection (29 CFR 1926.500)

a. A competent person shall conduct an assessment of the type of fall protection to be provided if a fall hazard of 6 feet or greater exists; e.g. guardrails, personal fall arrest system (PFAS), safety net, controlled access zone, safety monitor, or other.

b. Procedures must provide for a prompt rescue within 20 minutes in the event of a fall.

c. When receiving materials at elevation from a crane, the landing zone shall be protected by a guardrail system, if possible, or use of a PFAS is required.

d. Holes and wall openings shall be properly covered or guarded to prevent falls.

e. Steel erection (see under Special Emphasis Program section of this manual)

18. Aerial Lifts & Work Platforms (29 CFR 1926.453)

a. Only trained, qualified employees are permitted to operate aerial lifts.

b. Inspect equipment per manufacturer's handbook prior to use.

c. Fall protection in the form of full body harness shall be utilized during platform use.

d. Barricade area below to protect workers from falling objects.

Section 3: CONTINUAL MONITORING & IMPROVEMENT

A. Safety Meetings/Training

Supervisors shall hold a (minimum) 10 minute tool box safety talk on a weekly basis for their employees at the work site. All Foremen / Supervisors are required to attend. Emergency procedures should be periodically reviewed. Employees should be reminded to put safety first and look out for their fellow workers. Employees should be encouraged to offer comments and safety suggestions at this time and regularly throughout the day as needed.

B. Inspections

Periodic inspections will be conducted to identify hazardous conditions and unsafe behaviors. The Supervisor will conduct inspections, as well as insurance company Loss Prevention personnel and/or the company assigned safety coordinator. The inspection should look for unsafe practices and conditions that can cause an incident and take corrective action immediately.

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Section 4: INCIDENT MANAGEMENT (29 CFR 1904)

A. Incident & Near Miss Reporting Procedures

If there is an incident or a near-miss while working, it is mandatory to notify the Supervisor immediately but especially prior to the end of the shift. The situation will be investigated and corrective action implemented to prevent future injury. Employees and witnesses must fully cooperate in the investigation.

1. If there is an injury on the job:
    a. Care for the injured worker immediately, if possible.
    b. Contact the designated employee who is trained in first-aid and/or CPR to assist in the situation.
    c. Contact and report to the Supervisor.
    d. If needed, the Supervisor or other designee should transport the injured worker to the company's designated medical facility to receive appropriate medical attention. A post-incident drug and/or alcohol test will be conducted in accordance with the subcontractor's Drug-Free Workplace Policy.
    e. If rescue personnel are summoned, the Supervisor should delegate an individual to wait for the rescue team and escort them to the injured employee.
    f. All witnesses to the incident should be available to speak with the Safety Coordinator or the Supervisor and cooperate in all incident investigations.
    g. The Supervisor should immediately notify the Safety Coordinator of the incident so a workers' compensation claim or a report only claim can be filed.
    h. Injured employees must comply with the medical treatment provided by the treating physician, cooperate with the insurance company and its designees, and abide by the company's return-to-work policy.

B. Incident Investigation

When an incident occurs, it is an indication that something has gone wrong. Incidents don't just happen, they are caused. The basic cause(s) of incidents are unsafe acts and/or conditions. Every incident must be investigated to determine the root cause and to initiate corrective action to prevent recurrence from the same causes.

Once completed, the incident investigation form shall be submitted to Management for review. The Management and Safety Coordinator should evaluate the corrective action taken or suggested and instruct if additional changes should be made.

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Section 5: TRAINING (29 CFR 1926.21)

A. Training

Kennedy Painting will provide training to assure the requirements of OSHA standards are met and continuously evaluate employee training needs to keep workers safe and healthy on the job.

1. New Employee Orientation

   New employees will receive training on the company safety and health management system, safe work practices and expectations, and specific safety and health training for the tasks that they will perform.

2. Safety Coordinator Training

   The Safety Coordinator or other designated person will appraise the skill and knowledge level of exposed workers, and provide any additional training, as required.

   a. Where safety and health training is needed, appropriate training will be provided to include:

      i. Hazard recognition.

      ii. Necessary precautions to be used (best work practices and PPE).

      iii. Training length and level of detail will be determined by the severity of the hazards and the requirements of OSHA.

   b. Records will be maintained for all training sessions with descriptions of topics covered and names of workers trained.

3. Huddle Talks

   Weekly Huddle Talks will be conducted as part of training on a full range of safety topics.

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Section 6: OSHA RECORDKEEPING (29 CFR 1904)

A. OSHA (Records) Requirements

All record keeping documents, including the OSHA No. 300 Log and Summary of Occupational Injuries and Illnesses, are maintained at the company office. Every recordable occupational injury or illness shall be logged within (6) working days from the time the employer learns of the injury.

The OSHA No. 300A Summary is posted from February 1st through April 30th where employees may review and evaluate its content.

Copies of required incident investigations and certification of employee safety training shall be maintained for 5 years and available for OSHA, when requested. A written report will be maintained on each incident, injury or on-the-job illness requiring medical treatment. Records pertaining to hazardous material or blood-borne pathogen exposure shall be maintained for 30 years from end of employment.

Additional log forms are available at www.osha.gov.

B. OSHA Inspection Checklist

Supervisors or Safety Coordinator shall complete the OSHA Inspection Checklist on a periodic basis to avoid safety violations and remain in compliance with OSHA standards. Deficiencies should be immediately corrected.

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Section 7: SUBSTANCE-ABUSE POLICY

A. Substance-Abuse Policy

It is recognized that if Kennedy Painting employees use, store, possess, manufacture, distribute, or illegal substances in the work place, it is a violation of this policy and it poses serious risks to the safety and health of the entire work force, as well as to the future well-being of each and every employee. Prescription drugs may only be used as directed by the individual for which that prescription is issued by a licensed physician.

No employee may use, possess, distribute, deliver, or be under the influence of a drug, or use or be under the influence of alcohol, while performing work on a public works project. An employee is is considered to be under the influence of alcohol for the purposes of this policy if the alcohol concentration is his or her blood or breath at the time alleged as shown by analysis of the employees blood or breath is at or above 0.02.

If this problem exists, it could damage the quality of services the company renders to its customers, cause damage to persons and property due to accidents and carelessness, lower morale within the work place, threaten the very ability of the company to compete in the market place, and ultimately threaten the financial security of both the company and the work force alike.

Subject to the following conditions, the Employer shall have the right to require an Employee to submit to urinalysis for illegal substances prior to assignment to projects where customer specifications or governmental regulations mandate such testing. In addition, the Employer shall have the right to implement Random Testing, “For Cause” testing and Post Accident testing as outlined below:

B. Testing

Any employee being notified to submit to a drug and/or alcohol test will sign a Substance Abuse Testing Notification Form regardless of the category in which the testing falls. ***(Form can be found in Section 10 of this manual)***

1. Pre-employment Testing

   Offers of employment with Kennedy Painting may be conditioned on proper cooperation with and participation in a drug and controlled substance screening test. Following a conditional employment offer, applicants will be asked to sign a form consenting to a screening test as part of the application process. Failure to sign the consent form will be considered a withdrawal of the application.

2. Random Testing

   Random drug and alcohol testing may be conducted. Employees selected for Random Testing shall report to the drug testing laboratory the same day that they are notified that they have been selected so long as proper laboratory facilities are provided during working hours. The testing and selection shall be conducted by a third party. Random Testing will be based on an agreement between Kennedy Painting and customer.

3. “Reasonable Suspicion” Testing

   An employee whose supervisor has reasonable suspicion to believe the employee is under the influence of alcohol or a drug is subject to discipline up to and including suspension, and is required to undergo an alcohol or drug test.

   a. "Reasonable suspicion" means a belief, based on behavioral observations or other evidence, sufficient to lead a prudent or reasonable person to suspect an employee is under the influence and exhibits slurred speech, erratic behavior, decreased motor skills, or other such traits. Circumstances, both physical and psychological, shall be given consideration.

b. Whenever possible before an employee is required to submit to testing based on reasonable suspicion, more than one supervisory or managerial employee shall observe the employee. It is encouraged that observation of an employee should be performed by a supervisory or managerial employee who has successfully completed a certified training program to recognize drug and alcohol abuse.

c. The employer who is requiring an employee to be tested based upon reasonable suspicion shall provide transportation for the employee to the testing facility and may send a representative to accompany the employee to the testing facility. Under no circumstances may an employee thought to be under the influence of alcohol or a drug be allowed to operate a vehicle or other equipment for any purpose.

d. The employee shall be removed from the job site and placed on inactive status pending the employer's receipt of notice of the test results. The employee shall have the right to request a representative or designee to be present at the time he or she is directed to provide a specimen for testing based upon reasonable suspicion.

e. If the test result is positive for drugs or alcohol, the employee shall be subject to termination. The employer shall pay all costs related to this testing.

f. If the test result is negative, the employee shall be placed on active status and shall be put back to work by the employer. The employee shall be paid for all lost time to include all time needed to complete the drug or alcohol test and any and all overtime according to the employee's contract

4. Post-Accident Testing

   If substance-abuse is likely to have been a contributing factor to the cause of an accident, the program may require that an employee submit to testing for drugs and alcohol.

   a. Employees may be subject to testing after a work related accident involving medical treatment (other than first aid), or which results in a lost work day to the individual or which involves significant property damage.

   b. Employee injuries that are considered to have occurred through no fault of the employee shall be excluded from testing.

C. Testing Guidelines

All Substance Abuse testing under this Memorandum of Understanding shall be carried out under the following conditions:

1. The Employer shall be responsible for all expenses incurred in carrying out drug testing, including, but not limited to lost time, travel time, travel expense and all costs of testing, except under item 6.
2. Only employees who are in the Random Testing Selection Pool or who agree to be tested and be placed in the Random Testing Selection Pool will be employed on projects covered by this agreement.
3. All testing shall become under the control and supervision of a physician with confidentiality protected in accordance with the “American Occupational Medical Association’s Code of Ethical Conduct for Physicians Providing Occupational Medical Services” (adopted by the Board of Directors of AOMA’s July 23, 1976) and “drug Screening in the Work Place Ethical Guidelines” (adopted July 26, 1986), and the Medical Review Officer Manual, as developed by the National Institute on Drug Abuse (published September 1988).
4. Urine testing shall be performed only by laboratories listed by current federal standards.
5. A “positive” drug test result shall mean test levels on both the screening test and the confirmatory test that are recognized as positive by current federal standards.

6. An employee testing “positive” shall have the right to have the second portion of his/her urine sample independently retested by an HHS-certified laboratory of his/her choice and at his/her expense. If the independent retest is “negative,” the employee shall be allowed to resume work and be reimbursed for the cost of such independent test.
7. Substance to be tested, (confirmatory test levels which are recognized as positive by current federal standards):

SUBSTANCE	THRESHOLD LIMIT
Alcohol	0.04%
Amphetamines	300 ng/ml
Cocaine metabolites	300 ng/ml
Marijuana metabolites	20 ng/ml
Opiate metabolites	300ng/ml
Phencylidine	25 ng/ml
Barbiturates	300 ng/ml
Benzodiazepines	300 ng/ml
Methadone	300ng/ml
Methaqualone	300ng/ml
Propoxyphene	300 ng/ml

8. The Employer shall treat employee records including positive test results with the highest degree of confidentiality. Such records shall not be distributed to other parties. If a grievance is brought before the Joint Labor Management Committee as a result of a positive test, the Employer shall have the right to present, as evidence, any and all employee records including positive test results.
9. It is understood, however, that the Employer shall have the right to document negative or “drug free” results for individual employees to customers, government agencies or the Union. In the case of alcohol testing verification, the Employer will document to the customer, government agency or the Union that all employees currently employed on the job site is in compliance with the alcohol section of the policy.

D. Alcohol Statement

1. The parties recognize that Alcohol Abuse differs from abuse of Illegal Drugs in that alcohol may be legally obtained and used, and each employee has the right to decides whether or not to drink on his own time so long as job safety and job performance are not impaired. However, improper use of alcohol affecting job safety or efficiency is unacceptable.
2. Unauthorized consumption of alcohol or alcohol impairment on any given job or project during working hours or in an Employer vehicle at any time, will be cause for termination.

E. Reassignment Upon Positive Substance Abuse Test

1. Employees who have tested “positive” for substance abuse shall be eligible for reassignment under the following conditions:
    a. In the case of a first violation of this policy, substance abuse, the employee may be reassigned to the project or other projects of that Employer. First-time violators shall be subject to Random Testing for use at any time without prior notice up to six months following the violation.
    b. The employee shall be immediately placed in an approved rehabilitation program directed by the Medical Review Officer.

c. Employees who test “positive” for substance abuse for the second time shall be subject to disciplinary action up to and including immediate termination.

d. Upon successful completion of an approved rehabilitation program, any employee who is certified as fit for duty shall have the right to return to the same Employer provided that the Employer has not made a layoff that would have included said employee.

2. The Employer shall have the right to verify that the employee has completed an approved rehabilitation program and is fit for duty.

F. Joint Labor Management Committee Involvement

In the interest of securing a drug-free work-place, protecting employee rights and securing employment opportunities, suggestions, and issues of concern and compliance problems should be communicated in writing to the Joint Labor Management Committee.

G. Substance Abuse Procedures

1. FIRST OFFENSE failure of a substance abuse test.

   Before an employee may return to work, at his or her expense, from the same testing office, pass the same test they had previously failed. The results must be negative and clouded results are not acceptable. Usually 30 days are required prior to someone passing a second test.

2. SECOND OFFENSE

   Second offense the employee must wait a minimum of 30 days before taking a second test, at his or her expense and from the same testing office and then be considered for re-employment. The re-employment is a discretionary decision on the part of management.

3. THIRD OFFENSE

   Third offense for failure of a substance abuse test is grounds for automatic termination without recourse.

H. Substance-Abuse Policy Acknowledgement Forms

All Kennedy Painting employees are required to sign a Substance-Abuse Policy Acknowledgement Form acknowledging that they have received and read the Substance-Abuse Policy as outlined in this section.

Section 8: SPECIAL EMPHASIS PROGRAMS

Special Emphasis – **Asbestos (29 CFR 1926.1101)**

A. Introduction

1. Asbestos is a naturally occurring fibrous silicate mineral known for its strength and durability and for its fireproof and insulation properties. It was used widely in construction and other products until 1978. During the twentieth century, some 30 million tons of asbestos have been used in industrial sites, homes, schools, shipyards, and commercial buildings in the United States. Exposure is possible when handling some of the more common Presumed Asbestos-Containing products and Materials (PACM) such as:

    a. Floor tiles
    b. Vinyl sheet flooring
    c. Ceiling tiles
    d. Siding shingles
    e. Pipe & boiler insulation
    f. Sprayed-on building insulation
    g. Automotive brake linings
    h. Laboratory counter tops
    i. Laboratory ventilation hoods

B. Health Effects

1. Asbestos is primarily hazardous when it becomes “friable” or easily crumbled by hand pressure into fibers. Once released into the air, fibers may be inhaled into the lungs causing asbestosis, mesothelioma, lung cancer, or other lung diseases. Ingestion can also cause stomach and/or colon cancer.
2. Asbestosis
    a. A disease characterized by fibrotic scarring of the lung. It is a restrictive lung disease, which reduces the overall volume of the lung. It is prevalent in workers exposed to large doses of asbestos fibers over a long period of time, usually 10-20 years.
3. Mesothelioma
    a. A cancer of the chest cavity lining (mesothelium) or abdominal cavity. It can spread rapidly and is always fatal. If caused by asbestos exposure, it too has a long latency period of 20-40 years after first exposure.
4. Lung Cancer
    a. Can result from exposure to large concentrations of asbestos fibers over many years, typically 20+ years. If also a cigarette smoker, workers are 50 times more likely to contract lung cancer than non-smokers.

C. Work Practices

1. All employees shall protect themselves and others from potential asbestos exposure through pro-active preventive measures. If asbestos is suspected the following procedures will apply:
2. Onsite Procedures
    a. Obtain site-specific information as to what building materials may be contacted during the course of the job activities.
    b. If encountered or suspected, no worker shall disturb the PACM in any manner.
    c. Report any damaged/friable materials discovered immediately to the facility owner or general contractor.

d. Never sand, grind, drill, hammer, cut, saw, break, damage, or move PACM or suspected PACM.

3. Training
    a. All employees shall be trained in background information, health effects, asbestos recognition and proper site-specific work procedures.
    b. Refresher training shall be done on an annual basis.
    c. Training shall be documented recording training dates, employee names, and the trainer's name.
4. Asbestos Abatement
    a. No employee shall be involved in any asbestos abatement activity.
    b. Employees shall respect asbestos abatement warning signs and barrier tape. No employee shall enter a regulated area.
    c. On a Multi-employer worksite where asbestos abatement is in progress, adequate containment is required or all employees must be removed from exposure.
    d. Employees shall report any unsafe asbestos work practices to facility owner.

Special Emphasis – **Fall Protection for Construction (29 CFR 1926.500)**

A. Introduction

OSHA currently regulates fall protection for construction under Part 1926, Subpart M. The standards for regulating fall protection systems and procedures are intended to prevent employees from falling off, onto or through working levels and to protect employees from falling objects. Fall protection requirements under the OSHA Construction regulations require considerable planning and preparation. [Note: These regulations do not address the issue of whether employers should compile a written fall protection plan, except to provide for the use of a written plan as justification for less conventional fall protection measures during leading edge work, precast concrete erection work, or residential construction.]

Written fall protection procedures establish guidelines to be followed whenever an employee works above dangerous equipment on ramps or runways, or at heights with fall protection at the job site. The regulations:

a. Are designed to provide a safe working environment, and

b. Govern use of fall protection procedures and equipment.

Written procedures for fall protection establish uniform requirements for fall protection training, operation, and practices. The effectiveness of the written fall protection procedures depends on the active support and involvement of all employees who perform the jobs requiring it. This plan is intended to document procedures that ensure all work requiring fall protection is carried out safely

B. Purpose

Kennedy Painting is dedicated to the protection of its employees from on-the-job injuries. All of our employees have the responsibility to work safely on the job. The purpose of this plan is to:

a. Supplement our standard safety policy by providing safety standards specifically designed to cover fall protection on the job.

b. Ensure that each employee is trained and made aware of the safety provisions which are to be implemented by this plan prior to the start of erection/construction.

This program informs interested persons, including employees, that we are complying with OSHA's Fall Protection requirements, (29 CFR 1926.500 to.503).

This program applies to all employees who might be exposed to fall hazards, except when designated employees are inspecting, investigating, or assessing workplace conditions before the actual start of construction work or after all construction work has been completed.

The Project Manager is responsible for its implementation and is the competent person for our company. Copies of the written program may be obtained from our written Safety and Health plan. Certain employees are authorized to inspect, investigate, or assess workplace conditions before construction work begins or after all construction work has been completed. These employees are exempt from the fall protection rule during the performance of these duties.

These authorized employees determine if all walking/working surfaces on which our employees work have the strength and structural integrity to support the employees. Our employees will not be allowed to work on these surfaces until they have the requisite strength and structural integrity.

All employees, or their designated representatives, can obtain further information about this written program, and/or the fall protection standard from the Project Manager/Competent Person..

C. Fall Protection

To prevent falls, our company has a duty to anticipate the need to work at heights and to plan our work activities accordingly. Careful planning and preparation lay the necessary groundwork for an accident-free jobsite.

