

Safety Coordinator:
Chris Harrington
Issuing Dept: **Safety/HR**



PRO PAINTING & DRYWALL

Environmental Health and Safety Manual

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Jacksonville, FL 32218
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PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:

Chris Harrington

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Environmental Health and Safety Manual

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Environmental Health and Safety Manual

Table of Contents

EHS Manual Revision History	18
Revision History Table	18
Responsibility Designation	19
Safety Policies and Procedures Acknowledgement Form	20
Policy Statement and Code of Safe Practices.....	21
Policy Statement.....	21
Code of Safe Practices.....	22
Aerial and Scissor Lifts.....	25
Purpose.....	25
Responsibilities	25
Policy	25
Fall Protection/Controlled Access Zones	26
Aerial Lift Training.....	27
Aerial Lift Equipment	28
Scissor Lift.....	29
Policy	29
How to Safely Use Scissor Lifts.....	29
Fall Protection for Scissor Lifts.....	30
Stabilization for Scissor Lifts.....	30
Positioning for Scissor Lifts	31
Scissor Lift Use Near Energized Power Lines.....	31
Scissor Lift Equipment Maintenance	31
Training for Scissor Lifts	32
Important Information Regarding Scissor Lift Compliance.....	32
Definitions.....	33
Bloodborne Pathogens.....	35
Purpose.....	35
Policy	35
Responsibilities	35
Personnel Exposure Determination	36
Universal Precautions	37
Exposure Control Plan	37
Engineering Controls and Work Practices	38
Training	39
Personal Protective Equipment	40



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:

Chris Harrington

Issuing Dept: Safety/HR

Environmental Health and Safety Manual

Housekeeping	41
Recordkeeping	41
Hepatitis B Vaccination	43
Caught-in or -between and Struck-by Hazards	46
Purpose.....	46
Responsibilities	46
Policy	46
Caught-in or -between Hazards	46
Struck-by Injuries	49
Personal Protective Equipment (PPE)	52
Forklifts and Powered Industrial Trucks.....	52
Inspections.....	52
Training	53
Code of Conduct	55
Statement of Policy	55
Definitions.....	55
Standards of Conduct	56
Equal Employment and Nondiscrimination	56
Environmental Compliance.....	57
Safety and Health	57
Drugs and Alcohol	57
Conflicts of Interest.....	58
Gifts and Entertainment.....	59
Communications and Records	60
Antitrust Policy.....	60
Claims.....	62
Statements and Certifications.....	63
Commitment to Disadvantaged Business Enterprises	63
Obligation to Report Violations and Cooperation	63
Consequences for Violations.....	64
Acknowledgment	64
Confined Spaces	66
Purpose.....	66
Responsibilities	66
Policy	67
Permit Required Confined Space.....	67
Employee Controlled Confined Space	69
Contractors.....	72



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:

Chris Harrington

Issuing Dept: Safety/HR

Environmental Health and Safety Manual

Reevaluation.....	72
Field Staff.....	73
Permits	75
Entry Permit	75
Written Permit Space Program	76
Termination and Closing or Cancelling of Permits.....	76
Emergency and Rescue Services.....	77
Employees Designated for Rescue	77
Non Entry Rescue	78
High Angle Rescue	78
Knot Tying.....	79
Rescue Equipment Inspection	80
Pre-Permit Duties.....	81
Forced Air Ventilation	83
Air Monitoring.....	83
Pre-Entry Actions	84
Entry.....	86
Monitor Inspection and Calibration	87
Completion of Entry	88
Illumination	88
Training	88
Entry Operations.....	90
Program Coordinators.....	91
Entry Supervisors, Attendants, and Entrants.....	91
Multi Employer Procedure	92
Personal Protective Equipment (PPE)	92
Definitions.....	93
Disciplinary	96
Purpose.....	96
Responsibilities	96
Policy.....	96
Inspections.....	96
Violations and Enforcement.....	96
Disciplinary Action Form	98
Driving Safety	100
Purpose.....	100
Responsibilities	100
Policy.....	101



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:

Chris Harrington

Issuing Dept: Safety/HR

Environmental Health and Safety Manual

Driver Qualification.....	101
Driving Safely	101
Cell Phones and 2 Way Radios	102
Monitoring Systems.....	102
Starting.....	102
Driving.....	103
Backing.....	104
Stopping	104
Cargo.....	104
Crash Reporting and Investigation	105
Commercial Driver License (CDL) Regulations.....	106
Vehicle Inspections	107
Progressive Disciplinary Actions.....	107
Fatigue Management.....	108
Training	109
CO ₂ Emission Reduction.....	109
Hours of Service Regulations.....	111
Emergency Action Plan	114
Purpose.....	114
Responsibilities	114
Policy.....	115
Reporting Fire and Emergency Situations	116
Alarm Systems.....	116
Elements of the Emergency Action Plan	117
Emergency Contact Information	117
Emergency Evacuation Plan	118
Evacuation Routes	118
Securing Property and Equipment.....	118
Personal Protective Equipment	119
Advanced Medical Care.....	119
Accounting for Employees/Visitors After Evacuation	119
Re-entry.....	119
Terrorism	120
Sheltering in Place	120
Earthquake.....	122
Severe Weather	122
Explosion.....	122
Training	122
Training Records.....	123



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:

Chris Harrington

Issuing Dept: Safety/HR

Environmental Health and Safety Manual

Fire/Evacuation Drills.....	123
Plan Evaluation	123
Ergonomics.....	125
Purpose.....	125
Responsibilities	125
Policy	126
High-Risk Industries	129
Musculoskeletal Disorders (MSDs)	129
Lifting	130
Office Ergonomics	133
Stretches.....	134
Training	142
MSD (Medical) Management and Early Return-to-Work	143
Ergonomic Process.....	144
Fall Protection and Falling Object Prevention/Protection	146
Purpose.....	146
Responsibilities	146
Policy	147
Training	148
Client Requirement.....	149
Initial Training	149
Certification Training	150
Refresher Training	150
Fall Prevention.....	150
Controlled Access Zones	151
Protective Materials and Equipment	153
Fall Protection Systems.....	154
Retractable Lifelines	154
Standard Harness.....	155
Inspection and Maintenance	155
Most Common and Most Dangerous Fall Hazards	156
Safety Monitoring Systems.....	156
Fall Protection Plan.....	157
Fall Rescue.....	157
Falling Object Prevention/Protection	159
Definitions.....	160
Fatigue Management.....	164
Purpose.....	164



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:

Chris Harrington

Issuing Dept: Safety/HR

Environmental Health and Safety Manual

Responsibilities	164
General	164
Training	165
Engineering Controls	165
Evaluation/Review	165
Fire Protection Extinguishers	167
Purpose.....	167
Responsibilities	167
Policy	167
Training	167
Hazards.....	168
Elimination of Ignition Sources	168
Removal of Incompatibles.....	168
Control of Flammable Gases.....	169
Fire Extinguishers.....	169
Classification of Fires	169
Selection of Extinguishers	169
Location and Marking of Extinguishers	170
Condition.....	171
Mounting and Distributing of Extinguishers.....	171
Inspection and Maintenance	171
Fire Safety Inspections and Housekeeping.....	172
Emergency Exits	172
Emergency Plans for Persons With Disabilities	172
Emergencies Involving Fire/Fire Alarms.....	172
Fire Emergency Procedures.....	173
First Aid/CPR	175
Purpose.....	175
Scope	175
References	176
Training	176
Responsibilities	177
Policy	179
First Aid Facilities	180
First Aid Response.....	180
Emergency Eye Wash and Shower Provision.....	181
Annual Eye Wash Test.....	181
Annual Shower Test	182



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:

Chris Harrington

Issuing Dept: Safety/HR

Environmental Health and Safety Manual

Hazard Determination.....	182
Engineering Controls	182
Procedures	182
Responding To Life-Threatening Emergencies.....	183
Automated External Defibrillators	184
Contractor and/or Temporary Employees	186
Documentation	186
Records.....	186
Forms	187
Definitions.....	187
Grounding Fault Protection - GFCI.....	189
Purpose.....	189
Responsibilities	189
Policy	189
Ground Fault Circuit Interrupters	189
Hand and Power Tools	193
Purpose.....	193
Responsibilities	193
Policy	193
Hand Tools.....	194
Power Tool Precautions	194
Guards.....	195
Safety Switches	195
Electrical Safety	196
Powered Abrasive Wheel Tools.....	196
Pneumatic Tools	197
Powder Actuated Tools	198
Powered Actuated Tool Fasteners.....	198
Hydraulic Power Tools	199
Jacks	199
Hazard Analysis (JSA).....	201
Purpose.....	201
Policy	201
Emergency Procedures	202
Spot the Hazards	202
List the Hazards and Controls.....	203
Training	204
Job Hazard Analysis Form Instructions	204



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:

Chris Harrington

Issuing Dept: Safety/HR

Environmental Health and Safety Manual

Job Hazard Analysis Form	206
HAZCOM	208
Purpose.....	208
Responsibilities	208
Policy	209
Employee Training	210
Non-Routine Tasks.....	211
Off-Site Use or Transportation of Chemicals	212
General Chemical Safety	212
Task Evaluation	212
Chemical Approval Process.....	213
Chemical Storage	213
Storage Cabinets.....	213
Container Labels	214
Emergencies and Spills	215
Housekeeping.....	216
Multi-Employers Worksite	216
Information Chemical Users Must Know	217
Employee Use of SDS	217
GHS (Global Harmonization System)	218
Hazard Communication Standard: Safety Data Sheets	219
New HCS Pictograms and Hazards	229
Allocation of Label Elements (Examples)	229
Definitions.....	230
Heat and Cold Stress.....	235
Heat Stress.....	235
Purpose.....	235
Responsibilities	235
Training	235
Heat Cramps	236
Heat Exhaustion.....	236
Heat Stroke	237
Safe Work Procedures	237
Workers	238
Heat Disorders.....	238
Environmental Factors	238
Physical Factors	239
Provisions of Water	239



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:

Chris Harrington

Issuing Dept: Safety/HR

Environmental Health and Safety Manual

Access to Shade.....	239
Safe Work Procedures	240
Employees.....	240
Cold Stress/Cold Weather Safety	241
Purpose.....	241
Scope	241
Work Considerations Pre-Planning	241
Signs and Symptoms	241
Safe Work Practices	242
Preventative Measures.....	243
Training Requirement.....	243
Personal Protective Equipment	244
First Aid	244
Definitions.....	245
Incident Investigation and Reporting, Near Miss, and Risk Analysis Control.....	247
Incident Investigation and Reporting	247
Purpose.....	247
Responsibilities	247
Policy	248
A Four Step System Approach to Conducting Incident Investigations	249
Documenting the Incident Investigation	250
Investigation Results	250
Medical Treatment and Resumption of Work	251
Near Miss	251
Purpose.....	251
Scope	252
Relevance	252
Procedure For Reporting A "Near Miss" Incident	252
Communication.....	253
Roles and Responsibilities	253
Non-Punitive Exemptions	254
Definitions.....	254
Risk Control Analysis	254
Purpose.....	254
Incident Investigation Form	256
Near Miss Reporting Form.....	257
Near Miss Investigation Form	258
Injury and Illness Prevention Plan/Recordkeeping	260



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:

Chris Harrington

Issuing Dept: Safety/HR

Environmental Health and Safety Manual

Purpose.....	260
Responsibilities	260
Compliance.....	260
Communication.....	261
Hazard Assessment	262
Accident/Exposure Investigations	263
Hazard Correction	264
Training and Instruction	264
Recordkeeping.....	265
Injury Case Management/Safe Return to Work	269
Purpose.....	269
Responsibilities	269
Policy	269
Transitional Work Assignments.....	270
Modified Work Opportunities	270
Permanent Job Modifications and New Position Assignments.....	270
Communications	271
Healthcare Providers	271
Guidelines for Matching Employees to Alternate Duty	271
Alternate Duties	272
Training	272
Records.....	272
Ladder and Stairway Safety	274
Purpose.....	274
Responsibilities	274
Training	275
Ladder Hazards and Safe Use.....	275
Ladder Safety Devices	277
Ladder Inspection	278
Stairways	278
Maintenance.....	281
Ladder Inspection Checklists	281
Definitions.....	282
Lead (Awareness and Abatement).....	286
Purpose.....	286
Responsibilities	286
Policy	286
Scope	286



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:

Chris Harrington

Issuing Dept: Safety/HR

Environmental Health and Safety Manual

Lead Abatement Activities (Commercial/Institutional and Residential)	287
Hazards.....	288
Exposure Limits	289
Exposure Assessment.....	290
Protection of Employees During Assessment of Exposure.....	290
Basis of Initial Determination	292
Air Monitoring.....	292
Observation of Monitoring.....	293
Biological Monitoring	294
Warning Signs	295
Engineering Controls	295
Exhaust Ventilation	296
Encapsulation of Materials Containing Lead	296
Substitution	297
Component Replacement.....	297
Process or Equipment Modification	297
Isolation.....	298
Housekeeping.....	298
Hygiene Facilities and Practices	299
End of Day Procedures	300
Personal Protective Equipment (PPE)	300
Respiratory Protection	301
Administrative Controls.....	303
Medical Surveillance Program.....	303
Medical Removals	304
Multi Contractor Sites	305
Definitions.....	305
RecordKeeping.....	305
Training	306
Lockout Tagout - Control of Hazardous Energy	309
Purpose.....	309
Policy.....	309
Hazard Controls	309
Authorized Employees Training	310
Affected Employee Training	310
Other Employee Training	310
Retraining	311
Preparation of Lock Out and Tag Out Training	311
Routine Maintenance and Machine Adjustments.....	311



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:

Chris Harrington

Issuing Dept: Safety/HR

Environmental Health and Safety Manual

Locks Hasps and Tags	311
Requirements for Lockout Tagout Devices	312
General Lock and Tagout Procedures	312
Shift or Personnel Changes	313
Energy Isolating Device	313
Full Employee Protection.....	313
Group Lockout Settings/Multiple Workers	316
LOTO Procedure for Electrical Plug Type Equipment.....	316
LOTO Procedure Involving More Than One Employee	317
Management of Lock and Tagouts	317
Removal of an Authorized Employee's Lockout Tagout by The Company	317
Lockout or Tagout Devices Removal	318
Testing or Positioning of Machines, Equipment or Components	318
Inspection	319
Contractors.....	319
Definitions.....	319
Manual Lifting.....	322
Purpose.....	322
Responsibilities	322
Policy	322
Hazard Assessment	322
Training	323
Precautions	323
Safe Practices	324
Injury Investigation	325
Two Man Lifts.....	325
Work Station Configuration	326
Personal Protective Equipment (PPE)	326
Additional Engineering Controls	327
Heavy Lifting - NIOSH Lifting Recommendation	327
New Hire Safety Orientation	330
Purpose.....	330
Responsibilities	330
Policy	330
Record Keeping	332
New Employee Orientation Checklist.....	333
Personal Protective Equipment (PPE).....	335
Purpose.....	335



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:

Chris Harrington

Issuing Dept: Safety/HR

Environmental Health and Safety Manual

Responsibilities	335
Policy	335
Hazard Assessment and Equipment Selection	335
Defective and Damaged Equipment	336
Employee-Owned Equipment	336
Payment for Protective Equipment.....	337
PPE Selection.....	337
Fitting Device.....	338
Devices With Adjustable Features	338
Eye and Face Protection	338
Eye and Face Protector Use	339
Head Protection	341
Foot Protection	342
Hand Protection	342
Selection of Gloves for Chemical Hazards	344
Electrical (PPE)	344
Alerting Techniques.....	345
Training	345
Shop Safety	348
Purpose.....	348
Responsibilities	348
Policy	348
General Shop Safety Guidelines.....	348
Hazard Specific Safety Practices	351
Emergency Plans and Procedures	356
Safety Equipment.....	358
Exposure Assessment and Medical Surveillance.....	360
Stop Work Authority.....	362
Purpose.....	362
Responsibilities	362
Policy	363
Reporting Unsafe Conditions	364
Right to a Safe Workplace.....	364
Stop Work Authority Process	364
Documentation	365
Training	365
Follow Up.....	365
Walking Working Surfaces	367



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:

Chris Harrington

Issuing Dept: Safety/HR

Environmental Health and Safety Manual

Purpose.....	367
Scope	367
Responsibilities	367
General Requirements	368
Host Employer's Property.....	369
Inspection, Maintenance and Repair	369
Openings.....	370
Step Bolts.....	371
Manhole Steps	371
Stairways	371
Scaffolds and Rope Descent Systems.....	371
Fixed Industrial Stairs.....	371
Ladders.....	372
Dock-Boards (Bridge Plates).....	373
Designated Areas.....	373
Fall Protection Systems.....	373
Fall Arrest Systems.....	374
Equipment Anchorage	375
Travel Restraint System.....	375
Falling Object Protection	376
Fall Rescue.....	376
Training Requirements	378
Recordkeeping.....	378
Definitions.....	379
Workplace Housekeeping (STF)	383
Purpose.....	383
Responsibilities	383
Policy	383
Importance of Proper Housekeeping.....	384
Maintenance.....	384
Dust/Dirt Removal.....	384
Floors/Aisles and Stairways.....	385
Slips, Trips, and Falls (STF).....	386
Tools and Equipment.....	388
Waste Disposal	389
Employee Facilities.....	389
Material/Equipment Storage.....	390
Inspections.....	391



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:

Chris Harrington

Issuing Dept: Safety/HR

Environmental Health and Safety Manual

Workplace Violence	393
Purpose.....	393
Responsibilities	393
Policy	393
Definitions	394
Prohibited Behavior	394
Notification	395
Reporting and Investigation	395
Confidentiality.....	396
Discipline.....	396
Retaliation	396
Counseling	397
Types of Workplace Violence.....	397
Workplace Harassment.....	399
Recordkeeping	399
Training	399
Training Guidelines.....	400
Assault/Threat Report Form	402
Risk Assessment Summary Report Form.....	404
Sexual Harassment Complaint Form.....	405
Suspect Information Form	407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:

Chris Harrington

Issuing Dept: Safety/HR

Environmental Health and Safety Manual

EHS Manual Revision History

REVISION HISTORY TABLE

The following table contains the revision history of this document.

Change	Version	Date	Modified By	Authorized By
Initial Issue of 32 Programs	1.0	12/14/2023	Pro Painting & Drywall Inc.	Chris Harrington
	1.1			
	1.2			
	1.3			
	1.4			



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Environmental Health and Safety Manual

Responsibility Designation

Designation	Employee
EHS Director	Chris Harrington
EHS Coordinator	As Designated Per Worksite
EHS Committee Chairman	Chris Harrington

Employee	Desk Phone	Mobile Phone
Chris Harrington	(904) 619-2465	



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Environmental Health and Safety Manual

Safety Policies and Procedures Acknowledgement Form

I have received The Company safety guidelines and acknowledge that it is my responsibility to read, understand and comply with all safety policies, procedures, and practices.

I acknowledge that I am responsible for knowing the safety risks in my work area, following safe work practices in performing my job, reporting any unsafe work practices, and assisting others in creating a safe work environment.

I further understand that failure to comply with these guidelines and safe work practices may result in corrective action, up to and including termination.

Employee Signature

Employee Name (printed)

Date



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Safety Coordinator:

Chris Harrington

Issuing Dept: Safety/HR

Environmental Health and Safety Manual

Policy Statement and Code of Safe Practices

POLICY STATEMENT

The Occupational Safety and Health Act of 1970 clearly states our common goal of safe and healthy working conditions to be the first consideration in operating this business.

Safety and health in our business must be part of every operation. Without question, it is every employee's responsibility at all levels.

It is the intent of this company to comply with all laws. To do this, we must constantly be aware of conditions in all work areas that can produce injuries. No employee is required to work at a job he/she knows is not safe or healthy. Your cooperation in detecting hazards and, in turn, controlling them, is a condition of your employment. Inform your supervisor immediately of any situation beyond your ability or authority to correct.

The personal safety and health of each employee of this company is of primary importance. Prevention of occupationally induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity, whenever necessary. To the greatest degree possible, management will provide all mechanical and physical activities required for personal safety and health, in keeping with the highest standards.

We will maintain a safety and health program conforming to the best practices of organizations of this type. To be successful, such a program must embody proper attitudes toward injury and illness prevention on the part of supervisors and employees. It also requires cooperation in all safety and health matters, not only between supervisor and employee, but also between each employee and his/her co-workers. Only through such a cooperative effort can a safety program in the best interest of all be established and preserved.

Our objective is a safety and health program that will reduce the number of injuries and illnesses to an absolute minimum, not merely in keeping with, but surpassing, the best experience of operations similar to ours. Our goal is to have zero accidents and injuries.

Our safety and health program will include:

- Providing mechanical and physical safeguards to the maximum extent possible.
- Conducting safety and health inspections to find, eliminate or control safety and health hazards as well as unsafe working conditions and practices, and to comply fully with the safety and health standards for every job.
- Training all employees in good safety and health practices.
- Providing necessary personal protective equipment, and instructions for use and care.



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Pro Painting & Drywall Inc.

Safety Coordinator:

Chris Harrington

Issuing Dept: Safety/HR

Environmental Health and Safety Manual

- Developing and enforcing safety and health rules and requiring that employees cooperate with these rules as a condition of employment.
- Investigating, promptly and thoroughly, every accident to find out what caused it and correct the problem so it will not happen again.
- Setting up a system of recognition and awards for outstanding safety service or performance."
- We recognize that the responsibilities for safety and health are shared:
- The employer accepts the responsibilities for leadership of the safety and health program, for its effectiveness and improvement, and for providing the safeguards required to ensure safe conditions.

CODE OF SAFE PRACTICES

All persons shall follow these safe practice rules, render every aid to safe operations, and report all unsafe conditions or practices to the foreman or superintendent.

- Foremen shall insist on employees observing and obeying every rule, regulation, and order as is necessary to the safe conduct of the work and shall take such action as is necessary to obtain observance.
- All employees shall be given frequent accident prevention instructions. Instructions shall be given at least every 10 working days.
- Anyone known to be under the influence of drugs or intoxicating substances that impair the employee's ability to safely perform the assigned duties shall not be allowed on the job while in that condition.
- Horseplay, scuffling, and other acts that tend to have an adverse influence on the safety or well-being of the employees shall be prohibited.
- Work shall be well planned and supervised to prevent injuries in the handling of materials and in working together with equipment.
- No one shall knowingly be permitted or required to work while the employee's ability or alertness is so impaired by fatigue, illness, or other causes that it might unnecessarily expose the employee or others to injury.
- Employees shall not enter manholes, underground vaults, chambers, tanks, silos, or other similar places that receive little ventilation, unless it has been determined that is safe to enter.
- Employees shall be instructed to ensure that all guards and other protective devices are in proper places and adjusted and shall report deficiencies promptly to the foreman or superintendent.
- Crowding or pushing when boarding or leaving any vehicle or other conveyance shall be prohibited.
- Workers shall not handle or tamper with any electrical equipment, machinery, or air or water lines in a manner not within the scope of their duties, unless they have received instructions from their foreman.
- All injuries shall be reported promptly to the foreman or superintendent so that arrangements can be made for medical or first aid treatment.



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Pro Painting & Drywall Inc.

Safety Coordinator:

Chris Harrington

Issuing Dept: Safety/HR

Environmental Health and Safety Manual

- When lifting heavy objects, the large muscles of the leg instead of the smaller muscles of the back shall be used.
- Inappropriate footwear or shoes with thin or badly worn soles shall not be worn.
- Materials, tools, or other objects shall not be thrown from buildings or structures until proper precautions are taken to protect others from the falling objects.



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Issuing Dept: Safety/HR

Environmental Health and Safety Manual



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 25 of 407

Aerial and Scissor Lifts

PURPOSE

The purpose of this document is to outline safety policies and procedures for the use of aerial and scissor lift devices for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company."

The hazards of potential falls at heights of 6 feet and above will be addressed in this document. This instruction describes a systematic approach that must be used to protect and prevent people from falling. This instruction also lists some of the most common fall hazards and provides recommendations and guidelines for selecting fall arrest systems.

OSHA [1926.453](#) [1926.500-503](#), [1926.502\(j\)](#)

RESPONSIBILITIES

The Company/Management

- Perform annual reviews of this safety policy and any corresponding training programs/records
- Ensure all worksites are protected from aerial/scissor lift injuries by providing the necessary Personal Protective Equipment (PPE)
- Enforce the contents of this policy and procedure
- Ensure all aerial lift devices are properly operated by competent persons
- Ensure all aerial lift devices used are designed and constructed in conformance with the requirements set forth by the American National Standards Institute (ANSI) for "Vehicle Mounted Elevating and Rotating Work Platforms" [ANSI A92.2 - 1969](#)
- Active management team to ensure that all aerial lift devices are properly operated by trained personnel

POLICY

Inspections

All aerial lift equipment shall be inspected at the beginning of each work shift to verify that all components of the equipment are in safe operating condition. Workers shall not operate any aerial lift equipment if any component of the pre-shift/job checklist is defective. Any equipment found defective or in need of repair shall be marked as defective and in need of repair, until repaired by qualified personnel prior to operating the defective piece of equipment. In addition to this routine inspection, all lift controls, brakes, and operating systems shall be tested each day prior to use, to verify that they are in safe working condition.



PRO PAINTING & DRYWALL

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Safety Coordinator:
Chris Harrington

Page: 26 of 407

Worksite inspections shall be performed at the start of each shift or job to verify the area is safe for the operation of aerial lifts and other devices.

The worksite inspection shall cover the following:

- Drop-offs, holes, or unstable surfaces such as but not limited to loose dirt, slopes, ditches, bumps, or oil and chemicals that may cause a slip
- Inadequate ceiling heights or other low-hanging obstructions such as but not limited to trees or power lines
- High winds and or severe weather conditions such as but not limited to ice
- The presence of other workers and personnel in the operation

Note: All inspections that take place shall be documented.

FALL PROTECTION/CONTROLLED ACCESS ZONES

If Fall Protection Plans are utilized, the following requirements need to be met:

- When used to control access to areas where leading edge and other operations are taking place the controlled access zone shall be defined by a control line or by any other means that restrict access:
 - When control lines are used, they shall be erected no less than 6 feet (1.8 m) nor more than 25 feet (7.7 m) from the unprotected or leading edge, except when erecting precast concrete members
 - When erecting precast concrete members, the control line shall be erected no less than 6 feet (1.8 m) nor more than 60 feet (18 m) or half the length of the member being erected, whichever is less, from the leading edge
 - The control line shall extend along the entire length of the unprotected or leading edge and shall be parallel to the unprotected or leading edge
 - The control line shall be connected on each side to a guardrail system or wall
- When used to control access to areas where overhand bricklaying and related work are taking place:
 - The controlled access zone shall be defined by a control line erected no less than 10 feet (3.1 m) nor more than 15 feet (4.5 m) from the working edge
 - The control line shall extend for a distance sufficient for the controlled access zone to enclose all employees performing overhand bricklaying and related work at the working edge and shall be parallel to the working edge

To prevent falls from aerial lift devices, the following rules shall be always followed, **except when the device is a Scissor Lift.**

- Use a body harness or a restraining belt with a lanyard attached to the boom or bucket
- An approved fall restraint system shall be worn when working from an aerial lift device. The fall restraint system must be attached to the boom or the basket



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 27 of 407

- Never tie-off, or "belt-off" to any adjacent structure or pole while in the bucket of the device
- Never use ladders, planks, or other materials/devices as a brace or standing platform as a working position
- Never climb or lean over guardrails or handrails
- Always stand firmly on the floor of the bucket or lift platform
- Ensure that access gates or openings are always closed
- The load capacity may never be exceeded in any circumstance. The combined weight of the workers, tools, and materials must be considered when calculating the load
- Boom and basket load limits specified by the manufacturer shall not be exceeded
- Be always aware of overhead clearance and overhead objects. The minimum clearance between electrical lines and any part of the equipment shall be 10 (ten) feet for all power lines rated 50 kV or below
- Never use an aerial lift device as a crane or use the aerial lift device to transport objects larger than the platform
- Always communicate with the worker(s) in the bucket/platform before engaging any of the lower-level controls. Always obtain permission from persons in the bucket before moving the lift, except in the case of an emergency
- All aerial lift devices operated shall have a working backup alarm audible above the surrounding noise level. If the specified device is not equipped with a backup alarm, the device may only be backed or in the reverse position when accompanied by a spotter or observer to ensure safe backing
- Aerial lift devices may only be field modified for uses intended by the manufacturer. All manufacturer recommendations for device modification must be in writing from the manufacturer or an equivalent entity. Said written consent must also be kept on file at least one of The Company's locations
- Never operate the device in winds higher than recommended by the manufacturer
- Never override hydraulic, mechanical, or electrical safety devices

AERIAL LIFT TRAINING

Any persons operating an aerial lift device must be trained as a competent person prior to operation and all training must meet or exceed OSHA requirements as outlined in the Code of Federal Regulations (CFR)

Training may be obtained from the rental company or other certified training facilities.

Retraining shall occur annually or when an employee shows a lack of understanding of aerial lift safe operating procedures.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 28 of 407

AERIAL LIFT EQUIPMENT

Aerial lift devices shall conform to ANSI standards applicable to the type of equipment being used – bucket truck, under-bridge inspection vehicle, portable and or self-propelled personnel lift. Aerial lift devices shall only be used for the purpose intended by the manufacturer. All manufacturer maintenance recommendations, warning regarding the operation, capacity, and safety precautions shall be strictly always followed. Permanent labeling must be conspicuously posted to indicate lifting capacity and travel height.

Only devices approved for lifting personnel shall be used as aerial lifts. Loaders, forklifts, and other material lift devices shall not be used to transport employees to elevated locations or as work platforms. Forklifts and cranes may only be used as a last resort and only with approved personnel baskets.

The insulated portion of an aerial lift shall not be altered in any manner that might reduce its insulating value.

Before moving an aerial lift for travel, the boom(s) shall be inspected to see that it is properly cradled, and outriggers are in a stowed position.

An aerial lift truck may not be moved when the boom is elevated in a working position with men in the basket, except for equipment that is specifically designed for this type of operation.

Before the truck is moved for highway travel, aerial ladders shall be secured in the lower traveling position by the locking device above the truck cab, and the manually operated device at the base of the ladder, or by other equally effective means.

Modifications shall not be made to any aerial lift device without express written authorization from the manufacturer. Buckets and bucket liners shall not be drilled, cut, welded on, etc.

Dual Controls

Articulating boom and extensible boom platforms, primarily designed as personnel carriers, shall have both platform (upper) and lower controls. Upper controls shall be in or beside the platform within easy reach of the operator. Lower controls shall provide for overriding the upper controls. Controls shall be plainly marked as to their function. Lower-level controls shall not be operated unless permission has been obtained from the employee in the lift, except in case of emergency.

Braking/Choking

The brakes shall be set and when outriggers are used, they shall be positioned on pads or a solid surface. Wheel chocks shall be installed before using an aerial lift on an incline, provided they can be safely installed.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 29 of 407

Bursting Safety Factor

The provisions of the American National Standards Institute standard ANSI A92.2-1969, section 4.9 Bursting Safety Factor shall apply to all critical hydraulic and pneumatic components. Critical components are those in which a failure would result in a free fall or free rotation of the boom. All noncritical components shall have a bursting safety factor of at least 2 to 1.

SCISSOR LIFT

POLICY

Only trained workers are allowed to use scissor lifts.

Scissor lifts provide a safe and reliable platform for workers to perform job tasks when used according to the manufacturer's instructions. When not used properly, scissor lifts can present a serious hazard to workers. Employers are responsible for keeping workers safe. This Hazard Alert highlights specific hazards present in workplaces where scissor lifts are used, and controls employers must implement to prevent injuries or fatalities.

Introduction

Scissor lifts are work platforms used to safely move workers vertically and to different locations in a variety of industries including construction, retail, entertainment, and manufacturing.

Scissor lifts are different from aerial lifts because the lifting mechanism moves the work platform straight up and down using crossed beams functioning in a scissor-like fashion.

Although scissor lifts present hazards like scaffolding when extended and stationary, using scissor lifts safely depends on considering equipment capabilities, limitations, and safe practices.

Over a one-year period, OSHA investigated ten preventable fatalities and more than 20 preventable injuries resulting from a variety of incidents involving scissor lifts. OSHA's investigations found that most injuries and fatalities involving scissor lifts were the results of employers not addressing:

- Fall Protection
- Stabilization
- Positioning

HOW TO SAFELY USE SCISSOR LIFTS

Safe scissor lift use includes:

- Properly maintaining the equipment
- Following the manufacturer's instructions



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 30 of 407

- Providing workers with training and needed PPE
- Implementing safe work practices

The worksite safety coordinator shall assess each worksite to identify all possible hazards to select the appropriate equipment for the task.

The worksite safety coordinator shall evaluate and implement effective controls that address fall protection, stabilization, and positioning prior to initial assignment.

FALL PROTECTION FOR SCISSOR LIFTS

Scissor lifts must have guardrails installed to prevent workers from falling [29 CFR 1926.451\(g\)](#) or [29 CFR 1910.29\(a\)\(3\)\(vii\)](#).

The Company will train all workers to:

- Check that a guardrail system is in place before working on the scissor lift
- Only stand on the work platform; never stand on the guardrails
- Keep work within easy reach to avoid leaning away from the scissor lift

STABILIZATION FOR SCISSOR LIFTS

The Company will ensure that scissor lifts are stable and will not tip over or collapse.

Stable conditions for scissor lift use include:

- Follow the manufacturer's instructions for safe movement – this usually rules out moving the lift in an elevated position
- Isolate the scissor lift or implement traffic control measures to ensure that other equipment cannot contact the scissor lift
- Select work locations with firm, level surfaces away from hazards that can cause instability (e.g., drop-offs, holes, slopes, bumps, ground obstructions, or debris)
- Use the scissor lift outside only when weather conditions are good. Scissor lifts rated for outdoor use are limited to wind speeds below 28 miles per hour
- Ensure that safety systems designated to stop collapsing are maintained and not bypassed
- Never allow the weight on the work platform to exceed the manufacturer's load rating
- Never allow equipment other than the scissor mechanism to be used to raise the work platform (e.g., using a forklift to lift the work platform)
- Keep the lift from being struck by other moving equipment on the worksite



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 31 of 407

POSITIONING FOR SCISSOR LIFTS

Positioning the scissor lift to avoid crushing or electrocution hazards is important for safe use.

Crushing hazards are present in workplaces using scissor lifts and may expose workers nearby, even those not working on the scissor lift.

Scissor lifts present crushing hazards similar to vehicles and other mobile equipment at worksites.

The Company will train workers to be watchful when:

- A moving scissor lift is near a fixed object
- A moving vehicle and the scissor lift are operating closely
- The scissor lift passes under a fixed object, such as a door frame or support beam

SCISSOR LIFT USE NEAR ENERGIZED POWER LINES

The Company will ensure scissor lifts are not positioned within close proximity of energized power lines, because electrocution can occur even if neither the scissor lift nor the worker touches the power line.

Position the scissor lift to avoid electrocution, arc flash, and thermal burns.

The Company will use the following safe work practices to ensure that scissor lifts are safely positioned:

- Implement traffic control measures around the scissor lift to prevent other workers or vehicles from getting too close
- Use ground guides when operating or moving the scissor lift around the workplace
- Operators must maintain a minimum clearance distance of at least 10 feet between overhead powerlines that are 50kV or less and any part of the equipment or load unless the lift is insulated for the voltage involved, and the work is performed by a qualified person, then the clearance distance between the uninsulated portion of the aerial lift
- If the job task requires work near an electrical source, ensure that the worker is qualified and has received the required electrical training. ([29 CFR 1910.269](#), [29 CFR 1910.333](#), and [29 CFR 1926 Subpart V](#))

SCISSOR LIFT EQUIPMENT MAINTENANCE

The Company will regularly maintain scissor lifts to ensure they are safe to use (e.g., Prevent the lifting mechanism from collapsing).



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 32 of 407

The Company will regularly:

- Test and inspect controls and components before each use
- Ensure that guardrail systems are in good working condition
- Verify that brakes, once set, will hold the scissor lift in position
- Ensure the brakes are set and outriggers, when used, are positioned on pads or a solid surface
- Ensure wheel chocks are installed before using an aerial lift on an incline

TRAINING FOR SCISSOR LIFTS

The Company will provide workers with training on hazards including how to work safely with or near scissor lifts. (Ref: [29 CFR 1926.454](#)) Training will, at a minimum, include:

- Manufacturer's instructions for operating the scissor lift vertically and while in transit
- How to handle materials on the scissor lift, including weight limits
- Other worksite hazards workers may encounter when working on a scissor lift (e.g., contact with electrical wires)

IMPORTANT INFORMATION REGARDING SCISSOR LIFT COMPLIANCE

The Company will comply with the following OSHA standards (29 CFR) to protect workers from hazards associated with scissor lifts:

General Industry

- [29 CFR 1910.23](#) – Guarding Floor and Wall Openings and Holes
- [29 CFR 1910.28](#) – Safety Requirements for Scaffolding
- [29 CFR 1910.29](#) – Manually Propelled Mobile Ladder Stands and Scaffolds (Towers)
- [29 CFR 1910.333](#) – Selection and Use of Work Practices

Shipyards

- [29 CFR 1915.71](#) – Scaffolds or Staging

Construction

- [29 CFR 1926.21](#) – Safety Training and Education
- [29 CFR 1926.451](#) – General Requirements
- [29 CFR 1926.452](#) – Additional Requirements to Specific Types of Scaffolds
- [29 CFR 1926.454](#) – Training Requirements

Note: Many scissor lifts are covered under OSHA's Scaffolding Standard.

The American National Standards Institute (ANSI) has standards for manufacturing, owning, and operating scissor lifts. They can be found in ANSI A92.3-2006 (Manually Propelled Elevating Aerial Platforms) and A92.6-2006 (Self-Propelled Elevating Work Platforms)



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 33 of 407

DEFINITIONS

Aerial Lift - As defined by OSHA, as any vehicle-mounted device that may be used to elevate personnel, including:

- Extendable boom platforms
- Aerial ladders
- Articulating (jointed) boom platforms
- Vertical towers and any combination of the above

Dual Controls – Articulating boom and extensible boom platforms primarily designed as personnel carriers shall have both platform (upper) and lower controls.

- Lower-level controls shall not be operated unless permission has been obtained from the employee in the lift, except in case of an emergency

Aerial lifts may be made of metal, fiberglass, or reinforced plastic, and may be powered or manually operated. The device is classified by OSHA as an aerial lift device whether it can rotate around a primary vertical axis.

Construction Industry [1926.501](#)(b)(1) - Unprotected sides and edges. Each employee on a walking/working surface (horizontal and vertical surface) with an unprotected side or edge which is 6 feet (1.8 m) or more above a lower level shall be protected from falling using guardrail systems, safety net systems, or personal fall arrest systems.

American National Standards Institutes:

ANSI/SIA A92.2 – 1969

ANSI/SIA A92.3

ANSI/SIA A92.5

ANSI/SIA A92.6

OSHA:

[29 CFR 1910.67](#)

[29 CFR 1910.269\(p\)](#)

[29 CFR 1926.21](#)

[29 CFR 1926.453](#)

[29 CFR 1926.502](#)



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 34 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 35 of 407

Bloodborne Pathogens

PURPOSE

The purpose of this document is to outline The Bloodborne Pathogens Exposure Control Plan for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company." OSHA requires that all employers that can "reasonably anticipate exposure" of employees to infectious material prepare and implement a written exposure control plan. The Company has adopted this policy to ensure a safe and healthy work environment for its personnel.

POLICY

Bloodborne pathogens are diseases caused by microorganisms that live in the bloodstream and are spread through blood and other body fluids. Bloodborne pathogens include the Human Immunodeficiency Virus (HIV), Hepatitis B Virus (HBV), and Hepatitis C Virus (HCV). These can enter the bloodstream through cuts, abrasions, or small tears in mucous membranes.

Bloodborne pathogens can be transmitted through any bodily fluid, and employees must take care when they are near, or meet contaminants, to prevent the spread of bloodborne infections.

RESPONSIBILITIES

The Company is committed to providing a safe and healthy work environment for all personnel. In pursuit of this objective, the following Exposure Control Plan (ECP) is provided to eliminate or minimize occupational exposure to bloodborne pathogens in accordance with [OSHA 29 CFR 1910.1030](#), "Occupational Exposure to Bloodborne Pathogens." This plan is vital to assist our organization in implementing and ensuring compliance with the OSHA standard, thereby protecting our employees.

ECP Administration

Chris Harrington shall be responsible for the implementation, maintenance, review, and update of this ECP. The plan should be reviewed at least once annually, but whenever necessary, to ensure the plan aligns with applicable regulatory standards. All personnel who have occupational exposure to blood and or Other Potentially Infectious Materials (OPIM) must comply with the procedures set forth in this policy.

Chris Harrington shall provide and maintain, on behalf of The Company, all necessary Personal Protective Equipment (PPE), engineering controls (e.g., sharps containers), labels, and red bags as required by the standard. **Chris Harrington** will ensure that adequate supplies of equipment are always available in the appropriate sizes to ensure that all personnel have access if needed.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 36 of 407

Chris Harrington shall be responsible for ensuring that all medical actions required by the standard are performed and that appropriate employee health and OSHA records are always maintained and current with applicable regulations. **Chris Harrington** will be responsible for training, documentation of training, and making the written ECP available to all personnel who perform work for The Company.

Chris Harrington shall be responsible for identifying employees who may be anticipated to meet blood and other potentially infectious materials. The Company shall provide post-exposure evaluation and follow-up should an employee be exposed to potentially infectious materials.

Employee Responsibilities

Every employee is expected to:

- Offer input on ECP as appropriate, including identification, evaluation, and selection of new control methods
- Follow all elements of the bloodborne pathogens policy and training
- Notify a supervisor if they encounter any problems or concerns related to this policy

PERSONNEL EXPOSURE DETERMINATION

Designated employees are trained to render first aid and basic life support; executing first aid or basic life support will expose employees to bloodborne pathogens and will require them to adhere to this ECP. Medical sharps or similar equipment are not provided to, or used by, personnel who may render first aid or basic life support. A list of all first aid and basic life support trained employees in this working group shall be maintained at each work site and within each first aid kit.

It is crucial to determine which jobs expose an employee to blood and other potentially infectious material, as well as how that exposure might occur. Accordingly, the safety committee or management will determine which job classifications can expect occupational exposure to potentially infectious material. The following will be determined and documented:

- Job classifications where all employees have occupational exposure
- Job classifications where some employees have occupational exposure
- Tasks and procedures where occupational exposure occurs

Note: This exposure determination shall be made without regard to the use of personal protective equipment. [1910.1030\(c\)\(2\)\(ii\)](#)

Methods of Compliance

Employees will take precautions to prevent contact with potentially infectious material. If an employee cannot easily determine the nature of a body fluid, he or she should treat it as infectious.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 37 of 407

UNIVERSAL PRECAUTIONS

All employees will utilize universal precautions involving the use of Personal Protective Equipment (PPE) and sanitary procedures such as hand washing and cleaning work surfaces to reduce the risk of exposure. When the differential of infectious bloodborne and noninfectious bloodborne body fluids is difficult or impossible, all body fluids will be considered potentially infectious.

Body Substance Isolation (BSI) may also be used as an alternative to Universal Precautions, provided facilities using the method adhere to all other provisions of the standard. BSI is a control method that defines all body fluids and substances as infectious. BSI incorporates not only the fluids and materials covered by the standard but expands coverage to include all body substances.

Regardless of which method is used, employees should be trained in engineering controls, work practice controls, and personal protective equipment that should be used to prevent exposure to blood and OPIM. These are discussed in the following sections.

EXPOSURE CONTROL PLAN

Personnel covered by the bloodborne pathogens' standards receive an explanation of this ECP during their initial training session as well as reviewed annual refresher training. Access to a copy of the ECP shall be provided to personnel in a reasonable time, place, and manner; specifically, each employee will receive a copy of this plan as a part of The Company's entire EHS manual at the time of hire as well as an updated/revised copy annually.

The Company's Exposure Control Plan covers the diverse types of bodily fluids that employees can be exposed to in the workplace, including but not limited to blood, mucus, and saliva.

If an employee misplaces their copy of this ECP, a new copy will be issued to the employee within five working days. If the employee needs access to the ECP before The Company can provide them with a new copy, an original copy will be always available in the office.

Review and Update of Exposure Control Plan

The Company safety committee will review the ECP and update it at least annually, and whenever necessary, to reflect new or changed tasks and procedures that affect occupational exposure.

Reviews and updates will:

- Reflect changes in technology that eliminate or reduce exposure to bloodborne pathogens
- Document the annual consideration and implementation of effective medical, and commercially available, devices and services designed to eliminate or minimize occupational exposure



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 38 of 407

ENGINEERING CONTROLS AND WORK PRACTICES

Engineering controls and work practice controls will be used to prevent or minimize exposure to bloodborne pathogens. This plan encourages work task changes to reduce exposure, as well as for isolating or removing materials that might pose a hazard. The ECP shall be examined regularly to maintain, and replace, engineering controls to ensure their effectiveness, such as:

Handwashing

- The Company will provide readily accessible handwashing facilities to every employee. If providing handwashing facilities is not feasible, The Company will provide antiseptic towelettes or an appropriate antiseptic hand cleanser in conjunction with clean cloth/paper towels
- For construction projects, the company must provide onsite general washing facilities (one per 20 employees), keep them in sanitary condition, and provide suitable cleaning agents/towels for the removal of hazardous and other substances
- In addition to basic workplace hygiene requirements, employees will wash their hands as soon as possible after removing gloves or other PPE
- Should an employee's skin or mucous membrane be exposed to potentially infectious materials, the employee will immediately wash their skin with soap and water or flush their mucous membranes with water

Sharps

- Employees will oversee and dispose of contaminated sharps in a way that prevents unnecessary exposure to hazards. Employees will not bend, recap, or remove contaminated sharps unless no alternative is feasible, and the employee can accomplish any bending, recapping, or needle removal using a mechanical device or one-handed technique
- As soon as possible after use, contaminated reusable sharps will be placed in a container that is puncture resistant, labeled, or color-coded appropriately, leak-proof on the sides and bottom, and constructed in a manner that does not require employees to reach into it to use it

Other Engineering and Work-Practice Controls

- Employees may not eat, drink, smoke, apply cosmetics, or handle contact lenses where occupational exposure may occur
- No food or drink is to be stored where potentially infectious materials are present
- Containers used to store, or transport potentially infectious materials should be closable, prevent leaks, and be appropriately labeled or color-coded. They should also be puncture-resistant, if necessary
- Employees will examine any equipment that may be contaminated before servicing or shipping and will decontaminate it as necessary and feasible. OSHA recommends this be done using a solution of one-part household bleach to 10 parts water



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 39 of 407

- Employees engaged in cleanup operations will be provided with personal protective equipment
- If decontamination is impossible, the employee will attach a label to the equipment, and inform all appropriate personnel of the contamination to ensure they take proper precautions

TRAINING

All employees who have occupational exposure to bloodborne pathogens will receive training on the epidemiology, symptoms, and transmission of bloodborne pathogen diseases. All employees shall be provided with training at the time of initial assignment to tasks where occupational exposure may take place, and at least annually thereafter. Training will be documented and retained for a minimum of three years. The employer shall make available the hepatitis B vaccine and vaccination series to all employees who have occupational exposure, and post-exposure evaluation.

The Company will provide additional training when tasks or procedures are added or changed that affect the employee's occupational exposure. It is acceptable for additional training to be limited to addressing only the changes or additions to the employees' exposure.

In addition, the training program covers, at a minimum, the following elements:

- A copy and explanation of the OSHA bloodborne pathogen standard
- Explanation of The Company ECP and how to obtain a copy
- Explanation of methods to recognize tasks and other activities that may involve exposure to blood and OPIM, including what constitutes an exposure incident
- An explanation of the modes of transmission of bloodborne pathogens
- An explanation of the use and limitations of engineering controls, work practices, and PPE
- An explanation of the types, use, location, removal, handling, decontamination, and disposal of PPE
- The basis of PPE selection
- Hepatitis B vaccine information
- Appropriate actions to take and persons to contact in an emergency involving blood or OPIM
- The procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available
- Post-Exposure evaluation and follow-up
- Signs and labeling
- The person conducting the training will be knowledgeable in the subject matter of the training program as it relates to the workplace



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 40 of 407

PERSONAL PROTECTIVE EQUIPMENT

The Company shall provide PPE to employees at no cost. Moreover, The Company will train all workers. The Company may use a qualified trainer in the use of appropriate PPE for specific tasks or procedures. Personal protective equipment will also be provided at no expense to affected employees when possible occupational exposure to bodily fluids exists.

The following list of PPES shall be made available to all personnel:

- Goggles or safety glasses
- Gloves
- Reinforced footwear as needed
- Masks
- Gowns or coveralls
- Face shields

Additional PPE shall be stored at offices, shops, in vehicles, and worksites. **Chris Harrington** is responsible for making all PPE available to personnel and for keeping all PPE in safe working conditions. Workers who notice PPE is damaged or in a non-working order shall notify **Chris Harrington** of the defective equipment to have it replaced or repaired.

All personnel shall follow the following work procedures and precautions:

- Wash hands immediately or as soon as feasible after removing gloves or other PPE
- Remove PPE after it becomes contaminated and before leaving the work area
- Used PPE may be disposed of in designated containers for storage, laundering, decontamination, or disposal
- Wear appropriate gloves when it is anticipated that there may be hand contact with blood or OPIM
- When handling or touching contaminated items or surfaces; replace gloves if torn, punctured, or contaminated
- If the ability of the gloves to function as a barrier is compromised remove them immediately
- Utility gloves may be decontaminated for reuse if their integrity is not compromised
- Discard utility gloves if they show signs of cracking, peeling, tearing, puncturing, or deterioration
- Never wash or decontaminate disposable gloves for reuse
- Wear appropriate face and eye protection when splashes, sprays, spatters, or droplets of blood or OPIM pose a hazard to the eye, nose, or mouth
- Remove immediately or as soon as feasible any garment contaminated by blood or OPIM, in such a way as to avoid contact with the outer surface
- Contaminated needles and other sharps should only be overseen by authorized or by trained personnel



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 41 of 407

HOUSEKEEPING

Personnel are responsible for keeping work areas clean and sanitary. All equipment and working surfaces must be cleaned and decontaminated using sanitizing cleanser after contact with blood or OPIM.

Contaminated work surfaces must be decontaminated with disinfectant upon completion of each of the following:

- Directly following the contamination or after any spill of blood or OPIM
- At the end of the workday if the surface may have become contaminated since the last cleaning
- All waste receptacles, buckets, and other containers shall be inspected regularly, cleaned/disinfected, and decontaminated as soon as reasonably possible if the unit is visibly contaminated
- Broken glass shall be picked up using safety equipment such as a broom, dustpan, tongs, or similar piece of equipment that is probable to mitigate worker exposure and risk
- Broken glass must not be picked up directly with the hands, even if gloved

Regulated Waste

Regulated waste is liquid or semi-liquid blood or OPIM. Contaminated items that would release blood or OPIM in a liquid or semi-liquid state if compressed. Regulated waste shall be placed in containers that are closeable, constructed to contain all contents and prevent leakage, and appropriately labeled.

Labels

The following labeling methods are used at The Company's facilities to identify regulated waste, sharps disposal containers, contaminated laundry bags containers, potentially infectious material, and equipment.

Chris Harrington shall be responsible for ensuring that warning labels or red bags are used as required.



Personnel shall notify **Chris Harrington** if they discover regulated waste containers, refrigerators containing blood or OPIM, contaminated equipment, etc. without proper labels.

RECORDKEEPING

Training Records

Training records are completed for each employee upon successful completion of training. These documents will be kept for at least three years at the office.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 42 of 407

Training records shall include the following information:

- Date of training
- Contents or a summary of the training
- Names and qualifications of trainer(s)
- Names and titles of all training session attendees

All training records shall be made available to all personnel upon request.

Medical Records

Medical records shall be maintained for each employee with occupational exposure in accordance with [29 CFR 1010.1020](#), "Access to Employee Exposure and Medical Records." Written employee consent is required prior to the release of employee medical records.

Chris Harrington is responsible for the maintenance of required medical records. These records shall be kept confidential in accordance with HIPPA regulations for the period of employment plus thirty years. Medical records shall be provided to personnel upon request.

Sharps Injury/Exposure Incident Log

A Sharps Injury Log is a record of each exposure incident involving a sharp. The purpose of the Sharps Injury Log is to generate a record of exposure incidents that will include enough information about the cause of the incidents to allow the company to analyze them and take preventive action.

The Sharps Injury Log must include:

- The date and time of the sharps-related exposure incident
- The type and brand of the sharp involved in the incident
- A description of the incident including:
 - The job classification of the exposed employee
 - The department or work area where the incident occurred
 - The procedure being performed
 - How the incident occurred
 - The body part injured
 - For sharps with Engineered Sharps Injury Protection (ESIP) if the safety mechanism was activated
 - If the incident occurred before action, during activation, or after activation of the mechanism. For sharps without ESIP, the employee's opinion of ESIP could have prevented the injury

Sharps injuries/exposures must be recorded on the log within 14 working days of when the incident was reported to the company.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 43 of 407

The Sharps Injury Log must be maintained for five years from the date of the occurrence of the exposure incident.

HEPATITIS B VACCINATION

The Company shall provide the Hepatitis B vaccine to all employees that have potential occupational exposure at no cost to the employee(s). If not vaccinated, employees will be informed of the opportunity to be vaccinated within 24 hours of an exposure incident.

Post-Exposure Evaluation and Follow Up

Should an exposure incident occur, the employee should contact the safety coordinator immediately.

In Case of Exposure

A licensed healthcare professional will conduct a **confidential** medical evaluation and follow-up and will provide a medical opinion on diagnosis/course of action, as soon as possible following an exposure incident. After administering initial first aid (cleaning the wound, flushing the eyes or other mucous membranes, etc.), follow the procedure below:

- Document the routes of exposure and how the exposure occurred
- Identify and document the source individual (unless the company can establish that identification is infeasible or prohibited by state or local law)
- Obtain consent, and arrange to have the source individual evaluated as soon as possible, to determine HIV, HCV, and HBV infectivity, document and notify the employee's health care provider of the source individual's test results. If the source individual is known to be HIV, HCV, and/or HBV positive, new testing is not necessary
- Provide the exposed employee with the source individual's test results and with information about applicable disclosure laws and regulations concerning the identity and infectious status of the source individual (e.g., laws protecting confidentiality)

Administrative Responsibilities Following Exposure

The Company will ensure that the healthcare professional responsible for post-exposure evaluation and follow-up receives the following:

- A copy of OSHA's bloodborne pathogens standard
- A description of the employee's job duties relevant to the exposure incident
- Route(s) of exposure
- Circumstances of exposure
- Results of the source individual's blood test if possible
- Relevant employee medical records, including vaccination status
- The Company will provide the employee with a copy of the evaluating healthcare professional's written opinion within 15 days of the completion of the evaluation



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 44 of 407

Counseling

The Company will ensure that post-exposure counseling will be given to employees following an exposure incident. Counseling should include Centers for Disease Control and Prevention (CDC) recommendations for the prevention and transmission of bloodborne infections including HIV, HBV, and HCV. Counseling must be made available regardless of the employee's decision to accept serological testing.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 45 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 46 of 407

Caught-in or -between and Struck-by Hazards

PURPOSE

The purpose of this program is to provide workers with information that will enable them to recognize common Caught-in or -between and Struck-by Hazards for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company."