1. Worksite Assessment and Fall Protection System Selection

   This written plan is for all our various construction sites. However, at those worksites which require a site-specific fall protection plan, it shall be prepared by a qualified person.

   a. All fall protection systems selected for each application will be installed before an employee is allowed to go to work in an area that necessitates the protection. When selecting and purchasing fall protection equipment and supplies, they shall be approved for the purpose for which they are intended. Such fall protection equipment shall bear appropriate labels clearly indicating that the equipment meets or exceeds applicable ANSI and ASTM requirements.

   b. This fall protection plan is intended to anticipate the particular fall hazards to which our employees may be exposed. Specifically, we:

      i. Inspect the area to determine what hazards exist or may arise during the work.

      ii. Identify the hazards and select the appropriate measures and equipment.

      iii. Give specific and appropriate instructions to workers to prevent exposure to unsafe conditions.

      iv. Ensure employees follow procedures given and understand training provided.

      v. Apprise ourselves of the steps our specialty subcontractors have taken to meet their fall protection requirements.

   c. Providing fall protection requires an assessment of each fall situation at a given jobsite. Our criteria for selecting a given fall protection system follow those established at 29 CFR 1926.502, fall protection systems criteria and practices. Each employee exposed to these situations must be trained as outlined later in this plan.

2. Unprotected Sides and Edges

   a. Our employees must be protected when they are exposed to falls from unprotected sides and edges of walking/working surfaces (horizontal and vertical surfaces) which are 6 feet or more above lower levels.

   b. We know that OSHA has determined that there is no "safe" distance from an unprotected side or edge that would render fall protection unnecessary.

   c. We utilize and require the use of covers, standard guardrails, or personal fall arrest systems (PFAS) to protect our employees and subcontractors from fall hazards.

   d. We maintain the system(s) chosen until all work has been completed or until the permanent elements of the structure which will eliminate the exposure to falling hazards are in place.

3. Leading Edge Work

   a. Some construction sites require leading edge work. Leading edges are defined as the edge of a floor, roof, or formwork that changes location as additional floor, roof, or formwork sections are placed, formed, or constructed. If work stops on a leading edge it will be considered to be an "unprotected side or edge" and will be covered by the section of this plan on unprotected sides and edges.

   b. We presume that it is feasible and will not create a greater hazard to implement at least one of the conventional fall protection systems for our leading edge work.

c. We utilize and require the use of covers, standard guardrails, safety nets, or personal fall arrest systems (PFAS) to protect our employees and subcontractors from fall hazards.

d. Employees who are not constructing the leading edge, but who are on walking/working surfaces where leading edges are under construction, will also protected from falls by the use of standard guardrails, safety nets, or personal fall arrest systems (PFAS).

4. Hoist Areas

   a. In all situations where equipment and material hoisting operations take place, we protect our employees from fall hazards. When we are involved in hoisting operations we utilize and require the use of covers, standard guardrails, safety nets, or personal fall arrest systems (PFAS) to protect our employees and subcontractors from fall hazards.

   b. When operations require the materials to be lifted by crane to a landing zone (and do not require an employee to lean through the access opening or out over the edge to receive or guide materials), we can select either personal fall arrest equipment or a guardrail system.

   c. When guardrails (or chains or gates) are removed to facilitate hoisting operations and one of our employees must lean through the access opening or out over the edge to receive or guide materials they will be protected by a personal fall arrest system.

5. Holes

   a. Our company protects employees from:

   b. Tripping in or stepping into or through holes (including skylights).

   c. Objects falling through holes (including skylights).

   d. We utilize and require the use of covers, standard guardrails, safety nets, or personal fall arrest systems (PFAS) to protect our employees and subcontractors from fall hazards.

   e. At our worksites employees can trip or step into or through a hole (including skylights) or an object could fall through a hole and strike a worker. In these instances we use covers to prevent accidents.

   f. We understand that OSHA does not intend that a guardrail be erected around holes while employees are working at the hole, passing materials, and so on. Therefore, if the cover is removed while work is in progress, guardrails are not required because they would interfere with the performance of work. When the work has been completed, we will be required to either replace the cover or erect guardrails around the hole.

6. Formwork and Reinforcing Steel

   a. We are involved in work where different systems fit different applications. If our jobsites requires formwork or reinforcing steel work 6 feet or more above lower levels, we will chose a fall protection systems at each location to protect our employees:

   b. We utilize and require the use of covers, standard guardrails, safety nets, or personal fall arrest systems (PFAS) to protect our employees and subcontractors from fall hazards.

7. Ramps, Runways, and Other Walkways

   a. We equip all ramps, runways, and other walkways with guardrails when employees are subject to falling 6 feet or more to lower levels.

8. Excavations

   a. At our jobsites we may have excavation edges that will not be readily seen (i. e., concealed from view by plant growth, etc.). In addition, walls, pits, shafts, and similar excavations 6 feet or more deep will be guarded to prevent employees from falling into them. When it is necessary, and when the excavation is 6 feet or more deep we will protect our employees and subcontractors.

b. We utilize and require the use of standard guardrails, fences, barricades, or personal fall arrest systems (PFAS) to protect our employees and subcontractors from fall hazards.

9. Dangerous Equipment

   a. We are committed to protecting our employees from falling onto dangerous equipment. Because of the inherent danger an employee or subcontractor will be exposed to, we will utilize and require the use of covers, standard guardrails, safety nets, or personal fall arrest systems (PFAS) to protect our employees and subcontractors from these fall hazards.

10. Overhand Bricklaying and Related Work

   a. Each employee performing overhand bricklaying and related work 6 feet or more above lower levels must be protected from falls. Related work means mason tending as well as electrical work that must be incorporated into the brick wall during the bricklaying process.

   b. When a job requires overhand bricklaying and related work, our employees will be protected by the use of covers, standard guardrails, safety nets, controlled access zone, or personal fall arrest systems (PFAS).

   c. When workers must reach more than 10 inches below the level of their working surface, a controlled access zone may not be used as the fall protection measure.

   d. We realize that there cannot be any exposure to our workers to fall hazards such as holes, or hoist areas, within a controlled access zone. If there is, the workers must be protected by a fall protection means addressing the specific hazard.

11. Roofing Work on Low-Slope Roofs

   a. Each of our employees engaged in roofing activities on low-slope roofs (4 in 12 or less, vertical to horizontal pitch) with unprotected sides and edges six-feet or more above lower levels will be protected from falling by requiring the use of covers, standard guardrails, safety nets, safety monitoring systems, or personal fall arrest systems (PFAS).

   b. We follow the guidelines in Appendix A of Subpart M to determine how to correctly measure a roof that is not a rectangle.

12. Steep Roofs

   a. We will protect our workers on roofs with slopes greater than 4 in 12 vertical to horizontal pitch (steep roofs) from falling when the roof has unprotected sides or edges more than 6 feet above lower levels by the use of covers, standard guardrails, safety nets, or personal fall arrest systems (PFAS).

13. Precast Concrete Erection

   a. Our company may be involved with precast concrete erection work.

   b. We presume that it is feasible and will not create a greater hazard to implement at least one of the conventional fall protection systems for any precast concrete erection work. When our employees are erecting precast concrete members 6 feet or more above a lower level they must be protected from falling by the use of standard guardrail, or personal fall arrest systems (PFAS).

14. Wall Openings

   a. Employees who are exposed to the hazard of falling out or through wall openings (including those with chutes attached) where the outside bottom edge of the wall opening is 6 feet or more above lower levels and the inside bottom edge of the wall opening is less than 39 inches above the walking/working surface must be protected from falling.

   b. We protect our employees from falls out or through wall openings by the use of covers, standard guardrails, safety nets, or personal fall arrest systems (PFAS).

15. Walking/Working Surfaces Not Otherwise Addressed

    a. We realize there will be situations that are not covered by our written safety plan, for which we have the duty to provide fall protection. All employees exposed to falls of 6 feet or more to lower levels must be protected by a guardrail system, safety net system, or personal fall arrest system except where specified otherwise in Part 1926. In addition to these measures, Safety Monitoring systems and controlled access zones may be utilized as alternative protection in accordance with the requirements of 29 CFR 1926.502(g) & (h).

    b. When Safety Monitoring Systems are utilized, the Project Manager will serve as the safety monitor or he shall designate an individual adequately trained under this program to serve as the safety monitor. The safety monitor is designated the competent person and has the authority to take prompt corrective action should he/she identify or predict any fall hazards that our employees may be exposed to.

    c. Duties of the safety monitor shall be:

        i. To recognize fall hazards.

        ii. Warn employees if they are unaware of a fall hazard or acting in an unsafe manner.

        iii. Be on the same working surface and in visual sight of employees.

        iv. Stay within a distance that verbal communication can be heard and understood.

        v. Shall not assume any other duties or assignments which may interfere with performing the duties of the safety monitor.

D. Protection from Falling Objects

1. When employees are exposed to falling objects, we ensure they wear hard hats and also implement one of the following measures:

    a. Erect toeboards, screens, or guardrail systems to prevent objects from falling from higher levels.

    b. Erect a canopy structure and keep potential fall objects far enough from the edge of the higher level so that those objects would not go over the edge if they were accidentally moved.

    c. Barricade the area to which objects could fall, prohibit employees from entering the barricaded area, and keep objects that may fall far enough away from the edge of a higher level so that those objects would not go over the edge if they were accidentally moved.

    d. Cover or guard holes 6 feet or more above a lower level.

E. General Worksite

1. If any one of the conditions described in the Workplace Assessment is not met for the area or piece of equipment posing a potential fall hazard, then do not perform that work until the condition is met. If you cannot remedy the condition immediately, notify a supervisor of the problem and utilize a different piece of equipment or work in a different area, according to the situation.

2. If the situation calls for use of fall protection devices such as harnesses or lanyards and belts because the fall hazard cannot be reduced to a safe level, then the employee must don such protective equipment before beginning the work and use it as intended throughout the duration of the work.

3. Only employees trained in such work are expected to perform it.

4. All places of employment, job sites shall be kept clean and orderly and in a sanitary condition.
5. Prompt rescue of employees shall be provided in the event of a fall or assurance the employees are able to rescue themselves. Each job will be assessed based on its unique environment by a competent person.
6. All walking/working surfaces must be kept in a clean and, so far as possible, dry condition. Where wet processes are used, drainage shall be maintained and false floors, platforms, mats, or other dry standing places should be provided where practicable.

F. Training

1. Guidelines
    a. Under no circumstances shall employees work in areas where they might be exposed to fall hazards, do work requiring fall protection devices, or use fall protection devices until they have successfully completed our company's fall protection training program.
2. Program

    The training program includes classroom instruction and operational training on recognition and avoidance of unsafe conditions and the regulations applicable to their work environment for each specific fall hazard the employee may encounter. The training program is given by a "competent person" qualified in each aspect of the program, and must cover the following areas:

    a. The nature of fall hazards in the work area.
    b. Selection and use of personal fall arrest systems, including application limits, proper anchoring and tie-off techniques, estimation of free fall distance (including determination of deceleration distance and total fall distance to prevent striking a lower level), methods of use, and inspection and storage of the system.
    c. The correct procedures for erecting, maintaining, disassembling, and inspecting the fall protection systems to be used.
    d. The use and operation of guardrail systems, personal fall arrest systems, safety net systems, warning line systems, safety monitoring systems, controlled access zones, and other protection to be used.
    e. The role of each employee in the safety monitoring system when this is used.
    f. The limitations on the use of mechanical equipment during the performance of roofing work on low-sloped roofs.
    g. The correct procedures for the handling and storage of equipment and materials and the erection of overhead protection.
    h. The role of employees in fall protection plans.
    i. The standards contained in Subpart M of the construction regulations.
3. Project Manager Responsibilities
    a. The Project Manager will identify all current and new employees who require training and schedule the classroom instruction for those employees. Training on the above components will occur both in the classroom and on the job site, as appropriate. Classroom training will cover written policy/procedures on fall protection and include a training video on the subject. Job site instruction will include demonstration of and practice in wearing fall protection equipment and any instruction necessary for a specific job.
    b. The Project Manager has overall responsibility for the safety of employees and will verify compliance with 1926.503(a), training program, for each employee required to be trained.

c. The Project Manager has the responsibility of determining when an employee who has already been trained, does not have the understanding and skill required by the training program (1926.503(a)).

4. Training Certificate
    a. A written certificate of training is required which must include:
    b. The name or other identity of the employee trained.
    c. The date(s) of training.
    d. The signature of the competent person who conducted the training or the signature of the employer.
5. Retraining
    a. Required when an employee cannot demonstrate the ability to recognize the hazards of falling and the procedures to be followed to minimize fall hazards.
6. Enforcement
    a. Constant awareness of and respect for fall hazards, and compliance with all safety rules are considered conditions of employment. The Project Manager reserves the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this program.
7. Incident Investigation
    a. All accidents that result in injury to workers, regardless of their nature, are investigated and reported. It is an integral part of any safety program that documentation take place as soon as possible so that the cause and means of prevention can be identified to prevent a reoccurrence.
    b. In the event that an employee falls or there is some other related, serious incident (e.g., a near miss) occurs, this plan will be reviewed to determine if additional practices, procedures, or training need to be implemented to prevent similar types of falls or incidents from occurring.
8. Changes to Plan
    a. Any changes to the plan must be approved by the Project Manager. This plan is reviewed by a qualified person as the job progresses to determine if additional practices, procedures or training needs to be implemented by the competent person to improve or provide additional fall protection. Workers are notified and trained, if necessary, in the new procedures. A copy of this plan and all approved changes is maintained at the jobsite.

Special Emphasis – **Hand Tools (29 CFR 1926.301)**

A. Administration

The Project Manager is the program coordinator, acting as the representative of Kennedy Painting who has overall responsibility for the plan. Copies of this plan may be obtained from the written Kennedy Painting Safety and Health Program or from the corporate office.

B. Training

All employees are instructed in the recognition and avoidance of un-safe conditions through our on-going safety training programs and project inspection.

C. Housekeeping

Good housekeeping is possibly the most visible evidence of management and employee concern for safety and health that a company displays on a day-to-day basis. Orderliness in the workplace contributes to a safe working environment by minimizing obstacles and potential safety and health threats such as spills, trip hazards, etc.

1. The main purpose of the housekeeping written procedures is to set standard procedures for daily, weekly, monthly, and even annual clean-up procedures.
2. These procedures serve as the written procedures for basic/ general housekeeping at this company. All of these rules are to be housekeeping standards of practice in this facility or at construction sites, in order to help ensure a safe work environment at all times in all areas of the company.
    a. All places of employment, passageways, storerooms, and service rooms shall be kept clean and orderly and in a sanitary condition.
    b. Combustible scrap and debris and wastes shall be removed at regular and frequent intervals.
    c. Form and scrap lumber with protruding nails and all other debris shall be kept clear of work areas.
    d. These housekeeping procedures are to be performed to maintain the workplace in a clean and safe state.

D. Machine Safety/Equipment Usage

The regulations governing machine safety and equipment usage are found in OSHA's Subpart 0, Machinery and Machine Guarding, and Subpart P, Hand and Portable Powered Tools and Other Hand-Held Equipment. These regulations have general requirements for all machines and equipment and very specific requirements for particular machines and equipment. This plan deals with the general safety requirements to follow when working with machines and equipment.

1. Procedures
    a. Written machine safety and equipment usage procedures establish guidelines to be followed whenever any employee works with machines or equipment at your company. The rules established are to be followed to:
        i. Provide a safe working environment,
        ii. Govern operator use of machines and equipment, and
        iii. Ensure proper care and maintenance of machines and equipment.

b. Written machine safety and equipment usage procedures establish uniform requirements designed to ensure that machines and equipment safety training, operation, and maintenance practices are communicated to and understood by the affected employees. These requirements also are designed to ensure that procedures are in place to safeguard the health and safety of all employees.

2. Policy

   It is the policy of this company to permit only trained and authorized employees to operate machinery or equipment at any time. This policy is applicable to both daily operators of machinery and equipment and those who only occasionally have cause to use machinery or equipment.

3. Training

   The training this company provides regarding machine operation is specific to the equipment that may be encountered in the work environment and is in accordance with the manufacturer's instructions.

E. Lifting/Back Safety

Back safety awareness and safe lifting guidelines are necessary, due to the prevalence and severity of back injuries throughout business and industry. Backs can be injured by improper lifting, falling, stretching, overextending, and other workplace mishaps. Of these, lifting improperly is the largest single cause of back pain and injury. To reduce back injury incidence, the company has instituted these proper lifting techniques and other back safety measures.

1. Policy

   a. The written back safety plan is in place to create an awareness of the hazard among our workforce, standardize lifting techniques, and specify alternative materials-handling measures when lifting or moving materials by hand could pose an injury hazard.

   b. This company requires the procedures in this plan to be followed to provide a safe working environment. The company has implemented these procedures on safe lifting practices to ensure that employees are trained to protect themselves from the hazards of improper lifting practices. Specifically;

   c. Get help when lifting loads to heavy or bulky for one person

   d. When lifting:

      i. Place your feet close to the load ... 8-12 inches apart for good balance.

      ii. Bend knees to the degree comfortable and get a good hand hold.

      iii. Then, using both leg and back muscles, lift the load

      iv. Lift the load smoothly and evenly while pushing with your legs and keeping the load

      v. close to your body

   e. The effectiveness of the back safety plan depends upon the active support and involvement of all affected employees.

F. Marking and Labeling

Marking and labeling of equipment, chemicals, and areas of the plant is an important safety communication method. To make safe work practices and identification of hazards easier, we have instituted some standardized practices regarding marking and labeling in-plant. These marking and labeling guidelines are in place to protect employees.

There are several standardized systems of marking and labeling, all of which serve the purpose of making marking and labeling practices consistent throughout the facility. This company follows the standardized method of marking and labeling of our written Hazard Communication Program, to ensure consistency and maximum safety at all times.

G. Hand Tools & Equipment

1. Any tool or piece of equipment that is identified as unsafe will be tagged/locked to prevent use, will be rendered inoperable, or shall be physically removed from its place of operation.
2. All tools and equipment (both, company and employee-owned) used by employees in workplace will be in good condition.
3. Hand tools such as chisels, punches, etc., which develop mushroomed heads during use will be reconditioned or replaced as necessary.
4. Broken or fractured handles on hammers, axes and similar equipment shall be replaced immediately.
5. Worn or bent wrenches will be replaced.
6. Handles used on files and similar tools will be appropriate and in good condition.
7. Employees will be trained regarding the hazards caused by faulty or improper use of hand tools.
8. Safety glasses, face shields, etc., will be used while using hand tools or equipment that might produce flying materials or be subject to breakage.
9. Jacks will be checked periodically to assure they are in good operating condition.
10. Tool cutting edges will be kept sharp so the tool will move smoothly without binding or skipping.
11. Eye and face protection will be used when driving hardened or tempered nails.

H. Portable (Power Operated) Tools and Equipment

1. Any power operated tool or piece of equipment that is identified as unsafe will be tagged/locked to prevent use, will be rendered inoperable, or shall be physically removed from its place of operation.
2. Grinders, saws, and similar equipment will be provided with appropriate safety guards.
3. Power tools will be used with the correct shield, guard, or attachment, recommended by the manufacturer.
4. Portable circular saws will be equipped with guards above and below the base shoe.
5. Rotating or moving parts of equipment will be guarded to prevent physical contact.
6. Cord-connected, electronically operated tools and equipment will be effectively grounded or of the approved double insulated type.
7. Effective guards shall be in place over belts, pulleys, chains, sprockets, on equipment such as concrete mixers, air compressors, etc.
8. Portable fans will be provided with full guards or screens having openings % inch or less.
9. Ground-fault circuit interrupters shall be provided on all temporary electrical 15 and 20- ampere circuits, used during periods of construction.
10. Pneumatic and hydraulic hoses on power-operated tools will be checked regularly for deterioration or damage.
11. Power cords will not be used to lie or lower portable electric tools.

12. All electrical cords will be kept clear from where vehicles might drive over them.
13. Table saws will be equipped with hood guards over the blade above the table, which will automatically adjust to the thickness and remain in contact with the material being cut.

I. Abrasive Wheel Equipment – Grinders

1. Any grinder that is identified as unsafe will be tagged/locked to prevent use, will be rendered inoperable, or shall be physically removed from its place of operation.
2. The work rest used will be kept adjusted to within 1/8 inch of the wheel.
3. The adjustable tongue on the topside of the grinder will be used and kept adjusted to within ¼ inch of the wheel.
4. Side guards will cover the spindle, nut and flange and 75 percent of the wheel diameter.
5. Bench and pedestal grinders will be permanently mounted.
6. Goggles or face shields will always be worn when grinding.
7. The maximum RPM rating of each abrasive wheel will be compatible with the RPM rating of the grinder motor.
8. Fixed or permanently mounted grinders will be connected to their electrical supply system with metallic conduit or other permanent wiring method.
9. Each grinder will have an individual on and off control switch.
10. Each electrically operated grinder will be effectively grounded.
11. When abrasive wheels are mounted, they will be visually inspected and ring tested.
12. Dust collectors and powered exhausts will be provided on grinders used in operations that produce large amounts of dust.
13. Splashguards will be mounted on grinders that use coolant to prevent the coolant from reaching employees.

J. Powder-Actuated Tools

1. Any powder-actuated tool that is identified as unsafe will be tagged/locked to prevent use, will be rendered inoperable, or shall be physically removed from its place of operation.
2. Employees who operate powder-actuated tools will be trained in their use and carry a valid operator’s card.
3. Each powder-actuated tool will be stored in its own locked container when not being used.
4. Signs at least 7 inches by 10 inches with bold face type reading "POWDER-ACTUATED TOOL IN USE" will be conspicuously posted when the tool is being used.
5. Powder-actuated tools will be left unloaded until they are actually ready to be used.
6. Powder-actuated tools will be inspected for obstructions or defects each day before use.
7. Powder-actuated tools operators have and will use appropriate personal protective equipment such as hard hats, safety goggles, safety shoes and ear protectors.

Special Emphasis – **Hazard Communications & Identification (29 CFR 1926.59)**

A. Purpose:

To ensure that information about the dangers of all hazardous materials used on the job site are known to Kennedy Painting and all affected employees. A secondary purpose is to comply with the requirements of the OSHA Hazard Communication Standard and corresponding state laws.

B. Scope:

This policy covers container labeling, safety data sheets, employee training and information, hazardous non-routine tasks, subcontractors, list of hazardous chemicals, chemicals in unlabeled pipes and safety procedures.

C. Policy:

1. Container Labeling

a. The Subcontractors will verify that all containers received for use will be clearly labeled by the manufacturer with the following:

- Name, address and telephone number of the manufacturer
- Product identifier
- Signal word
- Hazard statement(s)
- Precautionary Statement(s)
- Pictograms.

b. Existing labels will not be removed or defaced on incoming containers unless containers are to be immediately marked with required information.

c. All materials on site are to be stored in their original container with the label attached.

d. Any material with a label missing or illegible should be reported to the supervisor immediately for proper labeling.

e. All labels must include pictograms included in the Global Harmonization system. The pictograms found on all labeling must be according to the following list:

	**Exploding bomb** (for explosion or reactivity hazards)		**Flame** (for fire hazards)		**Flame over circle** (for oxidizing hazards)
	**Gas cylinder** (for gases under pressure)		**Corrosion** (for corrosive damage to metals, as well as skin, eyes)		**Skull and Crossbones** (can cause death or toxicity with short exposure to small amounts)
	**Health hazard** (may cause or suspected of causing serious health effects)		**Exclamation mark** (may cause less serious health effects or damage the ozone layer*)		**Environment*** (may cause damage to the aquatic environment)
	**Biohazardous Infectious Materials** (for organisms or toxins that can cause diseases in people or animals)				

* The GHS system also defines an Environmental hazards group. This group (and its classes) was not adopted in WHMIS 2015. However, you may see the environmental classes listed on labels and Safety Data Sheets (SDSs). Including information about environmental hazards is allowed by WHMIS 2015.

2. Safety Data Sheets (SDS)

   a. Any product having a hazardous warning on its label requires a SDS.

   b. The manufacturer, distributor, or vendor shall provide the SDS for the hazardous product.

   c. All SDS's shall be forwarded to the Project Manager and reviewed by the Job Superintendent and Subcontractor's employees using the product to determine safe work practices and personal protection, as needed. The SDS's will be maintained and keep at the Job Superintendent Office/Trailer

   d. The SDS must provide the 16 sections listed:

- Identification
- Hazard(s) identification
- Composition/information on ingredients
- First-aid measures
- Fire-fighting measures
- Accidental release measures
- Handling and storage
- Exposure control/personal protection
- Physical and chemical properties
- Stability and reactivity
- Toxicology information
- Ecological information
- Disposal Consideration
- Transport information
- Regulatory information
- Other information.

3. Employee Training and Information

   The Subcontractors will provide training to employees when hired and routinely thereafter on the hazardous nature of chemical products. Training will include:

   a. The Hazard Communication Policy

   b. Chemicals present in their workplace operations

   c. Physical and health effects of the hazardous chemicals

   d. Appropriate work practices and controls when using chemicals.

   e. Emergency and first-aid procedures

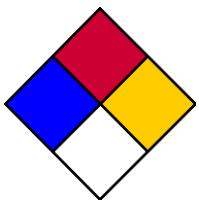
   f. How to read labels and review an SDS to obtain appropriate hazard information

   g. Location of the SDS file and written hazard communications program

D. Hazardous Material Identification System

The meaning of the numbers in each color field are outlined below

1. **FLAMMABILITY HAZARD (RED)**



4 Materials that rapidly or completely vaporize at atmospheric pressure and normal ambient temperatures and burn rapidly or are readily dispersed in the air and burn readily. (Below 73°F)

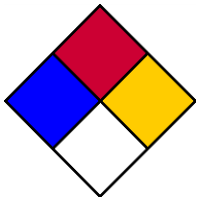
3 Liquids and solids that can be ignited under almost all ambient temperature conditions. (Below 100°F)

2 Materials that must be moderately heated or exposed to relatively high ambient temperatures before ignition can occur. (Below 200°F)

1 Materials that must be preheated before ignition occurs (Above 200°F)

0 Materials that will not burn

2. **HEALTH HAZARD (BLUE)**



4 Materials that on very short exposure could cause death or major residual injury even though prompt medical treatment was given. (Deadly)

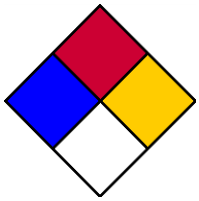
3 Materials that on very short exposure could cause serious temporary or residual injury even though prompt medical treatment was given. (Extreme Danger)

2 Materials that on intense or continued exposure could cause temporary incapacitation or possible residual injury unless prompt medical treatment was given. (Hazardous)

1 Materials that on exposure would cause irritation but only minor injury even if no hazard beyond that of ordinary combustible material. (Slightly Hazardous)

0 Materials that on exposure under fire conditions would offer no hazard beyond that ordinary combustible material. (Normal Material)

3. **REACTIVITY HAZARD (YELLOW)**



4 Materials that in themselves are readily capable of detonation or of explosive decomposition or reaction at normal temperatures and pressures. (May Detonate)

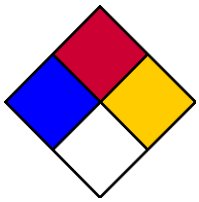
3 Materials that in themselves are capable of detonation or explosive reaction but require a strong initiating source, or must be heated under confinement before initiation, react explosively with water. (Shock & Heat May Detonate)

2 Materials that in themselves are normally unstable and readily undergo violent chemical change but do not detonate, or may react violently with water, or may form potentially explosive mixtures with water. (Violent Chemical Change)

1 Materials that in themselves are normally stable but which can become unstable at elevated temperatures or react with water with some release of energy but not violently. (Unstable if Heated)

0 Materials that in themselves are normally stable; even when exposed to fire, and do not react with water. (Stable)

4. **SPECIAL INFORMATION (WHITE)**



The white block is designated for special information about the chemical. For example, it may indicate that the material is radioactive by displaying the standard radioactive symbol, or unusually water-reactive by displaying a large W with a line through it (W̶). Typical symbols include:

W̶	Water Reactive
OXY	Oxidizer or Oxidizing Properties
TOX	Toxic
COR	Corrosive
IGN	Ignitable
	Radioactive
EXP	Explosive

Special Emphasis – **Heat & Cold Stress**

A. Introduction

Working in extreme temperatures (hot or cold) can overwhelm the body's internal temperature control system. When the body is unable to warm or cool itself, heat or cold related stress can result. Heat and cold stress can contribute to adverse health effects which range in severity from discomfort to death.

Kennedy Painting has developed this Heat and Cold Stress Program to minimize the effects of heat and cold stress for our employees. This program contains the procedures and practices for safely working in temperature extremes.

The Occupational Safety and Health Administration (OSHA) does not currently have specific standards for heat or cold stress. However, the Occupational Safety and Health Act of 1970 General Duty Clause (Section 5(a)(1)) states that "Each employer shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees." In addition, 29 CFR Subpart I relating to personal protective equipment requires employers to provide protection to employees exposed to hazards in the workplace. The OSHA website contains Fact Sheets and Guidance Documents that relate to heat and cold stress that have been incorporated into this program.

B. Assignment of Responsibilities

1. Management Responsibilities
    a. Maintain, review and update the Heat and Cold Stress Program as needed.
    b. Provide monitoring (upon request) and assist employees with the development of procedures to minimize the adverse effects of heat and cold stress in the workplace.
    c. Provide training to employees affected by heat and cold.
    d. Train employees to administer proper first aid on heat- and cold-induced injuries or illnesses.
    e. Ensure all employees are trained in the employer's heat and cold injury or illness, emergency response procedures.
2. Supervisor Responsibilities
    a. Review and comply with the provisions outlined in this program.
    b. Ensure all employees are properly trained before working in extreme temperature conditions.
    c. Assess the day-to-day heat or cold stresses on employees.
    d. Assess employees work load and assigning work and rest schedules as needed.
    e. Take personal factors into consideration before assigning a task where there is a possibility of a heat related illness occurring.
    f. Ensure all employees have the appropriate personal protective equipment (PPE) prior to working in extreme temperature conditions.
    g. Ensure employees are familiar with the company's safety program.
3. Employee Responsibilities
    a. Review and comply with the provisions outlined in this program.
    b. Complete training before working in extreme temperature conditions and be familiar with the signs and symptoms of heat and cold weather hazards.

c. Wear the appropriate PPE.

d. Report heat and cold stress concerns to their supervisor.

C. Heat Related Illnesses: Signs, Prevention & Treatment

While working in hot weather conditions, the human body may not be able to maintain a normal temperature just by sweating. If this happens, heat-related illnesses may occur. The physical factors which contribute to this condition should be considered prior to performing any tasks in hot weather.

1. Common Health Problems - Heat

   a. Heat stroke – This is the most serious heat related effect. Heat stroke occurs when the body temperature increases above 104 - 106 F. Signs and symptoms of heat stroke are confusion, loss of consciousness and lack of perspiration. This condition must be treated as a medical emergency and the employee must receive immediate medical attention.

   b. Heat exhaustion – Signs and symptoms of heat exhaustion include headache, nausea, dizziness, weakness, irritability, confusion, thirst, heavy perspiration and a body temperature 104 or greater. Employees experiencing heat exhaustion should be moved to a cool area, given fluids to drink and given cold compresses for their head, face and neck. Employees should also be taken to a clinic or emergency room to be monitored by medical personnel.

   c. Heat cramps – Signs and symptoms of heat cramps include muscle pains usually caused by the loss of body salts/fluids. Employees should replace fluid loss by drinking water and/or carbohydrate-electrolyte replacement liquids (e.g. Gatorade) every 15 to 20 minutes.

   d. Heat rash – Heat rash is caused by excessive perspiration and looks like a red cluster of pimples or small blisters. Heat rash usually appears on the neck, upper chest, in the groin, under the breasts and in elbow creases. Treatment for heat rash is to provide a cooler, less humid environment.

   e. Dehydration – Dehydration is a major factor in most heat disorders. Signs and symptoms of dehydration include increasing thirst, dry mouth, weakness or light-headedness (particularly if worse upon standing), and a darkening of the urine or a decrease in urination. Dehydration can be reversed or put back in balance by drinking fluids that contain electrolytes (i.e. Gatorade) that are lost during work related activities. Avoid caffeinated drinks.

2. Prevention methods - Heat

   a. Acclimation – Acclimation is a process by which the physical processes of an employee's body adjusts to the environment over a period of time. Based on data obtained from OSHA, this process usually takes five to seven days. This process could take up to three weeks depending on the individual and their work environment. According to the American Industrial Hygiene Association, the process requires a consistent work level for at least two hours each day during the acclimation period in order for an employee to become acclimatized. Mere exposure to heat does not confer acclimatization, nor does acclimatization at one heat stress level confer resistance to heat stress at a higher temperature or more vigorous workload.

      Employees who are not adequately acclimatized to the heat may experience temporary heat fatigue resulting in a decline in performance, coordination or alertness. They may also become irritable or depressed. This can be prevented through gradual adjustment to the hot environment. People in good physical condition tend to acclimatize better because their cardiovascular systems respond better.

b. Engineering Controls – For employees working indoors, the best way to prevent heat-related illness is to make the work environment cooler. Where and if possible, use air conditioning to cool the work area. Alternatively, increase the general ventilation as much as possible by opening windows or doors. When available, use cooling fans to aid in increasing ventilation.

c. Safe Work Practices – For employees working outdoors or working indoors without air conditioning or ventilation, take scheduled breaks in cool areas. Ensure there is plenty of cool, potable drinking water and take water breaks as needed. Employees shall always be provided with access to shaded area. Immediately report any problems to a supervisor. Supervisors should consider scheduling the hottest work for the coolest part of day, assigning extra employees to high demand tasks, and using work-saving devices (e.g. power tools, hoists or lifting aids) to reduce the body's work load. All employees should watch out for the safety of their coworkers.

d. Heat Index – The Heat Index is a single numeric value that uses both temperature and humidity to inform the public on how the weather outdoors "feels". The higher the Heat Index, the hotter the weather feels. OSHA has used the Heat Index to assign protective measures for workers as the Heat Index increases. These protective measures may reduce the likelihood of heat related illnesses.

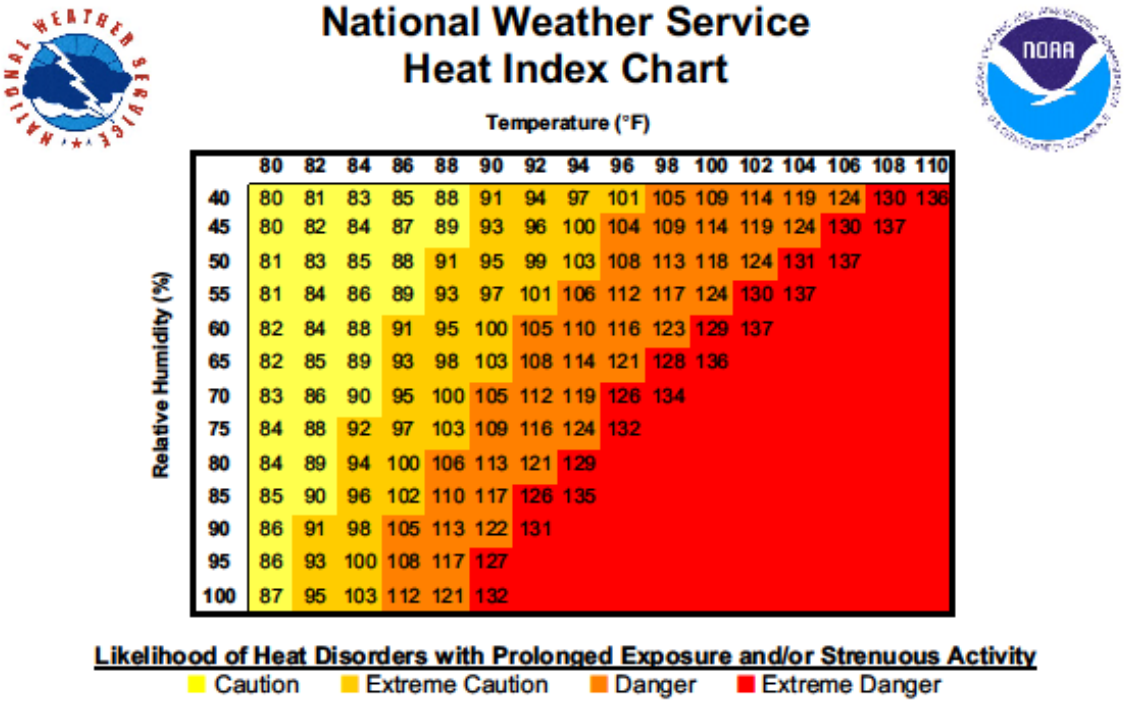
   i. Heat Index

   ii. The heat index is a simple tool and a useful guide for employers/employees making decisions about protecting employees in hot weather. It does not account for certain conditions that contribute additional risk, such as physical exertion. Consider taking the steps at the next highest risk level to protect employees from the added risks posed by:

      (1.) Working in the direct sun (can add up to 15°F to the heat index value)

      (2.) Wearing heavy clothing or protective gear

   iii. Under most circumstances, fluid intake should not exceed 6 cups per hour or 12 quarts per day. This makes it particularly important to reduce work rates, reschedule work, or enforce work/rest schedules.



3. Wet Bulb Globe Temperature (WBGT) Monitoring.
    a. Upon request, the company can provide WBGT monitoring using a Heat Stress Monitor. With this instrument, supervisors and employees will have the following information:
        i. Natural Wet Bulb Thermometer – Gives an indication of the effects of humidity on an individual.
        ii. Globe Thermometer – Gives an indication of the radiant heat exposure on an individual due to either direct light or hot objects in the environment.
        iii. Dry Bulb Thermometer – A measurement of the ambient air temperature.
        iv. Relative Humidity – A measurement of water vapor in the air.
4. After collecting the aforementioned information, the results can be compared and published with charts that show the allowable work-rest regimens for given workloads.

D. Cold Related Illnesses: Signs, Prevention & Treatment

During cold weather, an employee's body will use energy to maintain a normal internal body temperature. This will result in a shift of blood flow from employee's extremities (hands, feet and legs) and outer skin to the employee's core (chest and abdomen). If this happens, cold-related illnesses and injuries may occur if exposed to cold conditions for an extended period of time.