RESPONSIBILITIES

It is the responsibility of The Company to ensure:

- All hand tools are maintained in good condition
- The use of unsafe hand tools is not permitted (i.e., no sprung jaws on wrenches, no mushroomed heads, no splinters or cracks in wooden handles, no loose parts/heads of tools)
- Saws are equipped with guards and have a constant pressure switch that will shut off the power when the pressure is released
- Safety guards are on all abrasive wheel bench and stand grinders
- Only trained workers are allowed to operate powder-actuated tools
- All powder-actuated tools are tested daily before use and all defects discovered before or during use are corrected
- Powder-actuated tools are not loaded until immediately before use and loaded tools are not left unattended
- All materials stored in tiers are secured to prevent sliding, falling, or collapsing
- Toeboards are erected along the edge of overhead walking/working surfaces
- Ensure that qualified operators and riggers have been trained on rigging safety

Personnel

It is the responsibility of all workers to know, recognize, and avoid any unsafe conditions and comply with the regulations applicable to his/her work environment to control or eliminate any hazards or other exposure to illness or injury.

POLICY

It is the policy of The Company to provide all employees with a work environment free from recognized hazards that are causing or may cause injuries or death. Training on this program shall be provided to all employees before beginning a project can commence.

CAUGHT-IN OR -BETWEEN HAZARDS

According to OSHA, caught-in or -between hazards are defined as: Injuries resulting from a person being squeezed, caught, crushed, pinched, or compressed between two or more objects,



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 47 of 407

or between parts of an object. This includes individuals who get caught or crushed in operating equipment, between other mashing objects, between a moving and stationary object, or between two or more moving objects.

Common Types of Caught-in or -between Hazards

- **Cave-Ins/Collapses**
 - Trenches or excavation sites with inadequate wall bracing or benching/sloping
 - Walls collapsing during demolition
 - Scaffolding collapse
- **Pinned Between/Crushed**
 - Machinery that is not Locked Out/Tagged Out
 - Rigging failures resulting in dropped loads
 - Moving equipment that can pin objects against a wall or other equipment
- **Entrapped/Caught-in**
 - Machinery that has unguarded moving parts
 - Machinery that is not Locked Out/Tagged Out

Machinery with Unguarded Moving Parts

Almost all sites use machinery that has moving or rotating parts or that requires maintenance or repair at some point during construction. If machinery is not properly guarded or de-energized during maintenance or repair, injuries from caught - in or - between hazards may result, ranging from amputations and fractures to death. When machines or power tools are not properly guarded, workers can get their clothing or parts of their body caught in the machines. If machines are not de-energized (locked-out) when they are being repaired, they may cycle or otherwise start up and catch a worker's body part or clothing and cause injury or death. Workers can be trapped and crushed under heavy equipment that tips, especially if they are thrown from the equipment.

Pinch Points and Points of Operation

Personnel who work with or around machines need to take care to keep their body parts and clothes away from the machine's point of operation and any pinch points. A machine's point of operation is where work is performed, such as cutting, shaping, boring, or forming. Pinch points are any areas where machine parts move against one another. Coming into contact with moving parts can cause serious injuries such as deep cuts, crushing injuries or even amputation.

Points of operation, pinch points and other moving parts are generally protected by machine guards. Workers should never tamper with or remove machine guards. Your facility can implement policies to help protect workers, such as:

- Requiring workers to stay clear of moving parts
- Wearing appropriate protective equipment around pinch points or open machines
- Securing long hair or beard and clothing
- Removing jewelry that could get caught in machines



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 48 of 407

Precautions

Never remove a safety guard when a tool is being used. Hazardous moving parts of power tools and equipment need to be safeguarded. For example, belts, gears, shafts, pulleys, sprockets, spindles, drums, fly wheels, chains, or other reciprocating, rotating, or moving parts of equipment must be guarded if such parts are exposed to contact by workers. Be sure to avoid wearing loose clothing or jewelry that can be caught in moving parts.

Use other methods to ensure that machinery is sufficiently supported, secured, or otherwise made safe. Make sure that your equipment is de-energized and cannot be started accidentally.

First, disconnect tools when not in use, before servicing, and when changing accessories such as blades, bits, and cutters. Turn off vehicles before you do maintenance or repair work. If possible, lock out the power source to the equipment. The type of power source may be electric, pneumatic, liquid fuel, hydraulic, or powder-actuated. Lower or block the blades of bulldozers, scrapers, and similar equipment before you make repairs or when the equipment is not in use.

Buried-in or -by

The major hazard related to buried-in or -by is cave-ins of unprotected trenches and excavations. Cave-ins crush or suffocate workers. The safe work practices that you can use to reduce your caught-in/between risk while around a trench include:

- Never working in an unprotected trench that is five or more feet deep
- Never entering a trench of any depth that has not been approved for work by the "competent person" who is overseeing the project
- Always staying inside a trench's protective system
- Never pass underneath or work below loads that are being handled by lifting or digging equipment
- Always stand clear of any vehicle that is being loaded or unloaded

Workers may also be injured or killed by buried-in or -by accidents in the following situations:

- Working in silos filled with grain
- Working under suspended loads
- Working under construction or demolition operations

Workers who are working underneath large scaffolds may also be buried if the scaffolds collapse. Workers may also be buried and crushed by walls that collapse during demolition. OSHA has also established standards for scaffolding construction and demolition procedures that help to reduce the risk of workers being buried during these activities.

To prevent collapses, all scaffolding work must be performed under the supervision of a competent person, who ensures that proper procedures are followed.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 49 of 407

During demolition work; free-standing walls that are more than one story tall and were not designed to stand alone, or are thought to be unsafe, must be reinforced with lateral bracing. All jacks and raised loads must be cribbed, blocked, or otherwise secured.

Pinned Between

You can be pinned between equipment and a solid object, such as a wall or another piece of equipment; between materials being stacked or stored and a solid object, such as a wall or another piece of equipment; or between shoring and construction materials in a trench. These types of hazards can result in multiple broken bones, asphyxiation, or death.

Protect yourself from being pinned between equipment, materials, or other objects:

- Be aware at all times of the equipment around you and stay a safe distance from it
- Never place yourself between moving materials and an immovable structure, vehicle, or stacked materials
- Make sure that all loads carried by equipment are stable and secured
- Stay out of the swing radius of cranes and other equipment
- Wear a seatbelt, if required, to avoid being thrown from a vehicle and then potentially being crushed by the vehicle if it tips over

STRUCK-BY INJURIES

Struck-by injuries occur when a worker is hit by an object in the workplace. This can mean flying projectiles and loose work materials, objects falling from higher levels or elevated loads, swinging objects such as crane hooks or rigged loads, or rolling objects such as wheeled equipment or vehicles.

Struck-by injuries are produced by forcible contact or impact between the injured person and an object or piece of equipment. It is important to point out that in construction, struck-by hazards can resemble caught-in or -between hazards. There is a distinction which is best explained by looking at the key factor in making a determination between a "Caught" event, and a "Struck" event. **Ask: Was it the impact of the object alone that caused the injury?**

When the impact alone creates the injury, the event is considered as Struck. On the other hand, when the injury is created more as a result of crushing injuries between objects, the event is considered as Caught. Struck-by hazards are categorized as follows:

- Struck-by flying object
- Struck-by falling object
- Struck-by swinging object
- Struck-by rolling object



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 50 of 407

Struck-by Flying Objects

Flying object hazard exists when something has been thrown, hurled, or is being propelled across space. It can include instances when a piece of material separates from a tool, machine, or other equipment, striking a worker, resulting in injuries or fatality.

Hazards exist if an object is ejected under power by a tool or equipment usually designed for that purpose such as, a nail from a nail gun: The nail is propelled from the gun by force, it is discharged. This force can be either pneumatic or powder-actuated. Powder-actuated tools are particularly hazardous due to the force behind the fastener. These fasteners are designed to go through wood, concrete and steel and they can certainly go through a worker. Using compressed air can also cause flying object hazards. Compressed air is commonly used to power tools and clean surfaces.

Struck-by Falling Object

Struck-by falling object major hazards are when the source of injury is falling from an elevation to a lower level, including instances where the injured person is crushed, pinned, or caught under a falling object, other than collapsing material or structures, resulting from being struck by a falling object or equipment.

Struck-by Swinging Object

When materials are mechanically lifted, they have the potential to swing and strike workers. As the load is lifted, the materials may swing, twist, or turn. This movement can catch workers by surprise, and they could be hit by the swinging load. Windy conditions are especially hazardous because the load will swing more. Depending on where the worker is standing and the force behind the load, the worker may fall to another level after being struck and sustain even greater injuries. In addition to swinging, loads can slip from their riggings and strike workers. Loads must be rigged properly to prevent slippage.

When the source of injury has been referred to objects which are not free standing, they are attached at some point or are being held by the worker. This includes instances where a hinge-like motion retracts creating swinging motion in which the worker is struck-by a slamming or swinging motion.

Struck-by Rolling Object

Struck-by rolling object is when an object which is rolling, moving, or sliding on the same level at which the worker is located. Includes instances in which the worker is struck or run over by a moving vehicle without being caught under it or instances in which the worker is struck-by a sliding object or equipment on the same level.

Safety Precautions for Heavy Equipment (cranes, excavators, etc.)

- Stay away from heavy equipment when it's operating – In fact, be alert to the location of all heavy equipment whether in use or not



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 51 of 407

- Stay clear of lifted loads and never work under a suspended load
- Beware of unbalanced loads
- Workers should confirm and receive acknowledgement from the heavy equipment operator that they are visible
- Be aware of the swing radius of cranes and backhoes and do not enter that zone
- Drive equipment [or vehicles] on grades or roadways that are safely constructed and maintained
- Make sure that all workers and other personnel are in the clear before using dumping or lifting devices
- Lower or block bulldozer and scraper blades, end-loader buckets, dump bodies, etc., when not in use, and leave all controls in neutral position
- Haulage vehicles that are loaded by cranes, power shovels, loaders etc., must have a cab shield or canopy that protects the driver from falling materials
- Do not exceed a vehicle's rated load or lift capacity
- Do not carry personnel unless there is a safe place to ride

Motor Vehicles (trucks, cars, etc.)

Vehicle safety practices must be observed at construction sites to limit worker exposure to struck-by hazards such as struck-by swinging backhoes, struck-by falling/overturning vehicles, and struck-by trucks or cars. To avoid these types of hazards, workers should:

- Wear seat belts when provided
- Check vehicles before each shift to assure that all parts and accessories are in safe operating condition
- Do not drive a vehicle in reverse gear with an obstructed rear view, unless it has an audible reverse alarm, or another worker signals that it is safe
- Set parking brakes when vehicles and equipment are parked, and chock the wheels if they are on an incline
- All vehicles must have adequate braking systems and other safety devices
- Use traffic signs, barricades, or flaggers when construction takes place near public roadways
- Workers must be highly visible in all levels of light. Warning clothing, such as red or orange vests, are required; and if worn for night work, must be of reflective material

When working on or near any construction zone:

- Wear high-visibility reflective clothing
- Do not put yourself at risk of being struck by a vehicle and do not get caught in a situation where there's no escape route
- Do not direct traffic unless you are the flagger¹
- Check that necessary warning signs are posted
- Never cross the path of a backing vehicle
- Follow "Exit" and "Entry" worksite traffic plan



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 52 of 407

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Awareness of your surroundings and proper use of personal protective equipment (PPE) can go a long way in avoiding injuries at the construction site. It is important for employers to alert all workers of areas where there is greater potential for struck-by accidents to occur and to limit employee access to those areas. OSHA requires that employers provide employees with proper PPE. This varies by the type of work being done and the hazards workers are exposed to but items such as hard hats, safety glasses and face shields should be provided to protect workers from struck-by hazards.

Eye and face protection should be used based on anticipated hazards. Safety glasses or goggles should be worn any time work operations present an eye hazard; during welding, cutting, grinding, nailing (or when working with concrete and/or harmful chemicals or when exposed to flying particles)

Wear hard hats where there is a potential for objects falling from above, bumps to the head from fixed objects. Hard hats shall be kept in good condition and shall be routinely inspected for dents, cracks, or deterioration. Hard hats shall be replaced after heavy impacts.

Face shields are intended to protect the entire face or portions of it from impact hazards such as flying fragments, objects, large chips, and particles. When worn alone, face shields do not protect employees from impact hazards. Workers should use face shields in combination with safety spectacles or goggles, even in the absence of dust or potential splashes, for additional protection beyond that offered by spectacles or goggles alone.

FORKLIFTS AND POWERED INDUSTRIAL TRUCKS

Powered industrial trucks such as forklifts, motorized pallet jacks and tractors are common in manufacturing facilities. However, working around forklift operations can put pedestrians at risk of being struck or crushed by forklifts or their loads, or being hit by objects falling from the forklift.

If your facility has the space, you should create separate paths for pedestrians and forklifts. Forklifts are supposed to yield to pedestrians, but forklift operators may not be able to see pedestrians or stop quickly. Pedestrians should always yield to forklifts until they have made eye contact with the operator and have been given the signal to go. Pedestrians should always wear highly visible personal protective equipment (PPE) such as hard hats and reflective vests in facilities where forklifts are present.

INSPECTIONS

All vehicles, tools and equipment should be inspected regularly, usually at the beginning of each shift. Some types of equipment or operations may require additional or more frequent inspections.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 53 of 407

Personnel must be trained to perform these inspections according to manufacturer guidelines and all regulations applying to that piece of equipment. Any damaged vehicles, tools or equipment must be taken out of service until they can be repaired or replaced.

TRAINING

Workers shall be trained in the work zone to recognize hazards associated with the use of the equipment and any related duties that they are assigned to perform. Crane operators and signal person shall be qualified or certified according to OSHA standards.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 54 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 55 of 407

Code of Conduct

STATEMENT OF POLICY

The policy of **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company" is to maintain the highest ethical standards and comply with all applicable laws, rules, and regulations. We believe that adherence to this policy will ensure our continued success as well as earn and maintain the confidence of our customers and the community in which we live. To ensure The Company operates under this policy, we have established this Code of Conduct. The following general rules apply to the implementation of this Code of Conduct:

- All employees must comply with this Code of Conduct. Any officer, director, or employee violating this Code is subject to discipline, which may include demotion or dismissal
- All employees must report all suspected violations of the Code or other potentially unethical behavior by anyone, including officers, directors, employees, agents, customers, subcontractors, suppliers, and prime contractors, to the Corporate Compliance Officer
- Employees in management positions are personally accountable for their own conduct and the conduct of those reporting to them. Each management employee is expected to inform those reporting to them about this Code of Conduct and take all necessary steps to ensure compliance with this Code
- No employee has the authority to direct, participate in, approve, or tolerate any violation of this Code by anyone
- Any employee who has questions about the application of this Code should consult with the designated Corporate Compliance Officer

DEFINITIONS

Code of Conduct - The written statement of acceptable behavior by The Company's officers, directors, and employees that ensures The Company operates according to the highest ethical standards.

Code -The Code of Conduct.

Corporate Compliance Officer - The company official designated by the President to implement and administer the Code of Conduct. In the case where there is no Corporate Compliance Officer, or the Corporate Compliance Officer is not available, The Company President will be responsible for implementing and administering the Code of Conduct.

Corporate Compliance Program - The written procedures and policies used by The Company that is designed to ensure all officers, directors, and employees are aware of the Code of Conduct



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 56 of 407

and adhere to its standards. The Corporate Compliance Program is implemented and administered by the Corporate Compliance Officer.

Employee - Any person employed by The Company, including employees, supervisors, managers, officers, directors, and persons authorized to act on behalf of the Company.

Program - Corporate Compliance Program.

STANDARDS OF CONDUCT

Employers have the responsibility to provide a safe workplace. Employers must provide their employees with a workplace that does not have serious hazards and must follow all OHA safety and health standards. Employers must find and correct safety and health problems. Examples of conduct standards include:

- Equal Employment and Nondiscrimination
- Environmental Compliance
- Safety and Health
- Drugs and Alcohol
- Conflicts of Interest
- Gifts and Entertainment
- Antitrust Policy
- Claims
- Statements and Certifications
- Commitment to Disadvantaged Business Enterprises

EQUAL EMPLOYMENT AND NONDISCRIMINATION

Our company's continued success depends upon employing the most qualified people and establishing a work environment free of discrimination, harassment, intimidation, or coercion related to race, color, religion, sex, age, national origin, disability, or sexual orientation. This policy extends to all phases of employment, including hiring, placement, promotion, transfer, compensation, benefits, training, and the use of facilities. The Company is committed to complying with all applicable laws related to equal employment opportunities and to ensure there is no unlawful discrimination by any officer, director, or employee. The Company is committed to a work environment in which everyone is treated with respect, trust, honesty, fairness, and dignity.

Note: This program will be periodically reviewed and evaluated to ensure policies and procedures are adjusted accordingly when applicable. Changes made because of these reviews will be effectively communicated to employees.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 57 of 407

ENVIRONMENTAL COMPLIANCE

The Company is committed to full compliance with all federal, state, and local environmental laws, standards, and guidelines. Not only is environmental compliance legally necessary, but it is also a vital component of our obligation to the community and our good reputation. Each employee involved with regulated air emissions, water discharges, hazardous materials, or other regulated pollutants must know and comply with all applicable environmental laws and guidelines.

No one at The Company may participate in concealing an improper discharge, disposal, or storage of hazardous materials or other pollutants.

Any person who has reason to believe there may have been violations of any aspect of The Company's environmental compliance policy shall report immediately to The Company's environmental compliance officer or Corporate Compliance Officer. In addition to compliance with all environmental laws and guidelines, The Company is also committed to utilizing energy and materials in a manner that will minimize the impact on the environment. The Company will also consider using recycled materials whenever feasible.

SAFETY AND HEALTH

The Company considers employee safety and health as one of its highest priorities. Many of the job activities, products, and materials overseen by our employees require strict adherence to safety procedures, rules, and regulations. Each employee must be aware of The Company's safety program that incorporates all the applicable health and safety laws and guidelines and follow all applicable procedures. Also, supervisors are responsible for ensuring that all reasonable safeguards and precautions are taken in the workplace including ensuring compliance with The Company's procedures and guidelines, promoting safe work practices, and the use of personal protective equipment. If any employee has any safety-related concerns, he or she should report these concerns to The Company's safety compliance officer.

DRUGS AND ALCOHOL

The Company is committed to providing its employees with a safe and productive work environment to the extent possible and promoting ambitious standards of employee health. Accordingly, The Company expects all its employees to report to work and be able to perform his or her duties productively and safely. Drug and alcohol abuse by employees is regarded as unsafe by creating an increased risk to the safety of themselves, their fellow employees, and the public and is contrary to The Company's interests in maximizing its productivity.

Therefore, drug and alcohol abuse in The Company will not be tolerated and the company will take appropriate action to ensure compliance with this policy. Additionally, anyone caught using drugs or alcohol in the workplace will be subject to discipline, including termination.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 58 of 407

CONFLICTS OF INTEREST

Employees must avoid situations in which their personal interests could conflict with, or even appear to conflict with, the interests of The Company. Conflicts of interest arise when an individual's position or responsibilities with The Company present an opportunity for personal gain of profit separate and apart from that individual's earnings from The Company or where the employee's interests are otherwise inconsistent with the interests of The Company.

A conflict of interest may arise in any number of situations, and it is impossible to describe each instance. As a general matter, if you think that any situation may be a potential conflict of interest, you should consult with the Corporate Compliance Officer. However, the following situations have an enormous potential for conflicts of interest:

1. Outside Employment

As a matter of company policy, employees may pursue outside employment opportunities. However, such opportunities must not interfere with the employee's job responsibilities with The Company. Any outside employment that interferes with the employee's job responsibilities or conscientious performance of his or her duties is deemed to be a conflict of interest and is not permitted. Likewise, an employee's participation in civic, charitable, or professional organizations or activities that interferes with the employee's job responsibilities or conscientious performance of his or her job is deemed to be an impermissible conflict of interest. Additionally, employees may not use company time or resources to further non-company business. Employees also may not use The Company's name to lend weight or prestige to an outside activity without prior approval from authorized management. Prior to engaging in any outside employment activity or participating in any civic, charitable, or professional organization or activity that may give rise to an actual or potential conflict of interest, the employee must consult with the Corporate Compliance Officer and obtain express written approval.

2. Personal Financial Interests

Employees should avoid personal monetary interests that might conflict with the interests of The Company. Such interests may include but are not limited to, the following: obtaining a financial or other beneficial interest in a supplier, customer, or competitor of The Company; directly or indirectly having a personal financial interest in any business transaction that may be adverse to The Company; acquiring real estate or other property that the employee knows, or reasonably should know, that is of interest to The Company. Such personal monetary interests include those interests of not only the individual employee, but also those of the employee's spouse, children, parents, grandparents, siblings, and family-in-law.

If the employee knows or should know, that personal financial interest may conflict with the interests of The Company, the employee must first consult with the Corporate Compliance Officer and obtain express written approval.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 59 of 407

GIFTS AND ENTERTAINMENT

1. Bribery and Kickbacks

All forms of bribery and kickbacks are illegal and expressly prohibited. Any employee caught participating in such activity will be promptly terminated. Any employee who knows about, or reasonably should know about, any such activity and fails to report it to the Corporate Compliance Officer will be disciplined.

2. Government Personnel

All forms of gifts and entertainment to or from government personnel (Federal, State, and local), including persons that may be acting for or on behalf of the government, are expressly prohibited. However, the Corporate Compliance Officer may authorize an exception where a familial or personal relationship exists outside of the employee's business relationship with the government employee.

3. Non-Governmental Personnel

Receiving or accepting gifts or entertainment in the business context is a particularly sensitive area and can be inappropriate, or even illegal, depending on the circumstances. For this reason, all employees must be extra sensitive when it comes to giving or receiving gifts and entertainment from non-governmental personnel (as stated above, the giving or receiving of gifts from government personnel is prohibited). Therefore, regardless of the circumstances, the following rules apply:

- The Corporate Compliance Officer must approve the giving or receiving of all forms of gifts and entertainment
- Money, in any form, is never given, offered, solicited, or accepted
- No gift or entertainment may be given or received if it is, or could be construed to be, intended to influence an employee's behavior
- No employee may encourage or solicit gifts or entertainment of any kind from any individual or entity with whom The Company conducts business
- The Corporate Compliance Officer may authorize the expenditure of a non-monetary gift or entertainment with a value equal to or less than \$500 in the aggregate for any calendar year to an individual or entity with whom The Company conducts business only if it is for a legitimate and identifiable business purpose
- Employees may receive a non-monetary gift or entertainment from an individual or entity with whom The Company conducts business with a value equal to or less than \$500 in the aggregate for any calendar year, provided that such gifts or entertainment are reported to and approved by the Corporate Compliance Officer and is for a legitimate and identifiable business purpose
- The Corporate Compliance Officer may authorize an exception where a familial or personal relationship exists outside of the employee's business relationship with the non-governmental employee



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 60 of 407

COMMUNICATIONS AND RECORDS

All employees are expected to be familiar with, and conform to, The Company's document retention policy as well as The Company's recordkeeping and reporting procedures. Additionally, all Company and employee communications, correspondence, and records must be accurate, complete, and timely. The contents of any written communication must be legible and unambiguous.

If, after making any communication, correspondence, or record, the employee discovers they have made a mistake, then the employee must take all steps necessary to correct the mistake. Any employee who knowingly makes a false or misleading communication, correspondence, or record will be terminated.

ANTITRUST POLICY

The Company is fully committed to compliance with the antitrust laws, which are designed to promote free and open competition in the marketplace. Not only does the customer benefit by getting the best product at the lowest price, but The Company also benefits by being able to compete on a fair level playing field with competitors. The antitrust laws are complex and must be complied with. Routine business decisions involving prices, terms and conditions or sales, dealings with competitors, and many other matters present problems of great sensitivity. It is therefore essential that every employee be aware of the antitrust laws and that all employees that are actively involved in the bidding process participate in The Company's Antitrust Program. Below is a general overview of the antitrust laws: The Sherman Act is the primary federal antitrust statute. The Sherman Act prohibits any agreement among competitors to fix prices, rig bids, or engage in other anticompetitive activity. Violation of the Sherman Act is a felony punishable by a fine of up to \$10 million for corporations, and a fine of up to \$350,000- or 3-years imprisonment (or both) for individuals and may subject The Company and/or the individual to suspension or debarment. In addition, collusion among competitors may constitute violations of the mail or wire fraud statute, the false statements statute, or other federal felony statutes. In addition to receiving a criminal sentence, a corporation or individual convicted of a Sherman Act violation may be ordered to make restitution to the victims for all overcharges. Victims of bid-rigging and price-fixing conspiracies also may seek civil recovery of up to three times the number of damages suffered. Most criminal antitrust prosecutions involve price fixing, bid rigging, market division, or allocation schemes. Under the law, price-fixing and bid-rigging schemes are violations of the Sherman Act. This means that where such a collusive scheme has been established, it cannot be justified under the law by arguments or evidence that, for example, the agreed-upon prices were reasonable, the agreement was necessary to prevent or eliminate price-cutting or ruinous competition, or the conspirators were merely trying to make sure that each got a fair share of the market.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 61 of 407

1. Price-Fixing

Price-fixing is an agreement among competitors to raise, fix, or otherwise maintain the price at which their goods or services are sold. It is not necessary that the competitors agree to charge the same price, or that every competitor in each industry joins the conspiracy. Price-fixing can take many forms, and any agreement that restricts price competition violates the law.

Examples of price-fixing agreements include those to:

- Establish or adhere to price discounts
- Hold prices firm
- Eliminate or reduce discounts
- Adopt a standard formula for computing prices
- Maintain certain price differentials between diverse types, sizes, or quantities of products
- Adhere to a minimum fee or price schedule
- Fix credit terms
- Not advertise prices

2. Bid-Rigging

Bid-rigging is the way conspiring competitors effectively raise prices where purchasers - often federal, state, or local governments - acquire goods or services by soliciting competing bids. Competitors agree in advance who will submit the winning bid on a contract being let through the competitive bidding process. Bid-rigging also takes many forms, but bid-rigging conspiracies usually fall into one or more of the following categories:

- **Bid Suppression:** In bid suppression schemes, one or more competitors who otherwise would be expected to bid, or who have previously bid, agree to refrain from bidding or withdraw a previously submitted bid so that the designated winning competitor's bid will be accepted.
- **Complementary Bidding:** Complementary bidding (also known as "cover" or "courtesy" bidding) occurs when some competitors agree to submit bids that either is too high to be accepted or contain specific terms that will not be acceptable to the buyer. Such bids are not intended to secure the buyer's acceptance but are merely designed to give the appearance of genuine competitive bidding. Complementary bidding schemes are the most frequently occurring forms of bid rigging, and they defraud purchasers by creating the appearance of competition to conceal secretly inflated prices.
- **Bid Rotation:** In bid rotation schemes, all conspirators submit bids but take turns being the low bidder. The terms of the rotation may vary; for example, competitors may take turns on contracts according to the size of the contract, allocating equal amounts to each conspirator, or allocating volumes that correspond to the size of each conspirator company. A strict bid rotation pattern defies the law of chance and suggests collusion is taking place.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 62 of 407

- **Subcontracting:** Subcontracting arrangements can be part of a bid-rigging scheme. Competitors who agree not to bid or to submit a losing bid frequently receive subcontracts or supply contracts in exchange for the successful low bidder. In some schemes, a low bidder will agree to withdraw its bid in favor of the next low bidder in exchange for a lucrative subcontract that divides the illegally obtained higher price between them.
 - The Company will demonstrate its due diligence by monitoring the conduct of contractors and suppliers to ensure The Company's commitments to social responsibility with; ethical, social, environmental, gender equality, health, and safety criteria incorporated in the policies and procedures are being met.

3. Market Division

Market division or allocation schemes are agreements in which competitors divide markets among themselves. In such schemes, competing firms allocate specific customers or types of customers, products, or territories among themselves. For example, one competitor will be allowed to sell to, or bid on contracts led by, certain customers or types of customers. In return, he or she will not sell to, or bid on contracts led by, customers allocated to the other competitors. In other schemes, competitors agree to sell only to customers in certain geographic areas and refuse to sell to, or quote intentionally soaring prices to, customers in geographic areas allocated to conspirator companies.

Compliance with the antitrust laws is a serious matter and, as explained above, violations could subject The Company to substantial civil and criminal liability. Accordingly, any employee who violates antitrust laws shall be terminated. Additionally, any employee who knows, or should know, that an antitrust violation has been, or will be, committed and fails to report it to the Corporate Compliance Officer will be subject to discipline, which may include termination.

CLAIMS

All requests or demands for payment made on behalf of The Company pursuant to any contract or business agreement shall truthfully and accurately reflect the value of the goods or services provided. Under no circumstances may an employee make a false claim. Examples of false claims include billing extra time not spent working on a project, charging for materials not used in a project, or artificially inflating a claim to negotiate additional compensation from the customer.

Any claims that are false, fraudulent, or otherwise deceitful may subject The Company, and/or the individual making the claim, to civil liability up to three times the amount of false claim for payment, criminal liability punishable by up to five years imprisonment, a fine, and restitution, and administrative liability through suspension or debarment. Accordingly, any employee who knowingly makes false claims shall be terminated. Additionally, any employee who knows, or should know, that another employee has submitted, or intends to submit, a false claim and fails to report it to the Corporate Compliance Officer, will be subject to discipline, which may include termination.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 63 of 407

STATEMENTS AND CERTIFICATIONS

All statements, representations, and certifications made on behalf of The Company, whether written or oral, shall be accurate, truthful, and timely. Under no circumstances may an employee make a false or misleading statement, representation, or certification. Any statements that are false, fictitious, or fraudulent or contain materially false, fictitious, or fraudulent statements or entries, may subject The Company, and/or the individual making the statement, to criminal liability punishable by up to five years imprisonment, a fine, and restitution, and administrative liability through suspension and debarment. In addition, if a false statement is used to get a claim paid, then The Company and/or the individual, may be subject to civil liability up to three times the amount claimed for payment.

Additionally, employees are routinely required to certify that they and The Company are following various contractual provisions and regulatory requirements. Examples of common certifications include certifications pertaining to environmental, safety, personnel, and health matters, product quality and material certifications, and quality control and quality assurance testing certifications. Employees must be aware of the requirements applicable to their jobs and ensure that all certifications are accurate and that there is neither a material omission of fact nor materially misleading statements.

COMMITMENT TO DISADVANTAGED BUSINESS ENTERPRISES

The Company is committed to full compliance with government-sponsored opportunity programs, such as the Disadvantaged Business Enterprise (DBE) program and maximizing the opportunities of DBEs. As such, The Company will not discriminate based on race, color, national origin, or sex in the hiring of suppliers or subcontractors and will foster an environment in which everyone is treated with respect, trust, honesty, fairness, and dignity. For each government-funded contract, The Company will make good faith efforts to maximize the participation of DBEs in subcontracts and ensure that each DBE is performing a commercially useful function. A DBE is deemed to be performing a commercially useful function if the DBE is responsible for executing the work and fulfilling its responsibilities by performing, managing, and supervising the work.

OBLIGATION TO REPORT VIOLATIONS AND COOPERATION

Each employee must promptly report any known or suspected violation of this Code of Conduct and all other unlawful or unethical conduct to the Corporate Compliance Officer. Employees are obligated to report such known or suspected conduct without regard to the identity or position of the suspected offender. Any report made under this section will be strictly confidential and under no circumstances will any employee who makes a report be subject to any acts of retribution or retaliation or disciplinary action. Additionally, all employees must fully cooperate in any investigation of a suspected violation of this Code and fully cooperate with any request by the Corporate Compliance Monitor.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 64 of 407

Any employee found to have violated this Code or engaged in other unlawful or unethical behavior shall be disciplined, including demotion or dismissal. Any employee who fails to report known or suspected violations of this Code or other unlawful or unethical behavior shall be subject to appropriate disciplinary action.

CONSEQUENCES FOR VIOLATIONS

Any violation of this Code is cause for disciplinary action that may result in any of the following consequences:

- Reprimand
- Loss of compensation, seniority, or promotional opportunities
- Reduction in pay
- Demotion
- Suspension with or without pay
- Discharge

ACKNOWLEDGMENT

I acknowledge that I have received, reviewed, and understand The Company's Code of Business Ethics. I agree to comply with the Code and understand that I will be subject to disciplinary action if I violate the Code.

(Signature)

(Print Name)

(Date)



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 65 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 66 of 407

Confined Spaces

PURPOSE

The purpose of this document is to outline the Confined Space Safety Policy for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company." To prevent injuries to personnel, this policy will ensure specific precautions are taken while working in and around confined spaces.

RESPONSIBILITIES

The Company shall:

- Provide training to all employees and personnel
- Maintain records of all training
- Audit/inspect work conditions, operations, and documentation
- Provide each manager/supervisor with the necessary training and assist each manager in identifying confined spaces encountered by the supervisor's employees
- Cancel permits to evaluate the overall effectiveness of the Confined Space Entry Program and ensure that employees participating in entry operations are protected from permit space hazards

Safety Coordinator

Supervisors, foremen, and managers shall identify and report all job areas and locations that are or may be confined spaces to Chris Harrington.

Controlling Contractor

The 'Controlling Contractor' must provide the following information, to the 'controlling contractor':

- Location of each known permit space
- Hazards or potential hazards in each space
- Precautions that the Controlling Contractor or any previous controlling contractor or entry employer has implemented for the protection of employees in the permit space

A Competent Person

Before work begins at a worksite, a Competent Person identifies all confined spaces in which one or more of the employees it directs may work and identifies each space that is a permit-confined space.

Attendant

An individual stationed outside one or more permit spaces who monitors the authorized entrants and who performs all attendant duties assigned. The attendant summons helps in the event of an emergency and does not enter the permit space.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 67 of 407

Entrant

An employee who is authorized by The Company to enter a permit space. The entrant communicates with the attendant to check in or request rescue. The entrant must obey all commands of the attendant to exit the space.

Entry Supervisor

The person (such as the foreman, or crew chief) is responsible for determining if acceptable entry conditions are present at a permit space where entry is planned, for authorizing entry, overseeing entry operations, and for terminating entry as required.

All affected company employees must understand the hazards prior to participating in entry into a permit-required confined space.

POLICY

The Company shall follow all OSHA requirements for practices and procedures to protect employees engaged in construction activities at a worksite with one or more confined spaces.

Locations where confined spaces may occur include, but are not limited to, the following: Bins; boilers; pits (such as elevator, escalator, pump, valve, or other equipment); manholes (such as sewer, storm drain, electrical, communication, or other utility); tanks (such as fuel, chemical, water, or other liquid, solid, or gas); incinerators; scrubbers; concrete pier columns; sewers; transformer vaults; heating, ventilation, and air-conditioning (HVAC) ducts; storm drains; water mains; precast concrete and other pre-formed manhole units; drilled shafts; enclosed beams; vessels; digesters; lift stations; cesspools; silos; air receivers; sludge gates; air preheaters; step-up transformers; turbines; chillers; bag houses; and/or mixers/reactors. [29 CFR 1926.1201\(a\)](#)

PERMIT REQUIRED CONFINED SPACE

The Company shall evaluate the workplace to determine if any spaces are permit-required confined spaces. If the workplace contains permit spaces, The Company shall inform exposed employees, by posting danger signs or by any other equally effective means of the existence and location of and the danger posed by permit spaces.

DANGER
PERMIT-REQUIRED CONFINED SPACE
DO NOT ENTER

The Company shall:

- Implement the measures necessary to prevent unauthorized entry
- Identify and evaluate the hazards of permit spaces before employees enter them



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 68 of 407

- Develop and implement the means, procedures, and practices necessary for safe permit space entry operations, including, but not limited to, the following:
 - Specifying acceptable entry conditions
 - Providing each authorized entrant or that employee's authorized representative with the opportunity to observe any monitoring or testing of permit spaces
 - Isolating the permit space and physical hazard(s) within the space
 - Purging, inserting, flushing, or ventilating the permit space as necessary to eliminate or control atmospheric hazards

The Safety Coordinator shall publish a list of all confined spaces in the office. In addition to this, designated supervisors shall carry out the following tasks:

- Classify confined spaces as "permit required," "Alternate Procedure," or "non-permit required"
- Identify personnel who will enter confined spaces
- Identify the personnel under their supervision required to wear respirators
- Instruct personnel on routine measurement of respiratory hazards in confined spaces
- Provide instruction/training on confined space hazards and entry procedures to applicable personnel
- Provide instruction/training to personnel on the proper use of equipment required for confined space entry
- Issuance and cancellation of entry permits
- Inspect and maintain all equipment used to enter confined spaces
- Maintain records of equipment maintenance and personnel training
- Inform personnel who may enter the permit-confined space by posting warning/danger signs and by training
- Establish and disseminate a lockout program for applicable workers
- Identify and evaluate the hazards of permit spaces prior to personnel entry
- Conduct pre-entry meetings to inform entrants of hazards that are likely to be encountered
- Conduct work site inspections to ensure compliance with confined space entry procedures
- Prevent entrance into prohibited permit spaces by taking necessary and reasonable measures

Field Supervisor

The field supervisor with confined space entry oversight responsibilities shall be trained in the significance of confined space entry procedures and shall be responsible for the implementation and enforcement of the elements of this procedure in operation. Field supervisors are responsible for all elements listed in the definition of Entry Supervisor (see definition section).



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 69 of 407

All spaces owned or operated by The Company that meet the definition of permit-required confined spaces shall be identified and appropriately marked, and access to such spaces shall be controlled. Employees are prohibited from entering any space meeting the definition of permit-required confined space unless the following conditions are met:

- The Company determines that employees must enter permit-required confined spaces to perform the mission of the Unit and/or the duties of the employee
- Employees are trained in the duties under this policy which they are to perform
- The space is rendered safe for entry by:
 - Issuance and compliance with the conditions of a permit
 - The space is reclassified as a non-permit space; or
 - Alternate Entry Procedures are performed

Permits issued under the procedures in this policy shall be limited in duration to no longer than eight hours. A formal review of the confined space procedure shall be performed by The Company during the annual inspection that covers site-specific situations, changes in working practice, and as part of an annual document review process, i.e., enhances existing content, and removes system deficiencies.

The Company shall review entry operations when the measures taken under the permit space program may not protect employees and revise the program to correct deficiencies found to exist before subsequent entries are authorized.

The Company shall review the permit space program, using the canceled permits retained under [§ 1926.1205\(f\)](#), within 1 year after each entry and revise the program as necessary to ensure that employees participating in entry operations are protected from permit space hazards.

The Company must consult with affected employees and their authorized representatives on the development and implementation of all aspects of the permit space program. The Company must make available to each affected employee and his/her authorized representatives all information required to be developed by this standard.

Alternate Procedures to Enter a Space Under Non-Permit Conditions

- All physical hazards in the space are eliminated or isolated through engineering controls so that the only hazard posed by the permit space is an actual or potentially hazardous atmosphere
- Continuous forced air ventilation is utilized to maintain worker safety during entry

EMPLOYEE CONTROLLED CONFINED SPACE

Identification of Confined Spaces

- The Company shall identify each space under their jurisdiction which meets the definition of confined space, if any exist, maintain a list of such spaces



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 70 of 407

- The Company shall determine if the confined space meets the definition of permit-required confined space
- Each confined space on the list shall be designated as a non-permit or permit space
- The hazards of each permit space shall be cataloged

Distribution

The list shall be distributed to all affected managers and employees.

Signage

The Company shall provide a danger sign to be posted at the means of ingress to each identified permit and non-permit confined space. Signs shall meet the requirements of danger signs.

- The legend on the signs for permit spaces shall state:

**PERMIT REQUIRED CONFINED SPACE
DO NOT ENTER WITHOUT AUTHORIZATION AND PERMIT**

- The legend on the signs for non-permit spaces shall state:

**CONFINED SPACE
DO NOT ENTER WITHOUT AUTHORIZATION**

The supervisor with jurisdiction over employees who are required to enter an identified confined space shall:

- Receive training as an Entry Supervisor
- Determine whether employees enter permit spaces or perform work within non-permit spaces that may cause the space to meet the definition for permit-required confined space during the work activities. If so, the supervisor shall:
 - Select an Entry Supervisor(s) to oversee entry activities, and provide for training of the employee(s)
 - Ensure that affected employees receive training as entrants
 - Procure the necessary equipment to perform the tests required for entry
 - Ensure that an adequate number of employees have received training as attendants
 - Contact the local emergency rescue agency and establish assurance that they will perform rescue coverage during entry operations
- The supervisor, with the assistance of The Company management as necessary, shall ensure that the rescue services are trained and equipped to perform rescue operations from the space in compliance with safety regulations
- Rescue service must be on-site for Immediately Dangerous to Life and Health (IDLH) conditions while work is being performed
- The supervisor shall procure this assurance in writing



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 71 of 407

- The supervisor should invite rescue personnel to the site to pre-plan rescue operations; and
- If the rescue services cannot or will not perform such services, the supervisor or employee shall develop and implement a means to perform rescue for the space

For each entry into **a non-permit space**, the designated Entry Supervisor shall review the work to be performed to determine and carry out the following:

- If the work introduces a hazard into the space that will cause it to meet the definition of permit-required confined space, the supervisor shall:
 - Temporarily reclassify the space as a permit space
 - Follow the procedures for entry into a permit space
- Upon termination of the permit, re-inspect the space and take whatever actions necessary to remove the created hazards; and
- Reclassify the space as a non-permit space

If the work does not introduce a hazard, the Entry Supervisor may authorize entry into the space.

For each entry into **a permit space**, the designated Entry Supervisor shall:

- Perform the pre-entry duties of the Entry Supervisor on the permit space to be entered
- Prepare an entry permit, reclassify the space as a non-permit space, or authorize alternate entry procedures in compliance with the relevant procedures of this section
- Perform the post-entry duties of the Entry Supervisor
- Collect the permit from the attendant at the end of an entry or prepare the documentation for reclassification or alternate entry; and
- Maintain the permit or documentation for the required retention period

For the duration of each entry into a permit space, the entrants and attendants shall perform the duties outlined in these procedures and shall return the permit or documentation to the Entry Supervisor upon the termination of entry. An attendant **MUST** be on duty outside the confined space for the duration of entry operations. If multiple spaces are to be assigned to a single attendant, include in the permit program the means and procedures to enable the attendant to respond to an emergency. [1926.1204\(f\)\(g\)](#)

A person MUST NOT ENTER a confined space at a work site without a valid entry permit. An employer must establish an entry permit system for a confined space that:

- Lists the name of each worker who enters the confined space and the reason for their entry
- Gives the location of the confined space
- Specifies the time during which an entry permit is valid
- Considers the work being done in a confined space; and



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 72 of 407

- Considers the code of practice requirements for entering, being in, and leaving a confined space

The Company will ensure that before a worker enters a permit-required confined space an entry permit is properly completed, signed by a competent person, and a copy is kept readily available.

CONTRACTORS

The Company shall ensure that every contract for work within an identified permit space or work within a non-permit space that will introduce a reclassifying hazard, shall:

- Apprise the contractor that the space is a permit-required confined space and of the hazards within the space
- Require the contractor to control entry into the space by a permit system meeting the requirements of [29 CFR 1910.146](#); and
- Require the contractor to eliminate any temporary hazards created by the work or notify the supervisor responsible for the space of any permanent hazards created by the work

The Contractor or its designee shall notify the responsible supervisor prior to entry.

- The supervisor shall notify any employees near or affected by entry; and
- If employees shall enter the space with contracted employees, the supervisor shall ensure that entry operations are coordinated with the contractor or designee to assure that:
 - All entrants of both employers can be accounted for during the entry
 - The work of one employer does not endanger the employees of the second employer
 - There is a professionally trained attendant in place whenever employees of either employer have entered the space; and
 - Temporary hazards are eliminated, and the supervisor is apprised of new permanent hazards

The Contractor or designee shall meet with the supervisor after completion of the entry to provide notification of:

- Any new permanent hazards created by the work; and/or
- Any unidentified hazards encountered during the entry

REEVALUATION

The Company shall re-evaluate identified confined spaces within their jurisdiction to determine if such spaces should be added, deleted, or reclassified.

- Re-Evaluation shall be performed:
 - After notification by the responsible supervisor of a change in the hazards of a confined space



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 73 of 407

- After review by The Company during the annual inspection; and
- After notification of changes in hazards in a confined space by employees, managers, or any other source

FIELD STAFF

Each manager shall determine, by job title, any field staff that may enter permit-required confined spaces and shall document the determination. Managers of employees authorized to enter permit spaces shall:

- Procure the equipment necessary for entry testing and develop procedures to provide Entry Supervisors with the equipment as necessary
- Designate and train Entry Supervisors, Attendants, and Entrants:
 - Field employees entering a permit space may be both the Entry Supervisor and the Entrant, or the Entry Supervisor and the Attendant
 - Field employees serving as an Attendant for a permit space entry shall not be an Entrant during entry unless relieved by another authorized attendant
- Designate and train a Program Coordinator responsible for maintaining the required canceled permits and documentation
- Establish procedures to provide for rescue operations:
 - The manager may contact emergency rescue personnel in each location where employees are likely to encounter permit spaces, and procure in writing assurance that the emergency service:
 - Is trained in rescue procedures for the type of space employees enter
 - Is equipped to perform rescue from the type of space; and
 - If contacted prior to entry by the Entry Supervisor, will indicate whether they will or will not provide rescue coverage during that entry
- The manager may elect to develop procedures requiring Entry Supervisors to contact emergency services prior to each entry to procure coverage. Such procedures shall ensure that the Entry Supervisor determines that the contacted rescue services are professionally trained and equipped to perform a rescue in the specified space, are aware of the entry and exit times, agree to provide rescue coverage for that time, and will notify the attendant should rescue coverage end for any reason
- The manager may elect to establish other means of guaranteeing and certifying rescue coverage. Such procedures shall address training, practice, equipment, and other relevant issues
- Authorized employees encountering a permit space that they need to enter to carry out their job duties shall have a trained Entry Supervisor to coordinate with the entity controlling the space prior to entry
- The Entry Supervisor shall perform the pre-entry duties for the permit space in concert with the controlling entity
- If the controlling entity has a permit required confined space program:



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 74 of 407

- The Entry Supervisor shall conform to the requirements of that program where they do not conflict with or provide less protection than our procedures
- The Entry Supervisor may authorize the use of a trained attendant provided by the controlling entity, upon provision or verification of training. The attendant's name, position, and the employer shall be recorded on the permit
- The Entry Supervisor may accept actions taken by the controlling entity to authorize Alternate Entry Procedures or to reclassify the space as non-permit, after verifying and documenting the effectiveness of such actions. The Entry Supervisor may accept a copy of the controlling entity's documentation to meet the documentation requirement
- The Entry Supervisor may accept the controlling entity's rescue procedures if the entity agrees but must verify that rescue personnel are notified prior to entry
- Upon request by the controlling entity, the Entry Supervisor shall obtain and provide the following documents as proof of the program and entrant training:
 - A copy of this policy
 - A copy of our training protocol for Entrants
 - A copy of the entrant's training documentation; and
 - The name and telephone number of the employer contact
- If the controlling entity does not have a permit-required confined space program or has not identified the space as permit required:
 - If the controlling entity agrees to take the actions necessary for reclassifying a space to non-permit, the Entry Supervisor may oversee such actions, test their effectiveness, and reclassify the space
 - If conditions for Alternate Entry Procedures can be met, the Entry Supervisor may verify the achievement of the conditions and authorize Alternate Entry Procedures
 - If the controlling entity agrees to supply and require an individual to perform the functions of an Attendant, and if the Entry Supervisor can meet the conditions outlined in this policy for Special Attendants, the Entry Supervisor may authorize the individual as the attendant for the entry and prepare the required documentation
- The Entry Supervisor shall prepare and issue the permit or prepare the required documentation for Alternate Entry Procedures or reclassification
- The Entrant and Attendant shall follow the procedures for their classification for the duration of the entry and return the permit or documentation to the Entry Supervisor at the completion of the entry
- The Entry Supervisor shall perform post-entry duties in concert with the controlling entity.
 - If the controlling entity has a permit-required confined space program, the Entry Supervisor shall allow the controlling entity to perform the post-entry activities required by that program



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 75 of 407

- If the controlling entity does not have a permit-required confined space program, the Entry Supervisor shall oversee the return of the space to the condition prior to entry
- The Entry Supervisor shall immediately meet with the controlling entity to provide information on:
 - Hazards within the space of which the controlling entity was unaware, and/or
 - Any unexpected problems occurring during entry procedures

The Entry Supervisor shall submit the canceled permit, and/or any documentation prepared because of entry to the Safety Coordinator, who shall retain the document for the required retention period. The Entry Supervisor shall also report any emergencies, evacuations, or other unexpected events related to the entry, which shall be recorded in writing.

PERMITS

This program shall undergo an annual review, using the canceled permits retained within 1 year after each entry shall be conducted by the EHS Officer to revise the program as necessary, and ensure that employees are protected. If no confined space entries were performed during a 12-month period, no review is necessary.

The Company must consult with affected employees and their authorized representatives on the development and implementation of all aspects of the permit space program required and must make available to each affected employee and his/her authorized representatives all information required to be developed by this standard [1926.1212](#).

ENTRY PERMIT

Before entry is authorized, The Company shall prepare an entry permit. The Entry Supervisor identified on the permit shall sign it to authorize entry. The completed permit shall be made available at the time of entry to all authorized entrants or their authorized representatives. The duration of the permit may not exceed the time required to complete the assigned task or job identified on the permit.

The entry permits that document compliance and authorize entry to a permit space shall identify:

- The permit space to be entered
- The purpose of the entry
- The date and the authorized duration of the entry permit
- The authorized entrants within the permit space, by name or by such other means (for example, using rosters or tracking systems) as will enable the attendant to determine quickly and accurately, for the duration of the permit, which authorized entrants are inside the permit space



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 76 of 407

This requirement may be met by inserting a reference on the entry permit as to the means used, such as a roster or tracking system, to keep track of the authorized entrants within the permit space.

Content of the 'Permit Required' Entry Permit

- Space to be entered
- Purpose of the entry
- Date and the authorized duration
- Names of authorized entrants
- Means of detecting an increase in atmospheric hazard levels in the event the ventilation system stops working
- Names of entry attendants
- Name and signature of Entry Supervisor
- Hazards of the permit space to be entered
- Measures used to isolate the permit space and to eliminate or control permit space hazards before entry
- Acceptable entry conditions
 - Results of tests and monitoring performed {names or initials of the testers and by an indication of when the tests were performed}
 - Rescue and emergency services that can be summoned and the means {such as the equipment to use and the numbers to call}
- Communication procedures used by authorized entrants and attendants to maintain contact during the entry
- Equipment, such as personal protective equipment, testing equipment, communications equipment, alarm systems, and rescue equipment, to be provided
- Any additional permits, such as for hot work, which have been issued to authorize work in the permit space

WRITTEN PERMIT SPACE PROGRAM

If The Company decides that employees will enter a permit space, The Company must have a written permit space program that complies with [1926.1204](#) implemented at the construction site. The written program must be made available prior to and during entry operations for inspection by employees and their authorized representatives.

TERMINATION AND CLOSING OR CANCELLING OF PERMITS

The Entry Supervisor shall terminate the confined space permit, at the end of the job operation, at the end of the shift, or when the Entry Supervisor or Attendant determines that conditions in or near the confined space have changed and are potentially hazardous to the Entrants.

The Entry Supervisor shall, at the conclusion of the entry operation, close out the permit and provide the Safety Officer with the original copy of the Confined Space Permit.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 77 of 407

EMERGENCY AND RESCUE SERVICES

Emergency and rescue services must be at each job site containing confined spaces for the immediately dangerous to life and health conditions. Emergency and rescue services shall be:

- Provided by the Controlling Contractor's facility
- Provided by an outside service who has examined the entry site, practice rescue, and declined as appropriate, or
- Provided by The Company by selecting a rescue team that is equipped and trained to perform necessary emergency and rescue services

The Company shall evaluate a prospective rescuer's ability to respond to a rescue summons in a timely manner, considering the hazard(s) identified. What will be considered timely will vary according to the specific hazards involved in each entry. For example, Respiratory Protection requires that employers provide a standby person or persons capable of immediate action to rescue employee(s) wearing respiratory protection while in work areas defined as IDLH atmospheres.

Rescue Team

The Company shall evaluate a prospective rescue service's ability, in terms of proficiency with rescue-related tasks and equipment, to function appropriately while rescuing entrants from the permit space or types of permit spaces identified.

The Company shall select a rescue team or service from those evaluated that:

- Has the capability to reach the victim(s) within a time frame that is appropriate for the permit space hazard(s) identified
- Is equipped for and proficient in performing the needed rescue services

The Company shall inform each rescue team or service of the hazards they may confront when called on to perform a rescue at the site and provide the rescue team or service selected with access to all permit spaces from which rescue may be necessary so that the rescue service can develop appropriate rescue plans and practice rescue operations.

EMPLOYEES DESIGNATED FOR RESCUE

Personnel, equipment, and services necessary to perform an effective rescue shall be identified by The Company. They shall be identified in a way that uniquely marks them apart from regular personnel and equipment prior to entry into a permit-required confined space.

The Company shall also ensure the employees that have been designated to provide permit space rescue and emergency services shall take the following measures:

- Provide affected employees with the Personal Protective Equipment (PPE) needed to conduct permit space rescues safely and train affected employees, so they are proficient in the use of that PPE, at no cost to those employees



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Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 78 of 407

- Train affected employees to perform assigned rescue duties. The Company shall ensure that such employees successfully complete the training required to establish proficiency as an authorized entrant
- Train affected employees in basic first aid and Cardiopulmonary Resuscitation (CPR). The Company shall ensure that at least one member of the rescue team or service holds a current certification in first aid and CPR
- Ensure that affected employees practice making permit space rescues at least once every 12 months, using simulated rescue operations in which they remove dummies, manikins, or actual persons from the actual permit spaces or representative permit spaces. Representative permit spaces shall, with respect to opening size, configuration, and accessibility, simulate the types of permit spaces from which rescue is to be performed

NON ENTRY RESCUE

To facilitate non-entry rescue, retrieval systems or methods shall be used whenever an authorized entrant enters a permit space unless the retrieval equipment would increase the overall risk of entry or would not contribute to the rescue of the entrant.

Retrieval Systems

Each authorized entrant shall use a chest or full body harness, with a retrieval line attached at the center of the entrant's back near shoulder level, above the entrant's head, or at another point which The Company can establish a profile small enough for the successful removal of the entrant. Wristlets may be used in place of the chest or full body harness if the use of a chest or full body harness is infeasible or creates a greater hazard and the use of wristlets is the safest and most effective alternative.

The other end of the retrieval line shall be attached to a mechanical device or fixed point outside the permit space in such a manner that rescue can begin as soon as the rescuer becomes aware that rescue is necessary. A mechanical device shall be available to retrieve personnel from vertical-type permit spaces more than 5 feet (1.52 m) deep.

If an injured entrant is exposed to a substance for which a Safety Data Sheet (SDS) or other similar written information is required to be kept at the worksite, that SDS or written information shall be made available to the medical facility treating the exposed entrant.

HIGH ANGLE RESCUE

Because of the broad range of variables that exist in technical rescue, there is no hard and fast rule for conducting one. The format used for organizing a successful rescue is referred to as L.A.S.T. (Locate, Access, Stabilize, and Transport). The specific method for accomplishing any of these steps will differ with each rescue and should be selected based on experience and the multitude of factors unique to the current rescue scene.



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Safety Coordinator:
Chris Harrington

Page: 79 of 407

The list of guidelines and rules below are designed to minimize the danger to rescuers as they perform their duties. Because of the inherent risks involved in high-angle rescues, the method of rescue offering the least risk to the rescuer will be used. The following methods are listed in increasing order of risk. Factors influencing the selection include patient condition, rigging time, available manpower and/or equipment, and terrain conditions.

- Talk the victim into self-rescue
- Walk or climb with a belay line
- Rappel or lower with a belay line
- Pick-off with an independent belay
 - Raise the victim with a belay
 - Raise the victim and rescuer with a belay
 - Proceed with the stretcher evacuation

Rescuer safety is paramount in any rescue situation. Prior to conducting any high-angle operations, a Safety Officer and Rescue Group Supervisor will be clearly identified. The rescuers will establish a safe zone around the rigging and operations area as soon as possible.