1. Common health problems - Cold
    a. Hypothermia – Hypothermia is a potentially serious health condition. Hypothermia occurs when body heat is lost faster than it can be replaced. When the core body temperature drops to approximately 95°F, the onset of symptoms normally begins. The employee may begin to shiver, lose coordination, have slurred speech, and fumble with items in the hand. The employee's skin will likely be pale and cold. As the body temperature continues to fall these symptoms will worsen and shivering will stop. Once the body temperature falls to around 85°F severe hypothermia will develop and the person may become unconscious, and at 78°F, vital organs may begin to fail. Treatment depends on the severity of the hypothermia. For cases of mild hypothermia move to warm area and stay active. Remove wet clothes and replace with dry clothes or blankets, cover the head. To promote metabolism and assist in raising internal core temperature drink a warm (not hot) sugary drink. Avoid drinks with caffeine. For more severe cases do all the above, plus contact emergency medical personnel (Call 911 for an ambulance), cover all extremities completely, place very warm objects, such as hot packs or water bottles on the victim's head, neck, chest and groin. Arms and legs should be warmed last. In cases of severe hypothermia, treat the employee very gently and do not apply external heat to re-warm. Hospital treatment is required.
    b. Frostbite – Frostbite occurs when the skin actually freezes and loses water. In severe cases, amputation of the frostbitten area may be required. While frostbite usually occurs when the temperatures are 30° F or lower, wind chill factors can allow frostbite to occur in above freezing temperatures. Frostbite typically affects the extremities, particularly the feet and hands. The affected body part will be cold, tingling, stinging or aching followed by numbness. Skin color turns red, then purple, then white, and is cold to the touch. There may be blisters in severe cases. Do not rub the area to warm it. Wrap the area in a soft cloth, move the employee to a warm area, and contact medical personnel. Do not leave the employee alone. If help is delayed, immerse in warm (maximum 105 °F), not hot, water. Do not pour water directly on affected part. If there is a chance that the affected part will get cold again do not warm. Repeated heating and cooling of the skin may cause severe tissue damage.
    c. Trench Foot – Trench Foot is caused by having feet exposed to damp, unsanitary and cold conditions including water at temperatures above freezing for long periods of time. It

is similar to frostbite, but considered less severe. Symptoms usually consist of tingling, itching or burning sensation. Blisters may be present. For treatment, soak feet in warm water, then wrap with dry cloth bandages. Drink a warm, sugary drink. Seek medical attention if necessary.

d. Dehydration – It is easy to become dehydrated during cold weather. Signs of dehydration include increasing thirst, dry mouth, weakness or light-headedness (particularly if worse upon standing), and a darkening of the urine or a decrease in urination. Dehydration can be reversed or put back in balance by drinking fluids that contain electrolytes (i.e. Gatorade) that are lost during work related activities. Avoid caffeinated drinks

2. Prevention method - Cold

a. Acclimation – Employees exposed to the cold should be physically fit, without any circulatory, metabolic, or neurologic diseases that may place them at increased risk for hypothermia. A new employee should not be required to work in the cold full time during the first days of employment until they become adjusted to the working conditions and required protective clothing. New employees should be introduced to the work schedule slowly and be trained accordingly.

b. Engineering Controls – For employees working indoors, the best way to prevent cold-related illness is to make the work environment warmer. Where and if possible, use heaters to warm the work area. Alternatively, decrease the general ventilation as much as possible by closing windows or doors.

c. Safe Work Practices – For employees working outdoors or working indoors without heat, take scheduled breaks in warm areas. If available, use wind barricades to block the wind from the employees. Ensure there is plenty of water to drink and take water breaks as needed. Immediately report any problems to a supervisor. Supervisors should consider scheduling the most work for the warmest part of day, assigning extra employees to high demand tasks that will require longer periods in cold areas. All employees should watch out for the safety of their coworkers. All employees will be informed of dangers associated with working around unstable snow and ice build-ups. All regularly used walkways and travelways shall be sanded, salted, or cleared of snow and ice as soon as practicable.

d. Personal Protective Equipment (PPE) – PPE is an important factor in preventing cold stress related illnesses and injuries. Cold weather supplies will be regularly inspected and restocked when necessary. Employees should adhere to the following recommendations when dressing for work in a cold environment:

i. Wear at least three layers of clothing; an inner layer of wool, silk or synthetic to wick moisture away from the body; a middle layer of wool or synthetic to provide insulation even when wet; an outer wind and rain protection layer that allows some ventilation to prevent overheating.

ii. Wear a hat or hood; up to 40% of body heat can be lost when the head is left exposed.

iii. Wear insulated boots or other footwear.

iv. Do not wear tight clothing; loose clothing provides better ventilation.

v. Keep a change of clothing available in case work clothes become wet.

e. All employees should be under constant protective observation by a co-worker or supervisor for cold weather symptoms.

E. Training

1. Supervisors shall be trained in prevention measures for heat and cold related illnesses and well as emergency response procedures.
2. All employees shall receive initial and annual training regarding the health effects of Heat and/or Cold Stress prior to working in such conditions.
3. All workers shall be trained to administer proper first aid treatment on cold induced injuries or illnesses.
4. The company can provide heat or cold stress training upon request.

F. Recordkeeping

1. All training records should be maintained in the employees personnel file and maintained by the supervisor. Training records are maintained in the office for training programs.

Special Emphasis – **Ladders & Stairways (29 CFR 1926.1050)**

A. Purpose

This written Stairway and Ladder Safety Plan describes methods and practices for care and use of stairways and ladders that can be read and understood by all managers, supervisors, and employees at Kennedy Painting. This written plan is intended to be used to:

1. Create awareness of the hazards among our workforce,
2. Standardize procedures for use and care of the equipment,
3. Provide a consistent format for training employees on the proper procedures to be used,
4. Minimize the possibility of injury or harm to our employees, and
5. Demonstrate Kennedy Painting's compliance with stairway and ladder requirements in Subpart D of 29 CFR 1910.

The procedures establish guidelines to be followed whenever an employee works with ladders or stairways at our company.

B. Administrative Duties

1. The Project Manager is responsible for developing and maintaining this written Stairway and Ladder Safety Plan. This person is solely responsible for all facets of the plan and has full authority to make necessary decisions to ensure the success of this plan. Appropriate training and experience that is commensurate with the complexity of the plan, to administer or oversee our stairway and ladder safety program and conduct the required evaluations, also qualify the Project Manager.
2. This written Stairway and Ladder Safety Plan is kept in our written Safety and Health manual and at our corporate offices.
3. If, after reading this plan, you find that improvements can be made, please contact the Project Manager. We encourage all suggestions because we are committed to creating a safe workplace for all our employees and a safe and effective stairway and ladder safety program is an important component of our overall safety plan. We strive for clear understanding, safe work practices, and involvement in the program from every level of the company.

C. Fixed Industrial Stairs

Fixed industrial stairs are provided in our facility or on job sits in the following circumstances:

1. For access from one structure level to another where operations necessitate regular travel between levels,
2. For access to operating platforms at any equipment which requires attention routinely during operations, and
3. Where access to elevations is daily or at each shift for such purposes as gauging, inspection, regular maintenance, etc., where such work may expose employees to acids, caustics, gases, or other harmful substances, or for which purposes the carrying of tools or equipment by hand is normally required.
4. All fixed industrial stairs are provided according to OSHA specifications for stair strength, stair width, angle of stairway rise, stair treads, stairway platforms, railings and handrails, and vertical clearance.

D. Portable Ladders

1. All portable ladders, including job built ladders, provided by the company under normal conditions of usage.
    a. When positioned for use, all ladder rungs, cleats, and steps shall be parallel to the ground and uniformly spaced.
    b. Ladders shall not be loaded beyond the maximum intended load for which they were built, nor beyond the manufacturer's capacity.
2. For portable wood ladders, all wood parts should be visually inspected before use and be:
    a. Free from sharp edges and splinters.
    b. Sound and free from shake, wane, compression failures, decay, or other irregularities.
3. Portable metal ladders chose for use by the company are:
    a. Designed without structural defects or accident hazards such as sharp edges, burrs, etc;
    b. Of sufficient strength to meet the test requirements; and
    c. Protected against corrosion unless inherently corrosion-resistant.

E. Work Practices

1. When ascending or descending, the climber must face the ladder.
2. Ladders are only used for the purpose they were intended and designed for.
3. Portable ladders are designed as a one-man working ladder based on a 200 pound load and will be used accordingly. Ladders shall not be loaded beyond the manufacturer's maximum intended load.
4. Portable rung and cleat ladders will be used at such a pitch that the horizontal distance from the top support to the foot of the ladder is one-quarter of the working length of the ladder (the length along the ladder between the foot and the top support – 4:1 ratio).
5. The ladder will be so placed as to prevent slipping, or it will be lashed, or held in position. The ladder base section must be placed on a stable level surface with a secure footing.
6. Employees must not carry anything in hands that could cause injury in fall.
7. Employees will only use portable rung ladders with non-slip bases when there is a hazard of slipping. However, nonslip bases are not intended as a substitute for care in safely placing, lashing, or holding a ladder that is being used on oily, metal, concrete, or slippery surfaces.
8. The top of the ladder must extend 3 feet above the upper landing and placed with the two rails supported, unless equipped with single support attachment.
9. On two-section extension ladders, the minimum overlap for the two sections in use will be according to OSHA specifications.
10. Portable rung ladders with reinforced rails will be used only with the metal reinforcement on the underside.
11. The bracing on the back legs of stepladders is designed solely for increasing stability and not for climbing.
12. Ladders will not be:
    a. Used in a horizontal position as platforms, runways, or scaffolds.
    b. Placed in front of doors opening toward the ladder unless the door is blocked open, locked, or guarded.

c. Placed on boxes, barrels, or other unstable bases to obtain additional height.

d. Tied or fastened together to provide longer sections. They must be equipped with the hardware fittings necessary if the manufacturer endorses extended uses.

e. Use to gain access to a roof unless the top of the ladder extends at least 3 feet above the point of support, at eave, gutter, or roofline.

f. Used as a brace, skid, guy or gin pole, gangway, or for other uses than that for which they were intended, unless specifically recommended for use by the manufacturer.

13. More than one employee should not use ladders at a time for which dimensions are specified or with ladder jacks and scaffold planks where use by more than one employee is anticipated.
14. Ladders with broken or missing steps, rungs, or cleats, broken side rails, or other faulty equipment must not be used. Employees finding ladders with any of these conditions must report them to the Project Manager. Improvised repairs may not be made.
15. Ladders made by fastening cleats across a single rail will not be used.
16. Tops of the ordinary types of stepladders will not be used as steps.
17. Middle and top sections of sectional or window cleaner's ladders will not be used for bottom section unless the user equips them with safety shoes.

F. Inspections and Maintenance

1. Ladders will be inspected regularly and frequently to insure safety and serviceability.
2. Ladders will be maintained in good usable condition at all times.
3. The joint between the steps and side rails is kept tight, all hardware and fitting are securely attached, and the movable parts operate freely without binding or undue play.
4. Metal bearings of lock, wheels, pulleys, etc. will be frequently lubricated.
5. Frayed or badly worn rope will be replaced.
6. Safety feet and other auxiliary equipment will be kept in good condition to insure proper performance.
7. Ladders with defects will be withdrawn from service for repair or destruction and tagged or marked as Dangerous, Do Not Use.
8. If ladders tip over, our employee will:
   a. Inspect the ladder for side rail dents or bends, or excessively dented rungs;
   b. Check all rung-to-side-rail connections;
   c. Check hardware connections; and
   d. Check rivets for shear.
9. If ladders are exposed to oil and grease, equipment will be cleaned and kept free of oil, grease, or slippery materials.

G. Fixed Ladders

1. Fixed ladders are provided according to OSHA specifications for design, clearance, and pitch.
2. All fixed ladders are maintained in a safe condition.
3. Fixed ladders are inspected regularly and frequently to insure safety and serviceability.

H. Recordkeeping

1. The Project Manager is responsible for maintaining records of ladder inspections.
2. These records are kept at the corporate office.

I. Training

For all employees who work on ladders and stairways, training is provided to enable each employee to recognize hazards associated with ladders and stairways and to use proper procedures to minimize the hazards.

J. Disciplinary Procedures

Constant awareness of and respect for stairway and ladder safety procedures and compliance with all safety rules are considered conditions of employment. Supervisors and individuals in the Safety and Personnel Department reserve the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this stairway and ladder safety program.

K. Program Evaluation

Although we may not be able to eliminate all problems, we try to eliminate as many as possible to improve employee protection and encourage employee safety practices. Therefore, the Project Manager is responsible for evaluating and updating this written plan as necessary.

1. The evaluation will include a review of reported accidents, as well as near misses, to identify areas where additional safety measures need to be taken. A periodic review to determine the effectiveness of the program will also take place. This may include:
    a. A walk-through of the facility, and
    b. Interviews with employees to determine whether they are familiar with the requirements of this program and if safety measures are being practiced.

Special Emphasis – **Personal Protective Equipment (PPE) (29 CFR 1926.28)**

A. Introduction

This written program documents steps Kennedy Painting has taken to minimize injury resulting from various occupational hazards present at our construction sites by protecting workers through the use of PPE when the hazards cannot be eliminated.

The Project Manager is the program coordinator, acting as the representative of Kennedy Painting, who has overall responsibility for the program and will monitor employee use of PPE. This written plan is kept in our written safety and Health Manual and at the corporate office. Project Manager will review and update the program as necessary. Copies of this program may be obtained from the Project Manager.

We at Kennedy Painting believe it is our obligation to provide a hazard free environment to our employees. Any employee encountering hazardous conditions must be protected against the potential hazards. The purpose of protective clothing and equipment (PPE) is to shield or isolate individuals from chemical, physical, biological, or other hazards that may be present in the workplace.

Establishing an overall written PPE program detailing how employees use PPE makes it easier to ensure that they use PPE properly in the workplace and document our PPE efforts in the event of an OSHA inspection.

If after reading this program, you find that improvements can be made, please contact the Project Manager. We encourage all suggestions because we are committed to the success of our Personal Protective Equipment Program. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

B. Purpose

The basic element of any PPE program is an in depth evaluation of the equipment needed to protect against the hazards at the workplace; this is the initial hazard assessment for which written documentation is required. Two basic objectives of any PPE program should be to protect the wearer from incorrect use and/or malfunction of PPE. The purpose of this Personal Protective Equipment (PPE) Program is to document the hazard assessment, protective measures in place, and PPE in use at this company. PPE devices are not to be relied on as the only means to provide protection against hazards, but are used in conjunction with guards, engineering controls, and sound manufacturing practices. If possible, hazards will be abated first through engineering controls, with PPE to provide protection against hazards which cannot reasonably be abated otherwise.

C. Hazard Assessment

In order to assess the need for PPE the following steps are taken:

1. Project Manager, with other appropriate employees identifies job classifications where exposures occur or could occur. The Project Manager or designee examines the following records to identify and rank jobs according to exposure hazards:
    a. Injury/illness records
    b. First aid logs
2. The Project Manager conducts a walk through survey of workplace areas where hazards exist or may exist to identify sources of hazards to employees. They consider these basic hazard categories:

- Impact
- Heat
- Penetration
- Harmful dust
- Compression (roll over)
- Light (optical) radiation
- Chemical

a. During the walk through survey the Project Manager observes and records the following hazards along with PPE currently in use.
    i. Sources of motion; i.e., machinery or processes where any movement of tools, machine elements or particles could exist, or movement of personnel that could result in collision with stationary objects.
    ii. Sources of high temperatures that could result in burns, eye injury or ignition of protective equipment, etc.
    iii. Chemical exposures
    iv. Sources of harmful dust.
    v. Sources of light radiation, i.e., welding, brazing, cutting, furnaces, heat treating, high intensity lights, etc.
    vi. Sources of falling objects or potential for dropping objects.
    vii. Sources of sharp objects which might pierce the feet or cut the hands.
    viii. Sources of rolling or pinching objects which could crush the feet.
    ix. Layout of workplace and location of co workers.
    x. Electrical hazards.

b. Following the walk through survey, the Project Manager organizes the data and information for use in the assessment of hazards to analyze the hazards and enable proper selection of protective equipment.

c. An estimate of the potential for injuries is now made. Each of the basic hazards is reviewed and a determination made as to the frequency, type, level of risk, and seriousness of potential injury from each of the hazards found. The existence of any situations where multiple exposures occur or could occur are considered.

d. The Project Manager documents the hazard assessment via a written certification that identifies the workplace evaluated, the person certifying that the evaluation has been performed, the date(s) of the hazard assessment, and that the document is a certification of hazard assessment.

D. Selection Guidelines

Once any hazards have been identified and evaluated through hazard assessment, the general procedure for selecting protective equipment is to:

1. Become familiar with the potential hazards and the type of protective equipment (PPE) that are available, and what they can do.
2. Compare types of equipment to the hazards associated with the environment.
3. Select the PPE which ensures a level of protection greater than the minimum required to protect employees from the hazards.
4. Fit the user with proper, comfortable, well fitting protection and instruct employees on care and use of the PPE. It is very important that the users are aware of all warning labels for and

limitations of their PPE. (See the Employee Training guidelines outlined in the next section of this program for a more detailed description of training procedures.)

5. It is the responsibility of the Project Manager to reassess the workplace hazard situation as necessary, to identify and evaluate new equipment and processes, to review accident records, and reevaluate the suitability of previously selected PPE. This reassessment will take place as needed.
    a. Elements which should be considered in the reassessment include:
    b. Adequacy of PPE program
    c. Accidents and illness experience
    d. Levels of exposure (this implies appropriate exposure monitoring)
    e. Adequacy of equipment selection
    f. Number of person hours that workers wear various protective ensembles
    g. Adequacy of training/fitting of PPE
    h. Program costs
    i. The adequacy of program records
    j. Recommendation for program improvement and modification
    k. Coordination with overall safety and health program

E. Employee Training

The Project Manager or designee provides training for each employee who is required to use personal protective equipment.

1. Training includes:
    a. When PPE is necessary
    b. What PPE is necessary
    c. How to wear assigned PPE
    d. Limitations of PPE
    e. The proper care, maintenance, useful life, and disposal of assigned PPE
2. Employees must demonstrate an understanding of the training and the ability to use the PPE properly before they are allowed to perform work requiring the use of the equipment.
3. Employees are prohibited from performing work without donning appropriate PPE to protect them from the hazards they will encounter in the course of that work.
4. If the Project Manager has reason to believe an employee does not have the understanding or skill required, the employer must retrain. Since an employee's supervisor is in the best position to observe any problems with PPE use by individual employees, the Project Manager will seek this person's input when making this determination. Circumstances where retraining may be required include changes in the workplace or changes in the types of PPE to be used which would render previous training obsolete. Also, inadequacies in an affected employee's knowledge or use of the assigned PPE which indicates that the employee has not retained the necessary understanding or skills require retraining.
5. The Project Manager certifies in writing that the employee has received and understands the PPE training.

6. Because failure to comply with company policy concerning PPE can result in OSHA citations and fines as well as employee injury, an employee who does not comply with this program will be disciplined for noncompliance according to the following schedule:
    a. Verbal warning for the first offense accompanied by retraining
    b. Written reprimand for the second offense which goes in the employee's permanent record
    c. Suspension without pay for a third offense and documentation in the permanent record
    d. Dismissal as a last resort.

F. Cleaning and Maintenance

It is important that all PPE provided be kept clean, properly used and maintained in a sanitary and reliable condition by the employee to whom it is assigned. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision. PPE is to be inspected, cleaned, and maintained by employees at regular intervals as part of their normal job duties so that the PPE provides the requisite protection. Supervisors are responsible for ensuring compliance with cleaning responsibilities by employees. If PPE is for general use, the Project Manager has responsibility for cleaning and maintenance. If a piece of PPE is in need of repair or replacement it is the responsibility of the employee to bring it to the immediate attention of his or her supervisor or the Project Manager. It is against work rules to use PPE that is in disrepair or not able to perform its intended function. Contaminated PPE which cannot be decontaminated is disposed of in a manner that protects employees from exposure to hazards.

G. PPE Specific Information

1. Eye and face protection -- Goggles and face shields
    a. It is the policy of the company that as a condition of employment, all regular full time, part time, subcontractors, and temporary employees working in designated work areas and/or job assignments are required to wear ANSI approved goggles/face shields to help prevent eye and face injuries, including those resulting from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or light radiation, for example.
    b. Employees from temporary work agencies and contractors/subcontractors are required to wear goggles/face shields if assigned to work in the designated work areas requiring ppe.
    c. All supervisors and managers are responsible for ensuring employees under their charge are in compliance with this policy.
    d. All employees who work in designated work areas and/or job assignments are responsible for wearing company provided goggles/face shields to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.
    e. All employees required to wear goggles/face shields must routinely inspect and properly care for their goggles/face shields.
2. Foot Protection-Safety Shoes
    a. It is the policy of the company that as a condition of employment all regular full time, part time, subcontractors, and temporary employees working in designated work areas and/or job assignments are required to wear safety shoes to help prevent foot injuries, ankle injuries, slips, and falls.
    b. Employees from temporary work agencies and contractors/subcontractors are required to wear safety shoes if assigned to work in the designated work areas. It is the responsibility of the agency and/or contractor to ensure the employee reports to his/her temporary assignment at this company wearing approved safety shoes.

c. Those employees who work in non-designated areas of the company and vendors and visitors will be allowed to walk through the designated work areas without safety shoes as long as they remain in outlined aisles or walkways.

d. Members of the Emergency Response Team are required to wear safety footwear when responding to fire emergency situations. Safety footwear is provided by the company for those associates who do not work in the designated work areas within the company. All supervisors and managers are responsible for ensuring their associates are in compliance with this policy.

e. All employees who work in designated work areas and/or job assignments are responsible for purchasing and wearing safety shoes to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

f. Personnel are responsible for informing new employees who are assigned to the designated work areas of the safety shoe policy and the procedures for obtaining them. The new employee is responsible for reporting to his/her first day of work wearing approved safety shoes.

3. Hand Protection -- Gloves

a. It is the policy of the company that as a condition of employment, all regular full time, part time, subcontractors, and temporary employees working in designated work areas and/or job assignments are required to wear gloves to help prevent hand injuries, including cuts, burns, chemical exposure, for example.

b. Employees from temporary work agencies and contractors are required to wear protective gloves if assigned to work in the designated work areas.

c. All supervisors and managers are responsible for ensuring employees under their charge are in compliance with this policy.

d. All employees who work in designated work areas and/or job assignments are responsible for wearing company provided gloves to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

e. All employees required to wear protective gloves must routinely inspect and properly care for their assigned gloves (if the gloves are not disposable).

4. Head protection -- Hard hats

a. It is the policy of the company that as a condition of employment, all regular full time, part time, subcontractors, and temporary employees working in designated work areas and/or job assignments are required to wear ANSI approved hard hats to help prevent head injuries, including those resulting from falling objects, bumping the head against a fixed object, or electrical shock.

b. Employees from temporary work agencies and contractors are required to wear hard hats if assigned to work in the designated work areas.

c. All supervisors and managers are responsible for ensuring employees under their charge are in compliance with this policy.

d. All employees who work in designated work areas and/or job assignments are responsible for wearing company provided hard hats to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

e. All employees required to wear hard hats must routinely inspect and properly care for their hard hats.

H. Employee Owned Equipment

When applicable, the Project Manager will be responsible for the assurance of PPE adequacy, maintenance, and sanitation.

Special Emphasis – **Respiratory Protection (29 CFR 1926.103 or 1910.134)**

A. Purpose

Improper use of or failure to wear respiratory protection when required can have devastating effects on the life and/or health of workers. Lack of a respirator, early removal of a respirator and improperly fitting respirators has resulted in needless worker injury and death.

The purpose of this policy is to establish a respiratory protection program that ensures that Kennedy Painting employees are provided with the necessary information, training, and equipment to protect themselves from respiratory hazards in the workplace, and complies with OSHA, ANSI and other applicable standards and regulations.

B. Policy

It is management's responsibility to implement this program at no cost to the employees and it is the employee's responsibility to comply with all aspects of this program. Any voluntary use of respiratory protection equipment by employees shall be governed by the provisions of this program, also at no expense to the employees.

C. Responsibilities

1. Management

Has the responsibility of overseeing the implementation of this policy and assigning program administrators for each site location. These administrators must be suitably trained and have the appropriate accountability and responsibility to fully manage the site respiratory program. The program administrator will report, at least annually, on the effectiveness of the program to management, and be authorized to make appropriate changes to the site program. The administrators will be identified by name in the specific site program.

2. Supervisory

It is the responsibility of the supervisor to ensure that all personnel under their control are completely knowledgeable of the respiratory requirements of this program. Supervisors are to ensure that employees have been trained and are medically fit to use respiratory equipment safely. It is the supervisors' duty to monitor the employees' diligence in following procedure and take appropriate action when deficiencies are observed.

3. Employees

It is the responsibility of the employee to be aware of and practice the information presented in the training. Specifically, employee responsibilities are to report equipment malfunctions, seal check their respirator before every use, and to report medical or physical changes that could affect respirator use.

D. Procedure

1. Hazard Assessment

Respiratory hazard determination starts at the planning stage of a job. The responsible party is to identify all known hazards as required by the hazard communication standard. Evaluation of the hazards consists of exposure duration, potential for contact, and known or potential concentrations. When the hazard is a federally controlled substance, that hazard shall be assessed and monitored as dictated by that specific standard. A respiratory hazard may not have an established OSHA permissible exposure limit documented; however, all provisions of this program will be enforced to protect the health of the employees.

Acceptable methods for estimating respiratory hazards include:

a. Personal exposure monitoring is the most reliable and accurate method to determine exposure.

b. Use of objective data – This is the use of data obtained from industry studies, trade associations or from tests conducted by chemical manufacturers. The objective data shall represent the highest contaminant exposures likely to occur under reasonably foreseeable conditions of processing, use or handling. If objective data is used for assessment, the data must be documented as part of the written program.

c. Mathematical Approach – The use of physical and chemical properties of air contaminates, combined with information on room dimensions, air exchange rates, contaminant release rates, and other pertinent data including exposure patterns and work practices to estimate maximum exposure levels in the work place.

d. Where employee exposure cannot be identified or reasonably estimated, the atmosphere will be considered Immediately Dangerous to Life and Health (IDLH). Also atmospheres that are oxygen deficient will be treated as IDLH conditions.

e. Accidental release or emergency response must be a consideration when estimating hazard exposure.

2. Hazard Control

a. Engineering Controls

This should be the first consideration when evaluating hazard exposure.

i. Substitution of a less or non-toxic substance to replace a more harmful one. Example: Sandblasting with black grit instead of silica sand.

ii. Isolation or encapsulation of the process. Example: To spray asbestos insulation with glue paste to lessen exposure levels.

iii. Ventilation to remove contamination from the work area before exposure. Example: Mechanical dust collection system installed to capture contaminants and reduce buildup.

b. Administrative Controls:

i. Especially effective for repetitive stress and heat stress control, crew rotation could increase productivity in contaminated atmospheres.

ii. Adjust the length of the work shift. Instead of two 12 hour shifts, it may be more effective to have three 8 hour shifts.

iii. Change scheduled work to limit the number of employees exposed. The scheduling of other work near the exposure area could be limited until exposure is gone.

c. Personal Protective Equipment

Personal protective devices for the control of respiratory hazards are to be used as a last resort, and only when other means of control are not practical or feasible. Respiratory protection may be required while implementing engineering controls, or in conjunction with other control methods. Engineering controls may only lessen the exposure, but required to be implemented along with personal protective devices.

3. Respirator Selection

Selecting the proper respirator can be very complex and is critical in having an effective respiratory program. The program administrator must solicit information from all available professional resources concerning exposure controls.

a. Factors that must be considered include:

i. The nature of the hazardous operation or process

ii. The type of respiratory hazard (including physical properties, oxygen deficiency, physiological effects on the body, concentration of toxic material or airborne radioactivity level, established exposure limits for the toxic materials, established permissible airborne concentration for radioactive material, and established immediately dangerous to life or health concentration for toxic material)

iii. The location of the hazardous area in relation to the nearest area having respirable air

iv. The period of time for which respiratory protection must be worn

v. The activities of workers in the hazardous area

vi. The physical characteristics and functional capabilities and limitations of the various types of respirators

vii. Respirator-assigned protection factors listed in Attachment 1

b. Respirators for use under IDLH conditions:

i. The required respiratory protection for IDLH conditions caused by the presence of toxic materials, or a reduced percentage of oxygen, is a combination full face piece pressure demand supplied air respirator (SAR) with auxiliary self-contained air supply. For rescue applications, a full face piece pressure demand SCBA certified by NIOSH for a minimum service life of thirty minutes is acceptable.

ii. When respirators are worn under IDLH conditions, at least one standby person shall be present in a safe area. The standby person shall have the proper equipment available to assist the respirator wearer in case of difficulty. Communications (visual, voice, signal line, radio, or other suitable means) shall be maintained between the standby person and the wearer. While working in the IDLH atmosphere, the wearer shall be equipped with safety harness and safety lines to permit removal to a safe area, if necessary. Provisions for rescue other than safety harness and lines may be used, if equivalent.

4. Breathing Air Quality

a. Workers using supplied breathing air equipment shall be thoroughly trained in its use.

b. A Supplied Air Pre-Job Checklist shall be filled out.

c. Breathing air is typically supplied from cylinders or via a compressor. Appropriate measures shall be taken to ensure that all compressed breathing air meets at least the requirements for Grade D breathing air described in ANSI/Compressed Gas Association Commodity Specification for Air, G-7.1-1989, to include:

i. Oxygen content (v/v) of 19.5-23.5%;

ii. Hydrocarbon (condensed) content of 5 milligrams per cubic meter of air or less;

iii. Carbon monoxide (CO) content of 10 ppm or less;

iv. Carbon dioxide content of 1,000 ppm or less; and

v. Lack of noticeable odor.

d. Suppliers of breathing air cylinders shall provide the company with a certificate of analysis with each delivery certifying that the breathing air meets the requirements for Grade D breathing air; and that the moisture content in the cylinder does not exceed a dew point of -50 deg.F (-45.6 deg.C) at 1 atmosphere pressure. The certificate shall have the name of the breathing air supplier, the testing technician and date of test.

e. Breathing air cylinders shall be tested and maintained as prescribed in the Shipping Container Specification Regulations of the Department of Transportation (49 CFR part 173 and part 178).

f. Breathing Air Compressors

i. Compressors used to supply breathing air to respirators shall be constructed and situated so as to:

(1.) Prevent entry of contaminated air into the air-supply system;

(2.) Minimize moisture content so that the dew point at 1 atmosphere pressure is 10 degrees F (-5.56 deg.C) below the ambient temperature;

(3.) If required to ensure delivery of Grade D air to the user, provide suitable in-line air-purifying sorbent beds and filters. All filters, cartridges and canisters shall be labeled and color coded with the NIOSH approval label and the label shall remain legible. Sorbent beds and filters shall be maintained and replaced or refurbished periodically following the manufacturer's instructions. A tag containing the most recent change date and the signature of the person authorized by the employer to perform the change shall be attached to the equipment.

(4.) For compressors that are not oil-lubricated, the company shall ensure that carbon monoxide levels in the breathing air do not exceed 10 ppm.

(5.) For oil-lubricated compressors, the company shall use a high-temperature or carbon monoxide alarm, or both, to monitor carbon monoxide levels. If only high-temperature alarms are used, the air supply shall be monitored at intervals sufficient to prevent carbon monoxide in the breathing air from exceeding 10 ppm.

(6.) The air shall be routinely tested to ensure that it meets Grade D requirements.

ii. In addition, a stand-by attendant shall be on watch anytime workers are using breathing air supplied directly by a compressor.

iii. Breathing air couplings shall be incompatible with outlets for nonrespirable worksite air or other gas systems. No asphyxiating substance shall be introduced into breathing airlines.

5. Training

a. To protect employees from exposure to respiratory hazards using OSHA and ANSI standards as minimum guidelines, all employees who will wear respiratory protection will be trained on this policy. Training will be provided prior to job assignment where respirator equipment is required, and annually thereafter. Additional training is required when there are deficiencies in the employee's knowledge/skills or when there is a change in the work place or respiratory equipment that renders previous training obsolete. The training will include the following:

i. Responsibilities of employees and supervisors

ii. How, why and for what jobs we use respirators

iii. Hazard assessment including limitations of respirators

iv. Hazard control

v. Respirator selection

vi. Medical evaluation

vii. Respirator fit test

viii. Maintenance, care and storage

ix. Medical surveillance

x. Program evaluation

b. All training shall be conducted in a way that is understandable to the employee, and is documented.

i. Why use respiratory protection

(1.) The nature, extent and effects of respiratory hazards

(2.) Consequences of improper fit, usage and maintenance on respirator effectiveness

ii. Limitations and capabilities of the respirator

(1.) Air purifying respirators that filter either particles, or absorbing vapors and gases

(2.) Air supplying respirators that supply air from an uncontaminated source

(3.) Limitations of respirators in IDLH atmospheres and for emergency use only

iii. How respirators are inspected, donned, removed, seal checked and worn

(1.) What to do if respirators have defects

(2.) Who to report problems to during use

(3.) Proper technique for donning and removing the respirator, and how to store when not in use

(4.) How to seal check using the positive and/or negative pressure method

iv. Methods of maintenance and storage

(1.) Visual inspection of parts for worn or defective items

(2.) How to keep the issued respirator clean and sanitary

(3.) Requirement to disinfect and sanitize before reissue to other employees

(4.) Proper storage in a cool, clean and dry location, placing them in a clean, sealed plastic bag after drying

v. Medical signs and symptoms that may limit or prevent the effective use of respirators

(1.) An awareness of physical conditions that may indicate warning signs

(2.) An obligation to report signs and symptoms and the opportunity for medical reevaluation

(3.) Changes in weight (gain or loss)

(4.) Physical changes in facial structure

(5.) Changes in endurance, stability or general health

(6.) Medication for illness

E. Medical Evaluation

1. All employees whose job classification may require use of respiratory protection shall be evaluated and certified by a physician or a licensed health care professional (PLHCP) as being “medically fit” to wear a respirator. For new hires, the medical evaluation shall be made before any use of respiratory equipment. Thereafter, the evaluation shall occur at a minimum annually. The medical evaluation consists of, at a minimum, the administration of a health questionnaire meeting federal guidelines or provisions for a physical examination by a PLHCP that elicits the same information as the questionnaire. The PLHCP shall be provided with supplemental information by the employer on the description of the job classification, possible

work conditions and any additional P.P.E. that may be required of the employee while using respiratory equipment. Also a copy of this program will be given to the PLHCP for reference along with the OSHA standard.

2. The administration of the health questionnaire will be done during work hours and at no cost to the employee. The information on the questionnaire shall remain confidential between the PLHCP and the employee. The employee must have access to the PLHCP for discussion and asking questions concerning their medical evaluation. The company will only receive a recommendation of the employee's ability to wear respiratory equipment.
3. If an employee is restricted by the PLHCP from wearing a negative pressure respirator, but otherwise physically able to perform duties with a powered air respirator, then reasonable accommodations will be made by the program administrator not to have this restriction limit the employee's ability to perform his job.

F. Respirator Fit Test

Respirator fit testing is required of all employees prior to using a positive or negative tight fitting respirator. The fit test will be specific for respirator manufacturer, model and size. This test is to be repeated annually, or if there is a change in the respiratory equipment. Some substance specific standards may call for more frequent testing and dictate a specific protocol, which would take precedence over this program. A change in the employee's physical appearance can affect the seal of a respirator and may require re-testing. If the respirator is unacceptable to the employee due to comfort, irritation, or inability to get a seal, the employee will be offered a reasonable selection for an alternate choice of respirators.

The employee will be asked to wear the proposed respirator for a period of time to become familiar with the feel and fit. No obstacles can be between their face and the sealing surface of the respirator, including facial hair of 24 hours or more growth, side burns that extend into the sealing surface or hair that is long enough to prevent proper function of the respirator. Jewelry, caps, hats, scarves and certain safety gear must be evaluated as part of the fit test if the employee is permitted or required to wear them during work. OSHA did not restrict the use of contact lens with respirators, but did mandate that the use of corrective lens shall not interfere with the seal of the respirator. Any adaptive devices for vision correction with respiratory equipment will be supplied at no cost to the employee. The employee will be instructed on how to field check respiratory equipment. The positive and negative seal check methods of verifying a good seal shall be required before each and every entry into a respiratory hazard area. These seal checks are not to be considered a fit test.

1. Positive Seal Check

   A positive seal check is accomplished by effectively sealing the exhalation valve and slowly exhaling. This should create a slight, positive pressure inside the face piece for a short period of time. The participant must be careful not to exhale too fast or small leaks can be nullified and/or large leaks artificially created.

2. Negative Seal Check

   A negative seal check is accomplished by effectively sealing the inhalation ports of the respirator and inhaling slowly. The participant should be able to create a negative pressure inside the respirator and hold it for a short period of time. Inhaling too fast may nullify small leaks and/or artificially create other leaks.

3. Fit Test
   a. Qualitative fit test – a pass/fail test that relies on the subject to detect a challenge agent and is predicated on an individual's sensory response.
   b. Quantitative fit test – uses an instrument to measure the challenge agent inside the respirator and gives a numerical value to the test data.

i. If the qualitative testing is used, the employee should be informed of the exposure limitations. A limit of 10 times the permissible exposure level for an 8-hour duration is the maximum exposure for either a half mask, or full face piece negative pressure respirator.

4. For OSHA guidelines, refer to Attachment 5

5. Irritant Smoke Protocol

   Irritant smoke protocol for qualitative fit testing is very effective, since it is the only challenge agent that does not rely on a voluntary response. This type of test requires that the tester be well trained in the correct and safe use of the irritant smoke tubes. The smoke tubes can be a health hazard if not used properly and in a well ventilated room. Specific step by step procedures are referenced in Attachment 3.

G. Maintenance and Care

The company will provide for the cleaning and disinfecting, storage, inspection and repair of respirators that are issued to their employees. There are specific guidelines to follow in Attachment 4 to ensure the respirators are clean and disinfected. Respirators designated for the exclusive use of an employee shall be the responsibility of that employee to maintain and keep in a sanitary condition. Respirators issued to more than one employee shall be cleaned and disinfected before being worn by different individuals. Respirators maintained for emergency, training, or fit testing use shall be cleaned and disinfected after every use.

1. Storage

   Respirators shall be stored to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture and damaging chemicals. They shall be packed or stored to prevent deformation of the face piece. Emergency respirators shall, in addition, be kept accessible to the work area and stored in easily identifiable coverings. Refer to manufacturer's instructions for other recommendations.

2. Inspection

   Respirators are inspected on a regular basis and employees are instructed on how to inspect their respirator. All respirators used on a routine basis shall be inspected before each use and during cleaning. All emergency respirators shall also be inspected at least on a monthly basis. Respirator inspection shall include the tightness of connections and the condition of various parts including, but not limited to, the face piece, head straps, valves, and gaskets, connecting tubes, cartridges, canisters and filters. Also, check all elastic parts for deterioration and pliability. Inspection of self-contained breathing apparatus shall be done only by trained technicians competent with that specific brand, make and model of respiratory equipment. The technician conducting the inspection shall certify the inspection by attaching a signed and dated tag or label to the equipment.