Additionally, all rescue personnel shall adhere to the following safety guidelines:

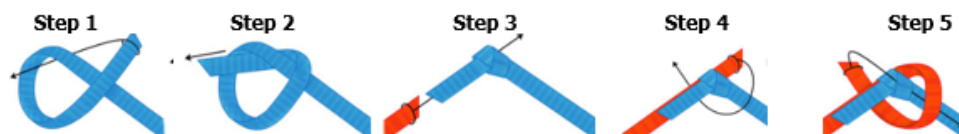
- Helmets and rescue gloves shall be always worn
- Edge protection shall be used anywhere that a rope encounters a hard surface
- All life safety ropes shall be double anchored prior to loading
- An independent belay shall be used. NFPA 1983 Standards on Life Safety Rope will be followed whenever possible

Anchors are a mixture of equipment, knot-tying, and judgment. With this said, all lifelines shall have two independent anchors. A large heavy object may be used for both the primary and backup anchors. Anchors may be natural (trees and boulders), structural (buildings, bridges, and towers), vehicles, or picket pins.

KNOT TYING

Knots shall be rated for strength by the percentage of rope strength that remains when the knot is tied; knots should always be tied off. Types of acceptable knots for rope rescue include:

Water Knot (used to tie webbing together)





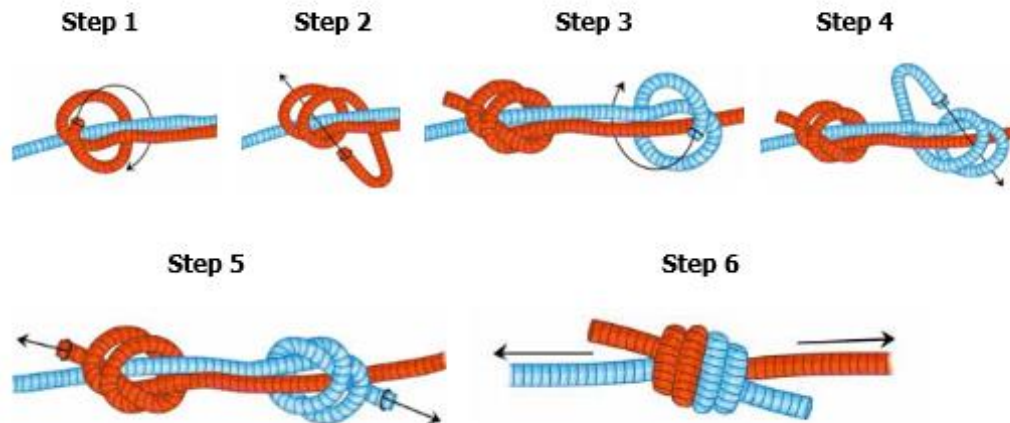
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Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 80 of 407

Double Fisherman or Double Overhand Fisherman (used to tie prusik loops)



RESCUE EQUIPMENT INSPECTION

According to [ANSI/ASSE Z359.2-2007](#) American National Standards Section 5.5.2. Fall protection and rescue equipment shall be inspected on a regular basis not to exceed one year (or more frequently if required by the manufacturer's instructions) by a competent person or a competent rescuer, as appropriate, to verify that the equipment is safe for use.

The inspection shall be documented and shall include (but is not limited to):

- Absence or illegibility of markings or tags
- Absence of any elements affecting the equipment form, fit, or function
- Evidence of defects in or damage to hardware elements including cracks, sharp edges, deformation, corrosion, chemical attack, excessive heating, alteration, or excessive wear
- Evidence of defects in, or damage to, straps or ropes (fraying, unsplicing, enlacing, kinking, knotting, roping, broken, or pulled stitches, soiling, abrasion, alteration, needed or excessive lubrication, excessive aging, or excessive wear)
- Alteration, absence of parts, or evidence of defects in, damage to, or improper function of, mechanical devices, and connectors
- Any other condition that calls to question the suitability of the equipment for its intended purpose

Rescue equipment shall be taken out of service when any inspection reveals that it may no longer serve the required function due to damage or wear because the required inspection interval has been exceeded because it does not meet the criteria of this standard.



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Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 81 of 407

PRE-PERMIT DUTIES

Pre-Permit Duties of the Entry Supervisor

- The Entry Supervisor shall record on the permit a descriptive identification of the permit space and its location
- The Entry Supervisor shall record on the permit the date of entry, the time of issuance, and the time of expiration. No permit shall be issued for a period longer than eight hours
- The Entry Supervisor shall record on the permit the reason for the entry
- The Entry Supervisor shall survey the permit space without entry and review the work to be performed, to identify the existing or potential hazards. Such hazards shall be recorded on the permit:
 - Gases or vapors which could displace the oxygen or processes which could consume oxygen
 - Flammable gases
 - Any other chemicals, gases, fumes, or mists that could be present or released by entry activities
 - A potential for low levels of oxygen from a lack of adequate ventilation
 - A potential for high levels of oxygen
 - Liquids or flowable solids which could engulf an entrant
 - Inwardly converging walls, sloped floors that taper to a smaller cross-section, pits, or holes in the floor into which an entrant could stumble and become wedged, and/or other characteristics of the configuration of the space which could trap or asphyxiate an entrant
 - Radiation
 - Bare, exposed, or ungrounded conductive parts of electrical equipment, machinery, wiring, fixtures, or installations
 - Unguarded points of operation or moving parts of machinery; and
 - Any other recognized hazard that could result in accidental injury or occupational illness requiring treatment greater than first aid
- The Entry Supervisor shall determine the actions necessary prior to entry to eliminate or control the hazards and shall record them on the permit:
 - Notification of the selected rescue personnel shall be required for each entry
 - Atmospheric Hazards
- If a potential or actual atmospheric hazard exists, testing shall be required
 - Oxygen, flammable gas, and carbon monoxide tests shall be conducted
 - The Entry Supervisor shall obtain and list the Permissible Exposure Limits (PEL) for each identified air contaminant
 - The Entry Supervisor shall test for each identified air contaminant

The Entry Supervisor shall determine if the atmospheric hazard can be eliminated or controlled by purging, venting, inserting, continuous forced air ventilation, or a combination.



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Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 82 of 407

If the only hazard in a space is a hazardous atmosphere and Alternate Entry Procedures are the desired means of entry, forced air is required.

- Engulfment Hazard elimination or control by blanking, binding, double block and bleed, line braking, or other methods
- Configuration Control means. Configuration hazards usually cannot be eliminated
- Other Serious Hazards elimination or control by lock-out/tag-out or other means
- The need for traffic control devices to isolate the permit space from vehicular and pedestrian traffic as well as any other potential external hazard

The Entry Supervisor shall determine and record the required equipment for entry.

- Equipment for the Attendant to summon rescue and the Entry Supervisor is required for all permit entries
- Equipment designed to test oxygen, flammable gases, and carbon monoxide shall be required for all permit spaces with hazardous atmospheres
- Equipment designed to test levels of identified airborne contaminants shall be required where such have been identified
- A forced air ventilation system is required for Alternate Entry Procedures and shall be required if determined by the Entry Supervisor
- Personal protective equipment is required where hazards cannot be effectively eliminated or controlled
- Traffic control equipment is required if the permit space is not effectively isolated from vehicles or pedestrian traffic
- Mechanical rescue equipment is required unless its use creates a greater hazard or would not effectively contribute to rescue
- Body Harness with a retrieval line attached at the upper back should be used whenever feasible
- Wristlets may be used where body harnesses are not feasible
- Mechanical retrieval devices shall be used for vertical entries into spaces deeper than five feet. Mechanical devices or fixed-point connections may be used otherwise
- Communication equipment is required where entrants will be out of voice range with the Attendant
- Other equipment shall be selected as needed

The Entry Supervisor shall identify the authorized entrants and at least one attendant and shall record their names on the permit. The Entry Supervisor shall determine the type of entry that is allowed.

If the pre-entry survey proves that the only hazard existing in the space is atmospheric and continuous forced air ventilation is provided, the Entry Supervisor may authorize Alternate Entry Procedures under the stipulation that:

- The initial atmospheric tests indicate the atmosphere meets the entry requirements
- Forced Air Ventilation continues for the duration of the entry; and



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Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 83 of 407

- The Attendant performs atmospheric tests once per hour and records them on the Air Monitoring Log on the permit

If the pre-entry survey proves that there are no atmospheric or configuration hazards in the permit space and that all other identified hazards can be eliminated (as opposed to controlled) from outside the space prior to entry, the Entry Supervisor may reclassify the space as non-Permit contingent upon the completion of all hazard elimination activities.

- If a non-permit entry is approved, the employee designated as Attendant on the permit shall serve as Lead Entrant. The permit shall serve as the required documentation
- If no other type of entry is obtainable or selected, the entry shall be by the permit process
- The Entry Supervisor shall indicate any other permits issued for simultaneous work within the space and shall indicate the means to contact rescue personnel
- The Entry Supervisor shall sign and issue the permit, effective upon the date issued and contingent upon completion of all pre-entry activities and expiring on the date indicated on the permit

FORCED AIR VENTILATION

Continuous forced air ventilation shall be used, as follows:

- An employee may not enter the space until the forced air ventilation has eliminated any hazardous atmosphere
- The forced air ventilation shall be so directed as to ventilate the immediate areas where an employee is or will be present within the space and shall continue until all employees have left the space
- The air supply for the forced air ventilation shall be from a clean source and may not increase the hazards in the space

The atmosphere within space shall be periodically tested as necessary to ensure that the continuous forced air ventilation is preventing the accumulation of a hazardous atmosphere. Any employee who enters the space, or that employee's authorized representative, shall be provided with an opportunity to observe the periodic testing required by this paragraph.

[1910.146\(c\)\(5\)\(ii\)\(E\)-\(F\)](#)

AIR MONITORING

Before an employee enters the space, the internal atmosphere shall be tested, with a calibrated direct-reading instrument, for oxygen content, flammable gases and vapors, and potentially toxic air contaminants, in that order. Any employee who enters the space, or that employee's authorized representative, shall be provided an opportunity to observe the pre-entry testing required by this paragraph. The Company shall also reveal the atmospheric testing results to the requested affected employees.



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Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 84 of 407

The purpose of air monitoring is to identify and quantify airborne contaminants to determine the level of worker protection needed. Initial screening for identification is often qualitative, i.e., the contaminant, or the class to which it belongs, is demonstrated to be present but the determination of its concentration (quantification) must await subsequent testing. Two principal approaches are available for identifying and/or quantifying airborne contaminants:

- The onsite use of direct-reading instruments
- Laboratory analysis of air samples obtained by gas sampling bag, filter, sorbent, or wet-contaminant collection methods

Portable Air Monitoring Equipment

- Portable air monitors are hand-held instruments that measure the concentration of combustible or toxic gases and vapors as well as oxygen concentration. All instruments used in USPL sound an audible alarm when concentrations exceed preset limits. Since air monitoring equipment is designed for various applications, each instrument may have its own operating characteristics and limitations
- Specific initial and continuous monitoring requirements for Hot Work, Confined Space, and Excavations are specified in the respective policies. These policies should be referenced for air monitoring specifics
- **Chris Harrington** should be consulted regarding air monitoring equipment and procedures

PRE-ENTRY ACTIONS

If the hazard assessment identifies a potential atmospheric hazard and a worker is required or authorized by an employer to enter the confined space, the employer must ensure that a competent worker performs a pre-entry atmospheric test of the confined space to:

- Verify that the oxygen content is between 19.5 percent and 23.0 percent by volume
- Identify the amount of toxic, flammable, or explosive substance that may be present

The Company must ensure that as often as necessary after the first time a worker enters the confined space, a competent worker:

- Performs atmospheric testing, and
- Identifies and records any additional hazards

The Company must ensure that if there is a potential for the atmosphere to change unpredictably after a worker enters the confined space, the atmosphere is continuously monitored.

If atmospheric testing identifies that a hazardous atmosphere exists or is likely to exist in a confined space, The Company must ensure that the confined space is ventilated, purged, or both before a worker enters the confined space.



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Safety Coordinator:
Chris Harrington

Page: 85 of 407

If ventilating or purging a confined space is impractical or ineffective in eliminating a hazardous atmosphere, the employer must ensure that a worker who enters the confined space uses personal protective equipment appropriate for the conditions within the confined space.

The Entry Supervisor shall ensure that required equipment is procured and available, and that pre-entry actions are completed prior to entry. The Entry Supervisor may perform these duties or may delegate them to the Attendant and/or other authorized Entrants.

Each pre-entry requirement successfully met shall be checked off in the block provided on the permit. When all requirements are completed, the responsible employee shall verify the actions by signing the permit.

Required atmospheric testing shall be performed in the order indicated below after the pre-entry actions to address atmospheric hazards have been performed. Entry may proceed only if the tests indicate:

- The percentage of oxygen in the permit space is between 19.5% and 23.5%
- The percentage of flammable gases is at or lower than 10 percent of the Lower Flammable Limit
- The parts per million parts (ppm) of carbon monoxide is at or lower than 17
- The amount of other identified air contaminants is/are less than one-half the PEL. Where more than one air contaminant is observed, those contaminants will be reviewed for additive effects
- The permit shall be posted at the point of entry into the space, and each authorized employee shall review it to become familiar with the hazards of the space and the acceptable entry conditions

The Company will ensure that workers within a confined space are protected against the release of hazardous substances or energy that could harm them.

The Company shall also ensure that a worker does not enter a confined space unless adequate precautions are in place to protect a worker from drowning, engulfment, or entrapment.

The Company will ensure that any hazardous energy in a restricted space is locked/tagged out.

A person must not enter or work in a confined space if more than 20 percent of the lower explosive limit of a flammable or explosive substance is present in the atmosphere.

Barriers and barricades will be set up and used to prevent unauthorized entry into the confined space.



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Safety Coordinator:
Chris Harrington

Page: 86 of 407

The Company shall implement pre-entry testing and periodic monitoring, provide an early warning system that continuously monitors for non-isolated engulfment hazards, and continuously monitor atmospheric hazards [1926.1204\(e\)](#).

ENTRY

Entrants shall:

- Enter the space and perform the assigned work as expediently as possible
- Wear and use all equipment required by the permit
- Notify the Attendant or Lead Entrant periodically or upon request that all is well
- Know all potential hazards that may be encountered during entry, including information on the signs, symptoms, and consequences of the exposure
- Use all required PPE such as eye protection, gloves, and breathing equipment
- Shall witness and verify calibrated air monitoring data and if approved, sign off, before entry is made
- Is entitled to additional monitoring at any time
- Always maintain communication with the Attendant to ensure the Attendant can monitor the Entrants status and to identify the need for rescue
- Immediately evacuate the space and alert the Attendant or Lead Entrant whenever any of the following occurs:
 - The development of a condition not in compliance with the permit
 - The development of a sign or symptom of exposure to a dangerous situation
 - Failure of any required equipment; and/or
 - The Attendant or Lead Entrant orders an evacuation

Lead/Supervisor Entrants shall:

- Maintain awareness of the location of the entrants, either inside or outside of the permit space
- If entry is by Alternate Entry Procedures, perform hourly atmospheric monitoring of the space and record on the Gas Monitoring Log of the permit
- Order an immediate evacuation upon becoming aware of:
 - Any sign or symptom of exposure to a dangerous situation
 - Any development of a condition not in compliance with the permit; and/or
 - Failure of any required equipment

Attendants

Single attendants are not permitted to monitor more than one confined space at any given time.

For every confined space or restricted space entry, The Company shall designate a competent worker to be in communication with a worker in the confined space or restricted space. The Company will also ensure that the designated worker has a suitable system for summoning assistance.



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Safety Coordinator:
Chris Harrington

Page: 87 of 407

If more than a single attendant monitors one confined space, the following means and procedures shall be used to enable the attendant to respond to emergencies in one or more permit space that he/she is monitoring without distraction from all responsibilities.

- Station themselves outside the permit space at the opening to the space, and remain in place throughout the duration of the entry or until relieved by another authorized Attendant
- Perform no other duties beyond those stated for Attendants
- Maintain an accurate count of entrants within and without the space, by use of the Entry Log on the permit
- Perform hourly atmospheric monitoring of spaces containing hazardous atmospheres, and record on the Gas Monitoring Log on the permit
- Communicate with entrants by voice or communication equipment periodically to assure that all is well
- Order an immediate evacuation of the space:
 - Upon becoming aware of the development of a sign or symptom of exposure to a dangerous situation
 - Upon becoming aware of the development of a condition out of compliance with the permit
 - Upon failure of an entrant to answer an attempt at communication; and/or
 - If unable to continue the performance of functions as an Attendant
- Summon rescue services if needed
- The Company shall provide entrants with a form of communication such as radios, cell phones, or walkie-talkie-like devices and provide procedures to summon rescue in the case of an emergency
- Warn unauthorized persons away from the permit space; and
- Summon the Entry Supervisor if unauthorized persons refuse to leave the space

Note: The Entry Supervisor shall remove unauthorized persons from the permit space as needed.

MONITOR INSPECTION AND CALIBRATION

All gas monitors shall be inspected and calibrated per the manufacturer's recommendations and have a current calibration sticker on the monitor.

Bump Tests

Daily bump tests are performed to ensure the monitor and alarms are working correctly. Bump tests are required to be completed at the beginning of each day the monitor is in use per the requesting client and manufacturer's guidelines to ensure the monitor is functioning correctly.



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Safety Coordinator:
Chris Harrington

Page: 88 of 407

COMPLETION OF ENTRY

The Attendant or Lead Entrant shall ensure that all entrants have exited the space. If the space was evacuated prior to the completion of work:

- The Attendant or Lead Entrant shall immediately terminate the permit by checking the appropriate box and describing the reasons for evacuation on the permit, then contacting the Entry Supervisor
- The Entry Supervisor shall:
 - Immediately notify the employee's supervisor of any injured or overexposed employee
 - Determine if reentry is required to complete work, eliminate a created hazard, or return the space to normal operation
- If reentry must be performed:
 - Resurvey the space to determine the cause of the evacuation; and
 - Issue another permit which includes the elimination or control of the hazard causing the evacuation
 - Alternate Entry Procedures and Reclassification to Non-Permit Space shall not be approved
- If reentry is unnecessary:
 - Oversee the completion of the post-entry activities indicated on the permit; and
 - End the entry activities
- If the entry was successfully completed, the Attendant or Lead Entrant shall:
 - Indicate such by checking the appropriate block on the permit
 - Oversee the completion of post-entry actions indicated on the permit and verify by signing in the appropriate location
 - Add any pertinent information concerning the entry on the permit; and
 - Return the permit to the Entry Supervisor

ILLUMINATION

The Company will make sure adequate illumination is provided for safe working where applicable.

When natural lighting is not sufficient, additional lighting will be provided. It must not exceed 12 volts in damp conditions and will be equipped with a ground fault circuit interrupter. In hazardous atmospheres, explosion-proof lighting will be required.

TRAINING

The Company must provide training to each employee whose work is regulated by this standard, at no cost to the employee, and ensure that the employee possesses the understanding, knowledge, and skills necessary for the safe performance of the duties assigned under this standard. This training must result in an understanding of the hazards in the permit space and the methods used to isolate, control, or in other ways protect employees from these hazards, and



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Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 89 of 407

for those employees not authorized to perform entry rescues, in the dangers of attempting such rescues (OSHA [1926.1207\(a\)](#)). The Company shall ensure that at least one member of the rescue team or service holds a current certification in first aid and CPR. In addition, The Company shall ensure affected employees practice making permit space rescues at least once every 12 months using simulated rescue operations in which they remove dummies, manikins, or actual persons from the actual permit spaces or representative permit spaces.

Training required by this section must be provided to each affected employee in both a language and vocabulary that the employee can understand:

- Before the employee is first assigned duties under this standard
- Before there is a change in assigned duties
- Whenever there is a change in permit space entry operations that presents a hazard about which an employee has not previously been trained
- Whenever there is any evidence of a deviation from the permit space entry procedures required by § [1926.1204\(c\)](#) or there are inadequacies in the employee's knowledge or use of these procedures

The training must establish employee proficiency in the duties required by this standard and must introduce new or revised procedures, as necessary, for compliance with this standard: [1926.1207\(c\)](#).

The employer must maintain training records to show that the training required has been accomplished. The training records must contain each employee's name, the name of the trainers, and the dates of training. The documentation must be available for inspection by employees and their authorized representatives for the period the employee is employed by that employer.

The documentation must be available for inspection by employees and their authorized representatives for the period the employee is employed by that employer.

The Company shall ensure that a worker assigned duties related to confined space or restricted space entry is trained by a competent person in:

- Recognizing hazards associated with working in confined spaces or restricted spaces
- Performing the worker's duties in a safe and healthy manner

The Company will ensure that competence in the following is represented in the workers responding to a confined space or restricted space emergency:

- First aid
- The use of appropriate emergency response equipment
- Procedures appropriate to the confined space or restricted space

Training may be performed in-house or by a 3rd party.



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Safety Coordinator:
Chris Harrington

Page: 90 of 407

Training for All Employees

The supervisor shall ensure that each employee receives awareness training on:

- Identifying characteristics of a confined space
- Identifying characteristics of a permit space
- Authorization or prohibition of their job classification to enter permit spaces
- Required actions when working around or near a permit space entry
- The authority of authorized Attendants and Entry Supervisors

Each affected employee shall be trained prior to initial assignment, prior to a change in assigned duties, if a new hazard has been created or special deviations have occurred.

Training shall be required:

- During orientation
- Within two months of the determination of the employee's entry authorization, but prior to entry
- Whenever the supervisor becomes aware that the employee has failed to follow the instructions provided in the training

The Supervisor shall provide the Program Coordinator with notification that training has been received.

ENTRY OPERATIONS

The Company shall develop and implement procedures (such as closing off a permit space and canceling the permit) necessary for concluding the entry after entry operations have been completed.

The Company shall review entry operations when there is reason to believe that the measures taken under the permit space program may not protect employees and revise the program annually to correct deficiencies found to exist before subsequent entries are authorized.

Examples of circumstances requiring the review of the permit space program are:

- Any unauthorized entry of a permit space
- The detection of a permit space hazard not covered by the permit
- The detection of a condition prohibited by the permit
- The occurrence of an injury or near-miss during entry
- A change in the use or configuration of a permit space and employee complaints about the effectiveness of the program



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Safety Coordinator:
Chris Harrington

Page: 91 of 407

Multiple Entrants

When The Company arranges to have employees of another employer perform work that involves permit space entry or confined space entries, The Company shall:

- A. Inform the contractor that the workplace contains permit spaces and that permit space entry is allowed only through compliance with a permit
- B. Apprise the contractor of the elements, including the hazards identified and The Company's experience with the space, which make the space in question a permit space
- C. Apprise the contractor of any precautions or procedures that The Company has implemented for the protection of employees in or near permit spaces where contractor personnel will be working
- D. Coordinate entry operations with the contractor, when both The Company personnel and contractor personnel will be working in or near permit spaces
- E. Debrief the contractor at the conclusion of the entry operations regarding the permit space program followed and regarding any hazards confronted or created in permit spaces during entry operations

PROGRAM COORDINATORS

The Company shall ensure that the designated Program Coordinator receives training in:

- The requirements of this policy and procedures
- The duties the coordinator shall perform

Training shall be provided:

- Within two months after designation as Program Coordinator
- Within one month of revisions to this policy and/or procedures

ENTRY SUPERVISORS, ATTENDANTS, AND ENTRANTS

The Supervisor shall ensure that employees designated as Entry Supervisors, Attendants, and/or Entrants receive training in:

- The requirements of this policy and any procedures
- The duties, authority, and responsibilities of Entry Supervisors, Attendants, Lead Entrants, and Entrants
- The types of hazards expected to be encountered in permit spaces
- The calibration, use, care, and cleaning of equipment expected to be used during entry operations
- The performance of pre-entry actions expected to be required in permit spaces

Training shall be provided:

- Prior to assignment or authorization of duties within permit spaces
- Within one month after revisions of this policy or procedures - assignment or authorization for permit space entry shall be suspended until training is completed



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Safety Coordinator:
Chris Harrington

Page: 92 of 407

- Whenever the supervisor becomes aware that an employee is deviating from the procedures of this policy. Assignment or authorization for permit space entry shall be suspended until training is completed and annually

The supervisor shall develop written certification that each affected employee has successfully completed training.

Certification shall include:

- Employee Name
- Authorized Duty (Entry Supervisor, Attendant, and/or Entrant)
- Name and signature of the Trainer
- Synopsis of topics covered
- Date of training

A copy of the certification shall be provided to the employee and Program Coordinator/authorized representative.

MULTI EMPLOYER PROCEDURE

When The Company arranges to have employees of another employer perform work that involves permit space entry The Company shall:

- Inform the contractor that the workplace contains permit spaces and that permit space entry is allowed only through compliance with a permit space program meeting the requirements of this section
- Appraise the contractor of the elements, including the hazards identified and the Controlling Contractor's experience with the space that make the space in question a permit space
- Appraise the contractor of any precautions or procedures that The Company has implemented for the protection of employees in or near permit spaces where contractor personnel will be working
- Coordinate entry operations with the contractor, when both The Company personnel and contractor personnel will be working in or near permit spaces

PERSONAL PROTECTIVE EQUIPMENT (PPE)

The Company will ensure that personal protective equipment and emergency equipment are available to workers undertaking rescue operations in a confined space to perform a timely rescue and will ensure that a worker does not enter or remain in a confined space unless an effective rescue can be carried out.

The Company will ensure the emergency response plan includes the emergency procedures to be followed if there is an accident or other emergency, including procedures in place to evacuate the confined space immediately.



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Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 93 of 407

The Company shall provide affected employees with the Personal Protective Equipment (PPE) needed to conduct permit space rescues safely and train affected employees, so they are proficient in the use of PPE at no cost to the employee.

Typical PPE used for confined space work may include:

- Eye protection
- Face protection
- Head protection
- Welding protective gear (when performing hot work operations in confined spaces)
- Foot protection
- Hand protection
- Body protection
- Hearing protection
- Respiratory protection
- Fall protection (designed for confined space use)
- Mechanical or natural ventilation devices

Note: Personal Protective Equipment must not interfere with the entrance into a confined space, pose additional hazards, or make it difficult to rescue an entrant. Always check with the employer on what PPE is needed when entering a confined space.

DEFINITIONS

Confined Space - A space large enough and so configured that an employee can bodily enter and perform assigned work and has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry,) is not designed for continuous employee occupancy.

Permit-Required Confined Space – A confined space that has one or more of the following characteristics:

- Contains or has the potential to contain a hazardous atmosphere
- Contains material that has the potential to engulf an entrant
- Has walls that converge inward or floors that slope downward and taper into a smaller area that could trap or asphyxiate an entrant
- Contains any other recognized safety or health hazard

Entrant Attendant - An individual stationed outside one or more permit spaces who monitors the authorized entrants and who performs all attendant duties assigned in the employer's permit space program.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 94 of 407

Rescue - To be free from danger, harm, or confinement. Confined space rescue can be an extremely dangerous act. Statistics show that more than 60 percent of those who die in confined spaces are people attempting to perform a rescue.

Confined Space Rescues are technically challenging because of the environment in which they occur. The spaces, such as underground vaults, silos, storage tanks, and sewers, are often narrow and constricting, preventing easy access by rescuers.

Spotter - An employee trained to look. The purpose of a spotter is to assist the operator in maneuvering equipment into position to prevent injury to the operator, spotter, or other personnel or prevent property damage.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 95 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 96 of 407

Disciplinary

PURPOSE

The purpose of this document is to outline a progressive disciplinary policy for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company." This policy is designed to provide a structured corrective action process to improve and prevent a recurrence of undesirable employee behavior and performance.

The Company reserves the right to combine or skip steps outlined in this policy based upon an evaluation of each specific situation and the nature of the offense. The level of disciplinary intervention may also vary based on factors such as repeat offenses, prior warnings, and the nature of the violation.

RESPONSIBILITIES

Supervisors, project superintendents/foreman, and the safety department shall be responsible for the enforcement of this disciplinary program.

All personnel, except those in their initial introductory (probationary) period, are subject to this policy; application shall be applied uniformly to achieve fair and impartial treatment of each person.

POLICY

The application of this policy is purposed to prevent undesirable, dangerous or any other form of unacceptable conduct, such as not following verbal or written safety procedures, guidelines, rules, horseplay, failure to wear selected Personal Protective Equipment (PPE), abuse of PPE, etc., to provide employees with an opportunity to correct their conduct in the future, and to assure a positive productive working environment.

INSPECTIONS

Physical inspections of work areas must be conducted to ensure compliance with safety rules and policies. Personnel responsible to conduct physical inspections are superintendents, foremen, team leads, drivers, and anyone operating equipment on behalf of The Company.

VIOLATIONS AND ENFORCEMENT

Each violation shall be investigated by management to ensure that an accurate and factual assessment of the infraction is documented. Corrective actions taken are meant to be corrective rather than punitive and shall be appropriate to each offense.



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Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 97 of 407

The Company is responsible for providing a secure and safe workplace in which employees are treated fairly, and with respect. Although it is not possible to list all forms of behavior deemed unacceptable in the workplace, the following examples would be considered infractions of The Company's rules of conduct. This list includes, but is not limited to:

- Theft or any inappropriate removal or possession of property from The Company or any fellow employees
- Willful destruction of property from The Company or any fellow employee
- Working under the influence of alcohol or illegal drugs
- Fighting, threatening violence, or using excessively obscene language
- Sexual or any other form of harassment
- Publicly disclosing any confidential information pertaining to The Company or any fellow employees
- Possession of dangerous or unauthorized materials, such as explosives or firearms
- Falsifying any company records or reports, including one's time records or any fellow employees
- Violation of company safety rules
- Not wearing proper personal protective equipment
- Violations of The Company's drug and alcohol program

In the case of an infraction or when unacceptable behavior is witnessed or reported, the following shall occur:

Step 1 (1st Offense): The immediate supervisor shall **meet in person with the employee** to bring attention to the violation, conduct, or performance/attendance issue. The supervisor shall discuss the nature of the violation with the employee. The supervisor shall clearly describe expectations and steps the employee must take to improve or correct the problem.

Step 2 (2nd Offense): The second offense, violation, or unacceptable behavior will result in a **written warning**. The process of step 2 includes formal documentation of the offense and shall include a description of the offense, the consequences of the current violation as well as the consequences that the employee may incur if a third offense occurs. The immediate supervisor and one witness of equal or higher authority within The Company shall be present for the presentation of this incident form, meeting, and documentation process.

A performance improvement plan may be set forth at the sole discretion of The Company.

Step 3 (3rd Offense): Final written warning, suspension, or termination may occur at this step, based upon the nature of the offense and the details of the performance improvement plan described in Step 3.

Step 4 (4th Offense): Termination.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 98 of 407

DISCIPLINARY ACTION FORM

Company Name				Date					
Employee									
Title									
Supervisor									
Type of Violation or Problem									
	Late		Alcohol		Quality of Work		Insubordination		
	Absent		Violence		Quantity of Work		Conduct		
	Drugs		Safety		Theft/Damage		Performance		
Type of Warning									
	1 st Warning (Verbal)			2 nd Warning			3 rd Warning		Termination
1st Offense (verbal warning) Plan for Improvement								Date	
Notes:									
2nd Offense and/or Violation Description								Date	
Employee Plan for Improvement									
3rd Offense Suspension/Possible Termination								Date	
	Suspension		Termination		Other (Describe)				



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 99 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 100 of 407

Driving Safety

PURPOSE

This program covers safe operation and maintenance of all **Pro Painting & Drywall Inc.** vehicles except those company vehicles regulated by the Interstate Commerce Commission or US Department of Transportation. Examples of vehicles covered include company-owned-or-leased passenger vehicles, pickup trucks, light trucks, and vans. **Pro Painting & Drywall Inc.** is hereafter referred to as The Company.

RESPONSIBILITIES

Management

- Provide annual defensive-driver training for all employees authorized to operate company vehicles.
- Train authorized employees on vehicle inspection and accident procedures.
- Maintaining company vehicles in a safe condition.
- Maintain active insurance policies on all company vehicles.

Authorized Drivers

- Authorized drivers shall follow the safe driving guidelines set forth in this policy at all times.
- Operate company vehicles in a safe, responsible manner and obey all traffic laws.
- Participate in driver-training programs.
- Participate in the **The Company** drug-testing program.
- Ensure all vehicle occupants use seatbelts before moving the vehicle.
- Follow safe fueling procedures.
- Conduct a pre-use inspection before any first daily use.
- Conduct a post-use inspection after any use.
- Immediately report any safety defects or vehicle problems.
- Report on use of all prescription medication.

Training

All employees authorized to operate company-owned-or-leased vehicles will participate in initial and annual driver-safety training that will include:

- Defensive driving
- Vehicle inspection
- Accident procedures
- Hazardous weather driving
- Procedure for notification of unsafe vehicle
- Backing procedures (light truck and van operators)



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 101 of 407

- Cargo area storage (light truck and van operators)
- Loading and unloading (light truck and van operators)

POLICY

- Only authorized employees will drive a motor vehicle in the course and scope of work or operate a company-owned vehicle.
- Vehicles will always be maintained in a safe condition. In the event of an unsafe mechanical condition, the vehicle will be immediately placed out of service and the appropriate manager notified.
- Only qualified company vehicle mechanics or approved service facilities are permitted to perform maintenance on company vehicles.
- All vehicles will be operated, licensed, and insured in accordance with applicable local, state, and federal laws.
- All employees authorized to operate any company owned or leased vehicle will be included in the **The Company** random drug-testing program.
- All authorized employees must possess a valid state driver's license for the class vehicle authorized.
- Authorized employees must have a driving record at least equal to that required for maintaining a commercial driver's license.
- Drivers shall be appropriately assessed, licensed, and trained to operate the vehicle.
- All personal use of vehicles by employees shall be restricted. Also, the policy should include restricting non-employees operating company vehicles.

DRIVER QUALIFICATION

The Company will have methods in place to:

- Ensure that background checks and MVR's (Motor Vehicle Record) checks are conducted when applicable, Ideally, five to seven years of driving history is obtained. However, some states will only provide three years of data on an MVR.
- Ensure when a driver receives a violation(s) they communicate it to **The Company**.
- Ensure that all drivers will have a current medical assessment on file.

DRIVING SAFELY

- Drivers shall not operate a motor vehicle while under the influence of alcohol, illegal drugs, or prescription or over-the-counter medications that might impair their driving skills.
- Loads shall be secure and shall not exceed the manufacturer's specifications and legal limits for the vehicle.
- The vehicle shall be used for its purpose.
- Only hands-free cell phones may be used by drivers while the vehicle is in motion.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 102 of 407

- Drivers shall not manipulate radios or other equipment which may cause distraction while driving.
- Drivers shall not exceed the posted speed limit and shall always maintain a safe distance between other vehicles.

CELL PHONES AND 2 WAY RADIOS

The Company shall communicate with drivers via cellphones and two-way radios when necessary and shall follow the requirements for use as listed below.

The two fundamentals for using two-way radios (walkie-talkies) and cell phones safely while driving:

- One touch
- No reach

Federal regulations forbid the use of cellphones and sending text messages while driving commercial vehicles. However, these statutes do not prohibit the use of two-way radios, but they do offer guidelines for keeping radio users safe while driving on company business.

According to federal regulators, the two greatest risks of using a cell phone while driving are reaching to grab one and using more than one button to operate it. Commercial drivers are allowed to use hands-free phones, provided they can operate the phone without reaching and by touching a single button.

These same concepts apply to the safe use of two-way radios while driving.

MONITORING SYSTEMS

Using mounted GPS tracking devices will allow The Company to get frequent updates and reports throughout the day about their drivers. A mounted GPS system can help prevent theft, verify employee travel expenses, monitor travel time, and increase productivity for employees. If the employer provides smartphones or laptops and a company truck to employees, they are allowed to track employee activity through GPS and the IP address.

The Company can also install cameras to watch what the driver sees through the front camera and monitor what the driver is doing inside the vehicle.

STARTING

- Conduct pre-use inspection.
- All occupants shall wear seatbelts, always when the vehicle is in motion.
- Adjust seat and mirrors before starting vehicle.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 103 of 407

- Allow a 15 second warm up time.
- Check for warning lights.

DRIVING

- Do not drive if drowsy.
- Think ahead - anticipate hazards.
- Do not trust the other driver to drive properly.
- Do not speed or tailgate.
- Drive slower in hazardous conditions or hazardous areas.
- Pass only in safe areas and when excessive speed is not required.
- No loose articles on the floor.
- Do not read, write, apply make-up, drink, eat or use a handheld cell phone while driving.
- Stay at least four seconds behind the vehicle ahead.
- Do not stop for hitchhikers or to provide roadside assistance.
- All employees are expected to follow all traffic laws and rules of the road while on company business
- Employees are prohibited from operating a motor vehicle while under the influence of drugs or alcohol. This includes:
 - a) blood alcohol level at or above the local legal limit
 - b) illegal drugs; and
 - c) prescription medications that cause drowsiness or other conditions that may cause impairment.
- Drivers must perform pull-through parking (pulling through a space, so the vehicle is facing outwards in the next space) when available or backing into a parking space if necessary. This provides the operator with an easier exit from the parking area as well as a quick exit in case of an emergency. When backing, it is recommended that a spotter be stationed outside the vehicle to ensure the driver backs safely, whenever practicable.

Maintaining Focus

- Keep both hands on the wheel
- Minimize distractions from passengers (avoid talking while driving)
- Think about a path of safe escape if a dangerous situation occurs suddenly in front of your vehicle – Rear End collisions are quite common for inattentive or distracted drivers
- Be especially careful near construction zones – traffic patterns can change suddenly, large equipment may merge, and the altered road surface can affect control
- Deal with Drowsiness
 - Get plenty of rest, maintain a balanced diet, do not rely on coffee to carry you



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 104 of 407

- **Take breaks if you recognize the danger signs** (nodding off, excessive daydreaming, etc.)
- When practical, share driving responsibilities on long trips

Safe Attitude

Workers must have control of their emotions and behavior, practice defensive driving techniques, ensure proper decision making and accept responsibility for all their driving decisions. There are many benefits to a safe driving attitude some include:

- Limiting stress while on the road
- Saving money on tickets and increased insurance costs
- Helping workers keep their driver license
- Reducing chances of being in a crash

BACKING

- Back slowly and be ready to stop.
- Do not back up if anyone is in the path of vehicle travel.
- Check clearances.
- Do not assume people see you.
- Getting out and check if you cannot see from the driver's seat.

STOPPING

- Park only in proper areas, not roadsides.
- Use warning flashers and raise hood if vehicle becomes disabled.

CARGO

The company and any employees operating company vehicles will secure any cargo on or in motor vehicles to ensure that it is stored and secured to prevent unintentional movement of the equipment which could cause spillage, damage to the vehicle, or injury to the operator.

Applicable/Placards

OSHA is hereby issuing a final rule that requires employers who receive a package, transport vehicle, freight container, motor vehicle or rail freight car which contains a hazardous material and which is required to be marked, placarded, or labeled in accordance with jurisdictional requirements and the U.S. Department of Transportation's (DOT) Hazardous Materials Regulations, to retain the markings, placards, and labels on the package, transport vehicle, freight container, motor vehicle or rail freight car.

This rule is issued pursuant to section 6(b) of the Occupational Safety and Health Act of 1970 (the Act) and in accordance with section [29 of Public Law 101-615](#), the Hazardous Materials Transportation Uniform Safety Act of 1990 (HMTUSA).



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 105 of 407

Hazardous Material Record Handling

A consignor must be able to produce a copy of any shipping document for two years after the date the shipping document or an electronic copy of it was prepared or given to a carrier by the consignor, for hazardous materials imported into the US, for two years after the date the consignor ensured that the carrier, on entry into the US, had a shipping document or was given an electronic copy of one, and within 15 days after the day on which the consignor receives a written request from an inspector.

Hazardous Material Training

The Hazardous Materials Transportation Officer shall provide access to an approved training program for employees, who during employment, directly affect hazardous materials transportation, to include:

- Loads, unloads, or handles hazardous materials onto or from vehicles that enter highway commerce
- Tests, reconditions, repairs, modifies, marks, or otherwise represents containers, drums, or packaging as qualified for use in the transportation of hazardous materials
- Prepares hazardous materials for transportation offsite
- Prepares shipping documents for hazardous material shipments; or
- Operates a vehicle used to transport hazardous materials off site.

CRASH REPORTING AND INVESTIGATION

Establish and enforce a crash reporting and investigation process. All crashes, regardless of severity, should be reported to the employee's supervisor as soon as feasible after the incident. Company traffic safety policies and procedures should clearly guide drivers through their responsibilities in a crash situation. All crashes should be reviewed to determine their cause and whether the incidents were preventable. Understanding the root causes of crashes and why they are happening, regardless of fault, forms the basis for eliminating them in the future.

Authorized drivers will report any collision or traffic violation while driving on company duties to the appropriate personnel.

- Do not admit responsibility.
- Notify your company and law enforcement as soon as possible.
- Cooperate with any law enforcement officers.
- Move the vehicle only in the direction of a law enforcement officer.
- Fill out all sections of the accident report in the glove box.
- Do not sign any forms unless required by a law enforcement officer.
- At the scene get the following information:
 - Investigating officer name and law enforcement agency
 - Make, Model and License Plate number of other vehicles
 - Names, addresses, and phone numbers of all witnesses
 - Name, address, and license of another driver(s)



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 106 of 407

- Photos of accident using camera in glove box of:
 - All four sides of all vehicles,
 - Roads and intersection at the scene,
 - Interior of all vehicles - seating and floor areas.

All motor vehicle incidents while in company business must be reported immediately to the involved company employee's supervisor(s) and when applicable law enforcement as well as the company's insurance company.

COMMERCIAL DRIVER LICENSE (CDL) REGULATIONS

CDL Medical Card

All commercial drivers of vehicles in interstate commerce with a maximum gross vehicle weight rating of over 10,000 pounds (4,536 kilograms) are required to obtain and maintain a valid Medical Examiner's Certificate (ME Certificate) Commercial drivers who drive vehicles requiring a CDL have two additional requirements.

All CDL holders must declare to their State Driver Licensing Agency (SDLA) that they only operate or expect to operate commercially in 1 of 4 categories with their CDL. This process is called self-certification.

Endorsements

Individuals may apply for an endorsement to be placed on their driver license.

Depending on the type of endorsement, an individual may be required to provide additional information, complete a separate application, or pass a knowledge test specific to the type of endorsement the individual is seeking.

The types of endorsements an individual can apply for are listed below:

- H – Authorizes the transportation of hazardous materials (CDL only)
- N – Authorizes the operation of a tank vehicle (CDL or CLP only)
- P – Authorizes the operation of a vehicle transporting passengers (CDL or CLP only)
- S – Authorizes the operation of a school bus (CDL or CLP only)
- T – Authorizes towing two (double) or three (triple) trailers over a specific weight
- X – Authorizes the operation of a combination of hazardous material and tank vehicle (CDL only)



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 107 of 407

VEHICLE INSPECTIONS

Driver Inspections

Prior to each first daily use and at the end of each use, the driver shall inspect the vehicle for proper operation of the following safety features, as applicable:

- Horn
- Backup warning
- Head, tail, and signal lights
- Windshield wipers
- Tire inflation (visual check)
- Brakes
- Steering control
- Mirrors
- No operational warning lights
- Accident kit in glove compartment
- Fire extinguisher (light trucks and vans)
- Broken glass

Mechanical Inspections

A qualified vehicle mechanic will inspect every company vehicle at least every three months. Vehicles shall be maintained in safe working order. Inspection and maintenance points include:

- Road test
- Visual inspection of brake system - wheel removal required
- Fluid system levels and visual inspection
- Brake pad wear
- Belts and hoses
- Battery condition
- Filter replacement
- Lubrication
- Oil change
- Emissions systems visual inspection
- Tire tread

Maintenance records of company owned vehicles shall be maintained by The Company.

PROGRESSIVE DISCIPLINARY ACTIONS

Disciplinary action is typically taken in stages. A first offense may constitute a verbal warning, the second offense may be a written warning, and a third offense may result in suspension or termination. Some violations may be considered grounds for immediate suspension or termination.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 108 of 407

Examples of infractions that may result in immediate suspension or termination include acts of violence and/or harassment against a coworker, failure to follow critical life safety procedures (such as completion of a safe work permit or failure to use fall protection), possession of weapons, use of drugs or alcohol, etc.

Each violation shall be investigated by management to ensure that an accurate and factual assessment of the infraction is documented. Corrective actions taken are meant to be corrective rather than punitive and shall be appropriate to each offense. In the case of an infraction or when unacceptable behavior is witnessed or reported, the following shall occur:

Step 1 (1st Offense): The immediate supervisor shall meet in person with the employee to bring attention to the violation, conduct or performance/attendance issue. The supervisor shall discuss the nature of the violation with the employee. The supervisor shall clearly describe expectations and steps the employee must take to improve or correct the problem.

Step 2 (2nd Offense): The second offense, violation or unacceptable behavior will result in a written warning. The process of step 2 includes a formal documentation of the offense, and shall include a description of the offense, the consequences of the current violation as well as the consequences that the employee may incur if a third offense occurs. The immediate supervisor and one witness of equal or higher authority within The Company, shall be present for the presentation of this incident form, meeting, and documentations process.

A performance improvement plan may be set forth at the sole discretion of The Company.

Step 3 (3rd Offense): Final written warning, suspension or termination may occur at this step, based upon the nature of the offense and the details of the performance improvement plan described in Step 3.

Step 4 (4th Offense): Termination.

FATIGUE MANAGEMENT

When driving long distances, sufficient breaks should be taken to prevent fatigue. When driving alone and having trouble staying awake, pull off the road and get out of the vehicle for fresh air, or take a power nap. If driving late at night, consider getting a hotel room and starting fresh the next day. If two licensed drivers are in the vehicle, take turns driving. Get plenty of rest before beginning your journey.

Drowsy Driving

Your number one responsibility as a driver is to get yourself and your passengers to your destination safely. When behind the wheel, you always need to be alert and focused. At 55 mph, a vehicle travels the length of a football field in 3.7 seconds. This is no time for a "mini" snooze.



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Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 109 of 407

Being an attentive driver, and looking out for the driver who is not, is increasingly important. Drive focused. Stay safe.

Safety Facts for the Road

Drowsy driving causes more than 100,000 crashes each year, resulting in 40,000 injuries and 1,550 deaths. Crashes caused by drowsy driving are often serious crashes and occur most often on high-speed rural highways when the driver is alone.

Drowsy driving can happen to anyone. A recent National Sleep Foundation study revealed that one half (51%) of adults have driven while drowsy and 17% report having fallen asleep while driving within the past year.

Drive Focused, Stay Safe and Avoid Aggressive Driving:

- Be aware of your behavior and the behavior of others on the road during the late night, early morning, and mid-afternoon hours when drowsy driving crashes are most likely to occur. Plan a rest stop during these hours.
- Get a full night of rest before driving. If you become tired while driving, stop. A short nap (15 to 45 minutes) and consuming caffeine can help temporarily.
- Stop at regular intervals when driving long distances. Get out of the car every two hours to stretch and walk briskly.
- Set a realistic goal for the number of miles you can safely drive each day.
- Avoid taking medications that cause drowsiness.

TRAINING

All employees shall receive documented training for driving and fatigue management. Training shall consist of general defensive driving information and specifics for fatigue management. Training is given every 3 years for each employee.

CO₂ EMISSION REDUCTION

Listed below are just some of the steps The Company is taking to trying to reduce CO₂ emission output:

Carpooling

Employees carpooling to worksites drastically reduces CO₂ emissions. Less Company vehicles unnecessarily being used, less fuel consumption, less emissions, less pollution to the environment.

Driving Efficiently

Speeding, rapid acceleration and unnecessary breaking can increase the carbon output. Company drivers can reduce emission by going easy on the gas pedal and breaks. **Reducing Idle Time**



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Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 110 of 407

When leaving Company vehicles idling, the vehicle is emitting carbon dioxide for no reason. Unnecessary idling of Company vehicles pollutes the air, wastes fuel, and causes excess engine wear.

Maintenance

Getting regular tune-ups, following the manufacturer's maintenance schedule, and using the recommended motor oil for Company vehicles can increase fuel efficiency.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 111 of 407

HOURS OF SERVICE REGULATIONS

Property Carrying Drivers	Passenger Carrying Drivers
11-Hour Driving Limit May drive a maximum of 11 hours after 10 consecutive hours off duty.	10-Hour Driving Limit May drive a maximum of 10 hours after eight consecutive hours off duty.
14-Hour Limit May not drive beyond the 14th consecutive hour after coming on duty, following 10 consecutive hours off duty. Off-duty time does not extend the 14-hour period.	15-Hour Limit May not drive after having been on duty for 15 hours, following eight consecutive hours off duty. Off-duty time is not included in the 15-hour period.
30-Minute Driving Break Drivers must take a 30-minute break when they have driven for a period of eight cumulative hours without at least a 30-minute interruption. The break may be satisfied by any non-driving period of 30 consecutive minutes (i.e., on-duty not driving, off-duty, sleeper berth, or any combination of these taken consecutively).	
60/70-Hour Limit May not drive after 60/70 hours on duty in 7/8 consecutive days. A driver may restart a 7/8 consecutive day period after taking 34 or more consecutive hours off duty.	60/70-Hour Limit May not drive after 60/70 hours on duty in 7/8 consecutive days.
Sleeper Berth Provision Drivers may split their required 10-hour off-duty period, if one off-duty period (whether in or out of the sleeper berth) is at least two hours long and the other involves at least seven consecutive hours spent in the sleeper berth. All sleeper berth pairings MUST add up to at least 10 hours. When used together, neither time counts against the maximum 14-hour driving window.	Sleeper Berth Provision Drivers using a sleeper berth must take at least eight hours in the sleeper berth and may split the sleeper berth time into two periods provided neither is less than two hours. All sleeper berth pairings MUST add up to at least 10 hours.
Adverse Driving Conditions Drivers are allowed to extend the 11-hour maximum driving limit and 14-hour driving window by up to two hours when adverse driving conditions are encountered.	Adverse Driving Conditions Drivers are allowed to extend the 10-hour maximum driving time and 15-hour on-duty limit by up to two hours when adverse driving conditions are encountered.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 112 of 407

Short-Haul Exception

A driver is exempt from the requirements of §395.8 and §395.11 if: the driver operates within a 150 air-mile radius of the normal work reporting location, and the driver does not exceed a maximum duty period of 14 hours. Drivers using the short-haul exception in §395.1(e)(1) must report and return to the normal work reporting location within 14 consecutive hours and stay within a 150 air-mile radius of the work reporting location.

Short-Haul Exception

A driver is exempt from the requirements of §395.8 and §395.11 if: the driver operates within a 150 air-mile radius of the normal work reporting location, and the driver does not exceed a maximum duty period of 14 hours. Drivers using the short-haul exception in §395.1(e)(1) must report and return to the normal work reporting location within 14 consecutive hours and stay within a 150 air-mile radius of the work reporting location.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 113 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 114 of 407

Emergency Action Plan

PURPOSE

The purpose of the **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company," Emergency Action Plan is to comply with the Occupational Safety and Health Administration's (OSHA) Emergency Action Plan Standard, [29 CFR 1910.38](#), and to prepare employees for dealing with emergency situations. This plan is designed to minimize injury and loss of human life and company resources by training employees, procuring, and maintaining necessary equipment, and assigning responsibilities. This plan applies to all emergencies that may be expected to occur at The Company.

RESPONSIBILITIES

Emergency Plan Manager

Chris Harrington shall manage the Emergency Action Plan for The Company. The Emergency Plan Manager shall also maintain all training records pertaining to this plan. The plan manager is responsible for scheduling routine tests of The Company's emergency notification system with the appropriate authorities.

The Emergency Plan Manager shall also coordinate with local public resources, such as the fire department and emergency medical personnel, to ensure they are prepared to respond as detailed in this plan.

Emergency Plan Coordinators

The Company Emergency Plan Coordinators are as follows:

Bldg. Number/ Section/Dept.	Primary Name and Position	Primary Phone #	Alternate Name and Position	Alternate Phone #
Safety	Chris Harrington	(904) 619-2465		

The Emergency Plan Coordinators are responsible for instituting the procedures in this plan in their designated areas in the event of an emergency.

Note: Coordinators may also be given the responsibility of accounting for employees/visitors after an evacuation has occurred.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 115 of 407

The following individuals shall be responsible for assisting employees who have disabilities or who do not speak English during evacuation:

Bldg. Number/ Section/Dept.	Name of Person Requiring Assistance	Phone #	Assigned Assistant's Name and Position	Assistant's Phone #
Safety Dept.				

Management

The Company will provide adequate controls and equipment that, when used properly, will minimize, or eliminate the risk of injury to employees in the event of an emergency.

The Company management will ensure proper adherence to this plan through regular review.

The Company shall review the organization's emergency action plan with each company employee covered by the plan when the plan is developed, upon initial assignment, when responsibilities under the plan change, and when the plan is changed.

Supervisors

Supervisors shall themselves follow and ensure that their employees are trained in the procedures outlined in this plan.

Employees

Employees are responsible for following the procedures described in this plan.

Contractors

Contract employees are responsible for complying with this plan and shall be provided the training described herein by **Chris Harrington**.

POLICY

Employees are not to perform rescue or medical duties under any circumstances.

The Company shall keep this written emergency action plan in the workplace, and it will be available to employees for review, if fewer than 10 employees, must be communicated orally.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 116 of 407

REPORTING FIRE AND EMERGENCY SITUATIONS

All fires and emergency situations will be reported as soon as possible to **Chris Harrington** or other designated responsible person(s) by one of the following means:

- Verbally as soon as possible during normal work hours
- By telephone if after normal work hours or on weekends

To eliminate confusion and the possibility of false alarms, only **Chris Harrington** or other designated responsible person(s) is/are authorized to contact the appropriate community emergency response personnel. The telephone numbers and contact information for the emergency response personnel for **Pro Painting & Drywall Inc.** are:

1. Fire: _____
2. Police/Sheriff: _____
3. Ambulance/EMS: _____

Under no circumstances shall an employee attempt to fight a fire that has passed the incipient stage (that which can be put out with a fire extinguisher), nor shall any employee attempt to enter a burning building to conduct search and rescue. These actions shall be left to emergency services professionals who have the necessary training, equipment, and experience (such as the fire department or emergency medical professionals). Untrained individuals may endanger themselves and/or those they are trying to rescue.

ALARM SYSTEMS

The Company shall have and maintain an employee alarm system. The employee alarm system shall have a distinctive signal for each purpose and comply with the requirements in [29 CFR 1910.165](#).

Note: Suppliers who rely on the EAP of the Client, must be made aware of the meaning and tone of the Client's alarm system

The Company shall develop and maintain an employee alarm system that uses a distinctive signal for each purpose. For companies with less than ten employees, direct voice communication is acceptable for sounding an alarm provided all employees can hear the alarm.

The alarm system shall be distinctive and recognizable as a signal to evacuate the work area or perform actions designated under the emergency action plan.

Informing The Company Employees of Fires and Emergency Situations

In the event of a fire or emergency, **Chris Harrington** or other designated responsible person(s) shall ensure that all employees are notified as soon as possible using the building alarm system (which includes both audible and visual alarms 24 hours a day).



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 117 of 407

Chris Harrington or other designated responsible person(s) shall provide special instructions to all employees via the public address system.

If a fire or emergency occurs after normal business hours, **Chris Harrington** or other designated responsible person(s) shall contact all employees not on shift of future work status, depending on the nature of the situation.