3. Repairs

   Equipment that is defective, broken or otherwise in need of repair shall be identified immediately by attaching a red tag and stating the reason it is out of service. Repairs to respirator equipment shall be made by competent employees and only with the manufacturers' recommended replacement parts. Absolutely no substitution of parts is allowed that is not authorized by the NIOSH approval.

H. Medical Surveillance

Employees should be aware of medical conditions that would prevent or limit their use of respiratory equipment. Supervisors shall be informed when employees experience medical difficulties that may affect or be a result of respirator use. Substance specific hazards may require a specific medical

monitoring procedure that requires biological testing. Employees will be required to complete a medical questionnaire initially, and then further evaluation at the frequency determined by the medical evaluator.

I. Program Evaluation

The supervisor will monitor the work site for acceptance of and compliance with the written respiratory program. The supervisor will address issues where employees have had deficient respiratory issues, i.e. cartridge breakthrough and the respirator effectiveness. Employees will be asked questions about the effectiveness of the program and encouraged to offer suggestions for improvement including how the fit test protocol was performed, the maintenance procedures for care and storage of respirators and overall program. Periodic audits will be documented and reviewed by the program administrator. The program administrator will report, at lease annually, to the management on the effectiveness of the total program.

Attachment 1 – Respiratory Protection
Assigned Protection Factors

Type of respirator	Respiratory inlet covering	
	Half Mask [1]	Full Facepiece
Air purifying	10	100
Atmosphere supplying		
SCBA (demand) [2]	10	100
Airline (demand)	10	100

Type of respirator	Respiratory inlet covering			
	Half mask	Full Face	Helmet/Hood	Loose-fitting facepiece
Powered air purifier	50	1000 [3]	1000 [3]	25
Atmosphere supplying airline				
Pressure demand	50	1000	-	-
Continuous flow	50	1000	1000	25
Self-contained breathing apparatus				
Pressure demand	-	[4]	-	-
Open/closed circuit				

1) Includes ¼ mask, disposable half masks, and half masks with elastomeric facepieces.
2) Demand SCBA shall not be used for emergency situations such as firefighting.
3) Protection factors listed are for high-efficiency filters and sorbents (cartridges and canisters). With dust filters, an assigned protection factor of 100 is to be used due to the limitations of the filter.
4) Although positive-pressure respirators are currently regarded as providing the highest level of respiratory protection a limited number of recent simulated workplace studies concluded that all users may not achieve protection factors of 10,000. Based on this limited data, a definitive assigned protection factor could not be listed for positive-pressure SCBA's. For emergency planning purposes where hazardous concentrations can be estimated, an assigned protection factor of no higher than 10,000 should be used.

NOTE: *Assigned protection factors are not applicable for escape respirators. For combination respirators, e.g., airline respirators equipped with an air-purifying filter, the mode of operation in use will dictate the assigned protection factor to be applied.*

Attachment 2 - Respiratory Protection
Respirator Selection

Logic Guide: Reference ANSI 288.2 – 1992 7.2.2.

Respirator selection involves reviewing each operation to (a) determine what hazards may be present (hazard determination) and (b) select which type or class of respirators can offer adequate protection.

Hazard Determination Steps

1. The nature of the hazard shall be determined as follows:
    a. Determine what contaminant(s) may be present in the work place.
    b. Determine whether there is a published Threshold Limit Value, Permissible Exposure Limit, or any other available exposure limit or estimate of toxicity for the contaminant(s). Determine if the IDLH concentration for the contaminant is available.
    c. Determine if there is a comprehensive health standard (e.g., lead, asbestos) for the contaminant(s). If so, there may be specific respirators required that influence the selection process.
    d. If the potential for an oxygen-deficient environment exists, measure the oxygen content.
    e. Measure or estimate the concentration of the contaminant(s).
    f. Determine the physical state of the contaminant. If an aerosol, determine or estimate the particle size. Determine if vapor pressure of the aerosol is significant at the maximum expected temperature of the work environment.
    g. Determine whether the contaminant(s) present can be absorbed through the skin, produce skin sensitization, or be irritating or corrosive to the eyes or skin.
    h. Determine for a gas or vapor contaminant(s) if a known odor, taste, or irritation concentration exists.

Selection Steps

1. The proper respirator shall be selected as follows:
    a. If unable to determine what potentially hazardous contaminant may be present, the atmosphere shall be considered IDLH.
    b. If no exposure limit or guideline is available and estimates of the toxicity cannot be made, the atmosphere shall be considered IDLH.
    c. If a specific standard exists for the contaminant, follow those guidelines/requirements.
    d. If there is an oxygen-deficient atmosphere, the type of respirator selected depends on the partial pressure and concentration of oxygen and the concentration of the other contaminant(s) that may be present.
    e. If the measured or estimated concentration of the contaminant(s) is considered IDLH, reference “Respirators for use under IDLH conditions” at the end of this guide.
    f. Divide the measured or estimated concentration of each contaminant by the exposure limit or guideline to obtain a hazard ratio. When two or more substances are present, consideration needs to be given if there is a synergistic or combined effect of exposure rather than considering each substance individually. Select a respirator with an assigned protection factor greater than the value of the hazard ratio, as listed in Attachment 1.

g. If the contaminant(s) is a gas or vapor only, select a device with an assigned protection factor that is greater than the hazard ratio. The concentration shall also be less than the maximum use concentration of the cartridge/canister.

h. If the contaminant is a paint, lacquer, or enamel, select a respirator approved specifically for paint mists or an atmosphere-supplying respirator. (Approval label or regulatory provision may preclude use for some paints.)

i. If the contaminant is a pesticide, select a respirator and filtration system specifically approved for pesticides or an atmosphere-supplying respirator. (Approval label may preclude use for some pesticides.)

j. If the contaminant is an aerosol with an unknown particle size, or less than 2 um (MMAD), a high-efficiency filter shall be used.

k. If the contaminant is a fume, use a filter approved for fumes or a high-efficiency filter.

l. If the contaminant is an aerosol with a particle size greater than 2 um (MMAD), any filter type (dust, fumes, mist, or high efficiency) may be used.

m. If the contaminant is a gas or vapor and has poor warning properties, the use of an atmosphere-supplying respirator is generally recommended.

2. When atmosphere-supplying respirators cannot be used because of the lack of a feasible air supply, or the need for worker mobility, air-purifying devices should be used only if:

   a. The air-purifying respirator has a reliable end-of-service-life indicator that will warn the user prior to contaminant breakthrough or,

   b. A cartridge change schedule is implemented based on cartridge service data including desorption studies (unless cartridges are changed daily), expected concentration, pattern of use, duration of exposure, and the chemical does not have a ceiling limit.

3. Respirators for use under IDLH atmospheres:

   a. The required respiratory protection for IDLH conditions caused by the presence of toxic materials, or a reduced percentage of oxygen, is a combination full face piece pressure demand supplied air respirator (SAR) with auxiliary self-contained air supply. For rescue applications, a full face piece pressure demand SCBA certified by NIOSH for a minimum service life of thirty minutes is acceptable.

   b. When respirators are worn under IDLH conditions, at least one standby person shall be present in a safe area. The standby person shall have the proper equipment available to assist the respirator wearer in case of difficulty. Communications (visual, voice, signal line, intercom, radio or other suitable means) shall be maintained between the standby person and the wearer. While working in the IDLH atmosphere, the wearer shall be equipped with a safety harness and lifeline to permit removal to a safe area, if necessary. Provisions for rescue other than harness and lifeline may be used, if equivalent.

4. Special considerations for confined space entry into IDLH conditions are not addressed in this policy.

Use and Duration of Cartridges

Use and Duration of Cartridges		
Contaminant (1)	**Maximum Concentration**	**Maximum Use Time (2) (Hours)**
1,3 Butadiene	50	1
Ammonia	100	4
Benzene	10	8
Benzene	50	4
Chemicals not specified (3)	NA	1
Naphtha	100	4
Naphtha	500	2
Particulates (including dusts, mists, welding fumes)	NA	8
Sulfur Dioxide	50	8
Total Hydrocarbons (as n-hexane)	100	4
Total Hydrocarbons (as n-hexane)	500	1

(1) If more than on contaminant is present, use the lowest maximum use time.

(2) Cartridges should be changed out if the contaminant can be detected inside the respirator mask, regardless of the maximum use time.

(3) Cartridges for chemicals not listed should be used for only 1 hour. This will err on the side of safety. If specific information is needed on a particular chemical, consult with the MSDS or your supervisor.

Attachment 3 - Respiratory Protection
Fit Testing

If the test subject is not familiar with using a particular respirator, the test subject shall be directed to don the face piece several times and to adjust the straps to become adept at setting the proper tension on the straps.

A. Assessment of comfort shall include a review of the following points with the test subject and allowing the test subject adequate time to determine the comfort of the respirator:
   1. Position of the mask on the nose
   2. Room for eye protection
   3. Room to talk
   4. Position of mask on face and cheeks

B. The following criteria shall be used to help determine the adequacy of the respirator fit:
   1. Chin properly placed
   2. Adequate strap tension, not overly tightened
   3. Fit across nose bridge
   4. Respirator of proper size to span distance from nose to chin
   5. Tendency of respirator to slip
   6. Self-observation in mirror to evaluate fit and respirator position

C. The test subject shall conduct a user seal check, utilizing the negative and positive pressure seal check methods. Before conducting the negative and positive pressure checks, the subject shall be told to seat the mask on the face by moving the head from side-to side and up and down slowly while taking in a few slow deep breaths. Another face piece shall be selected and retested if the test subject fails the user seal check tests.

D. The test shall not be conducted if there is any hair growth between the skin and the face piece sealing surface, such as stubble beard growth, beard, mustache or sideburns which cross the respirator sealing surface. Any type of apparel, which interferes with a satisfactory fit, shall be altered or removed.

E. If the employee finds the fit of the respirator unacceptable, the test subject shall be given the opportunity to select a different respirator and to be retested.

F. Exercise regimen: Prior to the commencement of the fit test, the test subject shall be given a description of the fit test and the test subject's responsibilities during the test procedure. The description of the process shall include a description of the test exercise that the subject will be performing. The respirator to be tested shall be worn for at least 5 minutes before the start of the fit test

G. The fit test shall be performed while the test subject is wearing any applicable safety equipment that may be worn during actual respirator use, which could interfere with respirator fit.

H. Test exercises: The following test exercises are to be performed for all fit testing methods. The test subject shall perform exercises, in the test environment, in the following manner:

1. Normal breathing: In a normal standing position, without talking, the subject shall breathe normally.
2. Deep breathing: In a normal standing position, the subject shall breathe slowly and deeply, taking caution so as not to hyperventilate.
3. Turning head side to side: Standing in place, the subject shall slowly turn his/her head from side to side between the extreme positions on each side. The head shall be held at each extreme momentarily so the subject can inhale at each side.
4. Moving head up and down: Standing in place, the subject shall slowly move his/her head up and down. The subject shall be instructed to inhale in the up position (i.e., when looking toward the ceiling).
5. Talking: The subject shall talk out loud slowly and loud enough so as to be heard clearly by the test conductor. The subject can read from a prepared text such as the Rainbow Passage, count backward from 100, or recite a memorized poem or song.

I. Rainbow Passage

1. When the sunlight strikes raindrops in the air, they act like a prism and form a rainbow. The rainbow is a division of white light into many beautiful colors. These take the shape of a long round arch, with its path high above, and its two ends apparently beyond the horizon. There is, according to legend, a boiling pot of gold at one end. People look, but no one ever finds it. When a person looks for something beyond reach, his friends say he is looking for the pot of gold at the end of the rainbow.
    a. Bending over: The test subject shall bend at the waist as if he/she were to touch his/her toes. Jogging in place shall be substituted for this exercise in those test environments that do not permit bending over at the waist.
    b. Normal breathing: Same as exercise (H,1).
2. Each test exercise shall be performed for one minute. The test subject shall be questioned by the test conductor regarding the comfort of the respirator upon completion of the protocol. If it has become unacceptable, another model of respirator shall be tried. The respirator shall not be adjusted once the fit test exercises begin. Any adjustment voids the test, and the fit test must be repeated.

J. Irritant Smoke Protocol

This qualitative fit test uses a person's response to the irritating chemicals released in the "smoke" produced by a stannic chloride ventilation smoke tube to detect leakage into the respirator.

1. General Requirements and Precautions
    a. The respirator to be tested shall be equipped with high efficiency particulate air (HEPA) or P100 series filter(s).
    b. Only stannic chloride smoke tubes shall be used for this protocol.
    c. No form of test enclosure or hood for the test subject shall be used.

d. The smoke can be irritating to the eyes, lungs, and nasal passages. The test conductor shall take precautions to minimize the test subject's exposure to irritant smoke. Sensitivity varies, and certain individuals may respond to a greater degree to irritant smoke. Care shall be taken when performing the sensitivity screening checks that determine whether the test subject can detect irritant smoke to use only the minimum amount of smoke necessary to elicit a response from the test subject.

e. The fit test shall be performed in an area with adequate ventilation to prevent exposure of the person conducting the fit test, or the build-up of irritant smoke in the general atmosphere.

2. Sensitivity Screening Check

a. The test operator shall break both ends of a ventilation smoke tube containing stannic chloride, and attach one end of the smoke tube to a low flow air pump set to deliver 200 milliliters per minute, or an aspirator squeeze bulb. The test operator shall cover the other end of the smoke tube with a short piece of tubing to prevent potential injury from the jagged end of the smoke tube.

b. The test operator shall advise the test subject that the smoke can be irritating to the eyes, lungs, and nasal passages and instruct the subject to keep his/her eyes closed while the test is performed.

c. The test subject shall be allowed to smell a weak concentration of the irritant smoke before the respirator is donned to become familiar with its irritating properties, and to determine if he/she can detect the irritating properties of the smoke. The test operator shall carefully direct a small amount of the irritant smoke in the test subject's direction to determine that he/she can detect it.

3. Irritant Smoke Fit Test Procedure

a. The person being fit tested shall don the respirator without assistance, and perform the required user seal check(s).

b. The test subject shall be instructed to keep his/her eyes closed.

c. The test operator shall direct the stream of irritant smoke from the smoke tube toward the face seal area of the test subject, using the low flow pump or the squeeze bulb. The test operator shall begin at least 12 inches from the face piece and move the smoke stream around the whole perimeter of the mask. The operator shall gradually make two more passes around the perimeter of the mask, moving to within six inches of the respirator.

d. If the person being tested has not had an involuntary response and/or detected the irritant smoke, proceed with the test exercises.

e. The exercises identified in section H of this attachment shall be performed by the test subject while the respirator seal is being continually challenged by the smoke, directed around the perimeter of the respirator at a distance of six inches.

f. If the person being fit tested reports detecting the irritant smoke at any time, the test is failed. The person being retested must repeat the entire sensitivity check and fit test procedure.

g. Each test subject passing the irritant smoke test without evidence of a response (involuntary cough, irritation) shall be given a second sensitivity screening check with the smoke from the same smoke tube used during the fit test, once the respirator has been removed, to determine whether he/she still reacts to the smoke. Failure to evoke a response shall void the fit test.

h. If a response is produced during this second sensitivity check, then the fit test is passed.

Attachment 4 - Respiratory Protection
Respirator Cleaning Procedures

These procedures are provided as a guideline when cleaning respirators. They are general in nature, and the administrator as an alternative may use the cleaning recommendations provided by the manufacturer of the respirators used by their employees, provided such procedures are as effective as those listed here. Equivalent effectiveness simply means that the procedures used must accomplish the objectives set forth (i.e., must ensure that the respirator is properly cleaned and disinfected in a manner that prevents damage to the respirator and does not cause harm to the user).

A. Remove filters, cartridges, or canisters. Disassemble face pieces by removing speaking diaphragms, demand and pressure-demand valve assemblies, hoses, or any components recommended by the manufacturer. Discard or repair any defective parts.

B. Wash components in warm water (110° F maximum), with mild detergent or cleaner recommended by the manufacturer. A stiff bristle (not wire) brush may be used to facilitate the removal of dirt.

C. Rinse components thoroughly in clean, warm (110° F maximum), preferably running water. Drain.

D. When the cleaner used does not contain a disinfecting agent, respirator components should be immersed for two minutes in one of the following:

   1. Hypochlorite solution (50 ppm of chlorine) made by adding approximately one milliliter of laundry bleach to one liter of water at 110° F, or,
   2. Aqueous solution of iodine (50 ppm iodine) made by adding approximately 0.8 milliliters of tincture of iodine (6-8 grams ammonium and/or potassium iodide/100cc of 45% alcohol) to one liter of water at 110°F, or,
   3. Other commercially available cleansers of equivalent disinfectant quality when used as directed, if their use is recommended or approved by the respirator manufacturer.

E. Rinse components thoroughly in clean, warm (110° F maximum), preferably running water. Drain. The importance of thorough rinsing cannot be overemphasized. Detergents or disinfectants that dry on face pieces may result in dermatitis. In addition, some disinfectants may cause deterioration of rubber or corrosion of metal parts if not completely removed.

F. Components should be hand-dried with a clean lint-free cloth or air-dried.

G. Reassemble face piece, replacing filters, cartridges, and canisters where necessary.

H. Test the respirator to ensure that all components work properly.

Attachment 5 - Respiratory Protection
Acceptable Fit-Testing Methods

	QLFT	QNFT
Half-Face, Negative Pressure, APR (<100 fit factor)	Yes	Yes
Full-Face, Negative Pressure, APR (<10 fit factor) Used in atmospheres up to 10 times the PEL	Yes	Yes
Full-Face, Negative Pressure, APR (>100 fit factor)	No	Yes
PAPR	Yes	Yes
Supplied-Air Respirators (SAR), or SCBA used in Negative Pressure (Demand Mode) (>100 fit factor)	No	Yes
Supplied-Air Respirators (SAR), or SCBA used in Positive Pressure (Pressure Demand Mode)	Yes	Yes

Attachment 6 - Respiratory Protection
Site Specific Respiratory Protection Plan

Purpose

Because site facilities, equipment and procedures are not standard, OSHA requires that each worksite develop and maintain a Site Specific Respiratory Protection Plan. The Site Respiratory Protection Program Administrator will utilize the Respiratory Protection Program and this attachment to develop site specific procedures governing the administration, selection, use, and care of respirators.

Scope and Application

This procedure applies to all sites or projects where employees are required to wear respirators during normal work operations and during certain non-routine or emergency operations.

Site Respirator Program Administrator

The Site Respirator Program Administrator (Administrator) is responsible for overseeing the respiratory protection program at _____ (worksite). The Administrator will report, at least annually, on the effectiveness of the program to management, and be authorized to make appropriate changes to the Site Program. The person designated as the Administrator for this worksite is _____.

Administrators are responsible for ensuring that the respiratory protection program is implemented at their site. In addition all site supervisors shall be knowledgeable about the program requirements for their own protection, supervisors must ensure that the program is understood and followed by the employees under they supervise. Duties include:

- Ensuring that employees under their supervision (including new hires) have received appropriate and current training, fit testing, and medical evaluation.
- Ensuring the availability of appropriate respirators and accessories.
- Being aware of tasks requiring the use of respiratory protection.
- Enforcing the proper use of respiratory protection when necessary.
- Ensuring that respirators are properly cleaned, maintained, and stored according to the site respiratory protection plan.
- Ensuring that respirators fit well and do not cause discomfort.
- Identifying work areas, processes or tasks that require workers to wear respirators, and evaluating hazards.
- Monitoring respirator use to ensure that respirators are used in accordance with their certifications.
- Ensuring proper storage and maintenance of site respiratory protection equipment.
- Conducting qualitative/quantitative fit testing.
- Updating the Site Program as necessary to reflect workplace changes that affect respirator use.
- Coordinating with management on how to address respiratory hazards or other concerns regarding the Site Program.