ELEMENTS OF THE EMERGENCY ACTION PLAN

The following procedures are to be followed by employees who remain to operate critical plant operations before they evacuate. (Suppliers who rely on the EAP of the Client, must be made aware if they have employees who are part of critical operations. If so, the Client shall make prior contractual provisions for additional Supplier employee training, tools, and equipment) in accordance with [29 CFR 1910.38](#).

An emergency action plan must include at a minimum:

- Procedures for reporting a fire or other emergency
- Procedures for emergency evacuation, including the type of evacuation and exit route assignments
- Procedures to be followed by employees who remain to operate critical plant operations before they evacuate
- Procedures to account for all employees after evacuation
- Procedures to be followed by employees performing rescue or medical duties
- The name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan

EMERGENCY CONTACT INFORMATION

Chris Harrington or other designated responsible person(s) shall maintain a list of all employees' personal emergency contact information and shall keep the list in a designated area for easy access in the event of an emergency. In addition, the name or job title of every employee who may be contacted by employees who need more information about the plan, or an explanation of their duties shall be made available to all personnel and posted at worksites. [29 CFR 1910.38\(c\)\(6\)](#)

Note: Suppliers who rely on the EAP of the Client, must be made aware of the name of the Client employee who is assigned site ownership of the EAP.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 118 of 407

EMERGENCY EVACUATION PLAN

The Emergency Evacuation Plan shall include procedures for reporting a fire or other emergency, emergency evacuation, including the type of evacuation and exit route assignments, procedures to follow by employees who remain to operate critical plant operations before they evacuate, accounting for all employees after evacuation, procedures to follow by employees who perform medical or rescue duties, and obtaining the name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan in accordance with [OSHA CFR 29 1910.38\(c\)](#).

EVACUATION ROUTES

Emergency evacuation escape route plans are posted in designated areas throughout The Company. If a fire/emergency alarm is sounded or instructions for evacuation are given by a safety coordinator, all employees (except those noted in Part III.F of this plan) shall immediately exit the building(s) at the nearest exits as shown in the escape route plans and shall meet as soon as possible at the Designated Assembly Area. Employees with offices shall close the doors (unlocked) as they exit the area.

Mobility-impaired employees and their assigned assistants will gather at the Designated Area within the building to ensure safe evacuation in a pre-determined fashion.

Exit routes shall be lit, clearly visible, and marked by a sign reading "**EXIT**." Always keep the line of sight to exit signs clearly visible. Exit routes must be unobstructed and clear of any hazardous materials. The route should not take any occupant through or past a hazardous area. The width of an exit route must be sufficient to accommodate the maximum permitted occupant load of each floor served by the exit route. An outdoor exit route must be protected by guardrails if a fall hazard is present, covered, or protected from slipping hazards. Exit opening must be protected by using a self-closing approved fire door that remains closed or automatically closes in an emergency.

SECURING PROPERTY AND EQUIPMENT

If evacuation of the premises is necessary, some items may need to be secured to prevent further detriment to the facility and personnel on hand (such as shutting down equipment to prevent the release of hazardous materials).

Only the following individuals may remain in the building for the prescribed amount of time to secure the property and equipment to which they have been assigned:



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 119 of 407

Name	Property or Equipment to Secure	Location of Property or Equipment	Estimated time to complete security process

All individuals remaining behind to shut down critical systems or utilities shall be capable of recognizing when to abandon the operation or task. Once the property and/or equipment has been secured, or the situation becomes too dangerous to remain, these individuals shall exit the building by the nearest escape route as soon as possible and meet the remainder of the employees at the Designated Assembly Area.

PERSONAL PROTECTIVE EQUIPMENT

For some emergencies, an employee will experience hazards that require Personal Protective Equipment (PPE). Training preparation and procedures will include consideration for any necessary PPE.

ADVANCED MEDICAL CARE

Under no circumstances shall an employee provide advanced medical care and treatment. These situations shall be left to emergency services professionals, or Designated Person(s), who have the necessary training, equipment, and experience. Untrained individuals may endanger themselves and/or those they are trying to assist.

ACCOUNTING FOR EMPLOYEES/VISITORS AFTER EVACUATION

Once an evacuation has occurred, Designated Responsible Person(s) shall account for each employee/visitor assigned to them at the Designated Assembly Area. Each employee is responsible for reporting to the appropriate Responsible Person(s) so an accurate head count can be made. All employee counts shall then be reported to the Emergency Action Plan Manager as soon as possible.

All employees must be accounted for after evacuation.

RE-ENTRY

Once the building has been evacuated, no one shall re-enter the building for any reason, except for designated and trained rescue personnel (such as fire department or emergency medical



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 120 of 407

professionals). Untrained individuals may endanger themselves and/or those they are trying to rescue.

All employees shall remain at the Designated Assembly Area until the fire department or other emergency response agency notifies Responsible Person that either:

- The building is safe for re-entry, in which case personnel shall return to their workstations
- The building/assembly area is not safe, in which case personnel shall be instructed by a designated Responsible Person on how/when to vacate the premises

TERRORISM

Bomb Threats

Take all bomb threats seriously. Do not use fire alarms or cell phones in the building, as they generate radio waves that could initiate a bomb. If someone finds a package that may be or contain a bomb, they must note its size, shape, and whether it emits a sound. With this information notify an incident commander and call 911 to determine the next steps.

Threat of Violence

Every threat is serious. If you receive or are aware of a threat of violence, contact a supervisor immediately, if you can do so safely.

Active Shooter

In the case of an active shooter look for all possible "escape to safety" locations, anywhere behind lockable doors, or doors that can be barricaded. Employees are to be informed of evacuation routes and procedures once law enforcement is on scene and when the threat may no longer be active.

SHELTERING IN PLACE

If chemical, biological, or radiological contaminants are released into the environment in such quantity and/or proximity to The Company, authorities, or other designated responsible person(s) may determine that is safer to remain indoors rather than to evacuate employees. The Emergency Action Plan Manager shall announce Shelter in Place status by public address systems or other means of immediate notification available at the worksite.

- The Designated Responsible Person(s) shall immediately close the business. If there are customers, clients, or visitors in the building, they shall be advised to stay in the building for their safety
- Unless there is an imminent threat, employees, customers, clients, and visitors shall call their emergency contacts to let them know where they are and that they are safe



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 121 of 407

- The Designated Responsible Person(s) shall turn on call-forwarding or alternative telephone answering systems or services. The recording for voice mail or automated attendant shall be changed to indicate that the business is closed, and that staff and visitors will be remaining in the building until authorities advise that it is safe to leave
- The Designated Responsible Person(s) shall quickly lock exterior doors and close windows, air vents, and fireplace dampers. In addition, Designated Responsible Person(s) familiar with the building's mechanical systems shall turn off, seal, or disable all fans, heating and air conditioning systems, and clothes dryers, especially those systems that automatically provide for the exchange of inside air with outside air. If there is a danger of explosion, Responsible Person(s) shall close the window shades, blinds, or curtains

A safety coordinator or other designated responsible person(s) shall collaborate with neighboring businesses and building owners on evacuation planning to avoid confusion or gridlock. A safety coordinator or other designated responsible person(s) shall gather essential disaster supplies (i.e., nonperishable food, bottled water, battery-powered radios, first-aid supplies, flashlights, batteries, duct tape, plastic sheeting, and plastic garbage bags), which are stored at a pre-determined Designated Location, and shall take them to the Shelter in Place Location(s) within the building.

If possible, this designated area shall be an interior room(s) above the ground floor, with the fewest windows or vents. The room(s) should have adequate space for everyone to be able to sit. Avoid overcrowding by selecting several rooms if necessary. Large storage closets, utility rooms, pantries, and copy and conference rooms without exterior windows will work well. Avoid selecting rooms with mechanical equipment like ventilation blowers or pipes. These should be avoided because this equipment may not be able to be sealed from the outdoors. It is ideal to have a hard-wired telephone in the room(s) you select. Cellular telephone equipment may be overwhelmed or damaged during an emergency.

Call emergency contacts and have the telephone available if you need to report a life-threatening condition.

- All employees, customers, and visitors shall move immediately to the Shelter in Place Location(s) within the building. Responsible Person(s) shall seal all windows, doors, and vents with plastic sheeting and duct tape
- Responsible Person(s) shall print the names of everyone in the room and call the Designated emergency contact outside of the building to report who is in the room, and their affiliations with The Company (employee, visitor, client, customer)
- Responsible Person(s) shall monitor telephone, radio, television, and Internet reports for further instructions from authorities to determine when it is safe to leave the building



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 122 of 407

EARTHQUAKE

Training will emphasize the need to be flexible in response to all emergencies. During an earthquake, most workplaces are at greatest risk of collapsing ceilings, windows, light fixtures, and other falling objects. If you are indoors, the safest response is to take cover under sturdy furniture or to brace yourself against an inside wall. Stay away from windows, skylights, bookcases, and other heavy objects. Protect your head and neck.

SEVERE WEATHER

The Emergency Action Plan Manager shall announce severe weather alerts (such as tornados) by public address system or other means of immediate notification available at the worksite.

All employees shall immediately retreat to the Designated Area until the threat of severe weather has passed as communicated by the Emergency Action Plan Manager. The Emergency Action Plan Manager must communicate with employees about unexpected schedule changes because of severe weather conditions.

EXPLOSION

Any workplace that manages, stores, or processes flammable gases, liquids, and solids is vulnerable to explosions. If flammable substances are identified at your worksite, take extra caution. The Safety Data Sheet (SDS) will have in-house chemical flammability/combustibility, Lower Explosive Limit (LEL) as well as the fighting and reactivity directions and information.

TRAINING

The Company will designate and train employees to assist in a safe and orderly evacuation of other employees. Training will be provided at no cost to the employee.

Employee Training

All employees shall receive instruction on this Emergency Action Plan as part of New Employee Orientation upon hire. Additional training shall be provided:

- When the plan is developed, or the employee is assigned initially to a job
- When there are any changes to the plan and/or facility
- When an employee's responsibilities change
- When the plan is changed
- Annually as refresher training

Items to be reviewed during the training include:

- Proper housekeeping
- Fire prevention practices
- Fire extinguisher locations, usage, and limitations



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 123 of 407

- Threats, hazards, and protective actions
- Means of reporting fires and other emergencies
- Names of Emergency Action Plan Manager and Coordinators
- Individual responsibilities
- Alarm systems
- Escape routes and procedures
- Emergency shut-down procedures
- Procedures for accounting for employees and visitors
- Closing doors
- Sheltering in place
- Severe weather procedures
- Emergency Action Plan availability

Fire Extinguisher Training

Where The Company has provided portable fire extinguishers for employees' use in the workplace, The Company also will provide an educational program to familiarize employees with the general principles of fire extinguisher use and the hazards involved in incipient stage firefighting.

Training will be conducted prior to initial assignment and at least annually thereafter.

TRAINING RECORDS

Responsible Person(s) shall document all training pertaining to this plan and shall maintain records at a Designated Area. Training documents shall include, dates of training sessions, contents of the training, names and qualifications of the person conducting the training, and names and job titles of all persons attending the training session.

FIRE/EVACUATION DRILLS

Fire/Evacuation drills shall be conducted at least annually and shall be conducted in coordination with local police and fire departments. Additional drills shall be conducted if the physical properties of the business change, processes change, or as otherwise deemed necessary.

Chris Harrington will ensure the fire extinguishers are in good working condition by doing monthly inspections, as well as an annual inspection.

PLAN EVALUATION

This Emergency Action Plan shall be reviewed annually, or as needed if changes to the worksite are made, by Responsible Person(s). Following each fire drill, Responsible Management and Employee Representatives shall evaluate the drill for effectiveness and weaknesses in the plan and shall implement changes to improve it.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 124 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 125 of 407

Ergonomics

PURPOSE

The purpose of an ergonomics program is to apply ergonomic principles to the workplace to reduce the number and severity of Musculoskeletal Disorders or MSDs, for the workers of **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company." An ergonomically sound work environment maximizes employee comfort while minimizing the risk of undue physical stress.

RESPONSIBILITIES

Ergonomics Program Coordinator (if applicable)

The Ergonomics Program Coordinator will report directly to upper management and be responsible for this policy and program. All evaluations, controls, and training will be coordinated under the direction of the Ergonomics Program Coordinator in collaboration with management.

The Ergonomics Program Coordinator will monitor the results of the program to determine additional areas of focus as needed.

The Ergonomics Program Coordinator will:

- Ensure that evaluators performing worksite evaluations and training are professionally trained
- Ensure that control measures are implemented in a timely manner
- Ensure that a system is in place for employees to report MSD signs or symptoms and suspected work-related risk factors to managers and supervisors
- Ensure that accurate records are maintained and provide documentation upon request
- Schedule manager, supervisor, and employee training and maintain records to include the date, name of the instructor, topic, and materials used
- Monitor the program on a quarterly basis and provide an annual review
- Follow up with any ergonomics strategy and/or solutions

Managers

Duties of all managers will include:

- Accountability for the health and safety of all employees within their departments through the active support of the ergonomics program
- Allocating human and/or financial resources
- Attending ergonomics training to familiarize themselves with the elements of the program, recognition, and control of work-related ergonomic risk factors, MSD signs and symptoms, early reporting requirements and procedures, and medical management



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 126 of 407

- Ensuring supervisors and employees have received the appropriate training
- Ensuring ergonomics practices and principles are considered when conducting worksite evaluations
- Ensuring recommended controls are implemented and/or used appropriately through active follow-up

Supervisors

Duties of all supervisors will include:

- Attending ergonomics training to familiarize themselves with the elements of the program, recognition and control of work-related ergonomics risk factors, MSD signs and symptoms, early reporting requirements and procedures, and medical management
- Ensuring employees have received the appropriate training
- Ensuring employees are provided with and use the appropriate tools, equipment, parts, and materials in accordance with ergonomic requirements
- Ensuring employees understand the MSD signs and symptoms and early reporting system
- Responding promptly to employee reports
- Providing appropriate workers' compensation documentation to employees as required by all regulations
- Seeking clarification from Human Resources when return-to-work directives from the health care provider are unclear
- Maintaining clear communication with managers and employees

Employees

Every employee of The Company is responsible for conducting himself/herself in accordance with this policy and program. All employees will:

- When provided, use the appropriate tools, equipment, parts, materials, and procedures in the manner established by managers and supervisors
- Ensure that equipment is properly maintained in good condition and when not, report it immediately
- Provide feedback to supervisors regarding the effectiveness of design changes, new tools or equipment, or other interventions
- Attend ergonomics training as required and apply the knowledge and skills acquired to actual jobs, tasks, processes, and work activities
- Report MSD signs or symptoms and work-related MSD hazards to the supervisor as early as possible to facilitate medical treatment and initiate proactive interventions
- Take responsibility for their personal health and safety

POLICY

The Company will regularly review the activities at the place of employment that may cause or aggravate musculoskeletal injuries.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 127 of 407

Where a risk of musculoskeletal injury is identified, The Company will provide effective protection for each worker who may be at risk, which may include providing equipment that is designed, constructed, positioned, and maintained to reduce the harmful effects of an activity, implementing appropriate work practices and procedures to reduce the harmful effects of an activity, and/or implementing work schedules that incorporate rest and recovery periods, changes in workload, or other arrangements for alternating work to reduce the harmful effects of an activity.

The Company will eliminate or, if that is not practicable, minimize the risk of MSI to workers. Personal protective equipment may only be used as a substitute for engineering or administrative controls if it is used in circumstances in which those controls are not practicable. The employer must, without delay, implement interim control measures when the introduction of permanent control measures is delayed.

A proactive approach focuses on making changes when risks have already been identified, as well as incorporating ergonomics into the design phase of a new facility or process, purchasing new equipment or tools, and contemplating scheduling changes. The Company has such a program, which includes the following components:

Management Leadership

The Company management is committed to the ergonomics process. Management supports the efforts of the Ergonomics Program Coordinator and the Ergonomics Committee by pledging financial and philosophical support for the identification and control of ergonomic risk factors. Management will support an effective MSD reporting system and will respond promptly to reports. Management will regularly communicate with employees about the program.

Employee Participation

An essential element to the success of the ergonomics program, employees will be solicited for their input and assistance with identifying ergonomic risk factors, worksite evaluations, development and implementation of controls, and training. Employee participation in the program will occur only during company time.

Identification of Problem Jobs

Collecting data that identify injury and illness trends is called surveillance. Surveillance can be either passive or active. Conducting a records review is an example of passive surveillance, which looks at existing data such as recordable injuries, workers' compensation claims, trips to the medical facility, and absentee records. Active surveillance uses observations, interviews, surveys, questionnaires, checklists, and formal worksite evaluation tools to identify specific high-risk activities. The Company will be using both passive and active surveillance to identify problem jobs.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 128 of 407

Worksite Evaluations

Triggers for a worksite evaluation:

- When an employee reports an MSD sign or symptom
- Jobs, processes, or work activities where work-related ergonomic risk factors have been identified which may cause or aggravate MSDs
- Any change of jobs, tasks, equipment, tools, processes, scheduling, or changes in work shift hours (for example, going from a traditional 5-day, 8-hour shift to a compressed 4-day, 10-hour shift)
- When a safety walk-through or scheduled inspection or survey has uncovered potential MSD hazards

Work-related risk factors to be considered in the evaluation process include, but are not limited to:

- Physical risk factors including force, postures (awkward and static), static loading and sustained exertion, fatigue, repetition, contact stress, extreme temperatures, and vibration
- Administrative issues including job rotation/enlargement, inadequate staffing, excessive overtime, inadequate or lack of rest breaks, stress from deadlines, lack of training, work pace, work methods, and psychosocial issues
- Environmental risk factors including noise, lighting, glare, air quality, temperature, humidity, and personal protective equipment and clothing
- Combination of risk factors such as, but not limited to, highly repetitive, forceful work with no job rotation or precision work done in a dimly lit room

Hazard Assessment

A hazard assessment is performed by the employer or a competent person. This is done before any job begins to determine, identify, assess, and control workplace hazards and the risks to workers' safety and health.

This assessment is required by the Occupational Safety and Health Administration (OSHA). This assessment will also help the employer determine what kind of personal protective equipment is needed to protect workers.

Setting Priorities

Worksite evaluations will be scheduled based on the following:

- Any job, process, operation, or workstation which has contributed to a worker's current MSD
- A job, process, operation, or workstation that has historically contributed to MSDs
- Specific jobs, processes, operations, or workstations that have the potential to cause MSDs



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 129 of 407

Worksite Evaluation Methods

Various methods will be used to evaluate problem jobs including:

- Walk-through and observations
- Employee interviews
- Surveys and questionnaires
- Checklists
- Detailed worksite evaluations

Control of the Ergonomic Risk Factors

The Company will take steps to identify ergonomic risk factors and reduce hazards by using a three-tier hierarchy of control (in order of preference):

- **Engineering controls** - The most desirable and reliable means to reduce workplace exposure to potentially harmful effects. This is achieved by focusing on the physical modifications of jobs, workstations, tools, equipment, or processes
- **Administrative controls** - This means controlling or preventing workplace exposure to potentially harmful effects by implementing administrative changes such as job rotation, job enlargement, rest/recovery breaks, work pace adjustment, redesign of methods, and worker education
- **Personal Protective Equipment (PPE)** - Although not recognized as an effective means of controlling hazards and does not take the place of engineering or administrative controls, there are acceptable forms of PPE, which include kneepads and anti-vibration gloves

HIGH-RISK INDUSTRIES

The Occupational Safety and Health Administration (OSHA) lists high-risk industries where ergonomic injuries are common. Some industries include:

- Construction
- Food processing
- Firefighting
- Office jobs
- Healthcare
- Transportation
- Warehousing

Note: The Company is responsible for providing a safe and healthy workplace for workers.

MUSCULOSKELETAL DISORDERS (MSDS)

Musculoskeletal Disorders (MSDs) affect the muscles, nerves, blood vessels, ligaments, and tendons. Many reasons for MSD include lifting heavy items, bending, reaching overhead, pushing, and pulling heavy loads, working in awkward body positions, and repetitive motion.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 130 of 407

Common types of MSDs can include:

- **Carpal Tunnel Syndrome** – Occurs in the forearm and hand when the median nerve becomes pressed or squeezed at the wrist
- **Tendinitis** – Inflammation of the thick fibrous cord (tendon) that attaches the muscle to the bone
- **Rotator Cuff Injuries** – A tear in the tissue connecting the muscle to the bone (tendon) around the shoulder joint
- **Epicondylitis** – Referred to as “Tennis Elbow,” a painful condition that occurs when the tendons in the elbow are overloaded, typically caused by repetitive motions of the wrist and arm
- **Trigger Finger** – Occurs when a tendon that controls a finger or fingers, cannot glide smoothly in the sheath surrounding it
- Muscle strains and lower back injuries

LIFTING

Hazard Assessment

Before a worker manually/personally lifts, lowers, pushes, pulls, carries, handles, or transports a load that could injure the worker, a competent person will perform a hazard assessment that considers:

- The weight of the load
- The size of the load
- The shape of the load
- The number of times the load will be moved
- The way the load will be moved

The Company will provide appropriate lifting equipment for lifting, lowering, pushing, pulling, carrying, handling, or transporting heavy or awkward loads.

Before lifting, remember the following:

- Wear supportive shoes
- If available, use lift assists (hand dollies, carts, lift tables, forklifts)
- Carry all movements out horizontally (e.g., push and pull rather than lift and lower)
- Always use your body weight and not your feet when pushing
- Try to have most workplace deliveries placed at hip height
- Always keep objects in the comfort zone (between hip and shoulder height)
- Keep all loads close to and in front of the body
- Keep the back aligned while lifting
- Maintain the center of balance
- Let the legs do the actual lifting
- Reduce the size of the material to keep it light, compact, and safe to grasp



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 131 of 407

There is a 10:1 ratio for every lift performed. For example, if an object is 10 pounds, it takes your back 100 pounds of back pressure to pick up the object.

Plan the Lift

- Size up the load, its weight, shape, and position
- Determine if the load is too large, too heavy, or too awkward to move alone. If it is, get help from a coworker or use a mechanical aid device to help with the lift when necessary
- Decide on the route to take
- Check the route for any problems or obstacles such as slippery or cluttered floors
- Investigate the location where the load will be placed to anticipate any difficulties
- Always exercise or warm up the back prior to lifting

Squat Lifting

Squat lifting should be done for most lifts. Squat lifting should be performed as follows:

- Stand as close to the load as possible
- Move your feet shoulder-width apart
- Tighten your stomach muscles so you can tuck your pelvis
- Bend at the knees, keep your back straight and stomach tucked
- Get a good firm grip on the load
- Hug the load close to the center of your body
- Lift smoothly with your legs gradually straightening the knees and hips into a standing position
- Avoid twisting your body as you lift

Carrying the Load

- Keep the load close to the center of your body to take full advantage of the mechanical leverage of your body
- Do not change your grip on the load unless it is weight supported
- Avoid twisting your body without pivoting your feet at the same time
- If you must change direction, move your feet in that direction instead of twisting your trunk in that direction
- Make sure you can see over the load
- Move carefully toward your destination

Unloading Objects

Unloading objects should be done the same way as lifting objects, but in the reverse order as follows:

- Slowly bend your knees to lower the load
- Keep your back straight and the weight close to the center of your body
- Allow enough room for fingers and toes when the load is set down



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 132 of 407

- Place the load on a bench or table by resting it on the edge and pushing it forward with your arms and body
- Secure the load to ensure that it will not fall, tip over, roll, or block someone's way

One-arm Loads

One-arm loads are used when carrying items such as buckets. Lifting and carrying one-arm loads should be performed as follows:

- Bend the knees and at the waist, keep your back straight
- Reach for the load
- Grasp the handle of the load firmly
- Lift with your legs not your shoulders and upper back
- Keep your shoulders level while switching hands regularly to reduce overexertion on one side of the body while carrying the load

Team Lifts

Team lifts are used when objects are too heavy, too large, or too awkward for one person to lift.

Team lifts should be performed as follows:

- Work with someone of similar build and height, if possible
- Choose one person to direct the lift (e.g., "lift on the count of three")
- Lift with your legs and raise the load to the desired level at the same time
- Always keep the load at the same level while carrying
- Move smoothly and in unison
- Set the load down together

Overhead Lifts

Overhead lifts should be conducted as follows:

- When lifting or lowering objects from above the shoulders, lighten the load whenever possible
- Stand on something sturdy such as a step stool or platform to decrease the vertical distance
- When you are lowering objects from above the shoulders, slide the load close to your body, grasp the object firmly, slide it down your body and proceed with your move

Mechanical Aids

Special lifting equipment such as hand trucks, carts, dollies, forklifts, hoists, and wheelbarrows can help move loads when they are too heavy, or awkward, or a coworker is not available. Although mechanical aids are used, safe lifting procedures should still be followed by maintaining the natural curvature of the back, using the legs for any lifting that is encountered, and avoiding twisting the back.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 133 of 407

OFFICE ERGONOMICS

Office ergonomics can help you be more comfortable at work. It can help lower stress and injury caused by awkward positions and repetitive tasks. It focuses on how things are set up in your office workspace, such as:

- Your workstation set-up, how you sit, and how long you stay in one position
- How you do a certain task, the kinds of movements you make, and whether you make the same movements over and over
- Your work area, including light, noise, and temperature
- The tools you use to do your job and whether they are set up to fit your needs

Most injuries that happen at work are caused by physical stress and strain, such as sitting in the same position for a long time, making repetitive movements, and overuse. These injuries can cause stress and strain on your muscles, nerves, tendons, joints, blood vessels, and spine.

Symptoms can include pain in your:

- Back
- Hand, wrist, or arms
- Neck and shoulders

You could also be at risk for problems such as tendinopathy and bursitis. These are caused by overuse and repetitive movements. Over time, these kinds of movements can make you feel bad. They can cause long-term health problems and they use up your sick time.

You may be at greater risk for injuries at work if you have other health problems, such as arthritis or emotional stress.

Chairs

Choose a chair that supports your spinal curves. Adjust the height of your chair so that your feet rest flat on the floor, or a footrest and your thighs are parallel to the floor. Adjust armrests so your arms gently rest on them with your shoulders relaxed.

Should offer pneumatic seat-pan height adjustment, a backrest that tilts backward and forward, backrest tension control, and lumbar support.

Key Objects

Keep key objects — such as your telephone, stapler, or printed materials — close to your body to minimize reaching. Stand up to reach anything that cannot be comfortably reached while sitting.

Keyboard and Mouse

Place your mouse within easy reach and on the same surface as your keyboard. While typing or using your mouse, keep your wrists straight, your upper arms close to your body, and your hands



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 134 of 407

at or slightly below the level of your elbows. Use keyboard shortcuts to reduce extended mouse use. If possible, adjust the sensitivity of the mouse so you can use a light touch to operate it. Alternate the hand you use to operate the mouse by moving the mouse to the other side of your keyboard.

Telephone

If you frequently talk on the phone and type or write at the same time, place your phone on speaker or use a headset rather than cradling the phone between your head and neck.

Footrest

If your chair is too high for you to rest your feet flat on the floor — or the height of your desk requires you to raise the height of your chair — use a footrest. If a footrest is not available, try using a small stool or a stack of sturdy books instead.

Desk

Under the desk, ensure there's clearance for your knees, thighs, and feet. If the desk is too low and cannot be adjusted, place sturdy boards or blocks under the desk legs. If the desk is too high and cannot be adjusted, raise your chair. Use a footrest to support your feet as needed. If your desk has a hard edge, pad the edge, or use a wrist rest. Do not store items under your desk.

Monitor

Place the monitor directly in front of you, about an arm's length away. The top of the screen should be at or slightly below eye level. The monitor should be directly behind your keyboard. If you wear bifocals, lower the monitor an additional 1 to 2 inches for more comfortable viewing. Adjustable brightness and contrast, free from flicker and adjustable tilt.

STRETCHES

Stretching is an activity that can benefit everyone. In the short term, stretching can help release muscle tension and relieve soreness.

Over time, regular stretching can also decrease joint pain and stress, reduce the risk of injury, increase the range of motion, and improve posture. It can help prepare muscles for more vigorous activities and can improve balance, stability, and circulation.

Getting Started Safely

Talk to your doctor about any current or former musculoskeletal injuries or problems that might affect your ability to stretch safely and effectively.

Warm up your muscles before stretching by doing at least five minutes of low-intensity activity such as walking or marching in place. Stretching a cold muscle increases the risk of pulls or tears. When it comes to stretching, your muscles act like a rubber band. It is easy to stretch a warm rubber band, but if you try to stretch a cold one, you risk cracking or breaking it.



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Stretching Technique

- Ease into each stretch; movements should not be fast or sudden
- Take a deep breath and slowly exhale as you gently stretch a muscle to the point of tension
- Stretch only to a point of MILD discomfort; stop if you feel pain
- Concentrate on using the proper form as you stretch
- Hold each stretch for 15-30 seconds; do not bounce
- Breathe deeply and continuously; avoid holding your breath
- Relax and repeat the stretch 2-4 more times
- Stretch both sides; use the same stretches for the same amount of time on both sides of your body
- Stretch at least 2-3 days per week
- Do not bounce as you stretch; this can cause an injury
- Do not stretch a muscle that is not warmed up
- Do not strain or push a muscle too far; if you feel pain, ease up on the stretch
- Do not hold your breath during the stretch
- Do not stretch an injured muscle or joint

During the work shift, it is important to perform body movements and frequently stretch the neck, shoulders, mid and lower back, hips, elbows/forearms, and wrists to reverse daily awkward postures.

Measure Your Flexibility

The sit and reach test are a simple way to measure the flexibility of the backs of your legs, hips, and lower back. Measuring flexibility on a regular basis can help you to see your progress.

To perform a sit and reach test:

1. Place a yardstick on the floor. Secure the stick by putting a piece of tape across the yardstick at the 15-inch mark
2. Place the soles of your feet even with the 15-inch mark on the yardstick
3. Reach forward as far as you can without raising your knees off the ground
4. Hold the position for two seconds
5. Repeat the test and record the best of three reaches

Neck Retraction/Tuck

Use for stiff neck and shoulder muscles:

1. Face straight ahead
2. While keeping the back straight, pull your chin towards your chest until you feel a stretch along the back of your neck
3. Hold for five seconds



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3-Way Neck Stretch

Use for stiff neck and shoulder muscles:

1. Look straight ahead
2. Place your right hand on your left shoulder
3. Gently pull down and tip your head toward the right shoulder
4. Hold for 10-15 seconds
5. With the right hand holding down the left shoulder, look down and over your right shoulder
6. Hold for 10-15 seconds
7. With your right hand holding down your left shoulder, tip your head toward your right shoulder
8. Gently look back over your right shoulder
9. Hold for 10-15 seconds

Shoulder Shrug

Relax neck, shoulders, and upper back:

1. Slowly bring your shoulders up toward your ears
2. Hold for 5 seconds
3. Roll shoulders back and down
4. Relax and repeat 5-10 times

Shoulder Stretch

Relax the muscles in the back of the shoulder:

1. Reach your left arm across the front of your chest at shoulder level
2. Apply pressure towards your body with your right hand
3. Hold for 15-30 seconds
4. Repeat on the other side

Tip: Change this stretch by varying the angle of your shoulder across your body, either above or below shoulder level at an angle.

Arm Stretch

Stretch and relax the muscles along the front and back of the shoulders:

1. Extend your arms to the side and slightly behind you
2. Gently try to squeeze your shoulder blades together
3. Hold for five seconds
4. Bring the arms forward and touch the backs of your hands together
5. Hold for five seconds
6. Repeat five times



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Arm and Elbow Exercise

Keep elbows limber, stretch, and relax arms:

1. Stretch arms in front, palms facing the ceiling
2. Curl your arms up as far as you can
3. Hold for five seconds
4. Repeat with palms facing the floor
5. Repeat complete exercises five times

Back Scratch

Stretch and relax your arms:

1. Gently hold your elbow with your opposite hand
2. Pull your elbow behind your head
3. Reach your hand toward the middle of your back until you feel a gentle stretch
4. Hold for 15-30 seconds
5. Relax and repeat on the other side

Wrist Stretch

Improve wrist strength and flexibility:

1. Hold your right arm out in front of you at shoulder level
2. Fully extend your arm with your palm facing up
3. With your left hand, gently pull your right fingers back (all except your thumb)
4. Hold for 15-30 seconds
5. Repeat on the other side

Forearm Stretch

Relax and stretch the forearm:

1. Extend your right arm out in front of you with all fingers fully extended
2. With your left hand, gently pull your fingers (all but your thumb) back until you feel a forearm stretch
3. Hold for 15-30 seconds
4. Repeat on the other side

Additional stretch: Add a rotation to the inside and outside holding for 5 seconds in each position.

Alternate Forearm Stretch

Relax and stretch the forearm:

1. Hold both hands in front of your body at shoulder level
2. Fully extend your arms with your palms down
3. Make a fist with both hands
4. Hold for five seconds with fists down towards the floor
5. Rotate wrists to face each other and hold for another five seconds
6. Rotate wrists away from each other and hold for another five seconds



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Prayer Position

Improve wrist strength and flexibility:

1. Place your hands together, finger-to-finger, palm-to-palm, in prayer pose in front of the heart center
2. Slowly inhale, pressing the palms of your hands firmly together, fingers pointing up
3. Holding the prayer pose, exhale slowly as you lower your hands as far as possible
4. Inhale and slowly raise your hands in front
5. Repeat five times, remembering to maintain a prayer pose

Hand Massage

Stretch and relax your hands. This can be done frequently during a work shift:

1. Massage the inside and outside of the hand using the thumb and fingers
2. Repeat frequently (including before beginning work)

Hand Fist

Relax the hands and strengthen the wrists:

1. Make a tight fist
2. Hold for five counts
3. Open fist, spreading and stretching the fingers as far as possible
4. Hold for five counts
5. Repeat five times

Arm and Shoulder Stretch

Stretch and relax the upper back

1. Lace your fingers together and turn your palms facing out
2. Straighten your arms out in front of you
3. Hold for 15-30 seconds

Reach for the Sky

Stretch and relax your upper back, neck, and shoulders

1. Standing up straight, reach with both hands toward the sky
2. Look up at your hands
3. Hold for 15-30 seconds

Back Bend

Reduce fatigue and pain in the lower back (You should do this stretch frequently during the workday):

1. Looking straight ahead, stand tall, and put your hands on your hips
2. Gently bend backward
3. Hold for 15-30 seconds



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Shoulder Blade Stretch

Stretch and relax the upper back:

1. Cross right arm over left arm, palms out or down
2. Bend at elbows allowing the backs of arms to touch
3. Try to bring the backs of your hands flat against each other
4. Hold for 15-30 seconds
5. For a deeper stretch, bring elbows up level with shoulders
6. Relax and repeat on the other side

Standing Side Bend

Increase the range of motion in the spine:

1. Stand up straight with your left hand on your left hip
2. Bend towards your left side with your right-hand overhead and hold for 15-30 seconds
3. Relax and repeat on the other side

Side Bend Alternate

Increase the range of motion in the spine:

1. Stand up straight with your arms at your sides and feet shoulder-width apart
2. Bend your trunk sideways to the left while sliding your left hand down your thigh and reaching your right arm over your head
3. Hold for 15-30 seconds
4. Repeat on the other side

Standing Trunk Rotation

Increase the range of motion in the spine:

1. Stand up straight
2. Reach your right hand up and angle it toward your left shoulder
3. Twist your body towards the left side
4. Hold for 15-30 seconds

Alternative

If you feel pain in the lower back/ shoulder, you can put your arms down and place them on your hips.

Hug Stretch

Relax your upper back:

1. Hug your body by placing your right hand on your left shoulder and your left hand on your right shoulder
2. Breathe in and out while holding for 15-30 seconds



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Quadricep Stretch

Stretch the quadriceps muscle that runs along the front of your thigh

1. Stand on one leg (Use a wall or another sturdy surface if you need support)
2. Bend your knee and bring your heel toward your buttock
3. Reach for your ankle with your hand
4. Stand up straight
5. Gently pull your heel up and back until you feel a stretch in the front of your thigh
6. Keep your knees close together
7. Hold for 15-30 seconds
8. Switch legs and repeat

Tip: Be careful not to strain your knee—the goal of this stretch is to stretch the thigh, not to touch your heel to your buttock.

Standing Calf Stretch

Stretch the calf muscle that runs along the back of your lower leg:

1. With both hands resting on a wall, stand at an arm's length away
2. Place your left foot about 1½ feet behind your right foot
3. Slowly bend your right leg forward
4. Keep your left knee straight and your left heel on the ground
5. Hold for 15-30 seconds
6. Switch legs and repeat

Alternate Calf Stretch

Stretch the calf muscle that runs along the back of your lower leg:

1. Stand next to a wall and lean on it with your forearms
2. Rest your head on your hands
3. Bend one leg and place your foot on the ground in front of you, with the other leg straight behind
4. Slowly move your hips forward, keeping your lower back flat
5. Hold for 15-30 seconds
6. Switch legs and repeat

Stair Calf Stretch

Stretch and relax your calf muscles:

1. Stand up straight on the stairs
2. Hang on to two rails with toes pointing straight ahead
3. Slowly lower your heels towards the step below
4. Hold for 15-30 seconds



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Standing Forward Bend

Relax your shoulders and hamstrings:

1. Stand up straight with shoulders relaxed and back
2. Reach your arms behind your back and interlace your fingers
3. Lift your shoulders up toward your ears and lift your hands away from your back
4. Slowly bend forward at the waist, keeping your back flat, not rounded
5. Continue bending forward and lift your hands overhead as far forward as comfortable
6. Hold for 15-30 seconds

Hamstring Stretch

Stretch hamstrings:

1. Stand with feet shoulder-width apart
2. Squat down with elbows on your knees
3. Slowly straighten your legs
4. Hold for 15-30 seconds
5. Return to squat position and then slowly stand-up using arm support

Iliotibial Band Stretch

Stretch the iliotibial band muscle that runs along the outside of your hip, thigh, and knee

1. Stand near a wall for support
2. Cross your left leg over your right leg at the ankle
3. Extend your left arm overhead, reaching toward your right side (You should feel this stretch along your left hip)
4. Hold the stretch for 15-30 seconds
5. Switch sides and repeat

Hip Flexor Stretch

Stretch and relax the hip flexors located on your upper thighs, just below the hipbone:

1. Begin in a forward lunge position and place your hands on your knee
2. Press down with your hands and extend the hips forward (You should feel a stretch from the front of your hip, groin, and thigh)
3. Hold for 15-30 seconds
4. Switch legs and repeat

Hip Flexor/Calf Stretch

Relax your lower back, knees, hips, feet, and total body:

1. Stand up straight, facing a wall
2. Lean forward and touch the wall with your hands at shoulder level
3. Slowly raise your right knee as high as you can (comfortably)
4. Hold for 15-30 seconds
5. Switch knees and repeat



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 142 of 407

Hip Adductor/Groin Stretch

Relax your lower back, knees, and hips:

1. Start with feet wider than shoulder-width apart and feet pointed forward
2. Slowly bend forward reaching down towards the floor (between your feet) with both hands
3. Hold for 15-30 seconds

TRAINING

The Company will ensure that workers who may be at risk of developing musculoskeletal disorders are instructed in the safe performance of the worker's work, including the use of appropriate work practices and procedures, equipment, and personal protective equipment.

The Company will ensure that a worker who may be exposed to a risk of MSD is educated in risk identification related to the work, including the recognition of early signs and symptoms of MSDs and their potential health effects.

The Company will ensure that a worker to be assigned to work which requires specific measures to control the risk of MSD is trained in the use of those measures, including, where applicable, work procedures, mechanical aids, and personal protective equipment. Training may be performed in-house or by a 3rd Party.

The training will include but not be limited to:

- Identification of factors that could lead to a musculoskeletal injury
- The early signs and symptoms of musculoskeletal injury and their potential health effects
- Preventive measures including, where applicable, the use of altered work procedures, mechanical aids, and personal protective equipment
- Body positioning, ergonomics, repetitive motion hazards, personal lifting techniques, fatigue, material handling, working surfaces, and soft tissue injuries

Training is intended to enhance the ability of managers, supervisors, and employees to recognize work-related ergonomic risk factors and to understand and apply appropriate control strategies.

Training in the recognition and control of ergonomic risk factors will be given as follows:

- To all new employees during orientation
- To all employees assuming a new job assignment
- When new jobs, tasks, tools, equipment, machinery, workstations, or processes are introduced
- When high exposure levels to ergonomic risk factors have been identified

The minimum for all managers, supervisors, and employees will include the following elements:

- An explanation of The Company's ergonomics program and their role in the program
- A list of the exposures which have been associated with the development of MSDs



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 143 of 407

- A description of MSD signs and symptoms and consequences of injuries caused by work and non-work-related risk factors
- An emphasis on the importance of early reporting of MSD signs and symptoms and injuries to management
- The methods used by The Company to minimize work and non-work-related risk factors.

Training will be provided in one, or a combination, of the following formats:

- Oral presentations
- Videos
- Distribution of educational literature
- Hands-on equipment and work practice demonstrations

Trainers will be experienced in delivering training programs that address all work and non-work-related risk factors and will be familiar with The Company's operations. Training will include but not be limited to items such as body positioning, ergonomics, repetitive motion hazards, personal lifting techniques, fatigue, material handling, working surfaces, and soft tissue injuries.

Training will be provided from one, or a combination, of the sources listed below:

- Internally developed resources
- The workers' compensation carrier
- An outside consultant

All training will be documented, and all employees will be required to sign a training sign-in roster.

MSD (MEDICAL) MANAGEMENT AND EARLY RETURN-TO-WORK

The Company provides medical care to all employees injured at work. The Company maintains a good working relationship with our healthcare provider. All work-related injuries and illnesses will be referred to a designated Medical Facility unless the injured employee has notified The Company in writing that other provisions have been made prior to an injury or illness.

In the event of a work-related injury or illness, the healthcare provider will:

- Provide diagnosis and treatment for The Company employee
- Determine if reported MSD signs or symptoms are work-related
- Comply with The Company's Early Return-to-Work program by recommending restricted, modified, or transitional work duties when appropriate
- Refer The Company's injured employees to other clinical resources for therapy or rehabilitation
- Provide The Company with timely work status reports
- Develop a positive working relationship with The Company's workers' compensation carrier.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 144 of 407

The Company has an aggressive Early Return-to-Work program and will offer return-to-work opportunities to all injured employees in accordance with work restrictions identified by a recognized healthcare provider.

Program Evaluation and Follow-Up

To ensure that issues have been addressed and that new problems have not been created, monitoring and evaluation will be conducted on an ongoing basis. The methods include the use of individual interviews and checklists to reevaluate the job/task to ensure that risks have been reduced, minimized, or eliminated.

ERGONOMIC PROCESS

An ergonomic process can be implemented to reduce the risk of developing MSDs. The following are elements of an ergonomic process:

- **Provide management support** – Ensure management defines goals and objectives for the ergonomic process, discuss them with the workers, assigns responsibilities, and communicates clearly with workers
- **Involve workers** – Directly involve workers in worksite assessments, developing solutions, and implementing the ergonomic process
- **Provide training** – Train workers in the ergonomic process and ensure workers are aware of ergonomics and the benefits. Ensure workers are aware of the benefits of reporting early signs of MSDs symptoms
- **Identify problems** – Identify and assess ergonomic problems in the workplace before MSDs occurs
- **Encourage early reporting of MSDS signs and symptoms** – Early reporting can encourage job assessments and improve the process and can help prevent or reduce the progression of the symptoms
- **Implement solutions to control hazards** – Implement controls to reduce, control, or eliminate hazards



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 145 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 146 of 407

Fall Protection and Falling Object Prevention/Protection

PURPOSE

The purpose of this document is to outline safety policies and procedures surrounding fall protection for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company."

The hazards of potential falls at heights of four feet and above will be addressed in this document. This instruction describes a systematic approach that must be used to protect and prevent workers from falling. This instruction also lists some of the most common fall hazards and provides recommendations and guidelines for selecting fall arrest systems.

OSHA [1926.500-503](#), [1926.502\(j\)](#)

RESPONSIBILITIES

Many workers are injured or killed from falls each year, and it is the policy of The Company to provide a healthy work environment for its employees. Therefore, The Company management commits the necessary resources and time to ensure that all persons on worksites are protected from injury and illness hazards. Management staff at The Company, including the executive team, will lead in the design, implementation, and continuous monitoring and improvement of the site's safety and health activities.

The Company Safety Officer is **Chris Harrington**. This person is responsible for the administration of this program and has full authority to make necessary decisions to ensure the success of the program. All company employees are responsible for safety at all times. The Company has expressly authorized this person to halt any company operation where there is a danger of serious personal injury.

The fall protection plan shall be prepared by a qualified person for the specified work site.

Management shall perform annual reviews of this safety policy and any corresponding training programs/records to ensure that all workers are trained in the awareness and avoidance of unsafe acts and situations surrounding the use and or exposure of fall protection.

Contractor Responsibilities

In addition to complying with the fall protection requirements that apply to all company employees, each contractor who is retained to perform operations that involve fall protection will:

- Obtain any available information regarding fall hazards and protective measures from The Company



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 147 of 407

- Coordinate fall protection operations with The Company when both company personnel and contractor personnel will be working in or near recognized fall hazard locations
- Inform The Company of the fall protection program that the contractor will follow and of any hazards confronted or created in conducting operations involving fall protection within company-owned facilities through a debriefing immediately prior to the operation

It will remain the duty of The Company's active management team to ensure that all fall prevention equipment is properly maintained and used by trained personnel.

Employees and personnel of The Company, including part-time and temporary labor, shall follow this written health and safety policy to ensure a safe work environment for all.

Competent Person – One who can identify existing and predictable hazards in the surrounding or working conditions which are unsanitary, hazardous, or dangerous to personnel, and who has the authorization to take prompt corrective measures to eliminate them.

POLICY

Fall protection is required whenever employees are potentially exposed to falls from heights that exceed applicable regulatory thresholds. Guardrails, safety nets, or personal or fall arrest systems should be used.

The Company employees will adhere to the fall protection standards set below depending upon which job function they are performing:

General Industry [1910.29\(b\)](#) - Protection for wall openings and holes. Each employee is protected from tripping or stepping into or through any hole that is less than four feet (1.2 m) above a lower level by covers or guardrail systems.

Construction Industry [1926.501\(b\)\(1\)](#) - Unprotected sides and edges. Each employee on a walking/working surface (horizontal and vertical surface) with an unprotected side or edge which is 6 feet (1.8 m) or more above a lower level shall be protected from falling using guardrail systems, safety net systems, or personal fall arrest systems.

Marine Terminals [1917.112\(b\)\(1\)](#) - Guardrails shall be provided at locations where employees are exposed to floor or wall openings or waterside edges, including bridges or gangway-like structures leading to pilings or vessel mooring or berthing installations, which present a hazard of falling more than 4 feet (1.22 m) or into the water.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 148 of 407

Shipyard Industry 1915.73(d) - When employees are exposed to unguarded edges of decks, platforms, flats, and similar flat surfaces, more than five feet above a solid surface, the edges shall be guarded by adequate guardrails.

Steel Erection 1926.760(a)(1) - Each employee engaged in a steel erection activity who is on a walking/working surface with an unprotected side or edge more than 15 feet (4.6 m) above a lower level shall be protected from fall hazards by guardrail systems, safety net systems, personal fall arrest systems, positioning device systems, or fall restraint systems.

The fall protection plan shall be prepared by a qualified person for each specific work site.

When conventional fall protection is not used these locations will be identified and classified as controlled access zones.

A Competent Person will be assigned to:

- Recognize fall hazards
- Warn employees if they are unaware of a fall hazard or are acting in an unsafe manner
- Be on the same working surface and in visual sight
- Stay close enough for verbal communication
- Not have other assignments that would take the monitor's attention from the monitoring function

All accidents and serious incidents (near misses) shall be investigated, implementing changes to the fall protection plan, as necessary.

When purchasing equipment and raw material for use in fall protection systems applicable OSHA, ANSI, and ASTM requirements will be met.

The Company will provide prompt rescue of employees in the event of a fall or shall assure the employees can rescue themselves.

The workplace shall be assessed before each assigned job for potential fall hazards. Proper fall arrest equipment will be used for jobs requiring fall protection when elimination of the hazard(s) is not possible. The Company will evaluate the facilities of the department to determine fall hazards. This preliminary evaluation will detail the required steps for protecting employees from fall hazards.

TRAINING

The Company shall provide a training program for each employee who may be exposed to fall hazards, or who may have the likelihood of exposure to this risk.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 149 of 407

Training shall enable each employee to recognize the hazards of falling and shall train each employee in the procedure to follow to minimize all associated falling hazards.

The Company will have written certification records showing the following:

- Who was trained, when, and the dates of training
- Signature of the person providing training and the dates the employer determined training was deemed adequate

The Company will provide re-training when the following are noted, occur, or observed:

- Deficiencies in training
- Workplace changes
- Fall protection systems or equipment changes that render previous training obsolete

CLIENT REQUIREMENT

A training program shall be provided for all employees who will be exposed to fall hazards in the work area and will be conducted by competent personnel. The program will include but will not be limited to:

- A description of fall hazards in the work area
- Procedures for using fall prevention and protection systems
- Equipment limitations
- The elements encompassed in total fall distance
- Inspection and storage procedures for the equipment

Workers will be trained to recognize the hazards of falling from elevations and to avoid falls from grade level to lower levels through holes or openings in walking/working surfaces. Training programs will include prevention, control, and fall arrest systems. It must be ensured that appropriate fall arrest systems are installed and that employees know how to use them before beginning any work that requires fall protection.

INITIAL TRAINING

Training will be conducted prior to the job assignment. The Company will provide training to ensure the purpose, function, and proper use of fall protection is understood by employees and the knowledge and skills required for safe application and usage is acquired by employees. This standard practice instruction will be provided to and read by all employees receiving training. The training will include, as a minimum the following:

- Types of fall protection equipment appropriate for use
- Recognition of applicable fall hazards associated with the work to be completed and the locations of such
- Load determination and balancing requirements
- Procedures for removal of protection devices from service for repair or replacement



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 150 of 407

- All other employees whose work operations are or may be in an area where protection devices fall may be utilized, will be instructed to an awareness level concerning hazards associated with fall protection operations
- Fall protection equipment identification. Fall protection equipment having identification numbers will be checked for legibility. Fall protection equipment having illegible identification markings will be turned in to the supervisor for inspection
- Equipment maintenance and inspection requirements
- Equipment donning and doffing procedures
- Equipment strengths and limitations

CERTIFICATION TRAINING

The Company will certify that employee training has been accomplished and is being kept up to date. The certification will contain each employee's name and dates of training. Training will be accomplished by competent personnel.

REFRESHER TRAINING

This standard practice instruction will be provided to and read by all employees receiving refresher training. The training content will be identical to the initial training. Refresher training will be conducted on a semi-annual basis or when the following conditions are met, whichever event occurs sooner.

Retraining will be provided for all authorized and affected employees whenever (and prior to) a change in their job assignments, a change in the type of fall protection equipment used, or when a known hazard is added to the work environment which affects the fall protection program.

Additional retraining will also be conducted whenever a periodic inspection reveals, or whenever the employer has reason to believe there are deviations from or inadequacies in The Company's knowledge or use of fall protection equipment or procedures.

Whenever a fall protection procedure fails, the retraining will reestablish employee proficiency and introduce new or revised methods and procedures, as necessary.

Certification

The Company will certify that employee training has been accomplished and is being kept up to date. The certification will contain each employee's name and dates of training. Training will be accomplished by competent personnel.

FALL PREVENTION

Control Procedures Development. Once a facility evaluation has been accomplished, procedures will be developed, documented, and utilized for the control of potential fall hazards. Fall



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 151 of 407

prevention plans will be designed by company-competent individuals or other competent personnel. Company engineers (where utilized) or other competent personnel will be provided with any required specialized training to recognize fall hazards, understand, and address fall prevention techniques, and become familiar with fall arrest equipment and procedures. They must consider fall protection design for the safety of operations where employees must work at elevated heights. Safety during access and egress from elevated work sites will also be considered. The following guidelines will be used when planning work at elevated heights:

- Involve the Safety Department early in the project planning/job planning so that they can recommend appropriate fall-protection measures and equipment
- Involve qualified Engineers when the load rating of anchorage points must be determined or is in doubt. Required training will be provided as necessary
- Involve Engineering and Maintenance when anchorage points must be installed
- The Company and Engineering Departments will use the expertise of fall protection equipment manufacturers such as Rose Manufacturing Company., Miller Equipment Company, Research and Trading Company, and DBI/SALA
- The Company will be specific in dealing with fall hazards when developing contracts

CONTROLLED ACCESS ZONES

Where conventional methods of fall protection are not utilized, the following requirements need to be met for designated controlled access plans:

- Where no other alternative methods have been implemented, a safety monitoring system will be implemented
- When used to control access to areas where leading edge and other operations are taking place the controlled access zone shall be defined by a control line or by any other means that restrict access:
 - When control lines are used, they shall be erected no less than six feet (1.8 m) nor more than 25 feet (7.7 m) from the unprotected or leading edge, except when erecting precast concrete members
 - When erecting precast concrete members, the control line shall be erected no less than six feet (1.8 m) nor more than 60 feet (18 m) or half the length of the member being erected, whichever is less, from the leading edge
 - The control line shall extend along the entire length of the unprotected or leading edge and shall be parallel to the unprotected or leading edge
 - The control line shall be connected on each side to a guardrail system or wall
- When used to control access to areas where overhand bricklaying and related work are taking place:
 - The controlled access zone shall be defined by a control line erected no less than 10 feet (3.1 m) nor more than 15 feet (4.5 m) from the working edge
 - The control line shall extend for a distance sufficient for the controlled access zone to enclose all employees performing overhand bricklaying and related work at the working edge and shall be parallel to the working edge



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 152 of 407

- Additional control lines shall be erected at each end to enclose the controlled access zone
- Only employees engaged in overhand bricklaying or related work shall be permitted in the controlled access zone
- Control lines shall consist of ropes, wires, tapes, or equivalent materials, and supporting stanchions as follows:
 - Each line shall be flagged or otherwise clearly marked at no more than 6-foot (1.8 m) intervals with high-visibility material
 - Each line shall be rigged and supported in such a way that its lowest point (including sag) is no less than 39 inches (1 m) from the walking/working surface and its highest point is no more than 45 inches (1.3 m) [50 inches (1.3 m) when overhand bricklaying operations are being performed] from the walking/working surface
 - Each line shall have a minimum breaking strength of 200 pounds (.88 kN)
- On floors and roofs where guardrail systems are not in place prior to the beginning of overhand bricklaying operations, controlled access zones shall be enlarged, as necessary, to enclose all points of access, material handling areas, and storage areas
- On floors and roofs where guardrail systems are in place but need to be removed to allow overhand bricklaying work or leading-edge work to take place, only that portion of the guardrail necessary to accomplish that day's work shall be removed

The Company will ensure methods are used to identify employees working in controlled access zones (i.e., color-coded helmets, arm bands, or safety vests).

When used to control access to areas where leading edge and other operations are taking place the controlled access zone shall be defined by a control line or by any other means that restricts access. When control lines are used, they shall be erected no less than six feet (1.8 m) nor more than 25 feet (7.7 m) from the unprotected or leading edge, except when erecting precast concrete members.

When erecting precast concrete members, the control line shall be erected no less than six feet (1.8 m) nor more than 60 feet (18 m) or half the length of the member being erected, whichever is less, from the leading edge. The control line shall extend along the entire length of the unprotected or leading edge and shall be parallel to the unprotected or leading edge.

The control line shall be connected to a guardrail system or wall on each side.

When used to control access to areas where overhand bricklaying and related work are taking place:

- The controlled access zone shall be defined by a control line erected no less than 10 feet (3.1 m) nor more than 15 feet (4.5 m) from the working edge



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 153 of 407

- The control line shall extend for a distance sufficient for the controlled access zone to enclose all employees performing overhand bricklaying and related work at the working edge and shall be parallel to the working edge
- Control lines shall be erected at each end to enclose the controlled access zone

Note: Only employees engaged in overhand bricklaying or related work shall be permitted in the controlled access zone.

Control lines shall consist of ropes, wires, tapes, or equivalent materials, and supporting stanchions as follows:

- Each line shall be flagged or otherwise clearly marked at no more than 6-foot (1.8 m) intervals with high-visibility material
- Each line shall be rigged and supported in such a way that its lowest point (including sag) is no less than 39 inches (1 m) from the walking/working surface and its highest point is no more than 45 inches (1.3 m) [50 inches (1.3 m) when overhand bricklaying operations are being performed] from the walking/working surface
- Each line shall have a minimum breaking strength of 200 pounds (.88 kN)
- On floors and roofs where guardrail systems are not in place prior to the beginning of overhand bricklaying operations, controlled access zones shall be enlarged, as necessary, to enclose all points of access, material handling areas, and storage areas

On floors and roofs where guardrail systems are in place but need to be removed to allow overhand bricklaying work or leading-edge work to take place, only that portion of the guardrail necessary to accomplish that day's work shall be removed.

PROTECTIVE MATERIALS AND EQUIPMENT

Appropriate fall protection devices will be provided for potential fall hazards. The selection of the equipment will be based on the fall protection evaluation. Evaluations will be conducted by the person authorized to evaluate fall protection requirements.

Fall protection devices will be singularly identified; will be the only devices(s) used for controlling falls; will not be used for other purposes; and will meet the following requirements:

- Capable of withstanding the environment to which they are exposed for the maximum period that exposure is expected
- Anchor points will not deteriorate when located in corrosive environments such as areas where acid and alkali chemicals are handled and stored
- Capable of withstanding the ultimate load of 5,000 lbs. for the maximum period that exposure is expected
- Standardization within company facilities. Fall protection devices will be standardized whenever possible



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 154 of 407

FALL PROTECTION SYSTEMS

When fall hazards cannot be eliminated through any other means, fall arrest systems will be used to control falls. Proper training in the use of fall arrest equipment is essential and will be provided prior to use.

Full Body Harness Systems

A full-body harness system consists of a full-body harness, lanyard, energy shock absorber, and self-locking snap hook. Before using a full-body harness system, the supervisor and/or the user must address such issues as:

- Has the user been trained to recognize fall hazards and to use fall arrest systems properly?
- Are all components of the system compatible according to the manufacturer's instructions?
- Have appropriate anchorage points and attachment techniques been reviewed?
- Has free fall distance been considered so a worker will not strike a lower surface or object before the fall is arrested?
- Have swing fall hazards been eliminated?
- Have safe methods to retrieve fallen workers been planned?
- Has the full-body harness and all its components been inspected both before each use and on a regular semi-annual basis?
- Is any of the equipment, including lanyards, connectors, and lifelines, subject to such problems as welding damage, chemical corrosion, or sandblasting operations?

RETRACTABLE LIFELINES

- A retractable lifeline is a fall arrest device used in conjunction with other components of a fall arrest system. Retractable lifelines should be used by one person at a time
- A thoroughly inspected and maintained retractable lifeline, when correctly installed and used as part of the fall arrest system, automatically stops a person's descent in a short distance after the onset of an accidental fall
- Retractable lifelines may be considered when working in areas such as on roofs and scaffolds, or in tanks, towers, vessels, and manholes. Also, retractable lifelines should be considered when climbing such equipment as vertical fixed ladders. Before using a retractable lifeline, the supervisor and/or the user must address the following questions:
 - Has the user been trained to use a retractable lifeline correctly?
 - Is the retractable lifeline being used in conjunction with a complete fall arrest system?
 - Is the equipment under a regular maintenance program?
 - Has the equipment been inspected within the last six months?



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 155 of 407

STANDARD HARNESS

Harnesses for general purpose work should be Class III, constructed with a sliding back D-ring. Standard harnesses are suitable for continuous fall protection while climbing, riding, or working on elevated personnel platforms. They are suitable for positioning, fall arrest, and the rescue and evacuation of people who are working at elevated heights.

INSPECTION AND MAINTENANCE

To ensure fall protection systems are ready and able to perform their required tasks, an inspection and maintenance program will be implemented and maintained. The following, as a minimum, will comprise the basic requirements of the inspection and maintenance program:

- Equipment manufacturer's instructions will be incorporated into the inspection and preventive maintenance procedures
- All fall protection equipment will be inspected prior to each use, and a documented inspection at intervals not to exceed 6 months, or in accordance with the manufacturer's guidelines
- The Company Designated Competent Person will inspect equipment and check the inspection date before each usage
- The user will inspect his/her equipment prior to each use for any signs of defects and the inspection date
- Any fall protection equipment subjected to a fall or impact load will be removed from service immediately and inspected by a competent person (sent back to the manufacturer)
- Check all equipment for mold, damage, wear, mildew, or distortion
- Hardware should be free of cracks, sharp edges, or burns
- Ensure that no straps are cut, broken, torn, or scraped
- Special situations such as radiation, electrical conductivity, and chemical effects will be considered
- Equipment that is damaged or in need of maintenance will be tagged as unusable and **will not be stored** in the same area as serviceable equipment
- A detailed inspection policy will be used for equipment stored for periods exceeding one month
- Anchors and mountings will be inspected before each use by the user and supervisor for signs of damage

Accident investigations shall be conducted to evaluate the fall protection plan for potential updates to practices, procedures, or training to prevent reoccurrence.

Fall Arrest Systems

Personal fall arrest systems shall be inspected prior to each use for wear, damage, and other deterioration, and defective components shall be removed from service. [1926.502\(d\)\(21\)](#)



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 156 of 407

MOST COMMON AND MOST DANGEROUS FALL HAZARDS

The tasks and situations listed below present inherent fall hazards. Give special attention to providing fall prevention and/or fall control for them, remembering that this attention is necessary for the design, engineering, planning, and execution stages of work. Supervisors will give special consideration to fall protection for the following tasks:

- Working from crane booms and tower cranes
- Working on top of machinery and equipment, such as overhead cranes, furnaces, conveyors, and presses
- Other work that involves fall hazards, such as 'off-chutes' from main piping in ductwork or boilers
- Working on roofs, with deteriorating or unsupported sections and framing
- Working over chemical tanks or open pits
- Working from fixed or portable ladders or climbing systems
- Performing work on water towers, product tanks, silos, pipe racks, presses, and floor pits

SAFETY MONITORING SYSTEMS

Whereas fall protection is not utilized and controlled access zones are designated, The Company shall designate a competent person to monitor the safety of other employees and ensure the safety monitor complies with the following requirements:

- The safety monitor shall be competent to recognize fall hazards
- The safety monitor shall warn the employee when it appears the employee is unaware of a fall hazard or is acting in an unsafe manner
- The safety monitor shall be on the same walking/working surface and within visual sighting distance of the employee being monitored
- The safety monitor shall be close enough to communicate orally with the employee
- The safety monitor shall not have other responsibilities that could take the monitor's attention from the monitoring function [1926.502\(h\)](#)

Mechanical equipment shall not be used or stored in areas where safety monitoring systems are being used to monitor employees engaged in roofing operations on low-slope roofs. No employee, other than an employee engaged in roofing work [on low-sloped roofs] or an employee covered by a fall protection plan, shall be allowed in an area where an employee is being protected by a safety monitoring system.

Each employee working in a controlled access zone shall be directed to comply promptly with fall hazard warnings from safety monitors.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 157 of 407

FALL PROTECTION PLAN

This option is available only to employees engaged in leading edge work, precast concrete erection work, or residential construction work who can demonstrate that it is infeasible, or that it creates a greater hazard to use conventional fall protection equipment. The fall protection plan must conform to the following provisions.

The fall protection plan shall be prepared by a qualified person and developed specifically for the site where the leading-edge work, precast concrete work, or residential construction work is being performed and the plan must be maintained up to date. Any changes to the fall protection plan shall be approved by a qualified person.

The implementation of the fall protection plan shall be under the supervision of a competent person. The fall protection plan shall document the reasons why the use of conventional fall protection systems (guardrail systems, personal fall arrest systems, or safety nets systems) are infeasible or why their use would create a greater hazard.

The fall protection plan must include a statement that provides the name or other method of identification for each employee who is designated to work in controlled access zones. No other employees may enter controlled access zones.

In the event an employee falls, or some other related, serious incident occurs, (e.g., a near miss) the employer shall investigate the circumstances of the fall or other incident to determine if the fall protection plan needs to be changed (e.g., new practices, procedures, or training) and shall implement those changes to prevent similar types of falls or incidents. [1926.502\(k\)](#)

FALL RESCUE

Prompt rescue must be provided in the event of a fall or employees must be able to rescue themselves. When personal fall arrest equipment is used, employees must develop a rescue plan before work begins.

Employers must ensure there is a certified rescuer on site when climbing is to be performed. If there is not a certified rescuer on site, there must be other arrangements for a rescuer such as an off-site certified rescuer or the fire department who can conduct a fall rescue. Arrangements with an off-site rescuer or the fire department must be made before climbing is conducted. These personnel must be made aware beforehand of the climbing operations to ensure there is a certified rescuer who can come to the site to perform a rescue in the event of a fall. A supervisor or other designated employee must have access to the phone number of off-site rescuers in the event one is needed.

OSHA's fall rescue plan for general industry is stated in **CFR 1910.140(c)(21)** which states the employer must provide for prompt rescue of each employee in the event of a fall.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 158 of 407

For OSHA's construction standard for fall rescue, see **CFR 1926.502(d)(20)** which states the employer shall provide for prompt rescue of employees in the event of a fall or shall assure that employees are able to rescue themselves.

Note: [ANSI Z359.1 Fall Protection Code](#) recommends that contact be made with a worker within six minutes after a fall. Rescue plans should be determined following the fall protection rescue hierarchy:

- Self-rescue
- Assisted rescue
- Professional rescue

If possible, employees should work in teams of two or more, when personal fall arrest systems are used to ensure prompt rescue in the event of a fall.

Note: When an employee uses a fall arrest system alone, alternative methods must be implemented that will provide an equivalent response, as listed above. Alternative methods may include (but not be limited to) notifying an on-site supervisor or other competent person of the type of work being performed, referencing the work location, and providing a review of the rescue plan.

Should a Fall Occur

- The person needing rescue can delay suspension trauma by flexing or pumping the leg muscles or using safety step devices to provide leg support and enhance blood circulation until rescue is provided
- The rescuer can provide emotional support during self-rescue and use a ladder or man-lift to provide assisted rescue
- If the employee was injured during the fall, contact local emergency services by dialing 911 and do not attempt to move or rescue the employee

Any employee involved in a fall must be seen by a health care provider and complete an incident report.

Employers must consider the following when creating a fall rescue plan:

- Accessibility available to complete the rescue
- Potential environmental and weather conditions
- Distance to, location of, and availability of local emergency services
- Communication method between rescuer(s) and fallen worker
- Rescue equipment required and location of equipment on site
- Training and skills requirements for rescuers
- Hazards that may be present during the rescue
- Structural features of work location



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 159 of 407

- Rescue methods that are available
- Rescue procedure(s) that will allow for safe and timely rescue

Reminder: ensure the local emergency authorities are identified in the rescue plan. If a fall occurs and there is no certified rescuer on-site, call 911 or the local emergency number listed in the rescue plan. If the fall rescue is for a person suspended in their PFAS, ensure the emergency responders are aware that treatment for suspension trauma may be required. Do not rely only on calling 911 as your fall rescue plan, emergency services may not always be trained or equipped to respond to specific situations, or they may not be located close enough to get on-site fast enough.

FALLING OBJECT PREVENTION/PROTECTION

Reference [OSHA 1926.502\(J\)](#)

Toe Board

A low protective barrier that will prevent the fall of materials and equipment to lower levels and provide protection from falls for personnel.

The Company will ensure that toe-boards, when used as falling object protection, will be erected along the edge of the overhead walking/working surface for a distance sufficient to protect employees below.

Any toe-board used by The Company must be capable of withstanding, without failure, a force of at least 50 pounds (222 N) applied in any downward or outward direction at any point along the toe-board.

Toe-boards shall be a minimum of 3 ½ inches (9cm) in vertical height from their top edge to the level of the walking/working surface. They shall have no more than 1/4-inch (0.6 cm) clearance above the walking/working surface. They shall be solid or have openings no over 1 inch (2.5 cm) in greatest dimension.

Guardrail Systems

Guardrail systems, when used as falling object protection, shall have all openings small enough to prevent the passage of potential falling objects.

During the performance of overhead bricklaying and related work:

No materials or equipment except masonry and mortar shall be stored within four feet (1.2m) of the working edge.

- Excess mortar, broken or scattered masonry units, and all other materials and debris shall be kept clear from the work area by removal at regular intervals, to prevent injury from falling objects



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 160 of 407

During the performance of roofing work:

- Materials which are piled, grouped, or stacked near a roof edge shall be stable and self-supporting

Canopies

Canopies, when used as falling object protection, shall be strong enough to prevent collapse and prevent penetration by any objects which may fall onto the canopy.

Walking/Working Surface

Any surface, whether horizontal or vertical, on which an employee walks or works, including, but not limited to, floors, roofs, ramps, bridges, runways, formwork, and concrete reinforcing steel but not including ladders, vehicles, or trailers, on which employees must be located to perform their job duties.

Warning Line System

A barrier erected on a roof to warn employees they are approaching an unprotected roof side or edge, and which designates an area in which roofing work may take place without the use of a guardrail, body belt, or safety net system to protect employees in the area.

DEFINITIONS

Anchorage - A secure point of attachment for lifelines, lanyards, or deceleration devices.

Body Belt - A strap with means both for securing it about the waist and for attaching it to a lanyard, lifeline, or deceleration device used with positioning systems, travel restraint systems, or ladder safety systems.

Body Harness - Straps that may be secured about the employee in a manner that will distribute the fall arrest forces over at least the thighs, pelvis, waist, chest, and shoulders with means for attaching it to other components of a personal fall arrest system.

Competent Person - A person who can identify hazardous or dangerous conditions in any personal fall arrest system or any component thereof, as well as in their application and use with related equipment.

Connector - A device which is used to couple (connect) parts of the personal fall arrest system and positioning device systems together. It may be an independent component of the system, such as a carabiner, or it may be an integral component of part of the system.

Deceleration Device - Any mechanism with a maximum length of 3.5 feet, such as a rope grab, rip stitch lanyard, tearing or deforming lanyards, self-retracting lifelines, etc. which serves to dissipate a substantial amount of energy during a fall arrest, or otherwise limit the energy imposed on an employee during fall arrest.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 161 of 407

Energy Shock Absorber - A device that limits shock-load forces on the body.

Failure - Load refusal, breakage, or separation of component parts. Load refusal is the point where the ultimate strength is exceeded.

Fall Arrest System - A system specifically designed to secure, suspend, or assist in retrieving a worker in or from a hazardous work area. The basic components of a fall arrest system include anchorage, anchorage connector, lanyard, shock absorber, harness, and self-locking snap hook.

Free Fall - The act of falling before a personal fall arrest system begins to apply force to arrest the fall.

Free Fall Distance - The vertical displacement of the fall arrest attachment point on the employee's body belt or body harness between the onset of the fall and just before the system begins to apply force to arrest the fall (maximum of six feet). This distance excludes deceleration distance, and lifeline/lanyard elongation, but includes any deceleration device slide distance or self-retracting lifeline/lanyard extension before they operate and fall arrest forces occur.

Hole - A gap or void two inches or more in its least dimension, in a floor, roof, or other walking/working surface.

Lanyard - Flexible line of rope, wire rope, or strap which has a connector at each end for connecting the body belt or body harness to a deceleration device, lifeline, or anchorage.

Leading Edge - The edge of a floor roof, or formwork for a floor or other walking/working surface which changes location as additional floor, roof, decking, or formwork sections are placed, formed, or constructed. A leading edge is an unprotected side and edge during periods when it is not actively and continuously under construction.

Lifeline - A component consisting of a flexible line for connection to an anchorage at one end to hang vertically or for connection to anchorages at both ends to stretch horizontally and which serves as a means for connecting other components of a personal fall arrest system to the anchorage.

Opening - A gap or void 30 inches, or more, high and 18 inches or wider, in a wall or partition, through which employees can fall to a lower level.

Personal Fall Arrest System - System used to arrest an employee in a fall from a working level. It consists of an anchorage, connectors, a body belt, or body harness and may include a lanyard, deceleration device, lifeline, or suitable combinations of these. As of January 1, 1998, the use of a body belt for fall arrest is prohibited.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 162 of 407

Positioning Device System - Body belt or body harness system rigged to allow an employee to be supported on an elevated vertical surface, such as a wall, and work with both hands-free while leaning.

Qualified Person - Recognized degree or professional certificate and extensive knowledge and experience in the subject field who is capable of design, analysis, evaluation, and specifications in the subject work, project, or product.

Retractable Lifeline - A fall arrest device that allows free travel without a slack rope but locks instantly when a fall begins.

Rope Grab - A deceleration device that travels on a lifeline and automatically, by friction, engages the lifeline and locks to arrest the fall of an employee. A rope grab usually employs the principle of inertial locking, cam/level locking, or both.

Safety-Monitoring System - A safety system in which a competent person is responsible for recognizing and warning employees of fall hazards.

Self-Retracting Lifeline/Lanyard - A deceleration device containing a drum-wound line that can be slowly extracted from, or retracted onto, the drum under slight tension during normal employee movement, and which, after the onset of a fall, automatically locks the drum and arrests the fall.

Snap Hook - A connector comprised of a hook-shaped member with a normally closed keeper, or similar arrangement, which may be opened to permit the hook to receive an object and, when released, automatically closes to retain the object. Snap hooks are one of two types:

- The locking type with a self-closing, self-locking keeper who remains closed and locked until unlocked and pressed open for connection or disconnection
- The non-locking type with a self-closing keeper which remains closed until pressed open for connection or disconnection (As of January 1, 1998, the use of a non-locking snap hook as part of personal fall arrest systems and positioning device systems is prohibited)



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 163 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 164 of 407

Fatigue Management

PURPOSE

The purpose of this document is to prevent illness and injury that may occur because of employee/worker fatigue while performing work on behalf of **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company."

RESPONSIBILITIES

Safety Officer

- Establish a recordkeeping and monitoring process to ensure hours of work and operation do not exceed legal standards
- Ensure that all personnel are trained in the policy outlined in this chapter

Management

- Ensure compliance with this policy by all affected crew members, including temporary workers and contractors
- Ensure all workers take scheduled breaks as outlined in The Company Employee Handbook and HR policy
- Ensure that each employee is given additional rest breaks commensurate to the work being performed

Employees

- Always follow this policy
- Inform the direct supervisor of any personal fatigue-related conditions that may affect the safety of themselves or another worker

All employees in safety-critical positions shall report fatigue/tiredness and lack of mental acuity to supervision; as well as supervisory personnel to make safety-critical decisions and take appropriate actions to prevent loss. The company evaluates based on ergonomic principles, equipment, and workstations to control employee fatigue.

GENERAL

Slow reaction to work conditions, failure to respond, poor logic and judgment, damage to property, and an increase in risk-taking which may result in injury are potential results of fatigue in the workplace. The Company will ensure as reasonably practicable that these conditions are not contributed through increased pressures to complete a project or work assignment.

Long work hours and or extended consecutive days of work in conjunction with inadequate hours of rest are factors that may contribute to fatigue and cause injury.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 165 of 407

TRAINING

Initial and annual training will be provided on how to recognize fatigue, how to control fatigue through appropriate work and personal habits, and reporting of fatigue to supervision.

ENGINEERING CONTROLS

Heat and cold stress, as well as the use of personal protective equipment, respirators, and other work equipment, are all factors that may increase fatigue and shall be taken into consideration when performing the daily job safety/hazard analysis.

The Company has set forth work-hour limitations in the Employee HR Handbook in accordance with state and federal statutes. The Company will also control job rotation schedules to control fatigue, allow for sufficient sleep, and increase mental fitness to control employee turnover and absenteeism.

Ergonomic equipment will be used to improve workstation conditions such as anti-fatigue mats for standing, lift assist devices for repetitive lifting, proper lighting and control of temperature, and other ergonomic devices as deemed appropriate. The company's employee work tasks should be evaluated routinely to control fatigue factors.

The Company will provide chairs for workers to sit periodically and will provide periodic rest breaks for personnel to prevent fatigue.

Employees must not chronically use over the counter or prescription drugs to increase mental alertness. The Company discourages employees from taking any substance known to increase fatigue in that employee, including fatigue that sets in after the effects of the drug wear off.

EVALUATION/REVIEW

The Company will analyze and evaluate work tasks periodically to control fatigue.

The Company will conduct periodic assessments to determine the effectiveness and a continuous improvement plan created to close any gaps.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 166 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 167 of 407

Fire Protection Extinguishers

PURPOSE

The purpose of this document is to outline the Fire Protection Extinguishers Program for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company." This policy applies to all sites, personnel, and contractors; this policy must be always followed.

RESPONSIBILITIES

Management

- Ensure all fire prevention methods are established and enforced
- Ensure fire suppression systems such as sprinklers and extinguishers are periodically inspected and maintained to a high degree of working order
- Train supervisors to use fire extinguishers for incipient fires
- Train employees on evacuation routes and procedures

Supervisors

- Closely monitor the use of flammable materials and liquids
- Train assigned employees in the safe storage, use, and handling of flammable materials
- Ensure flammable material storage areas are properly maintained

Employees

- Use, store, and transfer flammable materials in accordance with provided training
- Do not mix flammable materials
- Immediately report violations of the Fire Safety Program

POLICY

The Company Fire Safety Plan has been developed to work in conjunction with company emergency plans and other safety programs. This includes reviewing all new building construction and renovations to ensure compliance with applicable state, local, and national fire, and life safety standards. Fire prevention measures reduce the incidence of fires by eliminating opportunities for the ignition of flammable materials.

TRAINING

Where The Company has provided portable fire extinguishers for employees' use in the workplace, The Company will also provide an educational program to familiarize employees with the general principles of fire extinguisher use and the hazards involved in incipient stage firefighting.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 168 of 407

Training will be conducted prior to the initial assignment and at least annually thereafter.

HAZARDS

Fire and explosion hazards can exist in almost any work area. Potential hazards include:

- Improper operation or maintenance of gas fired equipment
- Improper storage or use of flammable liquids
- Smoking in prohibited areas
- Accumulation of trash
- Unauthorized Hot Work operations

Note: All materials shall be stored, handled, and piled with regard to their fire characteristics [1926.151\(d\)\(2\)](#).

ELIMINATION OF IGNITION SOURCES

All nonessential ignition sources must be eliminated where flammable liquids are used or stored. The following is a list of the more common potential ignition sources:

- Open flames, such as cutting and welding torches, furnaces, matches, and heaters- these sources should be kept away from flammable liquids operations. Cutting or welding on flammable liquids equipment should not be performed unless the equipment has been properly emptied and purged with a neutral gas such as nitrogen
- Chemical sources of ignition such as d.c. motors, switched, and circuit breakers- these sources should be eliminated where flammable liquids are managed or stored. Only approved explosion-proof devices should be used in these areas
- Mechanical sparks- these sparks can be produced because of friction. Only non-sparking tools should be used in areas where flammable liquids are stored or managed
- Static sparks - these sparks can be generated because of electron transfer between two contacting surfaces. The electrons can discharge in a small volume, raising the temperature to above the ignition temperature. Every effort should be made to eliminate the possibility of static sparks. Also, proper bonding and grounding procedures must be followed when flammable liquids are transferred or transported

REMOVAL OF INCOMPATIBLES

Materials that can contribute to a flammable liquid fire should not be stored with flammable liquids. Examples are oxidizers and organic peroxides, which, on decomposition, can generate substantial amounts of oxygen.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 169 of 407

CONTROL OF FLAMMABLE GASES

Flammable gases pose the same type of fire hazards as flammable liquids and their vapors. Many of the safeguards for flammable liquids also apply to flammable gases, other properties such as toxicity, reactivity, and corrosivity must also be considered. Also, flammable gas could produce toxic combustion products.

FIRE EXTINGUISHERS

A portable fire extinguisher is a "first aid" device and is highly effective when used while the fire is small. The use of a fire extinguisher that matches the class of fire, by a well-trained person, can save both lives and property. Portable fire extinguishers must be installed in workplaces regardless of other firefighting measures. The successful performance of a fire extinguisher in a fire situation depends on its proper selection, inspection, maintenance, and distribution.

CLASSIFICATION OF FIRES

Fires are classified into four diverse categories depending on the type of material or fuel involved. The type of fire determines the type of extinguisher that should be used to extinguish it.

- ❖ **Class A** fires involve materials such as wood, paper, and cloth which produce glowing embers or char
- ❖ **Class B** fires involve flammable gases, liquids, and greases, including gasoline and most hydrocarbon liquids which must be vaporized for combustion to occur
- ❖ **Class C** fires involve fires in live electrical equipment or materials near electrically powered equipment
- ❖ **Class D** fires involve combustible metals, such as magnesium, zirconium, potassium, and sodium
- ❖ **Class K** fires involve cooking oils and greases (animal fats, vegetable oils.)

Extinguishers will be selected according to the potential fire hazard, the construction and occupancy of facilities, the hazard to be protected, and other factors pertinent to the situation.

SELECTION OF EXTINGUISHERS

It is important to use the correct extinguisher for the type of fuel! Using the incorrect agent can allow the fire to re-ignite after being extinguished successfully. Below are the extinguishers listed and the classification of fires they can be used against:

Water or air-pressurized water (APW) extinguishers

- Designed for **Class A fires only**
- Large silver container, 2 to 3 ft. tall, weighing about 25 lbs. when full
- Filled two-thirds with ordinary water, then pressurized with air
- Detergents may be added



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 170 of 407

- Cool the surface to remove the heat
- Never use to extinguish flammable liquid fires or electrical fires

Carbon Dioxide (CO₂) extinguishers

- Designed for **Class B and Class C fires only**
- Red cylinders, ranging from 5 to 100 lbs. or larger, with a hard horn and no pressure gauge
- Filled with Carbon Dioxide (CO₂), under extreme pressure
- Displace oxygen; dry ice pieces also have a cooling effect
- Never use in confined spaces without respiratory protection

Dry Chemical extinguishers (multi-purpose)

- May be used on **Class A, Class B, and/or Class C fires** (check the label)
- Red cylinders, ranging in size from 5 to 20 lbs.
- Fire-retardant powder is the extinguishing agent and is propelled by a compressed, non-flammable gas
- Separates fuel from oxygen; powder also interrupts chemical reaction

Class K – dry and wet chemical extinguishers

- Designed for **kitchen fires**
- Only intended to be used after activation of the built-in hood suppression system
- Filled with electrically conductive extinguishing agents; use only after electrical power to the appliance has been shut off
- Potassium bicarbonate may be used in dry types; wet chemical extinguishers spray a fine mist

Dry Powder extinguishers

- Only effective on **Class D fires**
- Yellow cylinders, about 35ft. tall, weighing around 30lbs.
- Separates oxygen and fuel and removes heat
- Dangerous if inhaled and can cause visibility to be reduced

LOCATION AND MARKING OF EXTINGUISHERS

Extinguishers will be conspicuously located and readily accessible for immediate use in the event of a fire. They will be located along normal paths of travel and egress. Wall recesses and/or flush-mounted cabinets will be used as extinguisher locations whenever possible.

Extinguishers will be clearly visible. In locations where visual obstruction cannot be completely avoided, directional arrows will be provided to indicate the location of extinguishers and the arrows will be marked with the extinguisher classification.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 171 of 407

If extinguishers intended for different classes of fire are located together, they will be conspicuously marked to ensure that the proper class extinguisher selection is made at the time of a fire. Extinguisher classification markings will be located on the front of the shell above or below the extinguisher nameplate. Markings will be of a size and form to be legible from 3 feet.

CONDITION

Portable extinguishers will be maintained in a fully charged and operable condition. They will always be kept in their designated locations when not being used. When extinguishers are removed for maintenance or testing, a fully charged and operable replacement unit will be provided.

MOUNTING AND DISTRIBUTING OF EXTINGUISHERS

Extinguishers will be installed on hangers, brackets, cabinets, or on shelves. Extinguishers having a gross weight not exceeding forty pounds will be so installed that the top of the extinguisher is not more than 3-1/2 feet above the floor.

Extinguishers mounted in cabinets or wall recesses or set on shelves will be placed so that the extinguisher operating instructions face outward. The location of such extinguishers will be made conspicuous by marking the cabinet or wall recess in a contrasting color which will distinguish it from the normal decor.

Extinguishers must be distributed in such a way that the amount of time needed to travel to their location and back, so the fire does not get out of control. OSHA requires that the travel distance for Class A and Class D extinguishers not exceed seventy-five feet. The maximum travel distance for Class B extinguishers is fifty feet because flammable liquid fires can get out of control faster than Class A fires. There is no maximum travel distance specified for Class C extinguishers, but they must be distributed based on appropriate patterns for Class A and B hazards.

INSPECTION AND MAINTENANCE

Once an extinguisher is selected, purchased, and installed, it is the responsibility of the Safety Officer to oversee the inspection, maintenance, and testing of fire extinguishers to ensure that they are in proper working condition and have not been tampered with or physically damaged.

The Company will ensure that all portable fire extinguishers are subjected to monthly visual inspections and an annual maintenance check.

All firefighting equipment shall be periodically inspected and maintained in operating condition. Defective equipment shall be immediately replaced.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 172 of 407

FIRE SAFETY INSPECTIONS AND HOUSEKEEPING

First-line supervisors and Safety Committees are responsible for conducting work site surveys that include observations of compliance with the Fire Safety Program. These surveys should include observations of worksite safety and housekeeping issues and should specifically address proper storage of chemicals and supplies, unobstructed access to fire extinguishers, and emergency evacuation routes. Also, they should determine if an emergency evacuation plan is present in work areas and that personnel are familiar with the plan.

EMERGENCY EXITS

Every exit will be clearly visible, or the route to it conspicuously identified in such a manner that every occupant of the building will readily know the direction of escape from any point. At no time will exits be blocked.

Any doorway or passageway which is not an exit, or access to an exit but which may be mistaken for an exit, will be identified by a sign reading "Not an Exit" or a sign indicating its actual use (i.e., "Storeroom"). Exits and access to exits will be marked by a readily visible sign. Each exit sign (other than internally illuminated signs) will be illuminated by a reliable light source providing no less than 5-foot candles on the illuminated surface.

As warranted by the project, The Company shall provide a trained and equipped firefighting organization (Fire Brigade) to assure adequate protection to life. [1926.150\(a\)\(5\)](#)

EMERGENCY PLANS FOR PERSONS WITH DISABILITIES

The first-line supervisor is assigned the responsibility to assist Persons with Disabilities (PWD) under their supervision. The supervisor will choose an alternate assistant. The role of the two assistants is to report to their assigned person and to either assist in evacuation or assure that the PWD is removed from danger.

- Supervisors, alternates, and the person with a disability will be trained on available escape routes and methods
- A list of persons with disabilities is kept in the office
- Visitors who have disabilities will be assisted in a manner like that of company employees. The Host of the person with disabilities will assist in their evacuation

EMERGENCIES INVOLVING FIRE/FIRE ALARMS

In the event of a fire emergency, a fire alarm will sound for the building.

Evacuation Routes and Plans

Each facility shall have an emergency evacuation plan. All emergency exits shall conform to NFPA standards.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 173 of 407

Should evacuation be necessary, go to the nearest exit or stairway and proceed to an area of refuge outside the building. Most stairways are fire-resistant and prevent barriers to smoke if the doors are kept closed. Do not use elevators. Should the fire involve the control panel of the elevator or the electrical system of the building, power in the building may be cut and you could be trapped between floors. Also, the elevator shaft can become a flue, lending itself to the passage and accumulation of hot gases and smoke generated by the fire.

Emergency Coordinators/Supervisors

Emergency Coordinators/Supervisors will be responsible for verifying personnel have evacuated from their assigned areas.

FIRE EMERGENCY PROCEDURES

If you discover a fire:

- Activate the nearest fire alarm
- Notify your supervisor and other occupants

Fight the fire ONLY if:

- The fire department has been notified of the fire
- The fire is small and confined to its area of origin
- You have a way out and can fight the fire with your back to the exit
- You have the proper extinguisher in good working order and the knowledge of how to use it
- If you are not sure of your ability or the fire extinguisher's capacity to contain the fire, leave the area

If you hear a fire alarm:

- Evacuate the area - Close windows, turn off gas jets, and close doors as you leave
- Leave the building and move away from exits and out of the way of emergency operations
- Assemble in a designated area
- Report to the monitor so he/she can determine that all personnel have evacuated your area
- Remain outside until competent authority states that it is safe to re-enter

Evacuation Routes

- Learn at least two escape routes and emergency exits from your area
- Never use an elevator as part of your escape route
- Learn to activate a fire alarm
- Learn to recognize alarm sounds
- Take an active part in fire evacuation drills



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 174 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 175 of 407

First Aid/CPR

PURPOSE

The purpose of this document is to outline the First Aid/CPR Program for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company."

The objective of the First Aid Program is to ensure adequate supplies and properly trained personnel are available for employees and visitors of The Company should an injury occur. The Company will ensure that medical personnel are readily available for advice, consultation, and emergency response. In the absence of a clinic or hospital near the workplace, a person or person must be trained to render first aid. First aid supplies shall be readily available at all locations. Where the eyes or body of any person may be exposed to injurious corrosive and/or chemical materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use.

SCOPE

This program is designed to provide prompt medical attention in the case of any injury or illness during any project.

The provisions of this Policy apply to all employees and those contracted to The Company. This Policy applies to all personnel who work with or whose job responsibilities require them to be familiar with the contents of this Policy.

As with all Company policies and procedures, should our client's policies or procedures be more stringent than The Company's, then the more stringent policy or procedure should be considered, subject to The Company's evaluation and written approval by The Company manager and as reasonably practicable, so long as it does not endanger the employee's life or health, nor endanger the environment or public.

Management and the Environmental, Health and Safety (EHS) Coordinator will review and evaluate this Policy on an ongoing basis, or when operational changes within a facility occur that require revision. Effective implementation of this Policy requires support from all levels of Management within The Company. This written Policy shall be communicated to all personnel that are affected by it and supersedes any similar policy.

First aid kits shall consist of appropriate items which will be adequate for the environment in which they are used. For construction operations, items shall be stored in a weatherproof container with individually sealed packages of each type of item.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 176 of 407

REFERENCES

Occupational Safety and Health Administration, Department of Labor; [29 CFR 1910.151](#).

TRAINING

First Aid providers shall be certified by the American Red Cross or an equivalent organization. All training shall be documented.

When locations are within the acceptable response time of outside providers of emergency services, The Company will rely on these professionals to provide emergency services in the workplace. However, The Company has elected to have employees trained to provide first aid and CPR and require them to perform these services as part of their job duties.

The Company locations that are not within a reasonable response time (those locations exceeding three to five minutes) of emergency first aid or medical services from an outside provider must have enough trained employees to perform first aid and Cardiopulmonary Resuscitation (CPR). Those trained under the response time requirement must be expected and required as part of their job assignment to perform these services in the event of an emergency.

In the absence of medical assistance that is accessible in terms of time and distance to the work site, a person certified in first aid shall be readily available to assist injured employees and transport them to a hospital, doctor's office, or worker's home when necessary.

All Drivers and Equipment Operators are required to be trained in basic first aid and CPR. This covers the treatment of minor injuries and basic emergency procedures for more serious injuries or health problems.

Employees who may be required to render first aid in a respiratory emergency or who may be required to work as standby personnel during confined space jobs shall also be trained in CPR.

Training shall be conducted by a nationally accredited association (e.g., The American Red Cross, National Safety Council).

All employees/students who might be exposed to a chemical splash need to be trained by their department or lab instructor on the following topics:

- The specific location of the units serving that area
- How to properly activate and use the specific type of system
- Eyewash – eye injury - Individuals should be instructed to hold their eyelids "open" and roll the eyeballs continuously so fluid will flow on all surfaces of the eye and under the eyelid seek medical attention. Bring a copy of the Safety Data Sheet (SDS)



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 177 of 407

- Shower – body injury – remove all contaminated clothing, flush the body for a minimum of 15 minutes, and seek medical attention. Bring a copy of the SDS

Eyewashes should be activated monthly for a period long enough to verify operation and ensure that flushing fluid is available and clean. This flushing helps clean out any rust, scale deposits, or bacteria that may accumulate and cause additional eye injuries.

The monthly inspections should include, at a minimum, the following:

- Ensure that access to the eyewash is unobstructed
- Visually inspect the eyewash to ensure that there are no broken parts, leakage, etc.
- Verify that protective eyewash covers are properly positioned, clean, intact, and operate properly when activated
- Activate eyewash unit - flush pipes: check that the spouts are clean and that the water flow is effective and continuous. Operate the eyewash for approx. 3 minutes
- The unit must deliver low-pressure "soft" flow to both eyes, so it does not injure the open eyes
- Check that the unit's valve activator remains open without the use of the operator's hands
- Ensure each station has a highly visible emergency sign
- For portable (non-plumbed units), verify expiration date is not exceeded and fluid levels are full. Follow the manufacturer's instructions
- Ensure that problems identified during the weekly inspection are turned in to the Physical Plant immediately

RESPONSIBILITIES

The Company management shall implement, support, and enforce this program, and periodically review and evaluate its overall effectiveness, modifying it as appropriate.

The Company employees shall be familiar with and comply with the contents of this program.

Only those job designations listed in this section whose job duties require them to administer first aid or to respond to medical emergencies shall be covered under this program.

For instance, employees who have been trained in CPR, but are not required to respond to medical emergencies or to administer first aid would do so as "Good Samaritans" only ("Good Samaritans," however, should provide basic first aid and/or CPR to their level of training.)

It is the responsibility of the EHS Coordinator to conspicuously post emergency telephone numbers of a physician, hospital, ambulance, and local authorities, and train all personnel on the location of the postings.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 178 of 407

The employee has the responsibility as well as the authority to stop any job or task conducted in an unsafe manner and should immediately request the Supervisor/EHS Coordinator's involvement to rectify the issue. The employee's judgment call, when made in good faith and using good judgment, shall be considered commendable even though the conclusion of the investigation might be found to be the contrary. However, if the judgment call was not made in good faith and using good judgment, or was found to be insincere, the employee may be subject to disciplinary action in accordance with this Policy.

Enforcement of this Policy is the responsibility of every employee of The Company. For any violation of this Policy, whether willful or through negligence, the Designated Person in charge, Immediate Supervisor, EHS Coordinator, and/or Company Manager shall have the responsibility as well as the authority to pursue corrective action in accordance with this Policy.

Management

- Ensure adequate resources are allocated for conducting first aid in accordance with this First Aid Policy
- Determine the number of staff to be trained as First Aid Officers
- Review the performance of staff regarding occupational health and safety responsibilities and potential needs for first aid
- Ensure that appropriate first aid records are kept.
- Provide appropriate supervision to ensure that staff and other personnel comply with the First Aid Policy
- Develop risk assessments for first aid.
- Appoint First Aid Officers and ensure the provision of regular and appropriate training
- Ensure the provision, maintenance, and proper use of first aid facilities, such as first aid kits and Personal Protective Equipment (PPE)
- Ensure corrective action is implemented for all incidents and accidents involving first aid
- In areas where 911 is not available, the telephone numbers of the physicians, hospitals, or ambulances will be conspicuously posted by the Safety Coordinator

Personnel

- Compliance with the First Aid Policy
- Participate in the development of risk assessments for first aid
- Participate in induction and first aid training programs as instructed by the supervisor
- Ensure emergency procedures and equipment are in place for high-risk activities
- Wear PPE as provided compliance with first aid training.
- Review and update first aid provisions in relation to changes in work activities. This should be done in consultation with the supervisor.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 179 of 407

Designated First Aid Competent Person

- Administer first aid to sick and injured person(s) in accordance with this policy.
- Ensure first aid qualifications are current.
- Administer annual Cardiopulmonary Resuscitation (CPR) refresher training.
- Maintenance of first aid kits
- Maintaining contact details near the first aid kit, including emergency contacts and priority contact personnel

POLICY

The Company is committed to providing a safe and healthy environment for all personnel and ensures effective implementation of first aid through:

- Staff having access to policies and procedures relating to first aid
- Provision of tailored training to persons with specific tasks
- Record of first aid activities, including first aid training provided and undertaken information provided to clients, and use of PPE
- Mechanisms for monitoring compliance with first aid
- First aid supplies shall be easily accessible when required
- Workplace activities have potential harmful consequences for staff, clients, and others. Each worksite is likely to have different first aid requirements
- The Safety Director will determine the number of designated First Aid Officers, the type of First Aid kit required, and the organization's approach to first aid response
- All personnel are encouraged to disclose health information that may assist in prompt and appropriate first aid responses to foreseeable medical emergencies
- In the absence of an infirmary, clinic, hospital, or physician, which is accessible in terms of time and distance to the worksite, which is available for the treatment of injured employees, a person who has a valid certificate in first aid shall be available at the worksite to render first aid

Trained First Aid Officers include the following:

- A person who holds a current first aid certificate issued after successful completion of an approved first aid course
- A person who holds a current occupational first aid certificate issued after successful completion of an approved occupational first aid course
- A registered nurse
- A medical practitioner

A valid certificate in first aid training must be obtained from the U.S. Bureau of Mines, the American Red Cross, or equivalent training that can be verified by documentary evidence.

A person with one or more of the above qualifications is appointed by the organization to be the designated First Aid Officer



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 180 of 407

FIRST AID FACILITIES

First aid facilities must be provided and adequate for the immediate treatment of injuries and illnesses that may arise at the workplace.

FIRST AID RESPONSE

- First aid kits will be stocked/supplied in accordance with applicable regulatory and client/worksite-specific guidelines
- First aid kits are maintained by the designated First Aid Officer. Emergency telephone numbers are clearly marked on each first aid kit
- First aid kits shall consist of appropriate items which will be adequate for the environment in which they are used. For construction operations, items shall be stored in a weatherproof container with individually sealed packages of each type of item
- All first aid kits will be checked before being sent out to each job and at least weekly
- While on duty, all staff have a duty of care to themselves and others to provide first aid assistance to the level of their competence and to call on expert assistance if necessary
- The designated First Aid Officer is informed of the need for first aid and will respond immediately if available
- Proper equipment for prompt transportation of the injured person to a physician, hospital, or a communication system for contacting the necessary ambulance service shall be provided
- Emergency medical care and/or an ambulance are to be called if required
- Staff trained in first aid will provide first aid assistance if there is no designated First Aid Officer present and emergency medical care and/or an ambulance has not yet arrived

First Aid officers or those providing first aid care shall assume that all blood and other body fluids are infectious and are aware of standard precautions in relation to managing blood and other body fluids, including wearing gloves when administering first aid.

Cross-infection is managed while providing first aid by wearing gloves and washing hands with soap and water:

- Before and after contact with an ill or injured person
- After contact with blood and/or other body fluids or contaminated items
- When protective gloves are removed

When soap and water are not available, first aiders will use an alcoholic-based hand wash or equivalent.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 181 of 407

EMERGENCY EYE WASH AND SHOWER PROVISION

The Occupational Safety and Health Administration (OSHA) 29 CFR 1910.151 requires that suitable means for flushing and quick drenching of the eyes and body are provided in any area where corrosive and/or chemical materials are used.

Therefore, where the eyes or body of any person may be exposed to injurious corrosive and/or chemical materials, suitable facilities shall be provided within the work area.

Departments that have areas where corrosive and/or chemical materials are used are responsible for ensuring that emergency eyewash stations and safety showers are installed and maintained before allowing work with corrosive and/or chemical materials to be performed. In most cases, the initial first aid treatment for a chemical splash is to rinse the affected area with water for at least 15 minutes prior to seeking any other medical treatment. It is critical that the eyes are flushed during the first few seconds following a chemical splash with contaminant-free water for the injury to be minimized. That is why eyewash stations and showers must be kept in proper working order and inspected with a documented program.

Chemical burns can continue to burn and cause serious tissue damage [without significant pain] (delayed effect) after exposure. Chemical exposure to corrosive and/or chemical materials should be flushed immediately – a lag time of 3 minutes can cause more severe injuries. Ocular burns can result in cornea damage, cataracts, and/or complete loss of vision. Flushing should be initiated within the first few seconds of exposure.

Hydrofluoric (HF) acid is a particularly hazardous caustic agent. Exposure to HF must be immediately flushed with water for 30 minutes, followed by an application of a topical ointment (such as a calcium gluconate solution). Seek medical attention immediately. Proper eye protection should always be worn when working with hazardous chemicals.

The Company will provide Personal Protective Equipment (PPE) to protect first aid and ill or injured persons from risks of exposure to harm from sharp objects and blood or other body fluids. PPE includes:

- Disposable PVC, latex, and/or heavy-duty gloves
- Eye protection, such as goggles and safety glasses
- Safety footwear
- Resuscitation masks

ANNUAL EYE WASH TEST

- Verify the flow rate of the device annually. Let the water run for exactly one minute to verify the collection of at least 1.5 liters (0.4 gallons) of water for eyewash alone or 11.4 liters (3.0 gallons) for an eye/face wash unit with a minimum water pressure of 30 PSI



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 182 of 407

- Check for tepid water temperature (80 – 95 deg preferred)
- Maintain and file the inspection checklist inspection for all testing

ANNUAL SHOWER TEST

- The flow rate of the device should be conducted annually. Let the water run for exactly one minute to verify the collection of at least 75.7 liters (20 gallons) of water at a minimum water pressure of 30 PSI. This can also be accomplished in a 15-second increment to fill a five-gal bucket
- Maintain an inspection tag for this testing
- Ensure that problems identified during the inspection are turned in to the Physical Plant immediately
- Maintain and file the inspection checklist for all testing

HAZARD DETERMINATION

- Any communicable diseases and bloodborne pathogens
- Any hazards associated with the scene (e.g., water, electricity, traffic, etc.)
- Any hazards associated with trauma (e.g., seizures, combativeness, etc.)

ENGINEERING CONTROLS

If it is reasonably anticipated that employees will be exposed to blood or other potentially infectious materials while using first aid supplies, The Company will provide appropriate Personal Protective Equipment (PPE) in compliance with the provisions of the Occupational Exposure to Bloodborne Pathogens standard, [29 CFR 1910.1030\(d\)\(3\)](#). This standard lists appropriate PPE for this type of exposure, such as gloves, gowns, face shields, masks, and eye protection. Refer to The Company's Personal Protective Equipment Policy found in The Company's Environmental, Health, and Safety Manual.

PROCEDURES

First aid kits will be maintained at each location and in each company vehicle. All kits will be checked at least once per month as a minimum by the EHS Coordinator or immediate supervisor. The kits will be replenished as necessary and will not be sent to an assignment in a depleted condition.

First aid kits shall be placed in a weatherproof container with individually sealed packages of each type of item. They shall be checked by the employer before being sent out on each job and at least weekly on each job thereafter, to ensure that the expended items are replaced. Quantities relative to the size of the workforce will be maintained for minor emergencies such as cuts and skin abrasions.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 183 of 407

Where the eyes or body of any employee may be exposed to injurious corrosive and/or chemical materials, suitable facilities for quick drenching or flushing of the eyes and body will be provided within the work area for immediate emergency use. This will include but is not limited to portable and fixed emergency eyewash stations. Where installed, eyewash stations will be periodically inspected to ensure proper emergency operations.

Damaged or faulty equipment must be repaired immediately. When equipment is damaged, activities that might potentially require the use of the emergency stations must be ceased until repairs are made or a suitable temporary replacement emergency station must be installed.

All designated basic first aid and CPR providers shall comply with the provisions of The Company's Bloodborne Pathogens Program.

In the event of an incident:

- Effective communication devices will be always provided and available to workers. This will allow workers to contact emergency medical care and transportation in the case of an incident
- Effective equipment will be prepared for transportation or a communication device to contact the nearest healthcare facility

RESPONDING TO LIFE-THREATENING EMERGENCIES

First aid training should be designed for the specific worksite and include first-aid instruction for the management of the following:

Breathing Problems

The training program should be designed or adapted for the specific worksite and may include first-aid instruction in the following:

- Establishing responsiveness
- Establishing and maintaining an open and clear airway
- Performing rescue breathing
- Treating airway obstruction in a conscious victim
- Recognizing asphyxiation and the danger of entering a confined space without appropriate respiratory protection

Additional training is required if first-aid personnel will assist in the rescue from the confined space.

Poisoning

- Ingested poisons: alkali, acid, and systemic poisons. Role of the Poison Control Center (1-800-222-1222)



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 184 of 407

- Inhaled poisons: carbon monoxide, hydrogen sulfide, smoke, and other chemical fumes, vapors, and gases. Assessing the toxic potential of the environment and the need for respirators
- Knowledge of the chemicals at the worksite and of first aid and treatment for inhalation or ingestion
- Effects of alcohol and illicit drugs so that the first-aid provider can recognize the physiologic and behavioral effects of these substances

Physical Injuries

The Company's first aid providers will be able to:

- Recognize the signs and symptoms of shock and provide first aid for shock due to illness or injury
- Assess and treat a victim who has an unexplained change in the level of consciousness or sudden illness
- Control bleeding with direct pressure

Sudden Cardiac Arrest and Cardiopulmonary Resuscitation

OSHA standards require training in Cardiopulmonary Resuscitation (CPR) in some employment situations where sudden cardiac arrest from asphyxiation, electrocution, or exertion may occur, as well as permit-required confined spaces, logging operations, electric power generation, transmission, and distribution, dive teams, and power transmission and distribution construction. However, sudden cardiac arrest is a potential risk at **ALL** worksites, and those trained in first aid benefit from learning CPR regardless of work hazards.

AUTOMATED EXTERNAL DEFIBRILLATORS

The Company will determine the need for an Automated External Defibrillator (AED) program as part of the first-aid response plan. Typically, the deciding factor on whether to obtain an AED has to do with response times by first responders. If your location is remote, in an area of common traffic congestion, or in a hard-to-locate facility, you may want an AED on site.

CPR training will incorporate AED training if an AED is available at the worksite.

All AEDs used by The Company will be inspected and maintained quarterly to ensure they are in good working condition. Any AEDs found to be damaged or defective will be removed from service and replaced immediately.

Perform CPR Until AED Arrives

If a person collapses suddenly, perform an initial assessment of the area, and ensure the scene is safe for you to be in or enter. Tap the patient's shoulder and shout: "**Are you OK?**"



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 185 of 407

If unresponsive, activate your emergency response plan (includes calling 911):

- Resuscitation is successful when quality chest compressions (pushing hard and fast) are started immediately
- Previously, the initial steps were Airway, Breathing, and Compressions (ABC)
- Starting compressions asap increases survival. Now, the steps are Compressions, Airway, Breathing, or CAB. This encourages early CPR and avoids bystanders mistaking agonal breathing as signs of life and withholding CPR
- "Look, listen, and feel" for breathing is no longer recommended. Instead, begin CPR if the person is not breathing (or gasping for breath), has no pulse, or is unresponsive. Do not perform any respiration assessment. The goal is quick delivery of chest compressions
- The guideline now is a target compression rate of 100-120 per minute. Increasing the compression rate past 120 compressions/minute may decrease cardiac output due to incomplete cardiac filling during chest recoil
- Target depth for adult compressions is 2-2.4 inches. Compressions beyond this depth may result in resuscitation-related injuries such as rib fractures

High-quality chest compressions are most valuable in saving a life. Chest compressions are better than doing nothing. First responders are likely to have a speakerphone-equipped cell phone, and bystanders calling 911 can be instructed by EMS dispatchers to perform hands-only CPR. If not successful, begin the AED process.

DEFIBRILLATOR USAGE

- Place the AED near the head of the patient on the same side as the rescuer
- Turn on the AED and follow voice prompts
- When the patient is a child under 8 years old or 55 pounds, use infant/child pads if available

Bare, Prepare, and Place Defibrillation Pads

- Bare and prepare chest:
 - Cut or tear away clothing
 - Shave or clip excessive chest hair
- Place pads on bare skin exactly as shown in illustrations on pads:
 - Do not place pads over nipples, medication patches, or visible implanted devices

Defibrillate if Prompted by the Device

- Allow the AED to analyze automatically when it is fully attached to the patient:
 - Ensure no one is touching the patient during the analysis
- If prompted by a defibrillator, deliver a shock. Ensure no one is touching the patient when delivering a shock



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 186 of 407

- Follow the voice prompts and deliver additional shocks if indicated

If no shock is indicated by the defibrillator, reassess the patient

- Reassess the patient and begin CPR if indicated and continue until prompted by the defibrillator or EMS to stop
- If normal breathing is present, roll the patient to the side to keep fluids out of the airway
- Continue to follow the voice prompts until EMS arrives
- Continue care until EMS is ready to assume control

When EMS Arrives

If you are able, provide basic information to EMS personnel:

- Patient's name
- Patient's age
- Estimated time patient collapsed or was found
- Initial and current assessment of the patient
- Number of shocks delivered
- Any known medical problems, allergies, or medications
- Assist the EMS providers as requested

CONTRACTOR AND/OR TEMPORARY EMPLOYEES

The provisions of this procedure apply to all contract and temporary employees of The Company. Contract and temporary employees shall be trained and designated as basic first aid and CPR providers and must provide current documentation.

DOCUMENTATION

Accurate records shall be maintained at all locations regarding personal injuries occurring at the workplace. Refer to The Company's policy on Accident/Incident Investigation and Reporting Procedures whenever first aid is required.

The EHS Coordinator will maintain accurate training records of all initial and refresher first aid and CPR courses.

RECORDS

An Incident Report form will be completed by the trained First Aid Officer and/or person providing first aid and includes:

- Date and time
- Name of person receiving first aid
- Description of symptoms



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 187 of 407

- Treatment provided
- Name of person providing first aid
- Referral arrangements (e.g., ambulance, hospital, or medical service)
- Name of person completing the Incident Report form

The original copy of the Incident Report form will be retained in the office.

If a person is transferred to a medical facility, a copy of the Incident Report form shall accompany them.

All persons receiving and providing first aid have access to relevant Incident Report forms arising from first aid incidents.

FORMS

A written record or First Aid Injury Log should be maintained of all supplies used from the first aid kit. The purpose of recording supplies as they are used is to track repetition of workplace injuries or illnesses that could be prevented. The written record should contain the name of the injured, date, injured body part (i.e., finger, palm, etc.), treatment provided, and the materials used.

DEFINITIONS

Designated Basic First Aid Provider - Employees designated as First Aid Providers by management.

Exposure Incident - Refers to a specific exposure to the eye, mouth, other mucous membrane, non-intact skin, or parenteral exposure to blood or other potentially infectious material that results from the performance of an employee's duties. A medical follow-up is required pursuant to an exposure incident.

Basic First Aid Provider - Employees who routinely work at remote locations where medical facilities are more than three to five (3 to 5) minutes away (emergency medical services).

Occupational Exposure - Refers to anticipated skin, eye, mucous membrane, or parenteral (i.e., puncture) contact with blood or other potentially infectious body fluids or materials that may result from the performance of an employee's duties. Personal protective equipment is required to be worn when potential occupational exposure exists.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 188 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 189 of 407

Grounding Fault Protection - GFCI

PURPOSE

The purpose of this document is to outline safety requirements surrounding the use and exposure to electricity, and to eliminate all injuries resulting from malfunctions, improper grounding, and defective electrical tools for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company." This policy applies to all sites, personnel, and contractors; this policy must always be followed.

RESPONSIBILITIES

Supervisors shall be responsible for implementing the assured equipment grounding conductor program and shall be designated as competent persons for the program. One or more competent persons must be designated as set forth in [CFR 1926.404\(b\) \(11\) \(iii\)](#) and [Cal/OSHA T8 CCR 2405.4](#) to implement the program.