Employee Responsibilities

Each employee has the responsibility to wear his or her respirator when and where required and in the manner in which they were trained. Employees must also:

- Care for and maintain their respirators as instructed and store them in a clean, sanitary location.
- Inform supervisor if the respirator no longer fits well and request a new one that fits properly.
- Inform their supervisor or the Program Administrator of any respiratory hazards that they feel are not adequately addressed in the workplace and of any other concerns that they have regarding the program.
- Notify their supervisor or Program Administrator of any other problems associated with using their respirator.

Hazard Determination/Respirator Selection

The Administrator shall utilize Attachment 2 to ensure that the respirator selected will be adequate to effectively reduce exposure to the respirator user under all conditions of use including reasonably foreseeable emergency situations.

- When necessary, exposure monitoring will be conducted to measure potential hazardous exposures. Monitoring will be conducted by _____.

The results of the hazard evaluation are summarized in Table 1.

TABLE 1: HAZARD EVALUATION SUMMARY

Work Activity	Contaminants	Exposure Monitoring	Permissible Exposures	Controls
Asbestos Insulation Work	Asbestos	Sample prior to start of work	0.1 f/cc TWA	▪ Not in excess of 1 f/cc - ½ mask APR w/ high efficiency filters ▪ Not in excess of 5 f/cc – FF APR w/high efficiency filters ▪ Not in excess of 10 f/cc – PAPR w/high efficiency filters
Opening equipment containing Benzene	Benzene	Prior to opening	1 ppm	▪ < 1 ppm – No respirator. ▪ Less than or 10 ppm ½ mask APR w/ organic vapor cartridge ▪ Less than or 50 ppm FF APR w/organic vapor cartridge ▪ Less than or 100 ppm FF PAPR w/ organic vapor cartridge ▪ Less than or 1000 ppm supplied air FF respirator ▪ > 1000 ppm SCBA
Opening equipment containing Butadiene	Butadiene	Prior to opening	1ppm (TWA)	Same a Benzene
Lead paint work Activities covered: ▪ Dry abrasive blasting ▪ Burning, flame-torch cutting & welding ▪ Grinding, sanding or buffing with power tools	Lead	Sample prior to start of work	50 Ug/M3 (TWA)	▪ Airborne concentration of Lead ▪ Not in excess of 0.5 mg/M3 – ½ APR w/high efficiency filters ▪ Not in excess of 2.5 mg/M3 – FF APR w/high efficiency filters ▪ Not in excess of 50 mg/M3 PAPR w/high efficiency filters
Opening equipment containing H2S	H2S	Sample prior to start of work	10 ppm	< 10 ppm No respirator

Site Hazard Evaluation Update

The Administrator is responsible to revise and update the hazard evaluation as needed (i.e., any time work process changes may potentially affect employee exposure). If an employee feels that respiratory protection is needed during a particular activity, she/he is to notify their immediate supervisor.

Assigned Protection Factors

The Administrator will use Attachment I to determine the type of respirator to be selected for non-routine or reasonably foreseeable emergency situations.

Medical Evaluation

The Administrator will insure that section F, Medical Evaluation, of this policy is followed.

Fit Testing

Refers to section F, Respirator Fit Test, of the Respiratory Protection Program.

Procedures for Immediately Dangerous to Life and Health (IDLH) Situations

All employees are prohibited from entering and working in known IDLH areas, unless they are specifically trained and certified for such work i.e. inert entry. Whenever workers are assigned to work in potentially IDLH areas, task specific procedures including training requirements shall be developed and strictly adhered to.

The Administrator has identified the following areas or job duties as presenting the potential for IDLH conditions: (List areas/job duties/non-routine activities)

- _____
- _____
- _____
- _____
- _____

Cleaning and Disinfecting

Respirators will be cleaned and disinfected by _____, the Administrator insure the procedures in Attachment 4 are strictly adhered to.

Storage

Respirators will be stored so that they are protected against damage, contamination, dust, sunlight, temperature extremes, excessive moisture, and damaging chemicals. When respirators are packed or stored, the facepiece and exhalation valve will be stored in a manner that prevents deformation. Each respirator should be positioned so that it retains its natural configuration.

Respirators will be readily available for use will be stored at

_____.

The Administrator will ensure that an adequate number and type of respirators are provided each work area where they are needed.

Inspection

Respirators used in routine situations will be inspected during cleaning, prior to issue and prior to use.

Inspection information for respirators will be maintained in _____ until it is replaced following subsequent certification.

Repair

Repairs or adjustments to respirators will be done by _____. Only NIOSH-approved manufacturer's replacement parts designed for that respirator will be used. Repairs will be made in accordance with the manufacturer's recommendations and specifications regarding the type and extent of repairs to be performed.

Because components such as reducing and admission valves, regulators, and alarms are complex and essential to the safe functioning of SCBAs, they are required to be adjusted and repaired only by the manufacturer or a technician trained by the manufacturer. Maintenance on SCBAs will be done by _____.

SCBA's air and oxygen cylinders will be maintained in a fully charged state and recharged when the pressure falls to 90% of the manufacturer's recommended pressure level. Cylinders will be recharged by sending them out to _____ or recharged on site by _____.

SCBA air and oxygen cylinders will be hydrostatically tested according the manufacturers recommended frequency. Hydrostatic testing will be conducted by _____.

Composite-wrapped aluminum cylinders will be taken out of service after 15 years regardless of the last hydrostatic test date.

Breathing Air Quality

The Administrator will ensure that breathing air for atmosphere-supplying respirators will be of high purity, meets quality levels for content, and does not exceed OSHA contaminant levels and moisture requirements.

For supplied-air respirators (SARs), only Grade D breathing air shall be used in cylinders. The Program Administrator or designee will coordinate deliveries of compressed air with _____ and require certification that the air in the cylinders meets the specifications of Grade D breathing air. All breathing gas containers must be marked in accordance with the NIOSH respirator certification standard, 42 CFR part 84.

Compressors

Compressors used for supplying breathing air must be constructed and situated so contaminated air cannot enter the air-supply system. Compressors must meet the requirements of Section E of this policy.

Only non-oil-lubricated compressors will be used at _____. The Administrator shall ensure that the compressor intake will not allow the introduction of carbon monoxide greater than 10 parts per million (ppm) into the system. Note: This could be from sources other than the compressor such as forklifts/vehicles or other gas powered equipment. Where this is not possible or feasible, it may be necessary to combine the use of a carbon monoxide alarm with a carbon monoxide sorbent bed when conditions are such that a reliable carbon monoxide-free area for air intake cannot be found.

Training and Information

_____ will provide training to respirator users, supervisors, and any person issuing respirators on the contents of the Respiratory Protection Program the proper care and use of site specific equipment and their responsibilities. All training records will include the manufacturer, type and model of respiratory protection equipment.

Recordkeeping

The Administrator shall retain copies of all respiratory protection program documents, including fit test and training records.

Special Emphasis – **Scaffolding & Aerial Lifts (29 CFR 1926.450)**

A. Introduction

Kennedy Painting's purpose in issuing these procedures is to further ensure a safe workplace based on the following formal, written procedures for scaffold work. These procedures will be reviewed and updated as needed to comply with new OSHA regulations, new best practices in scaffolding, and as business practices demand. The Project Manager is the plan coordinator/manager and is responsible for its implementation.

Copies of the written program may be obtained from the written Safety and Health manual or at our corporate offices. This written plan covers our various construction sites.

B. Scaffolding

The following general procedures apply to all scaffold and aerial lift operations for our company.

1. Capacity

Taking into account the OSHA rules we must apply and the engineering/manufacturing requirements of our scaffolds, the following rules apply.

a. Each scaffold and scaffold component we use will support, without failure, its own weight and at least four times the maximum intended load applied or transmitted to it.

b. When we use non-adjustable suspension scaffolds, each suspension rope, including connecting hardware, will support, without failure, at least six times the maximum intended load applied or transmitted to that rope.

2. Platform Construction

This section documents the procedures and safety requirements we use to construct our scaffold platforms.

a. Each scaffold plank will be installed so that the space between adjacent planks and the space between the platform and uprights is no more than one inch wide. If, in certain situations, we need to make this space wider, we will attach our demonstration in the appendix to this plan.

b. Except for outrigger scaffolds (3 inches) and plastering and lathing operations (18 inches), the front edge of all platforms will not be more than 14 inches from the face of the work, unless we have a guardrail or personal fall arrest system in place that meets regulations.

c. The following additional construction and safety information is included depending on the type of scaffold being erected.

i. Supported Scaffolds

(1.) Supported scaffolds with a height to base width ratio of more than four to one (4:1) must be restrained from tipping by guying, tying, bracing, or equivalent means.

(2.) Supported scaffold poles, legs, posts, frames, and uprights will always bear on base plates and mud sills or other adequate firm foundations.

ii. Suspension Scaffolds

(1.) Before a scaffold is used, all direct connections will be evaluated by our competent person. Our competent person will confirm, based on the evaluation, that the supporting surfaces are capable of supporting the loads that will be imposed.

(2.) When winding drum hoists are used on a suspension scaffold, they will never contain less than four wraps of the suspension rope at the lowest point of scaffold travel.

3. Gaining Access to Scaffolds

   We know that getting to the working platform is critical to the safety of our employees. This section outlines the mechanical requirements for gaining access to scaffold platforms such as:

   - Ladders,
   - Ramps and walkways,
   - Stair rails, and
   - Direct access from another scaffold.

   a. Portable, hook-on, and attachable ladders will be positioned so as not to tip the scaffold.

   b. All stair rail systems and handrails will be surfaced to prevent injury to our employees from punctures or lacerations, and to prevent snagging of their clothes.

4. Fall Protection Plan

   Fall protection planning is critical to the safety and well being of our employees. Our fall protection plan follows the OSHA requirements which are different depending on the type of scaffold we are using.

   One fact never changes. We know we must provide fall protection for any employee on a scaffold more than 10 feet above a lower level.

   This fall protection plan for our working employees is for the various types of scaffolds that we may encounter in the workplace: Self-contained adjustable scaffold supported by the frame structure-We will protect each employee on our self-contained, frame structure supported, adjustable scaffolds by a guardrail system or a Personal Fall Arrest System (PFAS).

   a. The guardrail system:

      i. Has a minimum 200 pound toprail capacity.

      ii. Will be installed before being released for use by our employees.

   b. Personal Fall Arrest System

      i. Will be inspected prior to each use for wear, damage and other deterioration, and defective components shall be removed from service.

5. Falling Object Protection

   All employees must wear hardhats when working on, assembling, or dismantling scaffolds. This is our primary protection from falling objects. Additionally, we will:

   a. Install all guardrail systems with openings small enough to prevent passage of potential falling objects.

   b. Prevent tools, materials, or equipment that inadvertently fell from our scaffolds from striking employees by barricading the area below the scaffold.

6. Using Scaffolds

   Site preparation, scaffold erection, fall protection, and gaining access to the working platform is only part of the requirements for scaffold work. While this all takes concentration and safe work practices, the most dangerous time can be when employees are concentrating on their work and not particularly aware of the hazards of working from scaffolds. It is critical that employees who use scaffolds be trained, among other things, in the recognition of the hazards associated with the type of scaffold being used and to understand the procedures to control or minimize those hazards. Our competent person will inspect all scaffolds and scaffold components for

visible defects before each work shift, and after any occurrence which could affect a scaffold's structural integrity. However, in addition to that, all users of scaffolds in this company will know and understand the following safety rules:

a. Scaffolds and scaffold components will never be loaded in excess of their maximum intended loads or rated capacities.

b. Debris must not be allowed to accumulate on platforms.

7. Specific Procedures

In addition to the general procedures in this written safety plan, there are procedures that apply to specific types of scaffolds. The safety rules for these specific types of scaffolds are found in1926.452.

a. Prohibited Practices

The following practices will never be tolerated in this company:

i. Scaffold components manufactured by different manufacturers will never be intermixed unless the components fit together without force and the scaffold's structural integrity is maintained.

ii. Unstable objects will never be used to support scaffolds or platform units. Footings must be level, sound, rigid, and capable of supporting the loaded scaffold without settling or displacement.

iii. Cross braces will never be used as a means of access.

iv. The use of shore or lean-to scaffolds is prohibited.

C. Aerial Lifts

1. Safety Rules

a. Anytime aerial lifts, including: (1) extensible boom platforms, (2) aerial ladders, (3) articulating boom platforms, (4) vertical towers, or (5) a combination of any such devices, are used to elevate employees to job-sites above ground, the following safety rules will apply:

i. Only authorized persons shall operate an aerial lift.

ii. Employees shall always stand firmly on the floor of the basket, and shall not sit or climb on the edge of the basket or use planks, ladders, or other devices for a work position.

iii. Approved fall protection shall be worn and a lanyard attached to a lanyard anchoring point when working from an aerial lift.

iv. Boom and basket load limits specified by the manufacturer shall not be exceeded.

v. For electrical lines rated 50 kV or below, a minimum clearance between the lines and any part of the aerial lift, employee, tools/equipment, or load shall be 10 feet. For lines greater than 50 kV, our competent person will determine clearance distances using the rule of 4” additional clearance or every 10 kV greater than 50 kV.

vi. Lift controls shall be tested each day prior to use to determine that such controls are in safe working condition. Tests shall be made at the beginning of each shift during which the equipment is to be used to determine that the brakes and operating systems are in proper working condition.

vii. All aerial lifts shall have a reverse signal alarm audible above the surrounding noise level or the vehicle is backed up only when an observer signals that it is safe to do so.

viii. No aerial lift this company owns or uses will be 'field modified' for uses other than those intended by the manufacturer unless:

(1.) the manufacturer certifies the modification in writing, or

(2.) any other equivalent entity, such as a nationally recognized testing lab, certifies the aerial lift modification conforms to all applicable provisions of ANSI A92.2-1969, and the OSHA rules at 1926.453. The lift must be at least as safe as the equipment was before modification.

D. Ladder Trucks and Tower Trucks:

Aerial ladders must be secured in the lower traveling position by the locking device on top of the truck cab, and the manually operated device at the base of the ladder before the truck is moved for highway travel.

E. Extensible and articulating boom platforms:

1. Safety Rules

a. We will test lift controls each day prior to use to determine they are in safe working condition.

b. Only authorized employees can operate an aerial lift.

c. A full body harness must be worn and a lanyard attached to the boom or basket when working from an aerial lift.

F. Duties of Competent and Qualified Persons

When working with scaffolds in this company there are some tasks that must be done by our competent or a qualified person.

1. Definition

a. Competent person-One who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

b. Qualified person-One who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training and experience, has successfully demonstrated his/her ability to solve or resolve problems related to the subject matter, the work, or the project.

2. Duties of a Competent Person:

a. We will not intermix scaffold components manufactured by different manufacturers unless the components fit together without force and the scaffold's structural integrity is maintained. Scaffold components manufactured by different manufacturers will not be modified in order to intermix them unless our competent person determines the resulting scaffold is structurally sound.

b. Before a suspension scaffold is used, direct connections must be evaluated by our competent person who will confirm, based on the evaluation, that the supporting surfaces are capable of supporting the loads to be imposed.

c. Prior to each work shift and after every occurrence which could affect a rope's integrity, suspension scaffold ropes will be inspected by our competent person. Ropes will be replaced if any of the conditions outlined in 1926.451(d)(10) exist.

d. Scaffolds will be erected, moved, dismantled, or altered only under the supervision and direction of a competent person.

3. Duties of a Qualified Person:

a. The following tasks will only be done by the person we have deemed competent or qualified to perform

b. Scaffolds must be designed by a qualified person and shall be constructed and loaded in accordance with that design.

c. Swaged attachments or spliced eyes on wire suspension ropes of suspension scaffolds will not be used unless they are made by the wire rope manufacturer or a qualified person.

d. We will have each employee who performs work while on a scaffold trained by a person qualified in the subject matter to recognize the hazards associated with the type of scaffold being used and to understand the procedures to control or minimize those hazards.

e. If any unsafe condition is noted which might impact the ability of the scaffolding system to safely perform its intended functions and protect personnel, the scaffolding system will be immediately tagged at all access points, "Danger: Do Not Use" These tags shall be designed in accordance with specifications detailed in 29 CFR 1910.145 & 1926.200. These tags are commercially available through Labelmaster as Product number HT-117 by calling 1-800-621 -5808.

f. Implement the company’s disciplinary plan in accordance with our corporate policies and procedures program when requirements of this program are not met or unqualified individuals alter, dismantle, or erect our scaffolding systems.

G. Training

Recognizing the need for training, the following syllabus is a part of this written safety plan.

1. Employees Who Use Scaffolds.

Our employees who perform work on scaffolds will be trained by a qualified person to recognize the hazards associated with the type of scaffold being used and to understand the procedures to control or minimize those hazards. The training will include the following areas as applicable:

a. The nature of and the correct procedures for dealing with electrical hazards.

b. The nature of and the correct procedures for erecting, maintaining, and disassembling the fall protection and falling object protection systems used.

c. The proper use of the scaffold, and the proper handling of materials on the scaffold.

d. The maximum intended load and the load-carrying capacities of the scaffolds used.

e. Any other pertinent requirements of the OSHA rules.

2. Employees Who Erect, Disassemble, Move, Operate, Repair, Maintain, or Inspect Scaffolds:

Our employees who erect, disassemble, move, operate, repair, maintain, or inspect scaffolds will be trained by our competent person to recognize the hazards associated with the work being done. The training will include the following topics as applicable:

a. The nature of scaffold hazards.

b. The correct procedures for erecting, disassembling, moving, operating, repairing, inspecting, and maintaining the type of scaffold in question.

c. The design criteria, maximum intended load-carrying capacity, and intended use of the scaffold.

d. Any other pertinent requirements of this subpart.

3. Employees Who Need Retraining:

When we have reason to believe that one of our employees lacks the skill or understanding needed for safe work involving the erection, use or dismantling of scaffolds, we will retrain the employee so that the requisite proficiency is regained. Retraining will be done in at least the following situations:

a. Where changes at the worksite present a hazard about which the employee has not been previously trained.

b. Where changes in the types of scaffolds, fall protection, falling object protection, or other equipment present a hazard about which an employee has not been previously trained.

c. Where inadequacies in an affected employee's work involving scaffolds indicate that the employee has not retained the requisite proficiency.

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Section 9: SAFETY VIOLATION POLICY

Should any Kennedy Painting employee commit an unsafe act, intentional or not, this action should be addressed by the immediate supervisor and reviewed by the Safety Coordinator and Management. It is not required to complete all steps of the disciplinary procedure in every case. Discipline may begin at any step appropriate to the situation.

Discipline includes, but is not limited to:

- Verbal Reprimand
- Written Reprimand
- Suspension from Job Site
- Termination of Employment Contract

Willful Safety Violation

Employees committing a willful behaving in a manner that results in a Life Threatening safety violation will be terminated immediately

Paperwork

- A Safety Violation Notice ***(Form can be found in Section 10 of this manual***) should be completed for all written reprimands.
- A copy should be maintained in the employee's file and provided to the Supervisor, if corrective action(s) is required.

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FORMS TO USE WITH YOUR SAFETY PROGRAM

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Incident/Near Miss Investigation Report

Investigator: _____ Report Date: _____ / _____ / _____

Incident Resulted In: ☐ Near Miss ☐ Equipment Damage ☐ Property Damage ☐ Injury ☐ Fatality

When did the incident occur? Date: _____ / _____ / _____ Time: ____ : ____a.m./p.m.