Employees are responsible for abiding by the following policy and requirements of this program. In addition, personnel and employees shall be held responsible to perform regular visual inspections and removing defective equipment from service. All personnel shall notify a supervisor of defective equipment as soon as reasonably possible.

POLICY

It is the policy of The Company to establish and implement an assured equipment grounding conductor program on all job sites covering all cord sets, receptacles that are not a part of the permanent wiring of the building or structure, and equipment connected by cord and plug which are available for use by personnel. In fact, OSHA requires that employees shall use either Ground Fault Circuit Interrupters (GFCI) or an assured equipment grounding conductor program to protect personnel from electrical shock while working.

A copy of this policy shall be placed at each job site for inspection and copy by OSHA officials and any affected employee/personnel.

The Company shall use GFCIs in lieu of an assured grounding program as afforded by [CFR 1926.400 \(h\)](#).

GROUND FAULT CIRCUIT INTERRUPTERS

Ground Fault Circuit Interrupters (GFCIs) are not required for 120 volts, single phase, or 15- and 20- ampere receptacles outlets where all the requirements of this procedure are implemented at



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 190 of 407

worksites as part of the permanent wing of the building or structure. These are in use by employees and should have approved GFCIs for personal protection.

Supervisors are designated to implement the assured equipment grounding conductor program: [1926.32](#) (f) which defines competent persons as one who is capable of identifying existing and predictable hazards in the surrounding area or working conditions that are unsanitary, hazardous, or dangerous to employees, and who is authorized to take prompt corrective measures to eliminate them.

Equipment found damaged or defective may not be used until repaired.

Supervisors shall be responsible and accountable for the following:

- Each cord set, attachment cap, plug and receptacle of cord set, and any equipment connected by cord and plug except cord sets and receptacles which are fixed and not exposed to damage, shall be visually inspected before each day's use for external defects, such as deformed or missing pins, or insulation damage, and an indication for possible internal damage
- Ensuring both forms of testing are being performed when checking electrical equipment
 - One is a Continuity Test to ensure that the equipment grounding conductor is electrically continuous. It must be performed on all cord sets, receptacles that are not part of the permanent wiring of the building or structure, and on cord-and-plug-connected equipment which is required to be grounded. This test can be performed using a simple continuity tester, such as a lamp and battery, a bell and battery, an ohm meter, or a receptacle tester
 - The other test is a GFI Test that must be performed on receptacles and plugs to ensure the equipment grounding conductor is connected to its proper terminal. This test can be performed with the same equipment used in the first test
- Tests shall be documented on the log for the assured equipment grounding conductor program and shall be on all worksites for inspection by OSHA officials and/or any affected employee

In accordance with OSHA standard [1926.21](#), supervisors shall attend training sessions as The Company may deem necessary.

The equipment grounding conductor shall be connected to its proper terminal:

- Before each use
- Before equipment is returned to service following any repairs
- Before equipment is used such as when a cord has been run over
- At intervals not to exceed three months
- Cord sets and receptacles that are fixed and not exposed to damage shall be tested at intervals not exceeding six months



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 191 of 407

Testing

All required tests shall be performed:

- Before first use
- Before equipment is returned to service following any repairs
- Before equipment is used after any incident which can be suspected to have caused damage (for example, when a cord set is run over)
- At intervals not to exceed three months, except that cord sets and receptacles which are fixed and not exposed to damage shall be tested at intervals not exceeding six months

Tests performed as required by this program shall be recorded as to the identity of each receptacle, cord set, and cord and plug connected equipment that passed the test and shall indicate the last date tested or interval for which it was tested. This record shall be kept by means of logs, color coding, or other effective means and shall be maintained until replaced by a more current record. These records shall be made available at the job site for inspection by the Assistant Secretary and any affected employees.

Equipment that does not meet the prescribed test shall not be put into service. In this case, the following shall occur:

- All equipment grounding conductors shall be tested for continuity and shall be electrically continuous
- Each receptacle and attachment cap or plug shall be tested for correct attachment of the equipment grounding conductor. The equipment grounding shall be connected to its terminal

Below is a recommended color code labeling system using colored tape to mark equipment. That shows how The Company tracks inspection and testing on a Quarterly, Monthly and/or Numeric tracking basis.

Assured Equipment Grounding Conductor Labeling Program			
Month/Quarter Test is Performed	Quarterly Coding Scheme	Monthly Coding Scheme	Numeric Coding Scheme
Month	Quarterly	Monthly	Monthly
January	White (Winter)	White	1
February		White/Yellow	2
March		White/Blue	3
April	Green (Spring)	Green	4
May		Green/Yellow	5
June		Green/Blue	6
July	Red (Summer)	Red	7
August		Red/Yellow	8
September		Red/Blue	9
October	Orange (Autumn)	Orange	10
November		Orange/Yellow	11
December		Orange/Blue	12
Repair or Incident	Brown	Brown	0



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 192 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 193 of 407

Hand and Power Tools

PURPOSE

The purpose of this document is to outline safety policy and procedures surrounding the use of Hand and Power Tools for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company." This program covers hand, electrical, pneumatic, powder-driven, and hydraulic tool safety.

RESPONSIBILITIES

Management

- Provide correct tools for assigned tasks
- Ensure tools are maintained and stored safely
- Provide employee training
- Provide equipment repair

Employees

- Follow proper tool safety guidelines
- Report tool deficiencies and malfunctions
- Safely store tools when work is completed

Administrative

- Tool sharpening program
- Use of PPE
- Control of tool issue
- Employee Training
- Controlled access to equipment and tool areas

POLICY

Employees who use hand and power tools and who are exposed to the hazards of falling, flying, abrasive and splashing objects, or exposed to harmful dust, fumes, mists, vapors, or gases must be provided with the personal equipment necessary to protect them from the hazard.

All hazards involved in the use of tools can be prevented by following five basic safety rules:

- Keep all tools in good condition with regular maintenance
- Use the right tool for the job
- Examine each tool for damage before use
- Operate according to the manufacturer's instructions
- Provide and use the proper protective equipment



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 194 of 407

Whether furnished by the employer or the employee, tools shall be maintained in a safe condition.

Any tool which is not in compliance shall be identified as unsafe by tagging and or locking the controls to render the piece of equipment inoperable or the tool shall be physically removed from its place of operation.

HAND TOOLS

Hand tools are non-powered. They include anything from axes to wrenches. The greatest hazards posed by hand tools result from misuse and improper maintenance. Some examples:

- Using a screwdriver as a chisel may cause the tip of the screwdriver to break and fly, hitting the user or other employees
- If a wooden handle on a tool such as a hammer or an axe is loose, splintered, or cracked, the head of the tool may fly off and strike the user or another worker
- A wrench must not be used if its jaws are sprung because it might slip
- Impact tools such as chisels, wedges, or drift pins are unsafe if they have mushroomed heads. The heads might shatter on impact, sending sharp fragments flying

Employees using hand and power tools and exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to harmful dust, fumes, mists vapors, or gases shall be provided with PPE necessary to protect them from the hazard.

Appropriate personal protective equipment, e.g., safety goggles, gloves, etc., should be worn due to hazards that may be encountered while using portable hand and power tools.

Floors shall be kept as clean and dry as possible to prevent accidental slips with or around dangerous hand tools.

Around flammable substances, sparks produced by iron and steel hand tools can be a dangerous ignition source. Where this hazard exists, spark-resistant tools made from brass, plastic, aluminum, or wood will provide safety.

POWER TOOL PRECAUTIONS

Power tools can be hazardous when improperly used. There are several types of power tools, based on the power source they use: electric, pneumatic, liquid fuel, hydraulic, and powder actuated.

The following general precautions should be observed by power tool users:

- Never carry a tool by the cord or hose
- Never yank the cord or the hose to disconnect it from the receptacle
- Keep cords and hoses away from heat, oil, and sharp edges



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 195 of 407

- Disconnect tools when not in use, before servicing, and when changing accessories such as blades, bits, and cutters
- All observers should be kept at a safe distance away from the work area
- Secure work with clamps or a vise, freeing both hands to operate the tool
- Avoid accidental starting. The worker should not hold a finger on the switch button while carrying a plugged-in tool
- Tools should be maintained with care. They should be kept sharp and clean for the best performance. Follow instructions in the user's manual for lubricating and changing accessories
- Be sure to keep good footing and maintain a good balance
- The proper apparel should be worn. Loose clothing, ties, long hair/beards, or jewelry can become caught in moving parts
- All portable electric tools that are damaged shall be removed from use and tagged "Do Not Use"

GUARDS

Hazardous moving parts of a power tool need to be safeguarded. For example, belts, gears, shafts, pulleys, sprockets, spindles, drums, fly wheels, chains, or other reciprocating, rotating, or moving parts of equipment must be guarded.

Guards, as necessary, should be provided to protect the operator and others from the following:

- Point of operation
- In-running nip points
- Rotating parts
- Flying chips and sparks

Guards shall always be in place and operable while the tool is in use. The guard may not be manipulated in such a way that will compromise its integrity or compromise the protection in which it is intended. Guarding shall meet the requirements set forth in ANSI B15.1.

Safety guards must never be removed when a tool is being used. For example, portable circular saws must be equipped with guards. An upper guard must cover the entire blade of the saw. A retractable lower guard must cover the teeth of the saw, except when it contacts the work material. The lower guard must automatically return to the covering position when the tool is withdrawn from the work.

SAFETY SWITCHES

The following hand-held powered tools are to be equipped with a momentary contact "on-off" control switch: drills, tappers, fastener drivers, horizontal, vertical, and angle grinders with wheels larger than 2 inches in diameter, disc, and belt sanders, reciprocating saws, saber saws, and



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 196 of 407

other similar tools. These tools also may be equipped with a lock-on control if turnoff can be accomplished by a single motion of the same finger or fingers that turn it on.

The following hand-held powered tools may be equipped with only a positive "on-off" control switch: platen sanders, disc sanders with discs 2 inches or less in diameter; grinders with wheels 2 inches or less in diameter; routers, planers, laminate trimmers, nibblers, shears, scroll saws and jigsaws with blade shanks 1/4-inch wide or less.

Other hand-held powered tools such as circular saws having a blade diameter greater than 2 inches, chain saws, and percussion tools without positive accessory holding means must be equipped with a constant pressure switch that will shut off the power when the pressure is released.

ELECTRICAL SAFETY

Among the chief hazards of electric-powered tools are burns and slight shocks which can lead to injuries or even heart failure. Under certain conditions, even a small amount of current can result in severe injury and death. A shock also can cause the user to fall off a ladder or other elevated work surface.

To protect the user from shock, tools must either have a three-wire cord with ground or be grounded, be double insulated, or be powered by a low-voltage isolation transformer. Three-wire cords contain two current-carrying conductors and a grounding conductor. One end of the grounding conductor connects to the tool's metal housing. The other end is grounded through a prong on the plug. Anytime an adapter is used to accommodate a two-hole receptacle, the adapter wire must be attached to a known ground. The third prong should never be removed from the plug.

Double insulation is more convenient. The user and the tools are protected in two ways: by normal insulation on the wires inside, and by a housing that cannot conduct electricity to the operator in the event of a malfunction.

Electric Power Tool General Safety Practices

- Electric tools should be operated within their design limitations
- Gloves and safety footwear are recommended during the use of electric tools
- When not in use, tools should be stored in a dry place
- Electric tools should not be used in damp or wet locations
- Work areas should be well-lit

POWERED ABRASIVE WHEEL TOOLS

Powered abrasive grinding, cutting, polishing, and wire buffing wheels create special safety problems because they may throw off flying fragments.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 197 of 407

Before an abrasive wheel is mounted, it should be inspected closely and sound- or ring-tested to ensure it is free from cracks or defects. To test, wheels should be tapped gently with a light non-metallic instrument. If they sound cracked or dead, they could fly apart in operation and so must not be used. A sound and undamaged wheel will give a clear metallic tone or "ring."

To prevent the wheel from cracking, the user should be sure it fits freely on the spindle. The spindle nut must be tightened enough to hold the wheel in place, without distorting the flange. Follow the manufacturer's recommendations. Care must be taken to assure the spindle wheel will not exceed the abrasive wheel specifications.

Due to the possibility of a wheel disintegrating (exploding) during start-up, the employee should never stand directly in front of the wheel as it accelerates to full operating speed.

Portable grinding tools need to be equipped with safety guards to protect workers not only from the moving wheel surface but also from flying fragments in case of breakage.

Powered Grinder Safety Precautions

- Always use eye protection
- Turn off the power when not in use
- Never clamp a hand-held grinder in a vise

PNEUMATIC TOOLS

Pneumatic tools are powered by compressed air and include chippers, drills, hammers, and sanders. There are several dangers encountered in the use of pneumatic tools. The main one is the danger of getting hit by one of the tool's attachments or by a fastener the worker is using with the tool. Eye protection is required, and face protection is recommended for employees working with pneumatic tools. Working with noisy tools such as jackhammers requires proper, effective use of hearing protection.

When using pneumatic tools, employees are to check to see that they are fastened securely to the hose to prevent them from becoming disconnected. A short wire or positive locking device attaching the air hose to the tool will serve as an added safeguard.

A safety clip or retainer must be installed to prevent attachments, such as chisels on a chipping hammer, from being unintentionally shot from the barrel.

Screens must be set up to protect nearby workers from being struck by flying fragments around chippers, riveting guns, staplers, or air drills.

Compressed air guns should never be pointed toward anyone. Users should never "dead-end" it against themselves or anyone else.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 198 of 407

POWDER ACTUATED TOOLS

Powder-actuated tools operate like a loaded gun and should be treated with the same respect and precautions. In fact, they are so dangerous that they must be operated only by specially trained employees.

Powder-Actuated Tool Safety

- These tools should not be used in an explosive or flammable atmosphere
- Before using the tool, the worker should inspect it to determine that it is clean, all moving parts operate freely, and the barrel is free from obstructions
- The tool should never be pointed at anybody
- The tool should not be loaded unless it is to be used immediately. A loaded tool should not be left unattended, especially where it would be available to unauthorized persons
- Hands should be kept clear of the barrel end. To prevent the tool from firing accidentally, two separate motions are required for firing: one to bring the tool into position, and another to pull the trigger. The tools must not be able to operate until they are pressed against the work surface with a force of at least 5 pounds greater than the total weight of the tool

If a powder-actuated tool misfires, the employee should wait at least 30 seconds, then try firing it again. If it still will not fire, the user should wait another 30 seconds so that the faulty cartridge is less likely to explode, then carefully remove the load. The bad cartridge should be put in water.

Suitable eye and face protection are essential when using a powder-actuated tool.

The muzzle end of the tool must have a protective shield or guard centered perpendicularly on the barrel to confine any flying fragments or particles that might otherwise create a hazard when the tool is fired. The tool must be designed so that it will not fire unless it has this kind of safety device.

All powder-actuated tools must be designed for varying powder charges so the user can select a powder level necessary to do the work without excessive force.

If the tool develops a defect during use it should be tagged and taken out of service immediately until it is properly repaired.

POWERED ACTUATED TOOL FASTENERS

When using powder-actuated tools to apply fasteners, there are some precautions to consider. Fasteners must not be fired into material that would let them pass through to the other side. The fastener must not be driven into materials like brick or concrete any closer than 3 inches to an edge or corner. In steel, the fastener must not come any closer than one-half inch from a corner



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 199 of 407

or edge. Fasteners must not be driven into extremely hard or brittle materials that may chip or splatter or make the fastener ricochet.

An alignment guide must be used when shooting a fastener into an existing hole. A fastener must not be driven into a spalled area caused by an unsatisfactory fastening.

HYDRAULIC POWER TOOLS

The fluid used in hydraulic power tools must be an approved fire-resistant fluid and must retain its operating characteristics at the most extreme temperatures to which it will be exposed. The manufacturer's recommended safe operating pressure for hoses, valves, pipes, filters, and other fittings must not be exceeded.

JACKS

All jacks - lever and ratchet jacks, screw jacks, and hydraulic jacks - must have a device that stops them from jacking up too high. Also, the manufacturer's load limit must be permanently marked in a prominent place on the jack and should not be exceeded.

A jack should never be used to support a lifted load. Once the load has been lifted, it must immediately be blocked up. Use wooden blocking under the base if necessary to make the jack level and secure. If the lift surface is metal, place a 1-inch-thick hardwood block or equivalent between it and the metal jack head to reduce the danger of slippage.

To set up a jack, make certain of the following:

- The base rests on a firm, level surface
- The jack is correctly centered
- The jack head bears against a level surface
- The lift force is applied evenly

Proper maintenance of jacks is essential for safety. All jacks must be inspected before each use and lubricated regularly. If a jack is subjected to an abnormal load or shock, it should be thoroughly examined to make sure it has not been damaged.

Hydraulic jacks exposed to freezing temperatures must be filled with an adequate antifreeze liquid.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 200 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 201 of 407

Hazard Analysis (JSA)

PURPOSE

The purpose of this document is to outline the Job Safety Analysis/Job Hazard Analysis Program for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company."

The JSA will provide a consistent approach throughout The Company for pre-job hazard assessment. The JSA identifies, analyzes, and records existing and/or potential safety and health hazards associated with each JSA step. The JSA Steps include hazard identification, assessment, and control to assist in preventing work-related injuries, illnesses, property damage, environmental impact, and near misses. The JSA is also in place to support an effective means of communication of hazards prior to starting a task or when the scope of a task changes.

POLICY

The Company and its employees are responsible for identifying, assessing, and controlling workplace hazards. The Job Safety Analysis (JSA) is an essential element in the hazard assessment process. JSA's are the means for conducting a pre-job hazard assessment that will assist in identifying, assessing, and controlling high-risk tasks performed by The Company's employees or those working for The Company. The Company employees at each location or worksite will have the responsibility to perform JSA's based on their job duties and operational requirements. Individual responsibilities must be clearly defined and addressed on the JSA. A Job Safety Analysis (JSA) shall be conducted daily before each job task is started with the location of the worksite addressed on the JSA.

A JSA must be developed and implemented for each identified operation and task in the organization. When the scope of the job changes, a review of the original JSA must be performed. In circumstances where the risks are not included within the original JSA, a new JSA (red-lined) must be made, or applicable changes added to the existing JSA must occur. The completed JSA must be reviewed, and signed by the work crew, any visitors to the site onsite, and readily available to all personnel. The Department Supervisor where the work is being performed must approve all JSA's prior to work commencing. The name of the supervisor and supervisory approval must be included on the JSA.

The JSA procedure involves 5 critical steps:

- 1) Think through the task
- 2) Spot the hazards
- 3) List the hazards and controls on the chart
- 4) Make the changes and assess the risks using the Risk Assessment Matrix
- 5) Do the task safely



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 202 of 407

Before starting the five steps, complete the top section of the form, including stating a brief description of the task to be performed.

Think Through the Task

This step requires the individual(s) to answer questions relating to their understanding of the task they are to perform. Employee(s) must stop and talk to their supervisor if they answer "no" to any of the questions.

Questions include:

- Do I understand the scope and steps required to conduct the task?
- Does a written procedure exist?
- Have I read and understood the procedure?
- Do I have the necessary training to complete the job safely (crane/rigging, forklift, etc.)?
- Do I have the necessary tools to complete the job safely?
- Do I have the correct PPE to work safely?

If the individual(s) answer "**NO**" to any of the above questions, they must speak to their supervisor before proceeding. Corrections to deficiencies need to be made before proceeding.

When no supervisor or other member of management is available, workers must seek assistance from the appropriate person acting as a designate on behalf of management.

Work will not commence until mitigation steps are put in place.

EMERGENCY PROCEDURES

Emergency procedures for work site preparations regarding egress and muster points must be clearly defined on the JSA for the task. Emergency procedures shall be clearly defined on the JSA for the task, such as nearest hospital with directors, first aid personnel, drivers of vehicles to transport injured, doctor, and phone numbers for ambulance, police, fire, etc.

SPOT THE HAZARDS

Hazardous events of work operations taking place at any worksite can impact the safety of employees nearby. Task specific requirements must be clearly identified on the JSA including but is not limited to; personnel, equipment/tools, process controls, permits, etc. Any identified hazards associated with Simultaneous Operations (SIMOPS) shall be addressed on the JSA and mitigation steps will be put into place.

Questions include:

- Will I operate equipment with guards removed?
- Will I be struck, or am I in the line of fire?



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 203 of 407

- Does the task include hazardous materials or chemicals?
- Is a Safety Data Sheet (SDS) available?
- Will I be working at heights?
- Will I be working in a confined space?
- Will I be working with compressed fluids (liquid or gas)?
- What are the weather hazards associated with the work area?

If the individual(s) answers "**NO**" to any of the above questions, they must speak to their supervisor before proceeding. Corrections to deficiencies need to be made before proceeding.

In the case that no supervisors are available, individuals shall seek assistance from the appropriate person acting as a designate on behalf of management. Work will not commence until mitigation steps have been put in place and all mitigations implemented during work execution shall be included on the JSA.

LIST THE HAZARDS AND CONTROLS

The first step requires identifying the hazards that could arise during the task. Next, controls for the hazards are then identified since each hazard may have several controls. The following 5 points list ways in which hazards can be eliminated or minimized (in order of preference):

- Removing the hazard (including hazards associated with SIMOPS)
- Isolating or barricading the hazard
- Engineering the hazard out
- Reorganizing the job to minimize risk
- Wearing the right PPE (your last line of defense)

A resource to help identify hazards is to read and follow the Operators and Maintenance Manuals and Disassembly and Assembly manuals.

Make the Change and Assess the Risk

After the controls are in place,(i.e., PPE, removing, and/or isolating hazard, etc.) each hazard must be assessed. Recommended actions are then identified, analyzed, and recorded to ensure appropriate countermeasures are effective in eliminating and reducing identified hazards and included in the JSA form.

Do the Tasks Safely

Once all the hazards have been identified, controlled for, and discussed with the supervisor as needed, the task may be completed.

Every employee must be aware of whom they can speak to if they require assistance or if they encounter any problems. Once the JSA form is completed, it must be initiated by everyone involved in the task.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 204 of 407

TRAINING

Adequate Job Safety Analysis training will be given to all shop and service employees once a year by the Safety Department. Managers and Supervisors are responsible for day-to-day training and Counseling. Managers and Supervisors will conduct a quality review of the JSA's on a quarterly basis. This program will be evaluated yearly and updated accordingly.

JOB HAZARD ANALYSIS FORM INSTRUCTIONS

Start with selecting an employee to help you with the JSA: someone who is experienced in the job, willing to help, and a good communicator. It is required that a specific means of communication has been identified and is addressed on the JSA. The employees play a significant role in helping you identify job steps and hazards. In summary, to complete this form you must consider the purpose of the job, the activities it involves, and the hazards it presents. In addition, observing an employee performing the job, or "walking through" the operation step by step may give additional insight into potential hazards.

Here is how to do each of the three parts of a Job Safety Analysis:

Sequence of Basic Job Steps

Examining a specific or planned job by breaking it down into a series of steps, tasks, or activities associated with the work to be done will enable you to discover potential hazards employees may encounter. These must also be included in the JSA.

Each job or operation will consist of a set of steps or tasks. For example, the job might be to move a box from a conveyor in the receiving area to a shelf in the storage area. To determine where a step begins or ends, look for a change of activity, direction, or movement.

Picking up the box from the conveyor and placing it on a hand truck is one step. The next step might be to push the loaded hand truck to the storage area (a change in activity.) Moving the boxes from the truck and placing them on the shelf is another step. The last step might be returning the hand truck to the receiving area.

Ensure to list all the steps needed to perform the job. Some steps may not be performed each time; an example could be checking the casters on the hand truck. However, if that step is part of the job, it must be listed on the JSA.

Potential Hazards

A hazard is a potential danger. The purpose of the Job Safety Analysis is to identify **ALL** hazards – both those produced by the environment or conditions and those connected with the job procedure. To identify hazards, ask yourself these questions about each step:

- Is there a danger of the employee striking against, being struck by, or otherwise making injurious contact with an object?



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 205 of 407

- Can the employee be caught in, by, or between objects?
- Is there a potential for slipping, tripping, or falling?
- Could the employee suffer strains from pushing, pulling, lifting, bending, or twisting?
- Is the environment hazardous to safety and/or health (toxic gas, vapor, mist, fumes, dust, heat, or radiation)?
- Are there current or incoming weather conditions that could cause conditions to become hazardous to safety and/or health?

Close observation and knowledge of the job is important. Examine each step carefully to find and identify hazards – the actions, conditions, and possibilities that could lead to an accident. Compiling an accurate and complete list of potential hazards will allow you to develop the recommended safe job procedures needed to prevent accidents. A complete list of the above-listed hazards and any additional potential hazards must be addressed and included on the JSA.

Recommended Action or Procedure

Using the first two columns as a guide, decide what actions or procedures are necessary to eliminate or minimize the hazards that could lead to an accident, injury, or occupational illness.

Begin by trying to: (1) engineer the hazard out; (2) provide guards, safety devices, etc.; (3) provide personal protective equipment; (4) provide job instruction training; (5) maintain good housekeeping; (6) ensure good ergonomics (positioning the person in relation to the machine or other elements).

List the required or recommended personal protective equipment necessary to perform each step of the job.

Give a recommended action or procedure for each hazard.

Serious hazards must be corrected immediately. The JSA must then be changed to reflect the new conditions.

Finally, review your input on all three columns for accuracy and completeness with affected employees. Determine if the recommended actions or procedures have been put in place. Re-evaluate the job safety analysis, as necessary.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 206 of 407

JOB HAZARD ANALYSIS FORM

Location/Dept:		Date:	New? <input type="checkbox"/>	Revision <input type="checkbox"/>	JSA NO:				
Task			Supervisor:						
			Analysis By:						
Relevant EHS Chapter			Reviewed By:						
			Approved By:						
Team Members (Printed Name)									
Specific rules and procedures to be followed (Safe Work Policy _____)									
Sequence of Basic Job Steps	Potential Injury or Hazards		Recommendations to Eliminate or Reduce Potential Hazards.						
CHECK ITEMS REQUIRED TO DO THIS JOB:									
Safety Glasses	<input type="checkbox"/>	Leather Gloves	<input type="checkbox"/>	Face Shield	<input type="checkbox"/>	Fire Extinguisher	<input type="checkbox"/>	Atmospheric Testing	<input type="checkbox"/>
Hard Hats	<input type="checkbox"/>	Work Vest	<input type="checkbox"/>	Goggles (type?)	<input type="checkbox"/>	Lockout/Tagout	<input type="checkbox"/>	Traffic Control	<input type="checkbox"/>
Safety Shoes	<input type="checkbox"/>	Fall Harness	<input type="checkbox"/>	Flame Resistant Clothing	<input type="checkbox"/>	Warning signs	<input type="checkbox"/>	Other	<input type="checkbox"/>



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 207 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 208 of 407

HAZCOM

PURPOSE

The purpose of this document is to outline the Hazard Communication Program for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company." It provides detailed safety guidelines and instructions for the receipt, use, and storage of chemicals at our facility by employees and contractors. Reference: OSHA Standard [29 CFR 1910.1200](#).

RESPONSIBILITIES

Management

- Ensure compliance with this program
- Conduct immediate corrective action for deficiencies found in the program
- Maintain an effective Hazard Communication training program
- Make this plan available to employees or their designated representative
- Supply all necessary PPE for employees

Shipping and Receiving Manager

- Ensure all received containers are properly labeled and that labels are not removed or defaced
- Ensure all shipped containers are properly labeled
- Ensure shipping department employees are professionally trained in spill response
- Ensure received Safety Data Sheets (SDS) are properly distributed

Purchasing Agent

- Obtain, from the manufacturer, SDS for chemicals purchased from retail sources

Safety Coordinator

- Maintain a list of hazardous chemicals using the identity that is referenced on the SDS
- Monitor the effectiveness of the program
- Conduct an annual audit of the program
- Monitor employee training to ensure effectiveness
- Keep management informed of necessary changes
- Ensure SDSs are available as required
- Monitor facility for proper use, storage, and labeling of chemicals
- Ensure SDS are available for emergency medical personnel when treating exposed employees
- Provide information, as requested, concerning health effects and exposure symptoms listed on SDS



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 209 of 407

Supervisors

- Comply with all specific requirements of the program
- Provide specific chemical safety training for assigned employees
- Ensure chemicals are safely used, stored, and labeled
- Ensure only the minimum amount necessary is kept at workstations
- Ensure up to date SDS are readily accessible to all employees on all shifts

Employees

- Comply with the chemical safety requirements of this program
- Report any problems with the storage or use of chemicals
- Immediately report spills of suspected spills of chemicals
- Use only those chemicals for which they have been trained
- Use chemicals only for specific assigned tasks in the proper manner

Contractors

- Comply will all aspects of this program
- Coordinate information with the Safety Coordinator
- Ensure Contractor employees are professionally trained
- Notify the Safety Coordinator before bringing any chemicals into company property of facilities
- Monitor and ensure proper storage and use of chemicals by Contractor employees

POLICY

This written Hazard Communication Program (HAZCOM) has been developed based on OSHA Hazard Communication Standard and consists of the following elements:

- Materials Inventory
- Identification of Hazardous Materials
- Product Warning Labels
- Safety Data Sheets (SDS)
- Written Hazard Communication Program
- Effective Employee Training

When working in the field or at a client site, a copy of The Company's Health and Safety programs (including the HAZCOM program) shall always be available with the site supervisor, manager, or **Chris Harrington**.

Some chemicals are explosive, corrosive, flammable, or toxic. Other chemicals are safe to use and store but may become dangerous when they interact with other substances. To avoid injury and/or property damage, persons who manage chemicals in any area of The Company must understand the hazardous properties of the chemicals. Before using a specific chemical, safe handling methods and health hazards must always be reviewed.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 210 of 407

Supervisors are responsible for ensuring that the equipment needed to work safely with chemicals is accessible and maintained for all employees on all shifts. A list of the hazardous chemicals known to be present using an identity that is referenced on the appropriate Safety Data Sheet shall be maintained and posted in a conspicuous area at each worksite. SDSs shall be maintained and readily accessible in each work area. SDSs can be maintained at the primary work site. However, they should be available in case of an emergency. SDS shall be made available, upon request, to employees, their designated representatives, the Assistant Secretary, and the Director.

An SDS must be obtained for each required chemical. In addition, SDSs are to be maintained in a readily accessible location to employees.

All aspects of this policy and The Company's HAZCOM policy are subject to annual review by the Safety Coordinator to ensure the effectiveness of the policy, to further guarantee a safe work environment for employees, and to reflect any regulatory changes to which the policy must adhere to.

EMPLOYEE TRAINING

Initial Orientation Training

All new employees shall receive safety orientation training covering the elements of the HAZCOM and Right to Know Program. This training will consist of general training covering:

- Location and availability of the written Hazard Communication Program
- Location and availability of the List of Chemicals used in the workplace
- Methods and observation used to detect the presence or release of a hazardous chemical in the workplace
- The specific physical and health hazard of all chemicals in the workplace
- Specific control measures for protection from physical or health hazards
- Explanation of the chemical labeling system
- The requirements of regulatory bodies, industry standards, and best safety practices regarding specific chemicals
- Location and use of SDS
- Measures employees can take to protect themselves from hazards, including specific procedures the company has implemented for employee protection

Employees shall be provided with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals. Chemical-specific information must always be available through labels and safety data sheets.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 211 of 407

Job Specific Training

Employees will receive on-the-job training from their supervisor. This training will cover the proper use, inspection, and storage of necessary personal protective equipment and chemical safety training for the specific chemicals they will be using or will be working around.

Annual Refresher Training

Annual Hazard Communication refresher training will be conducted as part of The Company's continuing safety training program.

Immediate On-the-Spot Training

This training will be conducted by supervisors for any employee that requests additional information or exhibits a lack of understanding of the safety requirements.

The Company will maintain employee training records for 3 years from the date the training occurred.

NON-ROUTINE TASKS

Non-routine tasks are defined as working on, near, or with unlabeled piping, unlabeled containers of an unknown substance, confined space entry where a hazardous substance may be present, and/or a one-time task using a hazardous substance differently than intended (example: using a solvent to remove stains from tile floors).

Steps for Non-Routine Tasks:

- Step 1: Hazard Determination
- Step 2: Determine Precautions
- Step 3: Specific Training and Documentation
- Step 4: Perform Task

All non-routine tasks will be evaluated by the Department Supervisor and Safety Department before the task commences, to determine all hazards present. This determination will be conducted with quantitative/qualitative analysis (air sampling, substance identification/analysis, etc., as applicable).

Once the hazard determination is made, the Department Supervisor and Safety Department will determine the necessary precautions needed to either remove the hazard, change to a non-hazard, or protect from the hazard (use of personal protective equipment) to safeguard the employees present. In addition, the Department Supervisor or Safety Department will provide specific safety training for employees present or affected and will document the training using the Chemical Safety Training Checklist form which shall be marked "**Non-Routine Task Training.**"



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 212 of 407

OFF-SITE USE OR TRANSPORTATION OF CHEMICALS

An SDS will be provided to employees for each chemical and each occurrence of use or transport away from the company facilities. All State and Federal DOT Regulations will be followed including the use of certified containers, labeling, and marking, securing of containers, and employee training.

GENERAL CHEMICAL SAFETY

Assume all chemicals are hazardous. The number of hazardous chemicals and the number of reactions between them is so large that prior knowledge of all potential hazards cannot be assumed. Use chemicals in as small quantities as possible to minimize exposure and reduce possible harmful effects.

The following general safety rules shall be observed when working with chemicals:

- Read and understand Safety Data Sheets
- Keep the work area clean and orderly
- Use the necessary safety equipment
- Carefully label every container with the identity of its contents and appropriate hazard warnings
- Store incompatible chemicals in separate areas
- Substitute fewer toxic materials whenever possible
- Limit the volume of volatile or flammable material to the minimum needed for short operation periods
- Provide means of containing the material if equipment or containers should break or spill their contents

In the event engineering and administrative controls cannot maintain hazardous material exposure to safe levels, The Company will provide the necessary Personal Protective Equipment (PPE) to perform the task.

TASK EVALUATION

Each task that requires the use of chemicals should be evaluated to determine the potential hazards associated with the work. This hazard evaluation must include the chemical or combination of chemicals that will be used in the workplace, as well as other materials that will be used near the workplace. If a malfunction during the operation has the potential to cause significant injury or property damage, a Safe Operational Procedure (SOP) should be prepared and followed. Operations must be planned to minimize the generation of hazardous waste.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 213 of 407

CHEMICAL APPROVAL PROCESS

The Purpose of the Chemical Approval Process is to assure that there is an adequate review held to examine all health hazards associated with a proposed chemical before the worker uses it. All new chemicals that are used by The Company workers are to be evaluated through this process prior to use.

Chemical Approval Form

- Obtain the SDS for the new chemical or attach a copy of the old chemical's SDS for approval
- Provide a description when wanting to use a chemical
- Send an approval form to OSHA for review and to Chris Harrington of the employees who will be working with the new chemical

Chris Harrington will ensure that all the necessary safety precautions are taken when using the chemical.

CHEMICAL STORAGE

The separation of chemicals (solids or liquids) during storage is necessary to reduce the possibility of unwanted chemical reactions caused by accidental mixing. Explosives should be stored separately outdoors. Use either distance or barriers (e.g., trays) to isolate chemicals into the following groups:

- **Flammable Liquids** - Store in approved flammable storage lockers
- **Acids** - Treat as flammable liquids
- **Bases** - Do not store bases with acids or any other material
- **Other Liquids** - Ensure other liquids are compatible with any other chemical in the same storage location
- Lips, strips, or bars are to be installed across the width of storage shelves to restrain the chemicals in case of an earthquake

Chemicals will not be stored in the same refrigerator used for food storage. Refrigerators used for storing chemicals must be appropriately identified by a label on the door.

STORAGE CABINETS

Any flammable and/or combustible liquid must be stored separately from any ignition source. Any source of ignition is prohibited in areas where flammable and combustible sources are stored. This includes cigarette smoking, sparks from welding or grinding, open flames, etc.

Flammable liquids shall not be stored in areas used for exits, stairways, or normally used for the safe passing of people. No more than 25 gallons of flammable liquids can be stored in a room



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 214 of 407

outside of an approved storage cabinet. Quantities of flammable liquids more than 25 gallons must be stored in an acceptable or approved cabinet meeting OSHA requirements.

No more than 60 gallons of Category 1, 2, or 3 flammable liquids, nor more than 120 gallons of Category 4 flammable liquids shall be stored in any one storage cabinet. No more than 3 such cabinets can be in a single storage area.

In addition to ignition source storage rules, flammable and combustible liquids must be stored in areas away from substances that may cause a reaction, such as an oxygen tank.

Inside storage rooms must be constructed to meet the required fire-resistive rating for their use. Such construction must comply with the test specifications outlined in Standard Methods of Fire Test of Building Construction and Material, NFPA 251-1969.

Acceptable wooden storage cabinets must be constructed in the following matter or equivalent to the following information:

- The bottom, sides, and top must be constructed of an exterior grade of plywood at least 1 inch in thickness that cannot break or delaminate under standard fire test conditions
- All joints must be rabbeted and must be fastened in two directions with flathead wood screws
- When more than one door is used, there must be a rabbeted overlap of no less than 1 inch
- Steel hinges must be mounted in such a manner as to not lose their holding capacity due to loosening or burning out the screws when subjected to a fire
- Painted inside and outside with a fire-retardant paint

Approved metal storage cabinets will be acceptable.

Cabinets shall be labeled in conspicuous lettering stating: "**Flammable – Keep Away from Open Flames.**"

All containers for flammable or combustible liquids shall be labeled in accordance with OSHA regulations. Labeling must be in easy, legible fonts, which contrast with any other printed matter on the container.

Materials that will react with water and create a fire hazard must not be stored in the same room as flammable liquids.

CONTAINER LABELS

All containers of chemicals must be properly labeled. This includes every type of container from a 5,000-gallon storage tank to a spray bottle of degreaser. [1910.1200\(f\)](#)



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 215 of 407

The following requirements apply:

- All containers will have the appropriate label, tag, or marking prominently displayed that indicates the identity, safety, and health hazards
- Portable containers which contain a small number of chemicals need not be labeled if they are used immediately that shift but must be under the strict control of the employee using the product
- All warning labels, tags, etc., must be maintained in a legible condition and not be defaced. Facility weekly supervisor inspections will check for compliance of this rule
- Incoming chemicals are to be checked for proper labeling

Each container label should contain the following information:

- Product Identifier
- Pictograms
- Signal Word
- Precautionary Statements
- Supplier Identification (name, address, and telephone number of the chemical manufacturer)
- Hazard Statements

The Company shall ensure that workplace labels or other forms of warning are legible in English, and prominently displayed on the container, or readily available in the work area throughout each work shift. Employers having employees who speak other languages may add the information in their language to the material presented if the information is presented in English as well.

If you find a container without a label or with a torn or illegible label, report it to your supervisor immediately. Do not attempt to handle a chemical without a label until you know what it is. If you are carrying hazardous chemicals in a portable container that someone else might use, the container must be labeled to ensure the safety of other workers.

Secondary Container

When you transfer a chemical from its original container to another container, the container you transfer it into is called a secondary container such as a beaker, flask, or bottle.

Secondary Container Labeling

These containers usually hold chemicals that are transferred from a primary container. Secondary containers must comply with GHS labeling requirements except when the following criteria are met: The material is used within the work shift of the individual who makes the transfer.

EMERGENCIES AND SPILLS

In case of an emergency, implement the proper Emergency Action Plan

- Evacuate people from the area
- Isolate the area



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 216 of 407

- If the material is flammable, turn off ignition and heat sources
- Only personnel specifically trained in emergency response are permitted to participate in chemical emergency procedures beyond those required to evacuate the area
- Call for Emergency Response Team assistance if required

HOUSEKEEPING

- Maintain the smallest possible inventory of chemicals to meet immediate needs
- Periodically review the inventory of chemicals on hand
- Ensure that storage areas, or equipment containing enormous quantities of chemicals, are secure from accidental spills
- Rinse emptied bottles that contain acids or inflammable solvents before disposal
- Recycle unused laboratory chemicals wherever possible
- **DO NOT** place hazardous chemicals in salvage or garbage receptacles
- **DO NOT** pour chemicals onto the ground
- **DO NOT** dispose of chemicals through the storm drain system
- **DO NOT** dispose of highly toxic, malodorous chemicals down sinks or sewer drains

MULTI-EMPLOYERS WORKSITE

The Company shall maintain in the workplace copies of the required safety data sheets for each hazardous chemical and shall ensure that they are readily accessible during each work shift to employees when they are in their work area(s). Where employees must travel between workplaces during a work shift, i.e., their work is conducted at more than one geographical location, the safety data sheets may be kept at the primary workplace facility. The written HAZCOM Program will also be available in the employee "pocket-sized safety manual" that shall be always kept in each work vehicle. The Company shall make the written hazard communication program available, upon request, to employees, their designated representatives, the Assistant Secretary, and the Director, in accordance with the requirements of [29 CFR 1910.1020 \(e\)](#).

All outside contractors working inside Company Facilities are required to follow the requirements of this program. The Company will provide the Contractor's information concerning:

- Pre-job/kick-off briefing shall be conducted with the contractor prior to the initiation of work on the site
- Location of SDS
- Precautions to be taken to protect contractor employees
- Potential exposure to hazardous substances
- Chemicals used in or stored in areas where they will be working
- Location and availability of Safety Data Sheets
- Recommended Personal Protective Equipment
- Labeling system for chemicals



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 217 of 407

A written hazard communication program shall be developed, implemented, and maintained at each workplace that describes how labels and other forms of warning, safety data sheets, and employee information will be met.

INFORMATION CHEMICAL USERS MUST KNOW

Fire and/or Explosion Information

- Material Flash Point, auto-ignition temperature, and upper/lower flammability limits
- Proper fire extinguishing agents to be used
- Firefighting techniques
- Any unusual fire or explosive hazards

Chemical Reaction Information

- Stability of chemical
- Conditions and other materials which can cause reactions with the chemical
- Dangerous substances that can be produced when the chemical reacts

Control Measures

- Engineering Controls required for safe product use
- Personal protective equipment required for use of the product
- Safe storage requirements and guidelines
- Safe handling procedures

Health Hazards

- Permissible Exposure Limit (PEL) and Threshold Limit Value (TLV)
- Acute or Chronic symptoms of exposure
- Main routes of entry into the body
- Medical conditions that can be made worse by exposure
- Cancer-causing properties if any
- Emergency and First Aid treatments

Spill and Leak Procedures

- Clean up techniques
- Personal Protective Equipment to be used during cleanup
- Disposal of waste and cleanup material

EMPLOYEE USE OF SDS

For SDS use to be effective, employees must:

- Know the location of the SDS
- Understand the major points for each chemical
- Check SDS when more information is needed, or questions arise
- Be able to quickly locate the emergency information on the SDS



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- Follow the safety practices provided on the SDS

GHS (GLOBAL HARMONIZATION SYSTEM)

Introduction to the GHS

The Globally Harmonized System (GHS) is an international approach to hazard communication, providing agreed criteria for the classification of chemical hazards, and a standardized approach to label elements and safety data sheets. The GHS was negotiated in a multi-year process by hazard communication experts from many different countries, international organizations, and stakeholder groups. It is based on major existing systems around the world, including OSHA's Hazard Communication Standard and the chemical classification and labeling systems of other US agencies.



The result of this negotiation process is the United Nations document entitled "Globally Harmonized System of Classification and Labeling of Chemicals," commonly referred to as The Purple Book. This document provides harmonized classification criteria for health, physical, and environmental hazards of chemicals. It also includes standardized label elements that are assigned to these hazard classes and categories and provides the appropriate signal words, pictograms, and hazard and precautionary statements to convey the hazards to users. A standardized order of information for safety data sheets is also provided. These recommendations can be used by regulatory authorities such as OSHA to establish mandatory requirements for hazard communication, but do not constitute a model regulation.

Overview

The revised Hazard Communication Standard (HCS) is a modification to the existing standard. The parts of the standard that did not relate to the GHS (such as the basic framework, scope, and exemptions) remained unchanged. There have been some modifications to terminology to align the revised HCS with the language used in the GHS.

For example, the term "hazard determination" has been changed to "hazard classification" and "material safety data sheet" was changed to "safety data sheet." OSHA stakeholders commented on this approach and found it to be appropriate.

Under both the current Hazard Communication Standard (HCS) and the revised HCS, an evaluation of chemical hazards must be performed considering the available scientific evidence concerning such hazards. Under the current HCS, the hazard determination provisions have



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definitions of hazard, and the evaluator determines whether the data on a chemical meets those definitions.

It is a performance-oriented approach that provides parameters for the evaluation, but not specific, detailed criteria. The hazard classification approach in the revised HCS is quite different. The revised HCS has specific criteria for each health and physical hazard, along with detailed instructions for hazard evaluation and determinations as to whether mixtures or substances are covered. It also establishes both hazard classes and hazard categories—for most of the effects; the classes are divided into categories that reflect the relative severity of the effect. The current HCS does not include categories for most of the health hazards covered, so this new approach provides additional information that can be related to the appropriate response to address the hazard. OSHA has included the general provisions for hazard classification in paragraph (d) of the revised rule and added extensive appendixes (Appendixes [A](#) and [B](#)) that address the criteria for each health or physical effect.

Major changes to the Hazard Communication Standard?

A. The three major areas of change are in hazard classification, labels, and safety data sheets.

Hazard Classification

The definitions of hazard have been changed to provide specific criteria for the classification of health and physical hazards, as well as the classification of mixtures. These specific criteria will help to ensure that evaluations of hazardous effects are consistent across manufacturers and that labels and safety data sheets are more accurate as a result.

Labels

Chemical manufacturers and importers will be required to provide a label that includes a harmonized signal word, pictogram, and hazard statement for each hazard class and category. Precautionary statements must also be provided.

Safety Data Sheets - Will now have a specified 16-section format.

HAZARD COMMUNICATION STANDARD: SAFETY DATA SHEETS

The information required on Safety Data Sheet (SDS) requires that the information on the SDS be presented using specific headings in a specified sequence.

Paragraph (g) of the final rule provides the headings of information to be included on the SDS and the order in which they are to be provided. In addition, Appendix [D](#) provides the information to be included under each heading. The SDS format is the same as the ANSI standard format, which is widely used in the U.S. and is already familiar to many employees.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 220 of 407

The format of the 16-section SDS should include the following sections:

- Section 1. Identification
- Section 2. Hazard(s) identification
- Section 3. Composition/information on ingredients
- Section 4. First-Aid measures
- Section 5. Fire-fighting measures
- Section 6. Accidental release measures
- Section 7. Handling and storage
- Section 8. Exposure controls/personal protection
- Section 9. Physical and chemical properties
- Section 10. Stability and reactivity
- Section 11. Toxicological information
- Section 12. Ecological information
- Section 13. Disposal considerations
- Section 14. Transport information
- Section 15. Regulatory information
- Section 16. Other information, including the date of preparation or last revision

The SDS must also contain Sections 12-15, to be consistent with the United Nations' Globally Harmonized System of Classification and Labeling of Chemicals (GHS). Although the headings for Sections 12-15 are mandatory, OSHA will not enforce the content of these four sections because these sections are within other agencies' jurisdiction.

The Hazard Communication Standard (HCS) ([29 CFR 1910.1200\(g\)](#)), revised in 2012, requires that the chemical manufacturer, distributor, or importer provide Safety Data Sheets (SDSs) (formerly MSDSs or Material Safety Data Sheets) for each hazardous chemical to downstream users to communicate information on these hazards. The information contained in the SDS is the same as the former MSDS, except now the SDSs are required to be presented in a consistent user-friendly, 16-section format. This brief provides guidance to help workers who manage hazardous chemicals to become familiar with the format and understand the contents of the SDSs.

The SDS includes information such as the properties of each chemical; the physical, health, and environmental health hazards; protective measures; and safety precautions for handling, storing, and transporting the chemical. The information contained in the SDS must be in English (although it may be in other languages as well). In addition, OSHA requires that SDS preparers provide specific minimum information as detailed in Appendix [D](#) of 29 CFR 1910.1200. The SDS preparers may also include additional information in various section(s).

Sections 1 through 8 contain general information about the chemical, identification, hazards, composition, safe handling practices, and emergency control measures (e.g., firefighting).



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 221 of 407

This information should be helpful to those that need to get the information quickly. Sections 9 through 11 and 16 contain other technical and scientific information, such as physical and chemical properties, stability and reactivity information, toxicological information, exposure control information, and other information including the date of preparation or last revision. The SDS must also state that no applicable information was found when the preparer does not find relevant information for any required element.

A description of all 16 sections of the SDS, along with their contents, is presented here:

Section 1: Identification

This section identifies the chemical on the SDS as well as the recommended uses. It also provides the essential contact information of the supplier. The required information consists of:

- Product identifier used on the label and any other common names or synonyms by which the substance is known.
- Name, address, phone number of the manufacturer, importer, or other responsible party, and emergency phone number.
- Recommended use of the chemical (e.g., a brief description of what it does, such as flame retardant) and any restrictions on use (including recommendations given by the supplier).

Section 2: Hazard(s) Identification

This section identifies the hazards of the chemical presented on the SDS and the appropriate warning information associated with those hazards. The required information consists of:

- The hazard classification of the chemical (e.g., flammable liquid, category¹).
- Signal word.
- Hazard statement(s).
- Pictograms (the pictograms or hazard symbols may be presented as graphical reproductions of the symbols in black and white or be a description of the name of the symbol (e.g., skull and crossbones, flame).
- Precautionary statement(s).
- Description of any hazards not otherwise classified.
- For a mixture that contains an ingredient(s) with unknown toxicity, a statement describing how much (percentage) of the mixture consists of ingredient(s) with unknown acute toxicity. Please note that this is a total percentage of the mixture and is not tied to the individual ingredient(s).



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 222 of 407

Section 3: Composition/Information on Ingredients

This section identifies the ingredient(s) contained in the product indicated on the SDS, including impurities and stabilizing additives. This section includes information on substances, mixtures, and all chemicals where a trade secret is claimed. The required information consists of:

Substances:

- Chemical name.
- Common names and synonyms.
- Chemical Abstracts Service (CAS) number and other unique identifiers.
- Impurities and stabilizing additives, which are themselves classified and which contribute to the classification of the chemical.

Mixtures:

- Same information required for substances.
- The chemical name and concentration (i.e., exact percentage) of all ingredients which are classified as health hazards are:
 - Present above their cut-off/concentration limits or
 - Present a health risk below the cut-off/concentration limits.
- The concentration (exact percentages) of each ingredient must be specified except concentration ranges may be used in the following situations:
 - A trade secret claim is made,
 - There is batch-to-batch variation, or
 - The SDS is used for a group of similar mixtures.

Chemicals where a trade secret is claimed

- A statement that the specific chemical identity and/or exact percentage (concentration) of composition has been withheld as a trade secret is required.

Section 4: First-Aid Measures

This section describes the initial care that should be given by untrained responders to an individual who has been exposed to the chemical. The required information consists of:

- Necessary first-aid instructions by relevant routes of exposure (inhalation, skin and eye contact, and ingestion).
- Description of the most important symptoms or effects, and any symptoms that are acute or delayed.
- Recommendations for immediate medical care and special treatment needed, when necessary.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 223 of 407

Section 5: Fire-Fighting Measures

This section provides recommendations for fighting a fire caused by the chemical. The required information consists of:

- Recommendations of suitable extinguishing equipment, and information about extinguishing equipment that is not appropriate for a particular situation.
- Advice on specific hazards that develop from the chemical during the fire, such as any hazardous combustion products created when the chemical burns.
- Recommendations on special protective equipment or precautions for firefighters.

Section 6: Accidental Release Measures

This section provides recommendations on the appropriate response to spills, leaks, or releases, including containment and cleanup practices to prevent or minimize exposure to people, properties, or the environment. It may also include recommendations distinguishing between responses for large and small spills where the spill volume has a significant impact on the hazard. The required information may consist of recommendations for:

- Use of personal precautions (such as removal of ignition sources or providing sufficient ventilation) and protective equipment to prevent the contamination of skin, eyes, and clothing.
- Emergency procedures, including instructions for evacuations, consulting experts when needed, and appropriate protective clothing.
- Methods and materials used for containment (e.g., covering the drains and capping procedures).
- Cleanup procedures (e.g., appropriate techniques for neutralization, decontamination, cleaning, or vacuuming; adsorbent materials; and/or equipment required for containment/clean up.)



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 224 of 407

Section 7: Handling and Storage

This section provides guidance on the safe handling practices and conditions for the safe storage of chemicals. The required information consists of:

- Precautions for safe handling, including recommendations for handling incompatible chemicals, minimizing the release of the chemical into the environment, and providing advice on general hygiene practices (e.g., eating, drinking, and smoking in work areas are prohibited).
- Recommendations on the conditions for safe storage, including any incompatibilities. Provide advice on specific storage requirements (e.g., ventilation requirements.)

Section 8: Exposure Controls/Personal Protection

This section indicates the exposure limits, engineering controls, and personal protective measures that can be used to minimize worker exposure. The required information consists of:

- OSHA Permissible Exposure Limits (PELs), American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values (TLVs), and any other exposure limit used or recommended by the chemical manufacturer, importer, or employer preparing the safety data sheet, where available.
- Appropriate engineering controls (e.g., use local exhaust ventilation, or use only in an enclosed system).
- Recommendations for personal protective measures to prevent illness or injury from exposure to chemicals, such as personal protective equipment (PPE) (e.g., appropriate types of eyes, face, skin, or respiratory protection needed based on hazards and potential exposure).
- Any special requirements for PPE, protective clothing, or respirators (e.g., type of glove material, such as PVC or nitrile rubber gloves; and breakthrough time of the glove material).



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 225 of 407

Section 9: Physical and Chemical Properties

This section identifies physical and chemical properties associated with the substance or mixture. The minimum required information consists of:

- Appearance (physical state, color, etc.)
- Upper/lower flammability or explosive limits
- Odor
- Vapor pressure
- Odor threshold
- Vapor density
- pH
- Relative density
- Melting point/freezing point
- Solubility(ies)
- Initial boiling point and boiling range
- Flash point
- Evaporation rate
- Flammability (solid, gas)
- Upper/lower flammability or explosive limits
- Vapor pressure
- Vapor density
- Relative density
- Solubility(ies)
- Partition coefficient: n-octanol/water
- Auto-ignition temperature
- Decomposition temperature; and
- Viscosity.

The SDS may not contain every item on the above list because information may not be relevant or is not available. When this occurs, a notation to that effect must be made for that chemical property. Manufacturers may also add other relevant properties, such as the dust deflagration index (Kst) for combustible dust, used to evaluate a dust's explosive potential.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 226 of 407

Section 10: Stability and Reactivity

This section describes the reactivity hazards of the chemical and the chemical stability information. This section is broken into three parts: reactivity, chemical stability, and other. The required information consists of:

Reactivity

- Description of the specific test data for the chemical(s). This data can be for a class or family of the chemical if such data represent the anticipated hazard of the chemical(s), where available.

Chemical stability

- Indication of whether the chemical is stable or unstable under normal ambient temperature and conditions while in storage and being handled.
- Description of any stabilizers that may be needed to maintain chemical stability.
- An indication of any safety issues that may arise should the product change in physical appearance.

Other

- Indication of the possibility of hazardous reactions, including a statement whether the chemical will react or polymerize, which could release excess pressure or heat, or create other hazardous conditions. Also, a description of the conditions under which hazardous reactions may occur.
- List of all conditions that should be avoided (e.g., static discharge, shock, vibrations, or environmental conditions that may lead to hazardous conditions).
- List of all classes of incompatible materials (e.g., classes of chemicals or specific substances) with which the chemical could react to produce a hazardous situation.
- List of any known or anticipated hazardous decomposition products that could be produced because of use, storage, or heating. (Hazardous combustion products should also be included in Section 5 (Fire-Fighting Measures) of the SDS.)



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 227 of 407

Section 11: Toxicological Information

This section identifies toxicological and health effects information or indicates that such data are not available. The required information consists of:

- Information on the routes of exposure (inhalation, ingestion, skin, and eye contact). The SDS should indicate if the information is unknown.
- Description of the delayed, immediate, or chronic effects from short- and long-term exposure.
- The numerical measures of toxicity (e.g., acute toxicity estimates such as the LD50 (median lethal dose)) - the estimated amount [of a substance] expected to kill 50% of test animals in a single dose.
- Description of the symptoms. This description includes the symptoms associated with exposure to the chemical including symptoms from the lowest to the most severe exposure.
- Indication of whether the chemical is listed in the National Toxicology Program (NTP) Report on Carcinogens (latest edition) or has been found to be a potential carcinogen in the International Agency for Research on Cancer (IARC) Monographs (latest editions) or found to be a potential carcinogen by OSHA

Section 12: Ecological Information (non-mandatory)

This section provides information to evaluate the environmental impact of the chemical(s) if it were released into the environment. The information may include:

- Data from toxicity tests performed on aquatic and/or terrestrial organisms, where available (e.g., acute, or chronic aquatic toxicity data for fish, algae, crustaceans, and other plants; toxicity data on birds, bees, and plants).
- Whether there is a potential for the chemical to persist and degrade in the environment either through biodegradation or other processes, such as oxidation or hydrolysis.
- Results of tests of bioaccumulation potential, referring to the octanol-water partition coefficient (Kow) and the bioconcentration factor (BCF), where available.
- The potential for a substance to move from the soil to the groundwater (indicate results from adsorption studies or leaching studies).
- Other adverse effects (e.g., environmental fate, ozone layer depletion potential, photochemical ozone creation potential, endocrine disrupting potential, and/or global warming potential).



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 228 of 407

Section 13: Disposal Considerations (non-mandatory)

This section provides guidance on proper disposal practices, recycling or reclamation of the chemical(s) or its container, and safe handling practices. To minimize exposure, this section should also refer the reader to Section 8 (Exposure Controls/Personal Protection) of the SDS. The information may include:

- Description of appropriate disposal containers to use.
- Recommendations of appropriate disposal methods to employ.
- Description of the physical and chemical properties that may affect disposal activities.
- Language discouraging sewage disposal.
- Any special precautions for landfills or incineration activities

Section 14: Transport Information (non-mandatory)

This section provides guidance on classification information for shipping and transporting hazardous chemical(s) by road, air, rail, or sea. The information may include:

- UN number (i.e., four-figure identification number of the substance)¹.
- UN proper shipping name¹.
- Transport hazard class(es)¹.
- Packing group number, if applicable, based on the degree of hazard².
- Environmental hazards (e.g., identify if it is a marine pollutant according to the International Maritime Dangerous Goods Code (IMDG Code)).
- Guidance on transport in bulk (according to Annex II of MARPOL 73/78³ and the International Code for the Construction and Equipment of Ships Carrying Dangerous Chemicals in Bulk (International Bulk Chemical Code (IBC Code))).
- Any special precautions which an employee should be aware of or needs to comply with, in connection with transport or conveyance either within or outside their premises (indicate when information is not available).

Section 15: Regulatory Information (non-mandatory)

This section identifies the safety, health, and environmental regulations specific to the product that is not indicated anywhere else on the SDS. The information may include:

- Any national and/or regional regulatory information on the chemical or mixtures (including any OSHA, Department of Transportation, Environmental Protection Agency, or Consumer Product Safety Commission regulations)



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 229 of 407

Section 16: Other Information

This section indicates when the SDS was prepared or when the last known revision was made. The SDS may also state where the changes have been made to the previous version. You may wish to contact the supplier for an explanation of the changes. Other useful information also may be included here.

NEW HCS PICTOGRAMS AND HAZARDS

There are nine pictograms under the GHS to convey the health, physical, and environmental hazards. The final Hazard Communication Standard (HCS) requires eight of these pictograms, the exception being the environmental pictogram, as environmental hazards are not within OSHA's jurisdiction. The hazard pictograms and their corresponding hazards are shown below.

Health Hazard	Flame	Exclamation Mark
<ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity 	<ul style="list-style-type: none"> • Flammables • Pyrophoric • Self-Heating • Emits Flammable Gas • Self-Reactive • Organic Peroxides 	<ul style="list-style-type: none"> • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (non-Mandatory)
Gas Cylinder	Corrosion	Exploding Bomb
<ul style="list-style-type: none"> • Gases under Pressure 	<ul style="list-style-type: none"> • Skin Corrosion/ burns • Eye Damage • Corrosive to Metals 	<ul style="list-style-type: none"> • Explosives • Self-Reactive • Organic Peroxides
Flame Over Circle	Environment (Non-Mandatory)	Skull and Crossbones
<ul style="list-style-type: none"> • Oxidizers 	<ul style="list-style-type: none"> • Aquatic Toxicity 	<ul style="list-style-type: none"> • Acute Toxicity (fatal or toxic)

ALLOCATION OF LABEL ELEMENTS (EXAMPLES)

In the revised Hazard Communication Standard (HCS), OSHA has provided classifiers with the option of relying on the classification listings of IARC and NTP to make classification decisions






PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 230 of 407

regarding carcinogenicity, rather than applying the criteria themselves. OSHA believes that this will make classification easier for classifiers, as well as lead to greater consistency. In addition, OSHA has provided in non-mandatory Appendix F of the revised rule, guidance on hazard classification for carcinogenicity. Part A of Appendix F includes background guidance provided by GHS based on the Preamble of the IARC "Monographs on the Evaluation of Carcinogenic Risks to Humans" (2006). Part B provides IARC classification information. Part C provides background guidance from the National NTP "Report on Carcinogens" (RoC), and Part D is a table that compares GHS carcinogen hazard categories to carcinogen classifications under IARC and NTP, allowing classifiers to be able to use information from IARC and NTP RoC carcinogen classifications to complete their classifications under the GHS, and thus the HCS.

CARCINOGENICITY		
Category 1A	Category 1B	Category 2
Danger	Danger	Warning
		
May cause cancer (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)	May cause cancer (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)	Suspected of causing cancer (state route of exposure if it is conclusively proven that no other routes of exposure cause the hazard)
Not required under the UN Recommendations on the Transport of Dangerous Goods, Model Regulations.		

OSHA is retaining the requirement to include the American Conference of Government Industrial Hygienists (ACGIH) Threshold Limit Values (TLVs) on the Safety Data Sheet (SDS) in the revised Standard. OSHA finds that requiring TLVs on the SDS will provide employers and employees with useful information to help them assess the hazards presented by their workplaces. In addition to TLVs, OSHA Permissible Exposure Limits (PELs), and any other exposure limit used or recommended by the chemical manufacturer, importer, or employer preparing the safety data sheet are also required.

The Company strictly adheres to these guidelines.

DEFINITIONS

Chemical - any element, chemical compound, or mixture of elements and/or compounds.

Combustible Liquid - means any liquid having a flash point at or above 100 deg. F (37.8 deg. C), but below 200 deg. F (93.3 deg. C), except for any mixture having components with flash



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 231 of 407

points of 200 deg. F (93.3 deg. C), or higher, the total volume of which makes up 99 percent or more of the total volume of the mixture.

Compressed Gas - any compound that exhibits:

- A gas or mixture of gases having, in a container, an absolute pressure exceeding 40 psi at 70 deg. F.
- A gas or mixture of gases having, in a container, an absolute pressure exceeding 104 psi at 130 deg. F. regardless of the pressure at 70 deg. F.
- A liquid having a vapor pressure exceeding 40 psi at 100 deg. F.

Container - any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. For purposes of this section, pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.

Employee - a worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies. Workers such as office workers or bank tellers who encounter hazardous chemicals only in non-routine, isolated instances are not covered.

Employer - a person engaged in a business where chemicals are either used, distributed, or produced for use or distribution, including a contractor or subcontractor.

Explosive - a chemical that causes a sudden, almost instantaneous release of pressure, gas, and heat when subjected to sudden shock, pressure, or elevated temperature.

Exposure or Exposed - an employee is subjected in the course of employment to a chemical that is a physical or health hazard and includes potential (e.g., accidental, or possible) exposure. Subjected in terms of health hazards includes any route of entry (e.g., inhalation, ingestion, skin contact, or absorption.)

Flammable - a chemical that falls into one of the following categories:

- "Aerosol, flammable" means an aerosol that yields a flame projection exceeding 18 inches at full valve opening, or a flashback (a flame extending back to the valve) at any degree of valve opening.
- "Gas, flammable" means:
 - A gas that, at ambient temperature and pressure, forms a flammable mixture with air at a concentration of thirteen (13) percent by volume or less; or,
 - A gas that, at ambient temperature and pressure, forms a range of flammable mixtures with air wider than twelve (12) percent by volume, regardless of the lower limit.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 232 of 407

- "Liquid, flammable" means any liquid having a flash point below 100 deg. F., except for any mixture having components with flash points of 100 deg. F. or higher, the total of which makes up 99 percent or more of the total volume of the mixture.
- "Solid, flammable" means a solid, other than a blasting agent or explosive as defined in [29 CFR 1910.109\(a\)](#), that is liable to cause fire through friction, absorption of moisture, spontaneous chemical change, or retained heat from manufacturing or processing, or which can be ignited readily and when ignited burns so vigorously and persistently as to create a serious hazard. A chemical shall be a flammable solid if it ignites and burns with a self-sustained flame at a rate greater than one-tenth of an inch per second along its major axis.

Flash Point - the minimum temperature at which a liquid gives off a vapor in sufficient concentration to ignite.

Hazardous Chemical - any chemical which is a physical hazard or a health hazard.

Hazard Warning - any words, pictures, symbols, or combination appearing on a label or other appropriate form of warning which conveys the specific physical and health hazard(s), including target organ effects, of the chemical(s) in the container(s). (See the definitions for "physical hazard" and "health hazard" to determine the hazards which must be covered.)

Health Hazard - a chemical for which there is evidence that acute or chronic health effects may occur in exposed employees. The term "health hazard" includes chemicals that are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic system, and agents that damage the lungs, skin, eyes, or mucous membranes.

Identity - any chemical or common name which is indicated on the safety data sheet (SDS) for the chemical. The identity used shall permit cross-references to be made among the required list of hazardous chemicals, the label, and the SDS.

Immediate Use - the hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.

Label - any written, printed, or graphic material displayed on or affixed to containers of hazardous chemicals.

Safety data sheet (SDS) - written or printed material concerning a hazardous chemical that is prepared in accordance with OSHA Standard [29 CFR 1910.1200](#) requirements.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 233 of 407

Mixture - any combination of two or more chemicals if the combination is not, in whole or in part, the result of a chemical reaction.

Oxidizer - means a chemical other than a blasting agent or explosive as defined in 1910.109(a), that initiates or promotes combustion in other materials, thereby causing fire either of itself or through the release of oxygen or other gases.

Physical hazard - a chemical that is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive), or water-reactive.

Pyrophoric - a chemical that will ignite spontaneously in air at a temperature of 130 deg. F. or below.

Specific Chemical Identity - the chemical name, Chemical Abstracts Service (CAS) Registry Number, or any other information that reveals the precise chemical designation of the substance.

Unstable (Reactive) - a chemical which in its pure state, or as produced or transported, will vigorously polymerize, decompose, condense, or will become self-reactive under conditions of shocks, pressure, or temperature.

Use - to package, handle, react, emit, extract, generate as a byproduct, or transfer.

Water-Reactive - a chemical that reacts with water to release a gas that is either flammable or presents a health hazard.

Work Area - a room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.

Workplace - an establishment, job site, or project, at one geographical location containing one or more work areas.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 234 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 235 of 407

Heat and Cold Stress

Heat Stress

PURPOSE

The purpose of this document is to provide employees with the necessary training and equipment to protect against heat-related injury and illness while working for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company."

RESPONSIBILITIES

Management

Ensure all employees are provided with this policy, the proper training, and any equipment necessary to avoid heat-related injury and illness prior to an initial assignment where heat may be a factor.

A competent employee will be designated as a hydration monitor.

TRAINING

All employees who are or may be exposed to potential heat-related illnesses will receive training on the following:

- The environmental and personal risk factors that cause heat-related illnesses
- The employer's procedures for identifying, evaluating, and controlling exposures to the environmental and personal risk factors for heat illness
- The importance of frequent consumption of small quantities of water, up to 4 cups per hour under extreme conditions of work and heat
- The importance of acclimatization
- The different types of heat illness and the common signs and symptoms of heat illness
- The importance of immediately reporting to the employer, directly or through the employee's supervisor, symptoms, or signs of heat illness in themselves, or in co-workers
- The employer's procedures for responding to symptoms of heat illness, including how emergency medical services will be provided should they become necessary
- Procedures for contacting emergency medical services, and if necessary, for transporting employees to a point where they can be reached by an emergency medical service provider
- How to provide clear and precise directions to the work site



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 236 of 407

- Supervisors must receive training in the prevention of heat-related illnesses prior to supervising employees working in the heat
- Supervisors should be trained in the employer's heat illness procedures to prevent heat illness and procedures to follow when an employee exhibits symptoms consistent with heat illness, including emergency response procedures

HEAT CRAMPS

Symptoms of heat cramps include:

- Loss of salt through excessive sweating
- Cramping in the back, legs, and arms

If someone shows signs and symptoms of heat cramps, they should:

- Stretch and massage muscles
- Replace salt by drinking commercially available carbohydrate/electrolyte replacement fluids
 - Carbohydrate/electrolyte replacement fluids shall also be provided by The Company for affected employees exposed to hot climates

HEAT EXHAUSTION

Heat exhaustion occurs when the body can no longer keep blood flowing to supply vital organs and at the same time send blood to the skin to reduce body temperature.

Heat exhaustion symptoms include:

- Weakness
- Difficulty continuing work
- Headache
- Breathlessness
- Nausea or vomiting
- Feeling faint or fainting

Heat Exhaustion Treatment

Call for emergency help if you suspect a worker has heat exhaustion. While awaiting emergency assistance, help the worker cool off by:

- Resting in a cool place
- Drinking cool water
- Removing unnecessary clothing
- Loosening clothing
- Showering or sponging with cool water

It takes 30 minutes to cool the body down once a worker becomes overheated and suffers heat exhaustion.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 237 of 407

HEAT STROKE

Heat stroke occurs when the body can no longer cool itself and the body temperature rises to critical levels.

Heat stroke symptoms include:

- Confusion
- Irrational behavior
- Loss of consciousness
- Convulsions
- Lack of sweating
- Hot, dry skin
- Abnormally high body temperature

Heat Stroke Treatment

- Provide immediate, aggressive, general cooling:
 - Immerse the victim in a tub of cool water or
 - Place in a cool shower or
 - Spray with cool water from a hose or
 - Wrap the victim in cool, wet sheets and fan rapidly
- Transport the victim to the hospital

Do not give anything by mouth to an unconscious victim.

SAFE WORK PROCEDURES

The Company shall institute work practice and engineering controls to reduce and maintain employee exposures at or below the Permissible Exposure Limit (PEL) of 1 part per million (ppm) wherever feasible. When engineering and work practice controls are not feasible to reduce employee exposures to or below the PEL, The Company will utilize these controls to reduce company employee exposures to the lowest levels achievable.

Supervisors are responsible for performing the following:

- Give workers frequent breaks in a cool area away from the heat
- Adjust work practices as necessary when workers complain of heat stress
- Oversee heat stress training and acclimatization for new workers and for workers who have been off the job for a period
- Monitor the workplace to determine when hot conditions arise
- Increase air movement by using fans where possible
- Provide portable water in required quantities
- Determine whether workers are drinking enough water



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 238 of 407

- Make allowances for workers who must wear personal protective clothing (welders, etc.) and equipment that retains heat and restricts the evaporation of sweat.
- Schedule hot jobs for the cooler part of the day; schedule routine maintenance and repair work in hot areas for the cooler times of the day
- Make available to all workers, cooling devices (hard hat liners/bibs/neck bands) to help rid the body of excessive heat

WORKERS

Workers are responsible for performing the following:

- Follow instructions and training for controlling heat stress
- Be alert to symptoms in yourself and others
- Determine if any prescription medications you are required to take can increase heat stress
- Wear light, loose-fitting clothing that permits the evaporation of sweat
- Wear light-colored garments that absorb less heat from the sun
- Drink small amounts of water – approximately 1 cup every 15 minutes
- Avoid beverages such as tea or coffee
- Avoid eating hot, heavy meals
- Do not take salt tablets unless prescribed by a physician

HEAT DISORDERS

Symptoms

- Red blotches and extreme itchiness in areas persistently damp with sweat
- Prickling sensation on the skin when sweating occurs

Treatment

- Cool environment
- Cool shower
- Thorough drying

Heat rashes typically disappear in a few days after exposure. If the skin is not cleaned frequently enough the rash may become infected.

ENVIRONMENTAL FACTORS

Procedures must be in place to control the effects of environmental factors that can contribute to heat-related illness. The most common environmental factors are air temperature, humidity, radiant heat sources, and air circulation.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 239 of 407

PHYSICAL FACTORS

Physical factors that contribute to heat-related illness should be taken into consideration before performing a task. The most common physical factors that can contribute to heat-related illness are the type of work, level of physical activity and duration, clothing color, weight, and breathability.

The Company management team and supervisors shall take into consideration the physical factors of affected workers that contribute to heat-related illness before assigning work. The most common physical factors that can contribute to heat-related illness are:

- Age
- Weight
- Physical fitness
- Drug/alcohol use
- Prior incidents of heat-related illness
- Work type
- Level of physical activity and duration
- Clothing color, weight, and breathability

PROVISIONS OF WATER

Employees shall have access to portable drinking water. Where it is not plumbed or otherwise continuously supplied, it shall be provided in sufficient quantity throughout the work shift.

Water shall be provided in sufficient quantity at the beginning of the work shift to provide one quart per employee per hour for drinking the entire shift for a total of 2 gallons per employee per an 8-hour shift. Employees may begin the shift with smaller quantities of water if effective procedures for replenishment of water during the shift have been implemented to provide employees with one quart or more per hour.

ACCESS TO SHADE

Employees suffering from heat illness or believing a preventative recovery period is needed shall be provided access to an area with shade that is either open to the air or provided with ventilation or cooling. Such access to shade shall always be permitted. Shade areas can include trees, buildings, canopies, lean-tos, or other partial and/or temporary structures that are either ventilated or open to air movement. The interior of cars or trucks is not considered shade unless the vehicles are air-conditioned or kept from heating up in the sun in some other way.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 240 of 407

SAFE WORK PROCEDURES

Supervisors must ensure personal factors that contribute to heat-related illness are taken into consideration before assigning a task where there is the possibility of a heat-related illness occurring. The most common personal factors that can contribute to heat-related illness are age, weight/fitness, drug/alcohol use, prior heat-related illness, etc.

- Give workers frequent breaks in a cool area away from the heat
- Adjust work practices as necessary when workers complain of heat stress
- Oversee heat stress training and acclimatization for new workers and for workers who have been off the job for a period
- Monitor the workplace to determine when hot conditions arise
- Increase air movement by using fans where possible
- Provide potable water in required quantities
- Determine whether workers are drinking enough water
- Make allowances for workers who must wear personal protective clothing (welders, etc.) and equipment that retains heat and restricts the evaporation of sweat
- Schedule hot jobs for the cooler part of the day; schedule routine maintenance and repair work in hot areas for the cooler times of the day
- Make available to all workers, cooling devices (hard hat liners/bibs/neck bands) to help rid the body of excessive heat

EMPLOYEES

Awareness of heat illness symptoms can save your life or the life of a co-worker. The following provides valuable information concerning heat-related illnesses and preventative measures:

- If you are coming back to work from an illness or an extended break or starting a job working in the heat, it is important to be aware that you are more vulnerable to heat stress until your body has time to adjust. Let your employer know you are not used to the heat. It takes about 5-7 days for your body to adjust
- Drinking plenty of water frequently is vital for workers exposed to heat. An individual may produce as much as 2 to 3 gallons of sweat per day. To replenish that fluid, you should drink 3 to 4 cups of water every hour starting at the beginning of your shift
- Taking your breaks in a cool shaded area and allowing time for recovery from the heat during the day are effective ways to avoid a heat-related illness
- Avoid or limit the use of alcohol and caffeine during periods of extreme heat as both dehydrate the body
- If you or a co-worker start to feel symptoms such as nausea, dizziness, weakness, or unusual fatigue, let your supervisor know and rest in a cool, shaded area. If symptoms persist or worsen, seek immediate medical attention
- Whenever possible, wear clothing that provides protection from the sun but allows airflow to the body. Protect your head and shade your eyes if working outdoors
- When working in the heat, pay extra attention to your co-workers and be sure you know how to call for medical attention



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 241 of 407

Cold Stress/Cold Weather Safety

PURPOSE

The purpose of this document is to outline the minimum safety requirements for protecting employees from potential injuries and illnesses associated with cold work environments for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company."

SCOPE

Each employee is expected to follow the guidelines outlined in this program. Members of management and site supervisors are responsible for initiating disciplinary action against employees who do not follow the guidelines within this section. This policy applies to all employees working in cold environments below 50°F with or without wind chill present.

WORK CONSIDERATIONS PRE-PLANNING

One aspect of the work environment that must be taken into consideration when planning and conducting projects in winter months (e.g., November through March) is the occurrence of adverse and harsh weather conditions. Cold weather can cause physical discomfort, loss of efficiency, and injury or death. The Site Safety Officer will be responsible for the daily monitoring of temperature and wind speed, which may result in cold stress for all personnel.

In addition, employees will be kept aware of the effects of cold stress. When outdoor temperatures are expected to be below (50° F), near freezing (30° F), or below, personnel should pace themselves, especially if wearing heavy clothing, and take frequent rest breaks if directly involved with strenuous activities (e.g., lifting, pushing, etc.). Proper intake of non-caffeinated beverages (e.g., water, commercial electrolyte-balanced drinks) is encouraged periodically throughout the workday to maintain proper fluid level retention and avoid dehydration.

SIGNS AND SYMPTOMS

If an employee experience one or more of the following:

- Pale, cool moist skin
- Heavy or no sweating
- Muscle spasms
- Pain in hands, feet, or abdomen
- Strong, rapid pulse rate
- Dizziness or nausea
- Confusion
- Fainting
- Red, hot, or drier than normal skin



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 242 of 407

It is strongly advised they should immediately sit down and attempt to alert a coworker to notify the site supervisor, who will take appropriate measures.

A risk assessment shall be conducted to evaluate employee exposures based on job classification to identify those at risk for cold exposure.

If a worker experiences the following disorders, especially during exhaustive, high physical activity periods outdoors in winter months:

- Uncontrollable shivering
- Vague or slowed speech
- Memory lapses
- Incoherence
- Drowsiness
- Color changing of the skin
- Decreasing blood pressure, pulse rate, or respiration

That person may be exhibiting early warning signs of cold stress. It is imperative to get this person acclimatized to a warmer (preferably indoors, at ambient temperatures) location as soon as possible and re-hydrated with non-caffeinated, sweetened beverages.

SAFE WORK PRACTICES

The following practices can help prevent cold stress and related injuries:

- Ensure workers have suitable clothing for working in cold conditions
- Postpone outdoor work if temperatures are less than 40 degrees and there is rain
- Conduct outdoor operations during the middle of the day to take advantage of solar heat load
- Provide a heated space for workers to take breaks
- Ensure workers stay hydrated
- Workers and supervisors should know the signs and symptoms of cold-related illness
- Workers should practice the buddy system and monitor other workers on the crew for signs and symptoms of cold-related illness
- Supervisors should remind workers of the dangers, signs, and symptoms of cold-related illness during daily and weekly safety briefings during periods of low temperatures
- Workers must use the "Buddy System" to ensure no employee is working alone in cold work environments
- Workers should notify the Site Safety Officer if the worker has a medical condition that would predispose him or her to cold stress. These conditions may include heart disease, high blood pressure, pulmonary diseases, obesity, lack of acclimatization, etc.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 243 of 407

PREVENTATIVE MEASURES

The Company shall ensure proper preventative measures, such as hydration, being made available to employees exposed to cold weather temperature extremes, are in place to prevent cold-related injuries to affected employees.

Some preventive measures include drinking plenty of liquids and avoiding caffeine and alcohol. It is easy to become dehydrated in cold weather. If possible, heavy work should be scheduled during the warmer parts of the day. Take breaks out of the cold. Try to work in pairs to keep an eye on each other and watch for signs of cold stress. Avoid fatigue since energy is needed to keep muscles warm. Take frequent breaks and consume warm, high-calorie food such as pasta to maintain energy reserves.

In addition, used walkways and travel ways shall be sanded, salted, or cleared of snow and ice as soon as practicable.

TRAINING REQUIREMENT

Workers exposed to the cold should receive initial, annual, and refresher training regarding the health effects of cold exposure, proper rewarming procedures, recognition, and first aid for frostbite and hypothermia, required protective clothing, proper use of warming shelters, the buddy system, vehicle breakdown procedures, and proper eating and drinking habits for working in the cold.

Cold-related illnesses training will include but is not limited to the following:

- **Hypothermia** - Occurs when body heat is lost at a rate quicker than it can be replaced. Symptoms of hypothermia include shivering, stomping of the feet to generate heat, loss of coordination, slurred speech, and skin that is pale and cold
- **Frostbite** - Occurs when the skin freezes and loses water. Symptoms of frostbite include cold, tingling, stinging, or aching followed by numbness. The affected skin will turn red, then purple, then white, and is cold to the touch. Blistering may occur in severe cases of frostbite
- **Trench foot or immersion foot** - Is caused by the foot or feet being immersed in cold water at temperatures below freezing for extended periods of time. Symptoms are like frostbite, but often less severe, and include tingling, itching, or burning sensations. Blisters may also form with trench foot
- **Wind Chill** - Temperature for wind chill is what the temperature "feels like" during cold weather because of the wind. Symptoms include uncontrollable shivering, memory loss, disorientation, incoherence, slurred speech, drowsiness, and apparent exhaustion. Medical attention is needed immediately. If it is not available, begin warming the body SLOWLY according to the National Weather Services



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 244 of 407

- **Windburn** – Is irritation of the skin due to prolonged exposure to wind and rushes of cold air. The symptoms are said to be like that of sunburn such as redness to the face and/or skin, tender to the touch, along with a “burning” sensation. The skin may also begin to peel as it begins to heal

All employees should be informed of the dangers and destructive potential caused by unstable snow buildup, sharp icicles, and ice dams and know how to prevent accidents caused by them.

PERSONAL PROTECTIVE EQUIPMENT

Protective clothing is the most important way to avoid cold stress. The type of fabric also makes a difference. Cotton loses its insulation value when it becomes wet. Wool, silk, and most synthetics, on the other hand, retain their insulation even when wet. The following are recommendations for working in cold environments:

- 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
- Wear a hat or hood. Up to 40% of body heat can be lost when the head is left exposed
- Wear insulated boots or other footwear
- Keep a change of dry clothing available in case work clothes become wet
- Except for the wicking layer, do not wear tight clothing. Loose clothing allows better ventilation of heat away from the body
- Do not underestimate the wetting effects of perspiration. Oftentimes wicking and venting of the body's sweat and heat are more important than protecting from rain or snow

Regular inspections on cold weather supplies (e.g., hand warmers, jackets, shovels, etc.) should be carried out to ensure that supplies are always in stock.

FIRST AID

All employees who are required to perform work in cold conditions should be knowledgeable on how to administer first aid treatment for cold-induced injuries or illnesses.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 245 of 407

The Cold Stress Equation Low Temperature + Wind Speed + Wetness = Injuries and Illnesses

Temperatures	Wind Speed (MPH)					Danger Level
	0	10	20	30	40	
30° F/-1.1° C						Little Danger (Caution)
20° F/-6.7° C						Freezing to Exposed Flesh within 1 Hour
10° F/-12.2° C						
0° F/-17.8° C						Danger Freezing to Exposed Flesh within 1
-10° F/-23.3° C						Minute
-20° F/-28.9° C						
-30° F/-34.4° C						Extreme Danger Freezing to Exposed Flesh
-40° F/-40° C						within 30 Seconds
-50° F/-45.6° C						

DEFINITIONS

Hypothermia - Hypothermia occurs when body heat is lost faster than it can be replaced. When the core body temperature drops below the normal 98.6 F to around 95 F, the onset of symptoms normally begins. The person may begin to shiver and stomp their feet to generate heat. Workers may lose coordination, have slurred speech, and fumble with items in their hands. The skin will be pale and cold.

Frostbite - Frostbite occurs when the skin 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.

Trench Foot - Trench foot or immersion foot is caused by having the feet immersed in cold water temperatures.

Wind Chill - A measure of the rate of heat loss from exposed skin caused by the combined effects of high winds and low temperatures. The wind chill temperature is what the temperature "feels like" during cold weather because of the wind. As the wind increases, it draws heat from the body, driving down skin temperature and eventually the internal body temperature. Once temperatures drop below 10°F and the wind is gusting, conditions are ripe for cold-related illnesses.

Windburn – Is typically defined as irritation of the skin due to prolonged exposure to wind and rushes of cold air. The symptoms are said to be like that of sunburn such as redness to the face and/or skin, tender to the touch, along with a "burning" sensation. The skin may also begin to peel as it begins to heal.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 246 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 247 of 407

Incident Investigation and Reporting, Near Miss, and Risk Analysis Control

Incident Investigation and Reporting

PURPOSE

The purpose of this document is to outline and set forth effective procedures for reporting, evaluating, and investigating incidents and non-conformances to prevent further occurrences for **Pro Painting & Drywall Inc.;** hereafter referred to as "The Company."

The purpose of workplace incident investigations is to find facts to guide future actions, not find fault or assign blame, and investigate all incidents in which a worker was hurt, as well as close calls (sometimes called "near misses"), in which a worker might have been hurt if the circumstances had been slightly different.

RESPONSIBILITIES

Responsibilities for incident investigation and reporting/evaluation shall be assigned prior to the occurrence of an incident. Individual responsibilities for reporting and investigation must be pre-determined and assigned prior to incidents.

The Company shall ensure investigations are conducted and shall assist in the identification and implementation of corrective actions.

Foreman, Supervisors, and Managers shall investigate, or assist in, incident investigations and address/correct any non-conformances. Foreman, Supervisors, and Managers, acting on behalf of The Company, will send injured employees to a licensed medical provider for initial treatment.

Personnel/Employees shall immediately report any injury, incident, job-related illness, spill, or damage to any property to their immediate supervisor. If their immediate supervisor is not available, the employee must immediately notify the project manager or equivalent personnel. Employees who could be first responders shall be trained and qualified in first aid techniques to control the degree of loss during the immediate post-incident phase.

Employees shall actively cooperate with investigators during incident investigations. They shall also participate in recommending changes to processes, systems, and the workplace and in helping to implement changes as necessary to prevent future incidents.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 248 of 407

POLICY

All incidents will be investigated by the responsible safety office or the owner of The Company. The extent of such investigation shall reflect the seriousness of the incident utilizing a root cause analysis or other similar methods.

Reporting the incident shall occur in a specified manner and the reporting sequence shall be posted. The Company shall verbally report required incidents to OSHA within eight hours and shall report to the customer as soon as reasonably possible or within 24 hours of the incident.

The Company shall report to OSHA any work-related incidents resulting in the death of an employee or the hospitalization of one or more employees. All incidents shall be reported to customers including, but not limited to injuries (including the loss of an eye or limb), spills, property damage, fires, explosions, and vehicle damage.

All personnel shall be trained in their roles and responsibilities for incident response and incident investigation techniques. In addition, training requirements relative to incident investigation/reporting (awareness, first responder, investigation, and training frequency) will be identified.

Equipment may include some or all the following items: pens/paper, measurement equipment such as tape measures and rulers, cameras, small tools, audio recorders, PPE, marking devices such as flags, equipment manuals, etc.

Employees who could be first responders will be trained and qualified in first aid techniques to control the degree of loss during the immediate post-incident phase.

After the immediate rescue, actions to prevent further loss will occur. For example, maintenance personnel will be summoned to assess the integrity of buildings and equipment, engineering personnel to evaluate the need for bracing of structures, and special equipment and response requirements such as safe rendering of hazardous material or explosives employed.

The identification/investigation of evidence immediately following the incident shall include a listing of people, equipment, and material involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, etc.

Before the investigation, all emergency response needs must be completed, and the incident site must be safe and secure for entry and investigation.

The scene must be preserved to prevent material evidence from being removed or altered.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 249 of 407

Items that can be used by investigators include:

- Cones
- Tapes
- Guards

Incident investigations will result in corrective actions, individuals will be assigned responsibilities relative to the corrective actions, and these actions will be tracked to closure. A written incident report will be prepared and include an incident report form and a detailed narrative statement concerning the event. The format of the narrative report will include an introduction, methodology, summary of the incident, investigation board member names, a narrative of the event, findings, and recommendations. Photographs, witness statements, and drawings will be included. Lessons learned will be documented and communicated to all affected employees. Changes to processes will be in place to affect the prevention of reoccurrence or similar events.

Note: Incident investigations must be documented.

Writing equipment such as pens/paper, measurement equipment such as tape measures and rulers, cameras, small tools, audio recorders, PPE, marking devices such as flags, equipment manuals, etc. will be made available to all employees to use for completing JSA/JHA forms as well as incident investigations.

A FOUR STEP SYSTEM APPROACH TO CONDUCTING INCIDENT INVESTIGATIONS

1. Preserve/Document the Scene

Preserve the scene to prevent material evidence from being removed or altered; investigators can use cones, tape, and/or guards. Document the scene: Document the incident facts such as the date of the investigation and who is investigating. Essential to documenting the scene is capturing the injured employee's name, injury description, whether they are temporary or permanent, and the date and location of the incident. Investigators can also document the scene by video recording, photographing, and sketching

2. Collect Information

Incident information is collected through interviews, document reviews, and other means

3. Determine Root Causes

The root causes of an incident are exactly what the term implies: The underlying reasons why the incident occurred in a workplace. Root causes reflect management, design, planning, organizational, and/or operational failings (e.g., employees were not trained adequately; a damaged guard had not been repaired).

4. Implement Corrective Actions

The investigation is not complete until corrective actions are implemented that address the root causes of the incident. Implementation should entail program-level improvements and should be supported by senior management.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 250 of 407

DOCUMENTING THE INCIDENT INVESTIGATION

Chris Harrington shall ensure to document all incident facts, such as:

- Injured employee's name
- Injury description
- Temporary or permanent position

Information of the incident shall be documented as well, such as:

- Date of the investigation
- Who is investigating

Documenting the scene can be by

- Video recording
- Photographing
- Sketching

The evidence such as people, positions of equipment, parts, and papers will be preserved, secured, and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment. All witnesses will be interviewed, and statements will be collected. Locating witnesses, ensuring unbiased testimony, and obtaining appropriate interviews will be detailed. Follow-up interviews will also be addressed.

Investigation Kit

An investigation kit kept on site should include:

- ✓ A Camera
- ✓ Tape recorder
- ✓ Tape measure
- ✓ High visibility tape
- ✓ Scissors
- ✓ Tape
- ✓ Sample containers
- ✓ PPE
- ✓ First aid kit,
- ✓ Gloves
- ✓ Envelopes,
- ✓ Report forms
- ✓ Paper

INVESTIGATION RESULTS

After identifying the direct cause of the incident, identify risk-reducing measures to prevent future comparable incidents. It is important to keep the safety-related aspect of the investigation



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 251 of 407

separate from any possible disciplinary action. Incident investigations will always focus on identifying safety failures and remedying them promptly.

The Company shall share the finding of the incident investigations to build widespread accountability for the types of safety system changes the workplace will require after the incident.

MEDICAL TREATMENT AND RESUMPTION OF WORK

- **Minor injury** - If the injury can be treated through the application of first aid techniques either at the work location or through the designated panel providers or pre-designated healthcare professional, the employee returns immediately to his normal duties
- **More severe injury** - Employees, who experience an injury/illness which requires care beyond first aid, must be seen by the designated panel providers unless they have pre-designated another provider. In case of serious or life-threatening injury, Public Safety may opt to arrange transport to an Emergency Room
- **In all cases**, the "Work Status Report" serves as authorization to receive said treatment. The healthcare provider completes the "Work Status Report" with directions to the employee and his supervisor on required follow up including directions to:
 - Return to work with no restrictions
 - Return to work with modifications
 - Remain off work for a specified duration
- The employee must return the "Work Status Report" to their supervisor. If the healthcare provider has directed the employee to remain off work; the employee must notify their supervisor immediately by telephone and return the report as soon as possible

Near Miss

PURPOSE

Many more "near misses" or "close calls" also happen; these are incidents that could have caused severe injury or illness but did not, often by sheer luck. All these harmful incidents and close calls are preventable.

The purpose of this policy is to ensure that all near-miss incidents (including minor incidents) are reported, recorded, and investigated. Reporting and sharing information with relevant parties creates an opportunity to answer the questions of what happened and why, then, use this insight to determine how to prevent a reoccurrence. Following the steps outlined in this policy will:

- Promote an open, learning culture regarding workplace safety



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 252 of 407

- Employ a systematic approach for all administration, shop employees, and drivers to report near miss incidents
- Encourage an opportunity to gain understanding and insight from an incident's analysis
- Utilize that knowledge to prevent or reduce future risk of reoccurrence
- Support management's goal of establishing a reporting culture to identify and control hazards, reduce risk, and prevent harmful incidents

This policy applies to all employees of The Company, who, regardless of level, location, or job description, all have a role in creating and maintaining an injury-free workplace.

SCOPE

While the Management of The Company acknowledges responsibility for implementing and managing health and safety for the workplace, employees must also recognize and accept responsibility for their decisions and actions which can, and will, affect their own personal safety as well as the personal safety of others.

All incidents, regardless of size or impact, need to be investigated. The process helps employers look beyond what happened to discover why it happened. This allows The Company to identify and correct shortcomings in its safety and health management programs.

RELEVANCE

Many safety activities are reactive and not proactive, and some organizations wait for losses to occur before taking steps to prevent a recurrence. Near miss incidents precede major events and are often overlooked as there was no harm (no injury, damage, or loss). An opportunity to prevent the incident is lost if these events are not reported. Recognizing, reporting, and investigating near miss incidents can significantly improve worker safety and enhance an organization's safety culture.

PROCEDURE FOR REPORTING A "NEAR MISS" INCIDENT

- An employee who witnesses a near miss incident must complete the Near Miss reporting form and submit it to the Safety and Compliance Manager. The reporting system is non-punitive and if desired by the person reporting, anonymous
- All Near Miss incidents will be reviewed by the Safety and Compliance Manager and the Joint Health and Safety Committee to identify the root cause and the weaknesses in the system contributing to the incident (see Exhibit "B"). The reporting employee (or contractor) may be asked to participate in the incident investigation



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 253 of 407

- Investigation results will be used to improve safety systems, hazard control, risk reduction, and to educate employees. All of these represent opportunities for training, feedback on performance, and a commitment to continuous improvement

COMMUNICATION

The steps taken (training, new policies and procedures, etc.) to improve workplace safety because of the Near Miss investigation will be reported to Management by the Safety and Compliance Manager.

Monitoring and investigation results of near miss incidents will be communicated to employees in at least one of the following venues:

- Safety and Compliance Manager discussion with employees
- Bulletin board postings
- Minutes of the Joint Health and Safety Committee Meetings

ROLES AND RESPONSIBILITIES

It is the responsibility of The Company's Management to:

- Support the development and implementation of safe working practices through the provision of proper resources
- Review health and safety procedures annually (minimum) or as necessary
- Consider incentives that encourage near miss reporting and enhance the culture

It is the responsibility of the **Safety and Compliance Manager** to:

- Acknowledge and document potential hazards reported by The Company employees
- Monitor health and safety performance, re-designing health and safety practices, and procedures when prudent to do so
- Include training for new employees to identify hazards and work safely as part of their orientation
- Celebrate the success and value of the near miss reporting process with all employees

It is the responsibility of the **Safety and Compliance Manager and Members of the Joint Health and Safety Committee** to:

- Perform thorough investigations based on facts and provide recommendations for corrective action to ensure that the potential for any future occupational injury, disease, and accidents is eliminated

It is the responsibility of The Company **Employees** to:

- Ensure action has been taken to maintain safety and ensure the safety of the area
- Promptly report (within 24 hours) all incidents by completing the near miss reporting form, (reporting only FACTS) and submit to the Safety and Compliance Manager



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 254 of 407

- Provide statements and participate in the near miss investigation

It is the responsibility of **Outside Contractors** to:

- Follow the same reporting procedure as employees directly employed by The Company
- Provide statements and participate in the near miss investigation

NON-PUNITIVE EXEMPTIONS

Near Miss reporting is non-punitive, and workers will not be subject to progressive disciplinary measures unless their behavior coincides with one of the following serious offenses:

- Willful breach of professional codes
- Acts of gross negligence
- Acts of gross misconduct (e.g., Possession of alcohol, illicit narcotics, or non-prescribed pharmaceuticals while on company property, or use thereof while operating The Company's equipment)
- Repeated unreported violations
- Malicious activities (including malicious reporting of untrue allegations against a colleague)
- Workplace violence, including but not limited to fighting, assault, harassment, or possession of a weapon

DEFINITIONS

Near Miss – An event that under different circumstances could have resulted in physical harm to an individual or damage to the environment, equipment, property, and/or material.

Incident – An event that may result in a crisis.

Hazard – Anything with the potential to cause injury, damage, or loss.

Close Call or "Near Miss" – An incident that could have caused severe injury or illness but did not.

Risk Control Analysis

PURPOSE

During an incident investigation, The Company must determine which factors contributed to the incident, and both OSHA and the EPA encourage The Company to go beyond the minimum investigation required and conduct a root cause analysis.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 255 of 407

A root cause analysis allows an employer to discover the underlying or systemic, rather than the generalized or immediate, causes of an incident. Correcting only an immediate cause may eliminate a symptom of a problem, but not the problem itself.

How to Conduct a Root Cause Analysis

A successful root cause analysis identifies all root causes—there are often more than one.

It is important to consider all possible “what,” “why,” and “how” questions to discover the root cause(s) of an incident.

Benefits of Root Cause Analysis for Employers

Conducting a thorough investigation that identifies root causes will help to prevent similar events from happening again. In this way, employers will reduce the risk of death and/or injury to workers or the community or environmental damage.

Root Cause Analysis Tools

Below is a list of tools that may be used by The Company to conduct a root cause analysis. The tools are not meant to be used exclusively. Ideally, a combination of tools will be used.

- Brainstorming
- Checklists
- Logic/Event Trees
- Timelines
- Sequence Diagrams
- Causal Factor Determination

Regardless of the combination of tools chosen, employers should use these tools to answer four important questions:

1. **What** happened?
2. **How** did it happen?
3. **Why** did it happen?
4. **What** needs to be corrected?



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 256 of 407

INCIDENT INVESTIGATION FORM

1. Employee Information				
Employee Name		Department	Job Title	Supervisor
2. Related Specific Information				
Type (Check box)	Date	Time	Location/Work Area	Shift
<input type="checkbox"/> Near Miss				
<input type="checkbox"/> First Aid				
<input type="checkbox"/> Medical Treatment				
<input type="checkbox"/> Fatality				
<input type="checkbox"/> Other				
3. Visible Surface Cause – What caused the incident/accident to occur?				
4. Root Cause Analysis (check all that apply)				
Unsafe Acts		Unsafe Conditions		System Deficiency(ies)
<input type="checkbox"/> Improper work technique	<input type="checkbox"/>	<input type="checkbox"/> Poor workstation design or layout	<input type="checkbox"/>	<input type="checkbox"/> Lack of written procedures
<input type="checkbox"/> Safety policy violation	<input type="checkbox"/>	<input type="checkbox"/> Congested work area	<input type="checkbox"/>	<input type="checkbox"/> Safety policies not enforced
<input type="checkbox"/> Improper PPE/PPE not used	<input type="checkbox"/>	<input type="checkbox"/> Hazardous substances	<input type="checkbox"/>	<input type="checkbox"/> Hazards not identified
<input type="checkbox"/> Operating without permit	<input type="checkbox"/>	<input type="checkbox"/> Fire or explosion hazard	<input type="checkbox"/>	<input type="checkbox"/> PPE unavailable
<input type="checkbox"/> Failure to warn or secure	<input type="checkbox"/>	<input type="checkbox"/> Inadequate ventilation	<input type="checkbox"/>	<input type="checkbox"/> Insufficient worker training
<input type="checkbox"/> Operating at improper speeds	<input type="checkbox"/>	<input type="checkbox"/> Improper material storage	<input type="checkbox"/>	<input type="checkbox"/> Insufficient supervisor training
<input type="checkbox"/> By-passing safety devices	<input type="checkbox"/>	<input type="checkbox"/> Improper tool or equipment	<input type="checkbox"/>	<input type="checkbox"/> Improper maintenance
<input type="checkbox"/> Guards not used	<input type="checkbox"/>	<input type="checkbox"/> Insufficient knowledge of the job	<input type="checkbox"/>	<input type="checkbox"/> Inadequate supervision
<input type="checkbox"/> Improper loading or placement	<input type="checkbox"/>	<input type="checkbox"/> Slippery conditions	<input type="checkbox"/>	<input type="checkbox"/> Inadequate job planning
<input type="checkbox"/> Improper lifting	<input type="checkbox"/>	<input type="checkbox"/> Poor housekeeping	<input type="checkbox"/>	<input type="checkbox"/> Inadequate hiring practices
<input type="checkbox"/> Servicing machinery in motion	<input type="checkbox"/>	<input type="checkbox"/> Excessive noise	<input type="checkbox"/>	<input type="checkbox"/> Inadequate workplace inspection
<input type="checkbox"/> Horseplay	<input type="checkbox"/>	<input type="checkbox"/> Inadequate guarding of hazards	<input type="checkbox"/>	<input type="checkbox"/> Inadequate equipment
<input type="checkbox"/> Drug or alcohol use	<input type="checkbox"/>	<input type="checkbox"/> Defective tools/equipment	<input type="checkbox"/>	<input type="checkbox"/> Unsafe design or construction
<input type="checkbox"/> Unnecessary haste	<input type="checkbox"/>	<input type="checkbox"/> Insufficient lighting	<input type="checkbox"/>	<input type="checkbox"/> Unrealistic scheduling
<input type="checkbox"/> Unsafe act(s) of others	<input type="checkbox"/>	<input type="checkbox"/> Inadequate fall protection	<input type="checkbox"/>	<input type="checkbox"/> Poor process design
<input type="checkbox"/> Other (specify):	<input type="checkbox"/>	<input type="checkbox"/> Other (specify):	<input type="checkbox"/>	<input type="checkbox"/> Other (specify):
5. Analysis – Why did this occur? (Answer the question of why five times)				
Why -				
6. Required Corrective/Preventative Actions				
Action Item Detail			Responsible Party	Target Date
7. Required Concurrences				
Title	Print Name	Signature	Date	
Investigator/Supervisor				
Department Manager				
Department Safety Coordinator				



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 257 of 407

NEAR MISS REPORTING FORM

Date of Incident:		Time of Incident:	
--------------------------	--	--------------------------	--

Location:		Injuries?	Yes		No	
------------------	--	------------------	------------	--	-----------	--

Persons Involved in Near Miss Incident

Name:		Contact Number:	
Name:		Contact Number:	
Name:		Contact Number:	
Name:		Contact Number:	

Other Witnesses

Name:		Contact Number:	
Name:		Contact Number:	
Name:		Contact Number:	
Name:		Contact Number:	

Briefly describe what happened including the sequence of events. Safety and Compliance Manager and JH and S Committee will investigate scene of incident or near miss; conditions present at time of incident; what was involved, what activity (if any) was taking place prior and at time of incident. What hazards was the worker exposed to? What hazards may have contributed to the incident occurring? (Attach photos if available)

Near Miss Incident#	
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PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 258 of 407

NEAR MISS INVESTIGATION FORM

What preventative action should have been taken? Why was this action not taken?

What contributing factors were there? (Lack of experience, adverse conditions, etc.)

Recommendation Resulting from Investigation

#1

#2

#3

#4

Recommendation #	Person Responsible	Completion Date	Review Date

Safety and Compliance Manager
Signature:

Date:

Near Miss Incident #



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 259 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 260 of 407

Injury and Illness Prevention Plan/Recordkeeping

PURPOSE

The purpose of this document is to identify Injury Illness Recordkeeping for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company." The purpose of this document is to ensure records of injuries and illnesses in the workplace are kept raising awareness among employers and employees of workplace hazards.

This document will also provide information on reducing or preventing workplace hazards.

RESPONSIBILITIES

Safety Officer

- Shall function as the Injury and Illness Prevention Program (IIPP) administrator
- **Chris Harrington** has the authority and responsibility for implementing the provisions of this program for The Company

Management

- Shall implement and maintain the IIPP in their work areas
- Shall answer worker questions about the program

A copy of this IIPP is available in the office.

COMPLIANCE

Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. **Supervisors** and lead personnel are expected to enforce the rules fairly and uniformly.

All employees are responsible for using safe work practices by following all directives, policies, procedures, and assisting in maintaining a safe work environment.

The following is our system of ensuring that all workers comply with the rules and maintain a safe work environment:

- Informing workers of the provisions of our IIPP
- Evaluating the safety performance of all workers
- Recognizing employees who perform safe and healthful work practices. This recognition is accomplished by employees who make a significant contribution to the maintenance of a safe workplace, as determined by their supervisors, who will receive written acknowledgment of such contributions which is maintained in employees' personnel files



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 261 of 407

- Providing training to workers whose safety performance is deficient
- Disciplining workers for failure to comply with safe and healthful work practices. The following outlines our disciplinary process: When it becomes necessary, our company reserves the right to discipline employees who knowingly violate company safety rules or policies
- Disciplinary measures will include, but are not limited to:
 - Verbal warning (documented) for minor offenses
 - Written warning for more severe or repeated violations
 - Suspension without pay, if verbal and written warnings do not prove to be sufficient

If none of the above measures achieve satisfactory corrective results, and no other acceptable solution can be found, The Company will have no choice but to terminate employment for those who continue to jeopardize their own safety and the safety of others.

Other means that we use to ensure employee compliance with safe and healthful work practices include:

- Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees
- Managers and superintendents are expected to enforce the rules fairly and uniformly
- All employees are responsible for using safe work practices by following all directives, policies, procedures, and for assisting in maintaining a safe work environment

Our system of ensuring that all workers comply with the rules and maintain a safe work environment includes:

- Informing workers of the provisions of our IIP Program
- Evaluating the safety performance of all workers
- Recognizing superintendents who perform safe and healthful work practices
- Providing training to workers whose safety performance is deficient
- Disciplining workers for failure to comply with safe and healthful work practices
- Terminating any employee who receives more than two written warnings

COMMUNICATION

The following is our system of communication and is designed to facilitate a continuous flow of two-way (management, supervision, and employees) safety and health information in a form that is readily understandable to and between all affected site personnel:

- New worker orientation, including a discussion of site-specific safety and health policies and procedures
- Follow-through by supervision to ensure effectiveness
- Workplace-specific safety and health training



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 262 of 407

- Safety meetings held at least every ten (10) working days in each department by the department supervisor. These meetings will be short (5-10 minutes) and will cover 1 or 2 specific topics. Safety meetings are required by OSHA to successfully communicate essential information to employees as well as promote safety awareness. These meetings will be documented using [OSHA Form 301](#). Our company will also hold company-wide safety meetings with all employees once every three months to provide information concerning serious issues in the field of safety as it pertains to our industry and more frequently as deemed necessary by the creation of hazards or occurrences of injuries and illnesses
- Effective communication of safety and health concerns between workers and supervisors, including language translation where appropriate
- Posted and distributed safety information
- A system for workers to anonymously inform management about workplace hazards. This is accommodated by: managers, supervisors, and employees will report any hazardous conditions or activities noted:
 - As a result of the formal monthly or quarterly inspections
 - During daily routine operations. Hazards can be reported to supervisors anonymously. There will be a safety suggestion box at each location where notices can be deposited
- Vehicle and site-specific codes of safe work practices
- Other means we use to ensure communication with employees include:
 - We recognize that open, two-way communication between management and employee on health and safety issues is essential to an injury-free, productive workplace.
- The following system of communication is designed to facilitate a continuous flow of safety and health information between management and employee in a form that is readily understandable and consists of the following items:
 - We will conduct new worker orientation including a discussion of safety and health policies and procedures as well as our IIP Program
 - An authorized instructor will conduct workplace safety and health training
 - Superintendents will conduct "Tailgate" meetings once every ten working days
 - Posting and/or distributing safety information
 - A suggestion box is available at every job site for workers to report hazards anonymously
- General safe work practices including specifics with respect to hazards unique to the employees' job assignments

HAZARD ASSESSMENT

Periodic inspections to identify and evaluate workplace hazards shall be performed by Supervisors according to the following schedule:

- When our Injury and Illness Prevention Program was first established



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 263 of 407

- At least, identification of workplace hazards will be accomplished through a cooperative effort between management, supervisors, employees, and safety consultants
- Responsibility and accountability for effective hazard identification will be placed on all employees, at all levels. The methods employed will include:
 - Monthly company location inspections of the shops, yards, storage areas, equipment, rolling stock, and office areas. The Safety Director and/or the Safety Consultant will perform these inspections
 - Weekly job site inspections; performed by the Safety Director, Safety Supervisors, and/or the Safety Consultant. Each location will perform at least one job site inspection each week. Inspections shall be made to identify and evaluate hazards:
 - When this program is first established
 - Whenever new substances, processes, procedures, or equipment are introduced to the workplace that represents a new occupational safety and health hazard
 - Whenever we are made aware of a new or previously unrecognized hazard prior to the beginning of the shifts
- When new substances, processes, procedures, or equipment that present potential new hazards are introduced into our workplace
- When new, previously unidentified hazards are recognized
- When occupational injuries and illnesses occur
- When we hire and/or reassign permanent or intermittent workers to processes, operations, or tasks for which a hazard evaluation has not been previously conducted
- Whenever workplace conditions warrant an inspection

Periodic inspections consist of the identification and evaluation of workplace hazards utilizing applicable sections of a Hazard Assessment Checklist and any other effective methods to identify and evaluate workplace hazards.

ACCIDENT/EXPOSURE INVESTIGATIONS

Accident investigation is a systematic method for collecting information that makes it possible to accurately reconstruct the accident and determine the underlying reasons for the cause of the accident. The investigation is fact-finding, not fault-finding. A Competent Person will do an investigation of workplace accidents, hazardous substance exposures, and near-accidents. Once the primary causes for the accident have been determined, preventative measures can be identified and effectively instituted. Each supervisor has a prominent role in conducting an accident investigation.

The responsibility for conducting an accident investigation includes collecting the facts, determining the sequence of events that resulted in the accident, identifying actions to prevent



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 264 of 407

a recurrence, and providing follow-up to ensure that corrective action was effective. All accidents should be investigated promptly regardless of their severity. Promptness of the investigation is essential since conditions at the accident scene change. Moreover, witnesses are more likely to relate circumstances as they were, without the added conjecture that comes late from discussions of the accident with other employees. Promptness in checking the scene assures employees that management is extremely concerned for their wellbeing. The type of investigation depends on the nature and magnitude of the accident. Each department supervisor/manager shall promptly investigate, thoroughly analyze, and report in writing to The Safety Officer all accidents involving personal injury and/or property damage or the potential there for once they occur.