Is the incident/injury reportable to OSHA? ☐ No ☐ Yes – Date reported to OSHA: _____ / _____ / _____

Involved Employee Information:

Name: _____ (LAST) _____ (FIRST) _____ (MI)

Address: _____ (STREET) _____ (CITY) _____ (STATE) _____ (ZIP)

Home Phone: _____ Mobile Phone: _____

D.O.B.: _____ Gender: _____ SS# _____ - _____ - _____

Occupation: _____

Was the employee Drug Tested? ☐ No ☐ Yes – Results: _____

Was the employee Alcohol Tested?☐ No ☐ Yes – Results: _____

Employer Information:

Company Name: _____

Supervisor's Name: _____ (LAST) _____ (FIRST) _____ (MI)

Telephone: _____ Fax Number: _____

Company Address: _____ (STREET) _____ (CITY) _____ (STATE) _____ (ZIP)

Witness Information: ☐ No Witnesses

Name: _____ (LAST) _____ (FIRST) _____ (MI)

Statement Attached? ☐ Yes ☐ No (If no, explain) _____

Name: _____ (LAST) _____ (FIRST) _____ (MI)

Statement Attached? ☐ Yes ☐ No (If no, explain) _____

Name: _____ (LAST) _____ (FIRST) _____ (MI)

Statement Attached? ☐ Yes ☐ No (If no, explain) _____

Incident/Near Miss Investigation Report (cont'd)

Incident Information:

When was the incident reported to supervisor?Date: _____ / _____ / _____ Time: ____ : ____a.m./p.m.

Job Site Address: _____ _____ _____ _____
STREET CITY STATE ZIP

Specific Location Where Incident Occurred: _____

The incident occurred while working: ☐ Inside ☐ Outside

Weather conditions: ☐ Sunny ☐ Excessive Heat ☐ Dry ☐ Rainy ☐ Snowy ☐ Excessive Cold

What was the involved employee doing at the time of the incident?

Describe how did the incident occurred:

Describe any Property damage:

Describe any Equipment damage:

What environmental factors (unsafe conditions) contributed to the incident? *(see supplemental information)*

What behavioral factors (unsafe acts) contributed to the incident? *(see supplemental information)*

What corrective actions have been taken to prevent incident recurrence?

Incident/Near Miss Investigation Report (cont'd)

Injury Information:

When was the injury reported to supervisor? Date: _____ / _____ / _____ Time: ____ : ____a.m./p.m.

Type of Medical Treatment administered: (check all applicable)

- ☐ None
- ☐ On-Site first aid
- ☐ Doctor/Clinic visit
- ☐ EMT/Paramedic
- ☐ Emergency Room
- ☐ Hospital Stay

Type of Injury/Illness that was incurred: (check all applicable)

- ☐ Abrasion
- ☐ Allergic Reaction
- ☐ Animal Bite
- ☐ Asphyxiation
- ☐ Blister
- ☐ Burns
- ☐ Cardiovascular
- ☐ Concussion
- ☐ Contusion (bruise)
- ☐ Crushing Injury
- ☐ Dermatitis
- ☐ Dislocation
- ☐ Electrocution
- ☐ Exposure-Chemical
- ☐ Exposure-Radiation
- ☐ Eye Cases
- ☐ Fracture
- ☐ Hearing Loss-Temp.
- ☐ Hernia
- ☐ Laceration
- ☐ Poisoning
- ☐ Puncture
- ☐ Repetitive Motion
- ☐ Splinter
- ☐ Sprain (joint)
- ☐ Sting-Insect Bite
- ☐ Strain (muscle)
- ☐ Temperature-Extreme Hot or Cold
- ☐ Unclassified

Injury Caused by: (check all applicable)

- ☐ Burns
- ☐ Caught in/between
- ☐ Climbing
- ☐ Cut/Puncture
- ☐ Electrical Shock
- ☐ Explosion
- ☐ Fall - Elevation
- ☐ Fall - Same Level
- ☐ Fall – Climbing
- ☐ Falling Object
- ☐ Irritation
- ☐ Lifting./Handling
- ☐ Motor Vehicle
- ☐ Natural Disaster
- ☐ Reaching for…
- ☐ Struck against…
- ☐ Struck by…
- ☐ Violence

Body Part that was injured: (check all applicable)

- ☐ Head
- ☐ Face
- ☐ Ear ☐ R ☐ L
- ☐ Eye ☐ R ☐ L
- ☐ Nose
- ☐ Mouth
- ☐ Throat
- ☐ Neck
- ☐ Back
- ☐ Chest
- ☐ Stomach
- ☐ Kidney ☐ R ☐ L
- ☐ Buttock ☐ R ☐ L
- ☐ Groin ☐ R ☐ L
- ☐ Hip ☐ R ☐ L
- ☐ Leg ☐ R ☐ L
- ☐ Knee ☐ R ☐ L
- ☐ Ankle ☐ R ☐ L
- ☐ Foot ☐ R ☐ L
- ☐ Toes ☐ R ☐ L

(circle)

- ☐ Shoulder ☐ R ☐ L
- ☐ Arm ☐ R ☐ L
- ☐ Elbow ☐ R ☐ L
- ☐ Wrist ☐ R ☐ L
- ☐ Hand ☐ R ☐ L
- ☐ Fingers ☐ R ☐ L

(circle)

Medical Treatment Information:

Hospital/Clinic Name: _____ Telephone: _____

Address: _____ _____ _____ _____
STREET CITY STATE ZIP

Attending Physician: _____ Telephone: _____

Address: _____ _____ _____ _____
STREET CITY STATE ZIP

Recommendation of the doctor: ☐ Return to Regular Work ☐ Restricted Work ☐ Days off Work

Number of Days to be off Work: _____ Date to Return to Restricted Work: _____ / _____ / _____

Number of Restricted Work: _____ Date to Return to Regular Work: _____ / _____ / _____

Incident/Near Miss Investigation Report (cont'd)

Supervisor Information:

I certify that I have reviewed all information contained on this Incident/Near Miss Report and am taking the appropriate actions to completely investigate the incident, as well as to report any required findings.

Reported to National Safety Consulting: Date: _____ / _____ / _____ Time: ____ : ____a.m./p.m.

Name of person to whom it was reported: _____

Reported to OSHA (if applicable): Date: _____ / _____ / _____ Time: ____ : ____a.m./p.m.

Signature:

_____ _____ _____ / _____ / _____
PRINT SIGNED DATE

National Safety Consulting Information:

Safety Manager Completing Investigation: _____

☐ Photos Attached to Report

Incident Notes:

Recommended Remediation:

National Safety Consultant Signature:

_____ _____ _____ / _____ / _____
PRINT SIGNED DATE

Incident/Near Miss Supplemental Information

Note: Each incident will involve <u>at least</u> one of the following conditions as a contributing factor.

Environmental Factors (Unsafe Conditions)

Conditions	Definition of Condition	Suggested Corrective Action
Unsafe procedures	Hazardous Process. Management failed to make adequate plans for safety.	A. Pre-Project Planning B. Formulation of Safe Procedures
Improperly guarded	Work areas, machines, or equipment that is unguarded or inadequately guarded.	A. Inspection B. Checking plans, blueprints, purchase orders, contracts, & materials for safety C. Include guards in original design, order, & contract D. Provide guards for existing hazards
Defective through use	Buildings, machines, or equipment that have become rough, slippery, sharp edged, worn, cracked, broken, or otherwise defective through use or abuse.	A. Inspection B. Proper Maintenance
Defective through design	Failure to provide for safety in the design, construction, and installation of buildings, machinery, & equipment. Too large, too small, not strong enough.	A. Source of supply must be reliable B. Checking plans, blueprints, purchase orders, contracts, & materials for safety C. Correction of defects
Unsafe clothing or personal protective equipment	Management's failure to provide or specify the use of goggles, respirators, safety shoes, hard hats, & other articles of safe dress or apparel.	A. Provide safe apparel or personal protective equipment. B. Specify the use or non-use of certain apparel or protective equipment on certain jobs.
Unsafe housekeeping facilities	Unsuitable layout or lack of equipment necessary for good housekeeping (i.e. shelves, boxes, bins, aisle markers, etc.)	A. Provide suitable layout and equipment necessary for good housekeeping.
Improper ventilation	Poorly or not ventilated area	A. Improve ventilation

Behavioral Factors (Unsafe Acts)

Factor	Definition of Factor	Suggested Corrective Action
Lack of knowledge or skill	Unaware of safe practice; Unpracticed or unskilled. Not properly instructed or trained.	A. Job training B. Improved hiring practices
Improper attitude	Worker was properly trained and instructed, but failed to follow instructions.	A. Supervision B. Discipline C. Improved hiring practices
Physical Deficiencies	Worker has impaired eyesight or hearing, heart trouble, hernia, previous injuries, etc.	A. Pre-employment physicals B. Periodic physicals C. Proper placement of workers D. Identification of workers with temporary physical deficiencies
Substance Abuse	Worker was under the influence of (illegal or prescribed) drugs or alcohol while completing task	

Incident/Near Miss Witness Statement

Witness Information:

Name: _____ _____ _____
LAST FIRST MI

Address: _____ _____ _____ _____
STREET CITY STATE ZIP

Home Phone: _____ Mobile Phone: _____

Name of Employer: _____

Supervisor's Name: _____ _____ _____
LAST FIRST MI

Telephone: _____ Fax Number: _____

Employer's Address: _____ _____ _____ _____
STREET CITY STATE ZIP

Incident Information:

When did the incident occur? Date: _____ / _____ / _____ Time: ____ : ____a.m./p.m.

The incident occurred while working: ☐ Inside ☐ Outside

Weather conditions: ☐ Sunny ☐ Excessive Heat ☐ Dry ☐ Rainy ☐ Snowy ☐ Excessive Cold

Please state your involvement in the incident: *(the more detail, the better – continue on back, if needed)*

Did you report the incident to anyone? ☐ Yes _____ ☐ No (If no, explain)

The events recounted on this Incident/Near Miss Report are true and complete to the best of my recollection.

_____ _____ _____ / _____ / _____
PRINT SIGNED DATE

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Safety Training / Meeting Sign In Sheet

Inspector: _____ Meeting Type: _____ Date: ____ / ____ / ____

	Print Name	Work Type	Signature
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			

Safety Topics Covered:

- ☐ Confined Space
- ☐ Driver Safety
- ☐ Drug-Free Workplace Program
- ☐ Emergency Procedures
- ☐ Fire Protection
- ☐ First Aid Training
- ☐ Hazardous/Flammable Materials
- ☐ Housekeeping
- ☐ Incident Investigation
- ☐ Incident Reporting
- ☐ Industrial Hygiene
- ☐ Injuries or Incident Review
- ☐ Lockout/Tagout
- ☐ Materials Handling/Back Safety
- ☐ Personal Protective Equipment
- ☐ Powered Industrial Truck
- ☐ Pre-Project Planning
- ☐ Safety Manual Orientation
- ☐ Supervisor's Training
- ☐ Teamwork
- ☐ Tools, Equipment, Machinery
- ☐ Violence Prevention Program
- ☐ Welding
- ☐ Other _____

Comments: _____

_____

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Kennedy Painting

Safety Inspection Check List

Inspector: _____ Title: _____ Date: ____ / ____ / ____

1 = Satisfactory 2 = Needs some attention 3 = Needs immediate action

Item	*Grade*	*Comments*
Housekeeping		
General neatness of work area, lunchrooms, restrooms. Housekeeping maintained		
Aisles are properly marked, clear & in good condition		
Aisle widths maintained		
Mats, gratings, etc. used when drainage is needed		
Floor openings & holes marked and protected		
Fire Prevention		
Fire extinguisher available & functional, where required		
No smoking signs posted & enforced		
Ventilation adequate		
Exposures from dust, fumes, vapors, etc. controlled		
Flammable Gases & Liquids, Batteries		
Proper storage, use & handling of flammable & combustible materials in approved cans and/or cabinets		
Proper handling of compressed gases & materials		
Storage drums for flammable liquids properly grounded & bonded		
Batteries are charged in a properly vented room		
No open flames exist in the battery charging room		
Fuel tanks are always filled when the equipment engine is turned off		
Tools, Machinery & Equipment		
Electrical & portable tools and outlets properly grounded		
Covers in place on all electrical fuse & outlet boxes		
Approved machines guards in place at points of operation & over foot treadles		
Only authorized tools are used to place & remove materials from machinery		
Proper guarding of gears, pulleys, conveyors, chains, etc.		
Machines firmly anchored to prevent moving		
Weight of load does not exceed equipment (i.e. scaffolding) rating to handle it		
Mobile equipment equipped with a horn, capacity sign & overhead guard		
Lockout/Tagout program in use for designated equipment		

Continued on back

Safety Inspection Check List (Page 2)

1 = Satisfactory 2 = Needs some attention 3 = Needs immediate action

Item	***Grade***	***Comments***
Ladders		
Ladders inspected, in good condition, and free from sharp edges & splinters		
Ladders have proper safety feet		
Cages & wells used as required (on fixed ladders only)		
Step ladders do not exceed 20 feet in length		
Stairs & Exits		
Stair handrails are 30-34 inches above surface		
A handrail is in place on every stairway with at least 4 risers (steps)		
Risers conform to proper height and are uniform		
Standard railings are in place on open sides of exposed stairs		
Building exits are marked & adequate		
Exit routes are not blocked and well illuminated		
Lighting on exit signs conform to government standards (5 foot candles)		
General Work Environment & Personal Protective Equipment		
Noise levels conform to government standards		
Compressed air for cleaning under 30 PSI		
Separate lunch rooms provided when toxic materials are present		
Number of restroom facilities available conforms to federal standards		
Separate restroom facilities provided for men & women		
Personnel trained in first aid & first aid kits are available		
Personal protective equipment provided & used		
Proper respirators & masks used when necessary		
OSHA Postings & Records		
OSHA poster is properly displayed		
Capacity signs posted through-out the building		

Kennedy Painting

Safety Violation Notice

Employee Name: _____

Department: _____ Violation Date: ____ / ____ / ____

A safety and health survey of your operation has revealed non-compliance of certain safety rules, procedures, programs, and/or local, state, or federal regulations. As a condition of the company's safety policy, you are required to maintain a safe work environment and to prevent unsafe actions of yourself, co-workers, and/or your employees.

This warning is for your protection and safety. The violation(s) noted and corrective action(s) are indicated below.

Rule Violated	Violation Description	Corrective Action Required*
1)		
2)		
3)		

Corrective Action Required*

1 = Cease operation until corrective action is complete
2 = Warn personnel and instruct them on proper safety procedures
3 = Provide proper equipment necessary
4 = Change procedure/work method
5 = Initiate and complete corrective action (include date)
6 = Other (specify above)

Comments: _____

Disciplinary Action Imposed

- ☐ Verbal Reprimand along with this notice
- ☐ Written Reprimand with a last chance warning
- ☐ Suspension from Work Site (from _____ / _____ / _____ until _____ / _____ / _____)
- ☐ Termination of Employment Contract

Supervisor: _____ Date: ____ / ____ / ____

Employee: _____ Date: ____ / ____ / ____

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Substance Abuse Testing Notification Form

To be signed by the employee and returned to the Company

Date: _____ / _____ / _____ Time: _____ am / pm

I acknowledge that I have been notified by my employer, Kennedy Painting, on the above date and time, that I have to submit to a drug or drug and alcohol test within 24 hours of this notification. If I do not submit to this request, within the 24-hour period, I am in violation of the policy and will be reclassified to a non-compliant status and subject to the reinstatement requirements as defined in this policy.

As verification that I completed my test within 24 hours, I will provide to my employer a copy of the chain-of-custody form that was given to me by the collection site when I performed my drug test

Print Name: _____ Date: _____ / _____ / _____

Signature: _____

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Substance Abuse Policy Acknowledgement Form

To be signed by the employee and returned to the Company

Under terms of the DRUG-FREE WORKPLACE ACT, we are required to give you a copy of our official policy statement concerning the establishment of a drug-free workplace.

Please sign below to indicate that:

1. You have received this statement of policy
2. You understand that substance abuse of any kind while on the job is prohibited.
3. You have read the Substance-Abuse Policy or been informed of the content within the policy.
4. You agree to abide by this Substance-Abuse Policy in all respects.
5. You have been provided a copy of our Substance-Abuse Policy.

NOTE THAT THE LAW REQUIRES YOU TO ACKNOWLEDGE AND AGREE TO THE ABOVE AS A CONDITION OF CONTINUED EMPLOYMENT.

If you have any questions regarding these procedures, please consult with your employer as soon as possible. Your cooperation with this policy and your continued safety is appreciated.

Acknowledged and agreed:

Print Name: _____ Date: _____ / _____ / _____

Signature: _____

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Special Emphasis Program Forms

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Respiratory Protection Supplied Air Pre-Job Checklist

Date		**Location**	
Unit		**Equipment**	
Supervisor		**Crew**	
Bottle Watch		**Safety Standby**	

Cylinders & Associated Equipment	**Yes**	**No**	**Hoses and Fittings**	**Yes**	**No**
Pressure: All bottles, i.e. 6 paks must be changed at 500 psi (SCBAs will be full for rescue or standby work 2000 psi)			Serviceable condition		
			Connected properly		
			No leaks		
Gauges					
Valve and check valve			**Facepiece and Regulator**	**Yes**	**No**
Cylinder Valve Cover(s)			Lens is clean		
Alarm			Tearoff Lens Present		
Regulator-coupling secured			Face seal (fit check)		
SCBA Frame and Harness Assembly	**Yes**	**No**	Head straps		
			Purge valve		
Waist belt			Exhalation valve & diaphragm		
Shoulder straps			Adequate air flow		
Snaps, buckles, clips					

Task Related Checklist	✓
Proper permits at location and displayed	
Hazard analysis completed and displayed	
Safe work and emergency plans understood by all crew members	
Personnel certified to perform supplied air work	
Standby attendant trained and procedures reviewed	
Bottle watch trained and procedures reviewed	
Area barricaded with red tape and tagged “supplied air being used”	
Emergency bypass off	
Damaged equipment tagged and removed from service	
Backup cylinder determined	

Note:

- *Cylinders which show evidence of exposure to high heat or impact damage shall be removed from service and retested prior to recharging.*
- *Do not use tools to open or close the purge valve (finger-tight only).*
- *Route hose lines in a manner that does not restrict access/egress.*
- *Make sure your work does not endanger others in your immediate area or downwind.*
- *Do not remove the facepiece if product exposure obstructs your vision. Use tearoff lens or wipe it off and move safely out of the hazardous environment.*

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Respiratory Protection Individual Respiratory Fit Test Record

Location:		**Date:**	
Instructor(s):		**Test Type:**	Qualitative / Quantitative
Respirator Information:		**Test Method:**	
Make			
Model			
Style			
Size			

Print Employee's Name | Social Security Number

Employee's Signature | Date Entered

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Safety Manual Acknowledgement Form

To be signed by the employee and returned to the Company

The rules, programs, and procedures stated above in the Kennedy Painting safety manual are not intended to cover all the possible situations you will face on the job. Kennedy Painting encourages and expects employees to act in a safe and responsible manner at all times, both on and off the job.

I have read the Kennedy Painting Safety Manual, understand it, and agree to abide by it. I understand that violation of these rules may lead to termination of employment contract.

Print Name: _____ Date: _____ / _____ / _____

Signature: _____

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End Safety Manual