Accident investigation reports shall be submitted within 24 hours of the first notice to the supervisor/manager and will include:

- Visiting the scene as soon as possible
- Interviewing affected workers and witnesses
- Examining the workplace for factors associated with the accident/exposure/near-accident
- Determining the causes of the accident/exposure/near-accident
- Taking corrective action to prevent the accident/exposure/near-accident from reoccurring
- Recording the findings and corrective actions taken on [OSHA Form 301](#)

HAZARD CORRECTION

Unsafe or unhealthy work conditions, practices, or procedures at our work facilities shall be corrected in a timely manner based on the severity of the hazards, and according to the following procedures:

- When observed or discovered
- When an imminent hazard exists which cannot be immediately abated without endangering employees and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition. Workers necessary to correct the hazardous condition shall be provided with the necessary protection
- All such actions are taken and the dates they are completed shall be documented on the attached Identified Hazards and Correction Record

TRAINING AND INSTRUCTION

All workers, including management, supervisors, and lead personnel, shall have training and instruction on general and job-specific safety and health practices.

Training and instruction shall be provided as follows:

- When the IIPP is first established
- To all new workers



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 265 of 407

- To all workers given new job assignments for which training has not been previously provided
- Whenever new substances, processes, procedures, or equipment are introduced to the workplace and represent a new hazard
- Whenever we become aware of a new or previously unrecognized hazard
- To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed
- To all workers with respect to hazards specific to each employee's job assignment

This training will include (but is not limited to):

- Explanation of our IIPP, emergency actions plan and fire prevention plans, and measures for reporting any unsafe conditions, work practices, injuries, and when additional instruction is needed
- Availability of toilet, handwashing, and drinking water facilities
- Provisions for medical services and first aid, including emergency procedures
- Proper housekeeping, such as keeping stairways and isles clear, work areas neat and orderly, and promptly cleaning up spills
- Prohibiting horseplay, scuffling, or other acts that adversely influence safety
- Proper storage to prevent:
 - Stacking goods in an unstable manner
 - Storing materials and goods against doors, exits, fire extinguishing equipment, and electrical panels

Where applicable our training may also include:

- Prevention of musculoskeletal disorders, including proper lifting techniques
- Use of appropriate clothing, including gloves, footwear, and personal protective equipment
- Information about chemical hazards to which employees could be exposed and other hazard communication program information
- Proper food and beverage storage to prevent them from becoming contaminated

In addition, we provide specific instructions to all workers regarding hazards unique to their job assignment, to the extent that such information was not already covered in other training.

RECORDKEEPING

Written IIPP and Documentation Requirements

Our organization has taken the following steps to implement and maintain our IIPP:

- Records of scheduled and periodic inspections including the person(s) conducting the inspection, the workplace hazards (i.e., unsafe conditions and work practices that have been identified), and the action(s) taken to correct the identified unsafe conditions and work practices are recorded on the Hazard Assessment Checklist, the



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 266 of 407

Identified Hazards and Correction Record, and the Investigation/Corrective Action Report. These records are maintained for at least one (1) year

- Documentation of safety and health training for each worker, including the worker's name or other identifier, training dates, type(s) of training, and training providers are recorded on the Worker Training and Instruction Record. This documentation is maintained for at least one (1) year

In accordance with OSHA regulations, The Company will keep records of fatalities, injuries, and illnesses. Specifically, The Company will keep records of each fatality, abnormality, and illness that:

- Is work-related
- Is a new case
- Meets one or more of the general recordkeeping criteria

Injuries include cases such as but are not limited to:

- A cut
- Fracture
- Sprain
- Amputation

Illnesses include both acute and chronic illnesses, such as, but not limited to:

- A skin disease
- Respiratory disorder
- Poisoning

Each recordable injury or illness must be entered on an OSHA 300 Log and 301 Incident Report, or another equivalent form, within seven (7) calendar days of receiving information that a recordable injury or illness has occurred. The Company shall ensure to notify OSHA up to eight (8) hours after a fatality has occurred.

A company executive must certify that he or she has examined the OSHA 300 Log and that he or she believes, based on his or her knowledge of the process by which the information was recorded, that the annual summary is correct and complete. The reviewing executive must sign the OSHA 300 Summary.

Posting

A copy of the annual summary must be posted in each establishment in a conspicuous place or places where notices to employees are customarily posted. The Company will ensure that the posted annual summary is not altered, defaced, or covered by other material.

The Company will post the annual summary no later than February 1st of the year following the year covered by the records and the posting kept in place until April 30th.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 267 of 407

The OSHA 300 Log, the privacy case list (if one exists), the annual summary, and the OSHA 301 Incident Report forms must be retained for five (5) years following the end of the calendar year that these records cover.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 268 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 269 of 407

Injury Case Management/Safe Return to Work

PURPOSE

The purpose of this document is to outline the Injury Care Management Plan for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company."

RESPONSIBILITIES

Safety Director and Management

- Educate workers about the return-to-work program
- Set specific time frames for the return to work
- Review workers' progress regularly
- Pay full wages and benefits for the day or shift on which the injury occurred
- Make certain that workers understand their obligations to cooperate
- Set clear procedures to follow in reporting injuries

Employees

- Contact the supervisor immediately of any injury. If not available, phone the office and contact the employer
- Stay in regular contact
- Help identify and cooperate in suitable work arrangements
- Return to work within 24 hours with the completed form to develop with the employer an early and safe return to work
- Choose a doctor or qualified practitioner

POLICY

Returning employees to The Company's loss control strategies. Benefits of a return-to-work program include:

- Faster, more effective healing
- Safer work environment
- Direct and indirect savings in lost wages, medical costs, and productivity
- Improved morale by providing support to employees with alternate assignments during recuperation to maintain desirable productivity levels
- Enhanced cross-training within The Company

It is the policy of The Company to provide a place of employment that is free from recognized hazards that cause or are likely to cause death or serious physical harm to employees or the public. However, when serious physical harm does occur to employees, The Company is committed to providing quality medical care and managing the costs associated with that medical



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 270 of 407

care. The Company is also committed to the effective return to work of injured employees while enhancing their recovery. A return-to-work program provides employees with an incentive to return to work as quickly as possible.

TRANSITIONAL WORK ASSIGNMENTS

As applicable, employees may be provided with transitional work assignments during their recuperation to maintain desirable productivity levels. These assignments are sometimes called limited or modified duty and should be short-term in nature (no greater than 90 days) until the employee can return to his/her original job assignment. Ideally, these transitional work assignments should be already defined prior to an injury. Ideas for defining transitional work assignments include:

- Getting a list of jobs that may be performed on an annual, monthly, weekly, or daily basis. Examples may include rainy day jobs, jobs that would require overtime or temporary help to complete, or any jobs that employees may do on an occasional basis
- Supervisors identifying tasks that do not come under any specific job title. These tasks could then be assigned as part of a transitional work position
- Discussing and documenting jobs/tasks that would be good for transitional work assignments or modified jobs as a topic during a safety meeting

MODIFIED WORK OPPORTUNITIES

The Company will offer modified work opportunities, whenever possible, to employees who are unable to return to their regular duties following a workplace injury or illness. The benefits of offering modified duties include, but are not limited to, reduced Worker's Compensation costs, improved employee retention, enhanced employee morale, reduction in lost time days, and strengthening of The Company's relationship with its employees. Modified work should be meaningful to the employee as well as the company, and consistent with work restrictions outlined by the treatment provider.

Employees may be informed by communicating the company policy via a safety meeting or toolbox talk, reviewing the policy as part of the new employee orientation, and/or posting the policy in a conspicuous location, etc.

PERMANENT JOB MODIFICATIONS AND NEW POSITION ASSIGNMENTS

Permanent job modifications and new position assignments are used for employees who receive a permanent disability because of an injury. In many instances, permanent job modifications may be the same as transitional work assignments except the transitional work assignments are temporary in nature.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 271 of 407

If an employee cannot be placed in a permanently modified job, then that employee may be assigned to another position that meets the restrictions imposed upon the employee by the treating physician.

COMMUNICATIONS

The Return-to-Work Program must be effectively communicated to injured employees, affected supervisors, and preferred providers. Program communication will be achieved by the training of supervisors, safety orientation training for employees, and the distribution of program literature.

HEALTHCARE PROVIDERS

Local healthcare providers shall be advised that The Company provides modified work to injured employees, whenever practicable.

This may be accomplished by proactively deciding with clinics that specialize in Occupational Health, and recommending injured employees seek treatment there. If/when this is not practicable, a standard letter should be drafted that outlines The Company's modified work opportunities. Injured employees should take this letter with them when they visit their healthcare provider.

The Company will ensure that the modified work being offered is consistent with the medical restrictions listed by the healthcare provider. Workers must ensure that changes in the scope of the modified work must adhere to the medical restrictions. Modified work is temporary and should be managed with the goal to return the individual to full-time work as soon as deemed medically fit.

Supervisors will be made aware of the modified work restrictions for each affected employee to ensure the modified work assigned meets the physician's orders.

GUIDELINES FOR MATCHING EMPLOYEES TO ALTERNATE DUTY

- The supervisor should list all restrictions provided by the physician
- The supervisor should then list all alternate duty jobs and their wages, including regular jobs with modifications available
- The doctor's restrictions should then be matched to the best possible alternate duty. In the case where there may be a unique restriction from the physician, check the alternate duty job chosen to ensure it meets the restrictions or can be modified to meet the restriction
- Take the identified and available job description(s) that meets restrictions. Examine the wage section to ensure that none of the alternate duty jobs pays more than the original job



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 272 of 407

- Forward the job description(s) to the physician's office and the Risk Management personnel. The physician will sign off on all jobs that are appropriate and make comments as necessary for this case. The physician will forward them back to the supervisor and the Risk Management personnel
- If the physician has identified more than one job as appropriate, the best alternate duty position should be chosen to best meet The Company's needs
- The Risk Management personnel will meet with the injured employee and physicians as needed to explain the alternate duty position

The alternate duty includes transitional work assignments (limited and modified duty), permanently modified jobs, and new position assignments.

ALTERNATE DUTIES

The Company will maintain a list of available jobs to be performed for employees on modified duty. All jobs will be assessed to determine which jobs persons working under specific restrictions can perform. It is recommended that a Physical Demands Analysis (PDA) be prepared for each of these jobs to ensure workers are placed accordingly.

TRAINING

The critical link in The Company's Return to Work Program is supervisors accurately understanding their key role in this process. Therefore, supervisors should receive training that includes specific details on the Return-to-Work process and their responsibilities under this program. This training will be conducted as a one-time training with re-training every two years.

The Company shall provide work reassignment suitable to the employee's capacity. Work reassignment shall be a temporary assignment and shall not exceed 90 days without approval from The Company. When the employee reaches maximum medical improvement, The Company shall return the employee to the original position held prior to workers' compensation leave.

RECORDS

Medical records will be kept by the employer strictly on a need-to-know basis and must adhere to all applicable state and federal regulations governing patient/worker privacy. In addition, the records should be kept in a locked file.

The Company will maintain written records of incident details. This will help The Company recall information about the circumstances of the incident later and will demonstrate due diligence.

Incident investigation records will be maintained, and records should be kept of communications with the injured employee regarding modified work. Worker's Compensation and medical records, where applicable, should also be maintained.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 273 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 274 of 407

Ladder and Stairway Safety

PURPOSE

The purpose of this document is to outline the Ladder Safety Program for **Pro Painting & Drywall Inc.** hereafter referred to as "The Company." This program will establish guidelines for the safe use of ladders throughout worksites by employees, personnel, and contractors.

This safety policy and procedure is established in accordance with Occupational Safety and Health Standards for General Industry ([29 CFR 1910.25-27](#)) and Occupational Safety and Health Standards for the Construction Industry ([29 CFR 1926.1053](#)).

RESPONSIBILITIES

Managers/Unit Heads

- Ensuring that adequate funds are available and budgeted for the purchase of ladders in their areas
- Shall obtain and coordinate the required training for the affected employees
- Ensure compliance with this safety policy and procedure through their auditing process

Supervisors

- Ensuring that all ladders (fixed and portable) are regularly inspected and properly maintained
- Tagging ladders in need of repair and removing defected ladders from service for repair or destruction
- Supervisors will audit for compliance with this safety policy and procedure during their facility and jobsite audits

Employees

- Employees shall comply with all applicable guidelines contained in this safety policy and procedure
- Employees are also responsible for reporting immediately suspected unsafe conditions or ladders to their supervisor
- Shall inspect ladders before using and are to keep ladders clean and in good condition

Safety Officer

- Provide prompt assistance to managers/unit heads, supervisors, or others as applicable on any matter concerning this safety policy and procedure
- Assist in developing or securing of required training



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 275 of 407

- Provide consultative and audit assistance to ensure effective implementation of this safety policy and procedure
- Work with Purchasing Department to ensure that all newly purchased ladders comply with this safety policy and procedure and current safety regulations

TRAINING

The Company shall train all employees to recognize hazards related to ladders and stairways and instruct them to minimize these hazards.

For example, The Company shall ensure that each employee is trained by a competent person in the following areas, as applicable:

- The proper use of the ladders
- What kind of ladder to use?
- How to set up ladders
- Ladder inspection
- Proper maintenance
- Nature of fall hazards in the work area
- Correct procedures for erecting, maintaining, and disassembling the fall protection systems to be used
- Proper construction, use, placement, and care in handling of all stairways and ladders; and
- Maximum intended load-carrying capacities of ladders used.

This training shall be done upon initial employment and/or job assignment. Refresher training shall be provided to employees at the discretion of their supervisor.

Employees shall be trained to maintain the three points of contact: two hands and one foot or two feet and one hand always. Only time allowed to break 3-point contact is when the employee has reached the ground or stable platform.

LADDER HAZARDS AND SAFE USE

Ladder Hazards

There are inherent hazards associated with ladder use. Typical ladder hazards include:

- Insufficient surface resistance on ladder rungs and steps
- Ladder structural failure
- Ladders tipping sideways, backwards, or slipping out at the bottom
- Ladder spreaders not fully opened and locked, causing the ladder to “walk,” twist or close up when a load is applied to the ladder
- Using metal ladders around electricity
- Using deteriorated ladders
- Using fixed ladders without cages or fall protection



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 276 of 407

Safe Ladder Use

Employees should follow certain rules when placing, ascending, and descending ladders which include:

- Hold on with both hands when going up or down. If material must be managed, raise, or lower it with a rope either before going down or after climbing to the desired level.
- Ladders are used only on stable and level surfaces unless they are secured or stabilized to prevent accidental displacement.
- Always face the ladder when ascending or descending.
- Never slide down a ladder.
- Be sure shoes are not greasy, muddy, or slippery before climbing.
- Do not climb higher than the third rung from the top on straight or extension ladder, or the second tread from the top on stepladders. (Never stand on the top two rungs of a step ladder.)
- Carry tools on a tool belt not in the hand and never carry objects that could cause injury in the event of a fall.
- Never lean too far to the sides. Keep your belt buckle within the side rails.
- Use a 4 to 1 ratio when leaning a single or extension ladder. (Place a 12-foot ladder so that the bottom is 3 feet away from the object the ladder is leaning against.)
- Inspect ladder for defects before using.
- Non-self-supporting ladders, which must lean against a wall or other support, are to be positioned at such an angle that the horizontal distance from the top support to the foot of the ladder is about 1/4 the working length of the ladder.
- In the case of job-made wooden ladders, that angle should equal about 1/8 the working length. This minimizes the strain of the load on ladder joints that may not be as strong as on commercially manufactured ladders.
- Never use a defective ladder. Tag or mark it so that it will be repaired or destroyed.
- Never splice or lash a short ladder together.
- Never use makeshift ladders, such as cleats fastened across a single rail.
- Be sure that a stepladder is fully open, and the metal spreader locked before starting to climb.
- Keep ladders clean and free from dirt and grease.
- Never use ladders during a strong wind except in an emergency and then only when they are securely fastened.
- Never leave placed ladders unattended.
- Never use ladders as guys, braces, or skids, or for any other purpose other than their intended purposes.
- Never attempt to adjust a ladder while a user is standing on the ladder.
- Never jump from a ladder. Always dismount from the bottom rung.
- Ladders shall not be loaded beyond the maximum intended load for which they were built, nor beyond the manufacturer's rated capacity.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 277 of 407

- Ladders shall be used only for the purpose for which they were designed. Never use ladder in a horizontal position or as scaffolding, do not place ladders on top of boxes, barrels, crates, etc.

Ladders shall be used at an angle such that the horizontal distance from the top support to the foot of the ladder is approximately one-quarter of the working length of the ladder. (The distance along the ladder between the foot and the top support.)

Ladder Load Limits

There are five categories of ladder Duty Ratings:

1.	Type IAA (Extra Heavy Duty)	375 pounds
2.	Type IA (Extra Heavy Duty)	300 pounds
3.	Type I (Heavy Duty)	250 pounds
4.	Type II (Medium Duty)	225 pounds
5.	Type III (Light Duty)	200 pounds

LADDER SAFETY DEVICES

Safety devices are available for both portable and fixed ladders to prevent a climber from falling. Safety devices for portable ladders include slip-resistant bases, safety tops, and any other device to increase the ladder stability. A portable ladder positioned at a location where it may be tipped over by work activities shall be securely fastened at the bottom and top. Safety devices for fixed ladders include cages (which enclose the stairwell) or a restraint belt attached to a sliding fixture anchored to the ladder.

The Company must ensure:

- Each ladder safety system allows the employee to climb up and down using both hands and does not require that the employee continuously hold, push, or pull any part of the system while climbing. [1910.29\(i\)\(2\)](#)
- The connection between the carrier or lifeline and the point of attachment to the body harness or belt does not exceed 9 inches (23 cm). [29 CFR 1910.25-27,29](#)
- Mountings for rigid carriers are attached at each end of the carrier, with intermediate mountings spaced, as necessary, along the entire length of the carrier so the system has the strength to stop employee falls. [1910.29\(i\)\(4\)](#)
- Mountings for flexible carriers are attached at each end of the carrier and cable guides for flexible carriers are installed at least 25 feet (7.6 m) apart but not more than 40 feet apart along the entire length of the carrier. [1910.29\(i\)\(5\)](#)



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 278 of 407

- The design and installation of mountings and cable guides does not reduce the design strength of the ladder. [1910.29\(i\)\(6\)](#)
- Ladder safety systems and their support systems are capable of withstanding, without failure, a drop test consisting of an 18-inch (41-cm) drop of a 500-pound (227-kg) weight.
- Personal fall protection systems. Body belts, harnesses, and other components used in personal fall arrest systems, work positioning systems must meet the requirements of [1910.140](#).
- All ladders stand platforms with a platform height above 10 feet (3 m) have guardrails and toe boards on the exposed sides and ends of the platform.

LADDER INSPECTION

All ladders shall be maintained in a safe condition. OSHA General Industry Standard [1910.23\(b\)\(9\)](#) Ladders are inspected before initial use in each work shift, and more frequently as necessary, to identify any visible defects that could cause employee injury. Ladders shall be inspected by a competent person for visible defects on a periodic basis and after any occurrence that could affect their safe use.

An inspection program should be set up by which all ladders are inspected once every three months. Appendix B presents a general inspection form. Ladders that are weak, improperly repaired, damaged, have missing rungs, or appear unsafe shall be removed from the job or site for repair or disposal. Before discarding a wood ladder, cut it up so no one can use it again. Additionally, portable ladders must be always maintained in good condition and inspected frequently. Tag any ladders that have developed defects with DANGEROUS--DO NOT USE and remove from service for repair or disposal.

For portable wood ladders, all wood parts shall be free from sharp edges and splinters; sound and free from accepted visual inspection from shake, wane, compression failures, decay, or other irregularities. For portable metal ladders, the design shall be without structural defects or accident hazards such as sharp edges, burrs, etc. The selected metal shall be of sufficient strength to meet the test requirements and shall be protected against corrosion. For fixed ladders, all wood parts shall meet the criteria of wood ladders. All metal parts shall meet the criteria of metal ladders.

STAIRWAYS

The rules covering stairways and their components depend on how and when stairs are used. Specifically, there are rules for stairs used during construction and stairs used temporarily during construction, as well as rules governing stair rails and handrails.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 279 of 407

Stairways Used During Construction

The following requirements are applicable to all stairways used during construction:

- Stairways that will not be a permanent part of the building under construction must have landings at least 30 inches deep and 22 inches wide (76 x 56 cm) at every 12 feet (3.7 m) or less of vertical rise. Stairways must be installed at least 30 degrees—and no more than 50 degrees—from the horizontal.
- Variations in riser height or stair tread depth must not exceed 1/4 inch in any stairway system, including any foundation structure used as one or more treads of the stairs.
- Doors and gates opening directly onto a stairway must have a platform that extends at least 20 inches (51 cm) beyond the swing of the door or gate.
- Metal pan landings and metal pan treads must be secured in place before filling.
- Stairway parts must be free of dangerous projections such as protruding nails.
- Slippery conditions on stairways must be corrected.
- Workers must not use temporary spiral stairways that will not be a permanent part of the structure.

Stairways Used Temporarily During Construction

The following requirements apply to stairways used temporarily during construction:

- Do not use stairways with metal pan landings and treads if the treads and/or landings have not been filled in with concrete or other materials unless the pans of the stairs and/or landings are temporarily filled in with wood or other materials. All treads and landings must be replaced when worn below the top edge of the pan.
- Do not use skeleton metal frame structures and steps (where treads and/or landings will be installed later) unless the stairs are fitted with secured temporary treads and landings.

Note: Temporary treads must be made of wood or other solid material and installed the full width and depth of the stair.

Stair Rails

The following general requirements apply to all stair rails:

- Stairways with four or more risers or rising more than 30 inches (76 cm) in height—whichever is less—must be installed along each unprotected side or edge. When the top edge of a stair rail system also serves as a handrail, the height of the top edge must be no more than 37 inches (94 cm) nor less than 36 inches (91.5 cm) from the upper surface of the stair rail to the surface of the tread.
- Stair rails installed after March 15, 1991, must be not less than 36 inches (91.5 cm) in height.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 280 of 407

- Top edges of stair rail systems used as handrails must not be more than 37 inches (94 cm) high nor less than 36 inches (91.5 cm) from the upper surface of the stair rail system to the surface of the tread. (If installed before March 15, 1991, not less than 30 inches [76 cm]).
- Stair rail systems and handrails must be surfaced to prevent injuries such as punctures or lacerations and to keep clothing from snagging.
- Ends of stair rail systems and handrails must be built to prevent dangerous projections, such as rails protruding beyond the end posts of the system.
- Unprotected sides and edges of stairway landings must have standard 42-inch (1.1 m) guardrail systems.
- Intermediate vertical members, such as balusters used as guardrails, must not be more than 19 inches (48 cm) apart.
- Other intermediate structural members, when used, must be installed so that no openings are more than 19 inches (48 cm) wide. Screens or mesh, when used, must extend from the top rail to the stairway step and along the opening between top rail supports.
- Handrails Requirements for handrails are as follows:
 - Handrails and top rails of the stair rail systems must be able to withstand, without failure, at least 200 pounds (890 n) of weight applied within two inches (5 cm) of the top edge in any downward or outward direction, at any point along the top edge.
 - Handrails must not be more than 37 inches (94 cm) high nor less than 30 inches (76 cm) from the upper surface of the handrail to the surface of the tread. ■ Handrails must provide an adequate handhold for employees to grasp to prevent falls.
 - Temporary handrails must have a minimum clearance of three inches (8 cm) between the handrail and walls, stair rail systems and other objects.
 - Stairways with four or more risers, or that rise more than thirty inches (76 cm) in height— whichever is less—must have at least one handrail.
 - Winding or spiral stairways must have a handrail to prevent use of areas where the tread width is less than 6 inches (15 cm).

Midrails

Midrails, screens, mesh, intermediate vertical members, or equivalent intermediate structural members must be provided between the top rail and stairway steps to the stair rail system. When midrails are used, they must be located midway between the top of the stair rail system and the stairway steps.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 281 of 407

MAINTENANCE

Portable wood ladders may be coated with a water-repellent preservative to provide a suitable protective material. Metal ladders and metal parts on wood ladders should be corrosion-resistant and kept free from nicks. If nicks occur, they should be promptly treated to prevent metal fatigue due to rust.

Portable and fixed ladders with structural defects, such as, but not limited to, broken or missing rungs, cleats, or steps, broken or split rails, corroded components, or other faulty or defective components, shall either be immediately marked in a manner that readily identifies them as defective, or be tagged with "Do Not Use" or similar language, and shall be withdrawn from service until repaired.

The ladder side rails shall extend at least 3 feet (.9m) above the upper landing surface. When ladders are not able to be extended then the ladder shall be secured at its top to a rigid support that will not deflect.

LADDER INSPECTION CHECKLISTS

Ladder rungs, cleats, and steps shall be parallel, level, and uniformly spaced, when the ladder is in position. Ladders used by the company's employees must meet OSHA/ANSI specifications. [29 CFR 1926.1053 \(a\) \(1-27\)](#)

Ladders used by company employees meet the requirements of the Occupational Safety and Health Administration (OSHA) and the American National Standards Institute (ANSI). Ladder rungs, cleats, and steps shall be parallel, level, and uniformly spaced, when the ladder is in position for use. Rungs, cleats, and steps of portable ladders and fixed ladders (including individual rung/step ladders) shall be spaced not less than 10 inches apart, nor more than 14 inches apart, as measured between center lines of the rungs, cleats, and steps. Rungs, cleats, and steps of step stools shall be not less than eight inches apart, nor more than 12 inches apart, as measured between center lines of the rungs, cleats, and steps. Rungs, cleats, and steps of the base section of extension trestle ladders shall not be less than eight inches nor more than 18 inches apart, as measured between center lines of the rungs, cleats, and steps. The rung spacing on the extension section of the extension trestle ladder shall be not less than 6 inches nor more than 12 inches, as measured between center lines of the rungs, cleats, and steps. The minimum clear distance between the sides of individual-rung/step ladders and the minimum clear distance between the side rails of other fixed ladders shall be 16 inches. The minimum clear distance between side rails for all portable ladders shall be 11 1/2 inches. The rungs of individual-rung/step ladders shall be shaped such that employees' feet cannot slide off the end of the rungs. The rungs and steps of portable metal ladders shall be corrugated, knurled, dimpled, coated with skid-resistant material, or otherwise treated to minimize slipping.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 282 of 407

All Ladders

- ✓ Loose steps or rungs are considered loose if they can be moved at all with the hand
- ✓ Loose nails, screws, bolts, or other metal parts
- ✓ Cracked, split, or broken uprights, braces, steps, or rungs
- ✓ Slivers on uprights, rungs, or steps
- ✓ Damaged or worn non-slip bases
- ✓ Rusted or corroded spots

Stepladders

- ✓ Wobbly from side strain
- ✓ Loose or bent hinge spreaders
- ✓ Stop on hinge spreaders broken
- ✓ Broken, split, or worn steps
- ✓ Loose hinges

Extension Ladders

- ✓ Loose, broken, or missing extension locks
- ✓ Defective locks that do not seat properly when the ladder is extended
- ✓ Deterioration of rope, from exposure to weather, acid, or other destructive agents

Fixed Ladders

- ✓ Loose, worn, or damaged rungs or side rails
- ✓ Damaged or corroded parts of cage
- ✓ Corroded bolts and rivet heads on inside of metal stacks
- ✓ Damaged or corroded handrails or brackets on platforms
- ✓ Weakened or damaged rungs on brick or concrete slabs
- ✓ Base of ladder obstructed

DEFINITIONS

Cage - A guard that may be referred to as a cage or basket guard which is an enclosure that is fastened to the side rails of the fixed ladder or to the structure to encircle the climbing space of the ladder for the safety of the person who must climb the ladder.

Extension Ladder - Non-self-supporting portable ladder adjustable in length. It consists of two or more sections traveling in guides or brackets so arranged as to permit length adjustment. Its size is designated by the sum of the lengths of the sections measured along the side rails.

Fixed Ladder - Ladder permanently attached to a structure, building, or equipment.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 283 of 407

Individual-Rung Ladder - Fixed ladder each rung of which is individually attached to a structure, building, or equipment.

Ladder - An appliance usually consisting of two side rails joined at regular intervals by cross-pieces called steps, rungs, or cleats, on which a person may step in ascending or descending.

Ladder Safety Device - Device, other than a cage or well, designed to eliminate or reduce the possibility of accidental falls and which may incorporate such features as life belts, friction brakes, and sliding attachments.

Pitch - The included angle between the horizontal and the ladder, measured on the opposite side of the ladder from the climbing side.

Platform Ladder - A self-supporting ladder of fixed size with a platform provided at the working level. The size is determined by the distance along the front rail from the platform to the base of the ladder.

Rail Ladder - Fixed ladder consisting of side rails joined at regular intervals by rungs or cleats and fastened in full length or in sections to a building, structure, or equipment.

Railings - A railing is any one or a combination of those railings constructed in accordance with OSHA Standard 29 CFR [1910.23](#). A standard railing is a vertical barrier erected along exposed edges of floor openings, wall openings, ramps, platforms, and runways to prevent falls of persons.

Rungs - Ladder cross-pieces of circular or oval cross-section on which a person may step in ascending or descending.

Section Ladder - Non-self-supporting portable ladder, nonadjustable in length, consisting of two or more sections of ladder so constructed that the sections may be combined to function as a single ladder. Its size is designated by the overall length of the assembled sections.

Side-Step Ladder - A ladder in which an individual getting off at the top must step sideways to reach the landing.

Single Ladder - Non-self-supporting portable ladder, nonadjustable in length, consisting of but one section. Its size is designated by the overall length of the side rail.

Special-Purpose Ladder - Portable ladder which represents either a modification or a combination of design or construction features in one of the general-purpose types of ladders previously defined, to adapt the ladder to special or specific uses.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 284 of 407

Stepladder - Self-supporting portable ladder, nonadjustable in length, having flat steps and a hinged back. Its size is designated by the overall length of the ladder measured along the front edge of the side rails.

Steps - Flat cross-pieces of a ladder on which a person may step in ascending or descending.

Through Ladder - A ladder in which an individual getting off at the top must step through to reach the landing.

Well - A permanent complete enclosure around a fixed ladder, which is attached to the walls of the well. Proper clearances for a well will give the person who must climb the ladder the same protection as a cage.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 285 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 286 of 407

Lead (Awareness and Abatement)

PURPOSE

To outline safety procedures, exposure limits and general awareness surrounding potential Lead exposure for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company."

RESPONSIBILITIES

The Company

It is the responsibility of The Company to meet at a minimum the OSHA Standards 29 CFR 1910.1025 and 29 CFR 1926.62 and provide training and education to employees and the implementation of lead awareness and procedures.

Supervisors

- Ensure employees are properly trained on awareness and procedures before beginning work where there is a potential exposure to lead
- Ensure employees are wearing the proper protective clothing and fit with the correct respirator (if applicable)
- Shall identify any potential employee exposure to lead
- Implement engineering and administrative controls

Employees

- Follow all operational and lead safety procedures
- Conduct operations in accordance with company provided training
- Immediately report to a supervisor any deficiency in engineering or administrative controls
- Properly use, store, and dispose of issued and assigned personal protective clothing
- Abide by any signs/labels/assessment reports indicating the presence of lead containing materials

POLICY

It is the policy of The Company to ensure proper training and education pertaining to lead and to ensure all employees are provided with proper facilities and provided with a work environment safe from hazards.

SCOPE

Construction projects vary in their scope and potential for exposing workers to lead and other hazards.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 287 of 407

Projects such as removing paint from a few interior residential doors may involve limited exposure. Others projects, however, may involve removing or stripping substantial quantities of lead-based paints on large bridges and other structures.

This section applies to all construction work where an employee may be occupationally exposed to lead. All construction work excluded from coverage in the general industry standard for lead by CFR 1910.1025 is covered by this standard CFR 1926.62. Construction work is defined as work for construction, alteration and/or repair, including painting and decorating. It includes but is not limited to the following:

- Demolition or salvage of structures where lead or materials containing lead are present
- Removal or encapsulation of materials containing lead
- New construction, alteration, repair, or renovation of structures, substrates, or portions thereof, that contain lead, or materials containing lead
- Installation of products containing lead
- Lead contamination/emergency cleanup
- Transportation, disposal, storage, or containment of lead or materials containing lead on the site or location at which construction activities are performed
- Maintenance operations associated with the construction activities

Employees who are not past awareness level training for Lead exposures must abide by any signs/labels/assessment reports indicating the presence of lead containing materials. Appropriate work practices must be followed to ensure the lead containing materials are not disturbed by those not trained to handle it.

LEAD ABATEMENT ACTIVITIES (COMMERCIAL/INSTITUTIONAL AND RESIDENTIAL)

These miscellaneous activities occur in conjunction with lead abatement or in-place management activities (dry hand-scraping, removal, and replacement of building components, heat-gun removal, chemical stripping of lead-based paint, and encapsulation). These ancillary activities include washing, HEPA vacuuming, enclosure set-up and tear-down, and waste disposal.

Engineering Controls

Engineering measures include:

- Exhaust ventilation
- Process and equipment modification
- Material substitution
- Component replacement
- Isolation or automation



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 288 of 407

Work Practice Controls

Surfaces and debris should be kept moist when they are being disturbed. Before sweeping or vacuuming, dust and debris should be misted with water to reduce airborne dust. Plastic sheeting should also be misted with water before handling to reduce dust. All retained liquid waste should be poured through a filter cloth to remove paint chips and other debris prior to disposal. Filtered materials as well as other waste and debris should be placed in appropriately labeled, 6-mil plastic bags or sealed containers suitable for the transport of lead waste and stored in a secure area pending disposal in accordance with State and/or local requirement.

HAZARDS

Pure lead (Pb) is a heavy metal at room temperature and pressure and is a basic chemical element. It can combine with various other substances to form numerous lead compounds.

The Permissible Exposure Limit (PEL) set by OSHA is 50 micrograms of lead per cubic meter of air (50 ug/m³), averaging over an 8-hour workday. No employee shall be exposed to more than 50 µg/m³ of air as a permissible exposure limit.

Lead can be absorbed by inhalation (breathing) and ingestion (eating). Lead is not absorbed through your skin. When lead is scattered in the air as dust, fume or mist it can be inhaled and absorbed through the lungs and upper respiratory tract. Lead can also be absorbed through the digestive system if swallowed.

Handling food, cigarettes, chewing tobacco, or make-up which have lead contamination or handling them with hands contaminated with lead, will contribute to ingestion.

Some locations of lead containing materials are leaded paints, leaded solders, pipes, batteries, circuit boards, cathode ray tubes, leaded glass, and demolition/salvage materials.

A significant portion of inhaled or ingested lead goes into the blood stream. Once in the blood stream, lead is circulated throughout the body and stored in various organs and body tissues. Some of this lead is quickly filtered out of the body and excreted, but some remains in the blood and other tissues. As exposure to lead continues, the amount stored in the body will increase. Lead stored in body tissues can cause irreversible damage, first to individual cells, then to organs and whole-body systems.

Short Term Effects of Overexposure to Lead

Lead is a potent, systemic poison. Taken in large enough doses, lead can kill in a matter of days. A condition affecting the brain called acute encephalopathy may arise which develops quickly to seizures, coma, and death from cardiorespiratory arrest. There is no sharp dividing line between rapidly developing acute effects of lead, and chronic effects which take longer to acquire. Lead adversely affects numerous body systems and causes forms of health impairment and disease which arise after periods of exposure as short as days or if several years.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 289 of 407

Common symptoms of acute lead poisoning are loss of appetite, nausea, vomiting, stomach cramps, constipation, difficulty in sleeping, fatigue, moodiness, headache, joint or muscle aches, and anemia. Long term (chronic) overexposure to lead may result in severe damage to the blood-forming, nervous, urinary, and reproductive systems.

Long term Effects of Overexposure to Lead

Chronic overexposure to lead may result in severe damage to blood-forming, nervous, urinary, and reproductive systems.

Some common symptoms of chronic overexposure include loss of appetite, metallic taste in the mouth, anxiety, constipation, nausea, pallor, excessive tiredness, weakness, insomnia, headache, nervous irritability, muscle and joint pain or soreness, fine tremors, numbness, dizziness, hyperactivity, and colic. In lead colic there may be severe abdominal pain.

Reproductive Risks

Lead is toxic to both male and female reproductive systems. Lead can alter the structure of sperm cells and there is evidence of miscarriage and stillbirth in women exposed to lead or whose partners have been exposed. Children born to parents who were exposed to excess lead levels are more likely to have birth defects, mental retardation, or behavioral disorders or to die during the first year of childhood.

Workers who desire medical advice about reproductive issues related to lead should contact qualified medical personnel to arrange for a job evaluation and medical follow-up, particularly if they are pregnant or actively seeking to have a child. Employees who may be exposed to lead and who have been contacted by employees with concerns about reproductive issues must make medical examinations and consultations available.

Chelating Agents

Under certain limited circumstances, a physician may prescribe special drugs called chelating agents to reduce the amount of lead absorbed in body tissues. Using chelation as a preventive measure, to lower blood level but continue to expose a worker is prohibited. Therapeutic or diagnostic chelation's of lead that are required must be done under the supervision of a licensed physician in a clinical setting, with thorough and appropriate medical monitoring. The employee must be notified in writing before treatment of potential consequences and allowed to obtain a second opinion.

EXPOSURE LIMITS

The standard establishes maximum limits of exposure to lead for all workers covered, including a permissible exposure limit (PEL) and action level (AL). The PEL sets the maximum worker exposure to lead: 50 micrograms of lead per cubic meter of air (50µg/m³) averaged over an 8-hour period.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 290 of 407

If employees are exposed to lead for more than 8 hours in a workday, their allowable exposure as a TWA for that day must be reduced according to the formula below.

Employee exposure (in $\mu\text{g}/\text{m}^3$) = 400 divided by the hours worked in the day

Action Level (AL), regardless of respirator use, is an airborne concentration of $30\mu\text{g}/\text{m}^3$, averaged over an 8-hour period. The AL is the level at which an employer must begin specific compliance activities outlined in the standard.

EXPOSURE ASSESSMENT

The Company shall determine if any employee may be exposed to lead at or above the Action Level (AL). Employee exposure is that exposure which would occur if the employee were not using a respirator.

Where monitoring is required, The Company shall collect personal samples representative of a full shift including at least one sample for each job classification in each work area either for each shift or for the shift with the highest exposure level. Full shift personal samples shall be representative of the monitored employee's regular, daily exposure to lead

PROTECTION OF EMPLOYEES DURING ASSESSMENT OF EXPOSURE

When The Company performs an employee exposure assessment and documents that the employee performing any of the listed tasks is not exposed above the PEL, The Company shall treat the employee as if the employee were exposed above the PEL, and not more than ten (10) times the PEL and shall implement employee protective measures. The tasks covered by this requirement are for certain tasks prone to produce high lead exposure. These include:

- Manual demolition of structures such as dry wall, manual scraping, manual sanding, and use of a heat gun where lead containing coatings or paints are present
- Power tool cleaning with or without local exhaust ventilation
- Spray painting with lead-containing paint
- Lead burning
- Use of lead-containing mortar
- Abrasive blasting, rivet busting, welding, cutting, or torch burning on any structure where lead-containing coatings or paint are present
- Abrasive blasting enclosure movement and removal
- Cleanup of activities where dry expendable abrasives are used
- Any other task the employer believes may cause exposures in excess of the PEL

If The Company has any reason to believe that an employee performing the task may be exposed to lead in excess of the PEL, until The Company performs an employee exposure assessment and documents that the employee's lead exposure is not above the PEL The Company shall treat the



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 291 of 407

employee as if the employee were exposed above the PEL and shall implement employee protective measures.

When The Company performs an employee exposure assessment and documents that the employee performing a task is not exposed more than 500 $\mu\text{g}/\text{m}^3$, The Company shall treat the employee as if the employee were exposed to lead more than 500 $\mu\text{g}/\text{m}^3$ and shall implement employee protective measures. If The Company does establish that the employee is exposed to levels of lead below 500 $\mu\text{g}/\text{m}^3$, The Company may provide the exposed employee with the appropriate respirator prescribed for such use at such lower exposures.

The tasks covered by this requirement are:

- Using lead containing mortar; lead burning
- Where lead containing coatings or paint are present:
 - Rivet busting
 - Power tool cleaning without dust collection systems
 - Cleanup activities where dry expendable abrasives are used
 - Abrasive blasting enclosure movement and removal

Once The Company performs an employee exposure assessment and documents that the employee performing the tasks is not exposed to lead in excess of 2,500 $\mu\text{g}/\text{m}^3$ (50 \times PEL), The Company shall treat the employee as if the employee were exposed to lead in excess of 2,500 $\mu\text{g}/\text{m}^3$ and shall implement employee protective measures. If The Company does establish that the employee is exposed to levels of lead below 2,500 $\mu\text{g}/\text{m}^3$, The Company may provide the exposed employee with the appropriate respirator prescribed for use at such lower exposures. Protection is required where lead containing coatings or paint are present on structures when performing:

- Abrasive blasting
- Welding
- Cutting, and Torch burning

The Company performs an employee exposure assessment and determines actual employee exposure, The Company shall provide to employee's protection as follows:

- Respiratory protection
- Personal protective clothing and equipment
- Change areas
- Hand washing facilities
- Biological monitoring to consist of blood sampling and analysis for lead and zinc protoporphyrin levels
- Training regarding Hazard Communication, use of respirators, and safety training and education



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 292 of 407

BASIS OF INITIAL DETERMINATION

The Company shall monitor employee exposures and shall base initial determinations on the employee exposure monitoring results and any of the following, relevant considerations:

- Any information, observations, or calculations which would indicate employee exposure to lead
- Any previous measurements of airborne lead
- Any employee complaints of symptoms which may be attributable to exposure to lead

AIR MONITORING

Initial Determination

The Company has made an initial determination of lead work areas and exposure levels and will conduct subsequent "initial determinations" in the event of changes to hazard control methods or operational processes that affect employee or environmental exposure. Initial determinations are conducted to determine if any employee may be exposed to lead at or above the action level of 30 micrograms per cubic meter of air (30 ug/m (3)) but below the permissible exposure limit (PEL) of 50 µg/m³.

Where a determination is made that no employee is exposed to airborne concentrations of lead at or above the action level, the company shall maintain a written record. The record shall include quantitative sampling data, date of determination, location within the worksite, and the name and social security number of each employee monitored.

Air Monitoring Requirements

- Monitoring and analysis methods shall have an accuracy (to a confidence level of 95%) of not less than plus or minus 20 percent for airborne concentrations of lead equal to or greater than 30 ug/m (3).
- Where a determination shows the possibility of any employee exposure at or above the action level, the company shall conduct monitoring which is representative of the exposure for each employee in the workplace or process area who is exposed to lead.
- For the purposes of monitoring requirements, employee exposure is that exposure which would occur if the employee were not using a respirator.
- Monitoring and sample collection shall cover full shift (for at least 7 continuous hours) personal samples including at least one sample for each shift for each job classification in each work area.
- Full shift personal samples must be representative of the monitored employee's regular, daily exposure to lead.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 293 of 407

If the initial determination or subsequent air monitoring reveals employee exposure to be at or above the action level but below the permissible exposure limit The Company shall repeat air monitoring at least every 6 months.

The Company shall continue air monitoring at the required frequency until at least two consecutive measurements, taken at least 7 days apart, are below the action level at which time The Company may discontinue monitoring for that employee.

Monitoring Frequency

- **At or Above Action Level and Below PEL** – Every 6 months if the initial determination or subsequent monitoring reveals employee exposure to be at or above the action level but below the permissible exposure limit. This monitoring (6-month frequency) will continue until at least two consecutive measurements, taken at least 7 days apart, are below the action level. Initial monitoring is above the OSHA action level
- **Above PEL** – If the initial monitoring reveals that employee exposure is above the permissible exposure limit the company will repeat monitoring quarterly. Quarterly monitoring will continue until at least two consecutive measurements, taken at least 7 days apart, are below the PEL but at or above the action level
- Upon achieving such control, the company may cease the 6-month monitoring for the affected employees.

Additional Monitoring

Whenever there has been a production, process, control, or personnel change which may result in new or additional exposure to lead, or whenever any other reason to suspect a change which may result in new or additional exposures to lead, additional monitoring will be conducted.

Employee Notifications of Monitoring Results

Affected employees shall be notified of the results of any monitoring performed within 15 working days, either individually in writing or by posting the results in an appropriate location that is accessible to affected employees.

Whenever the results indicate that the representative employee exposure, without regard to respirators, exceeds the permissible exposure limit, in the written notice shall be included a statement that the permissible exposure limit was exceeded, and a description of the corrective action taken or to be taken to reduce exposure to or below the permissible exposure limit.

OBSERVATION OF MONITORING

The company provides affected employees or their designated representatives an opportunity to observe any monitoring of employee exposure to lead.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 294 of 407

Observation Procedures

Whenever observation of the monitoring of employee exposure to lead requires entry into an area where the use of respirators, protective clothing or equipment is required, the company will provide the observer with and assure the use of respirators, clothing and equipment required, and will require the observer to comply with all other applicable safety and health procedures.

Without interfering with the monitoring, observers are entitled to:

- Receive an explanation of the measurement procedures
- Observe all steps related to the monitoring of lead performed at the place of exposure
- Record the results obtained or receive copies of the results when returned by the laboratory

BIOLOGICAL MONITORING

Blood lead and ZPP Level Sampling and Analysis

The Company shall make available biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels to each employee at least every 2 months for the first 6 months and every 6 months thereafter.

The Company shall notify each employee whose blood lead level is at or above 40 $\mu\text{g/dl}$ that the standard requires temporary medical removal with Medical Removal Protection benefits when an employee's blood lead level is at or above the numerical criterion for medical removal. For each employee who is removed from exposure to lead due to an elevated blood lead level at least monthly during the removal period.

Follow-up Blood Sampling Tests

Whenever the results of a blood lead level test indicate that an employee's blood lead level is at or above the numerical criterion for medical removal. The Company shall provide a second (follow-up) blood sampling test within two weeks after receiving the results of the first blood sampling test.

Accuracy of Blood Lead Level Sampling and Analysis

Blood lead level sampling and analysis provided pursuant to this section shall have an accuracy (to a confidence level of 95 percent) within plus or minus 15 percent or 6 $\mu\text{g/dl}$, whichever is greater, and shall be conducted by a laboratory approved by OSHA.

Employee Notification

Within five working days after the receipt of biological monitoring results, The Company shall notify each employee in writing of his or her blood lead.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 295 of 407

The Company shall notify each employee whose blood lead level is at or above 40 [mu]g/dl that the standard requires temporary medical removal with Medical Removal Protection benefits when an employee's blood lead level exceeds the numerical criterion for medical removal.

WARNING SIGNS

Proper signs will be posted at the entrance and exits to all lead hazard areas.

No other signs or statements may appear on or near any lead hazard sign which contradicts or detracts from the meaning of the required sign. All lead hazard signs will be kept illuminated and cleaned as necessary so that the legend is readily visible.

The Company shall post the following warning signs in each work area where the PEL is exceeded:

DANGER
MAY DAMAGE FERTILITY OR THE UNBORN CHILD
CAUSES DAMAGE TO THE CENTRAL NERVOUS SYSTEM
DO NOT EAT, DRINK OR SMOKE IN THIS AREA

Prior to June 1, 2016, employers may use the following legend in lieu of that specified above:

WARNING
LEAD WORK AREA POISON
NO SMOKING OR EATING

ENGINEERING CONTROLS

Where any employee is exposed to lead above the permissible exposure limit for more than 30 days per year, The Company shall implement feasible engineering and work practice controls (including administrative controls) to reduce and maintain employee exposure to lead.

Wherever the engineering and work practice controls which can be instituted are not sufficient to reduce employee exposure to or below the permissible exposure limit, The Company shall still use them to reduce exposures to the lowest feasible level and shall supplement them using respiratory protection.

Where any employee is exposed to lead above the permissible exposure limit, but for 30 days or less per year, The Company shall implement engineering controls to reduce exposures to 200 ug/m(3), but thereafter may implement any combination of engineering, work practice (including administrative controls), and respiratory controls to reduce and maintain employee exposure to lead to or below 50 ug/m(3).



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 296 of 407

EXHAUST VENTILATION

The Company shall equip power tools used to remove lead-based paint with dust collection shrouds or other attachments so that paint is exhausted through a high-efficiency particulate air (HEPA) vacuum system. For operations such as welding, cutting/burning, or heating, use local exhaust ventilation. Use HEPA vacuums during cleanup operations.

For abrasive blasting operations, The Company shall build a containment structure that is designed to optimize the flow of clean ventilation air past the workers' breathing zones. This will help reduce the exposure to airborne lead and increase visibility.

Maintain the affected area under negative pressure to reduce the chances that lead dust will contaminate areas outside the enclosure. Equip the containment structure with an adequately sized dust collector to control emissions of particulate matter into the environment.

When ventilation is used to control exposure, measurements which demonstrate the effectiveness of the system in controlling exposure, such as capture velocity, duct velocity, or static pressure shall be made at least every 3 months. Measurements of the system's effectiveness in controlling exposure shall be made within 5 days of any change in production, process, or control which might result in a change in employee exposure to lead.

Recirculation of Air

If air from exhaust ventilation is recirculated into the workplace, the system must include:

- A high efficiency filter with reliable back-up filter
- Controls to monitor the concentration of lead in the return air and to bypass the recirculation system automatically if it fails are installed, operating, and maintained

ENCAPSULATION OF MATERIALS CONTAINING LEAD

To reduce the lead inhalation or ingestion hazard posed by lead-based paint is to encapsulate it with a material that bonds to the surface, such as acrylic or epoxy coating or flexible wall coverings. Another option is to enclose it using systems such as gypsum wallboard, plywood paneling, and aluminum, vinyl, or wood exterior siding. Floors coated with lead-based paint can be covered using vinyl tile or linoleum.

The building owner or other responsible person should oversee the custodial and maintenance staffs and contractors during all activities involving enclosed or encapsulated lead-based paint. This will minimize the potential for an inadvertent lead release during maintenance, renovation, or demolition.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 297 of 407

SUBSTITUTION

Choose materials and chemicals that do not contain lead for construction projects. Among the options are:

- Use zinc-containing primers covered by an epoxy intermediate coat and polyurethane topcoat instead of lead-containing coatings
- Substitute mobile hydraulic shears for torch cutting under certain circumstances
- Consider surface preparation equipment such as needle guns with multiple reciprocating needles completely enclosed within an adjustable shroud, instead of abrasive blasting under certain conditions. (The shroud captures dust and debris at the cutting edge and can be equipped with a HEPA vacuum filtration with a self-drumming feature.)
 - One such commercial unit can remove lead-based paint from flat steel and concrete surfaces, outside edges, inside corners, and pipes.
- Choose chemical strippers in lieu of hand scraping with a heat gun for work on building exteriors, surfaces involving carvings or molding, or intricate iron work. Chemical removal generates less airborne lead dust. (Be aware, however, that these strippers themselves can be hazardous and that the employer must review the safety data sheets (SDSs) for these stripping agents to obtain information on their hazards.)

COMPONENT REPLACEMENT

Replace lead-based painted building components such as windows, doors, and trim with new components free of lead-containing paint. Another option is to remove the paint off site and then repaint the components with zinc-based paint before replacing them.

PROCESS OR EQUIPMENT MODIFICATION

When applying lead paints or other lead-containing coatings, use a brush or roller rather than a sprayer. This application method introduces little or no paint mist into the air to present a lead inhalation hazard. (Note that there is a ban on the use of lead-based paint in residential housing.)

Use non-silica-containing abrasives such as steel or iron shot/ grit sand instead of sand in abrasive blasting operations when practical. The free silica portion of the dust presents a respiratory health hazard.

When appropriate for the conditions, choose blasting techniques that are less dusty than open-air abrasive blasting. These include hydro/wet-blasting using high-pressure water with or without an abrasive or surrounding the blast nozzle with a ring of water, and vacuum blasting where a vacuum hood for material removal is positioned around the exterior of the blasting nozzle.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 298 of 407

When using a heat gun to remove lead-based paints in residential housing units, be sure it is of the flameless electrical softener type. Heat guns should have electronically controlled temperature settings to allow usage below 700 degrees F. Equip heat guns with various nozzles to cover all common applications and to limit the size of the heated work area.

When using abrasive blasting with a vacuum hood on exterior building surfaces, ensure that the configuration of the heads on the blasting nozzle match the configuration of the substrate so that the vacuum is effective in containing debris.

Ensure that HEPA vacuum cleaners have the appropriate attachments for use on unusual surfaces. Proper use of brushes of various sizes, crevice and angular tools, when needed, will enhance the quality of the HEPA-vacuuming process and help reduce the amount of lead dust released into the air.

ISOLATION

Although it is not feasible to enclose and ventilate some abrasive blasting operations completely, it is possible to isolate many operations to help reduce the potential for lead exposure.

Isolation consists of keeping employees not involved in the blasting operations as far away from the work area as possible, reducing the risk of exposure.

HOUSEKEEPING

Lead is a cumulative and persistent toxic substance that poses a serious health risk. A rigorous housekeeping program and the observance of basic personal hygiene practices will minimize employee exposure to lead. In addition, these two elements of the worker protection program help prevent workers from taking lead contaminated dust out of the worksite and into their homes where it can extend the workers' exposures and potentially affect their families' health.

All surfaces shall be maintained as free as practicable of accumulations of lead. The Company shall implement a regular schedule to remove accumulations of lead dust and lead-containing debris. The schedule should be adapted to exposure conditions at a particular worksite.

Vacuuming lead dust with HEPA-filtered equipment or wetting the dust with water before sweeping are effective control measures.

Compressed air may not be used to remove lead from contaminated surfaces unless a ventilation system is in place to capture the dust generated by the compressed air.

All lead-containing debris and contaminated items accumulated for disposal shall be placed into sealed, impermeable bags or other closed impermeable containers. Label bags and containers as lead-containing waste. These measures provide additional help in controlling exposure.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 299 of 407

HYGIENE FACILITIES AND PRACTICES

Company employees are instructed to wash their hands and face thoroughly if contact is made with materials containing lead. The Company shall ensure workers practice personal hygiene such as washing their hands and face after work and before eating to minimize their exposure to lead. Provide and ensure that workers use washing facilities. Provide clean change areas and readily accessible eating areas. If possible, provide a parking area where cars will not be contaminated with lead.

These measures reduce workers' exposure to lead and the likelihood that they will ingest it or take exposure beyond the worksite.

Reducing the movement of lead from the worksite provides added protection to employees and their families.

Change Areas

The Company shall provide a clean change area for employees whose airborne exposure to lead is above the PEL. The area must be equipped with storage facilities for street clothes and a separate area with facilities for the removal and storage of lead-contaminated protective work clothing and equipment. This separation prevents cross-contamination of the employee's street and work clothing.

Employees must use a clean change area for taking off street clothes, suiting up in clean protective work clothing, donning respirators before beginning work, and dressing in street clothes after work. No lead-contaminated items should enter this area.

Work clothing must not be worn away from the jobsite. Under no circumstances should lead-contaminated work clothes be laundered at home or taken from the worksite, except to be laundered professionally or for disposal following applicable federal, state, and local regulations.

Showers and Wash Facilities

When feasible, The Company shall provide showers to employees whose airborne exposure to lead is above the permissible exposure limit so they can shower before leaving the worksite.

Where showers are provided, employees must change out of their work clothes and shower before changing into their street clothes and leaving the worksite. If employees do not change into clean clothing before leaving the worksite, they may contaminate their homes and automobiles with lead dust, extending their exposure and exposing other members of their household to lead. Employees who work in areas where their airborne exposure to lead is above the PEL must shower at the end of each work shift.

In addition, The Company shall provide adequate washing facilities for their workers. These facilities must be close to the worksite and furnished with water, soap, and clean towels so



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 300 of 407

employees can remove lead contamination from their skin. Contaminated water from washing facilities and showers must be disposed of in accordance with applicable local, state, or federal regulations.

Lunchrooms

Separate lunchroom facilities are provided for employees who work in areas where their airborne exposure to lead is above the PEL. These facilities are temperature controlled, have positive pressure and filtered air supply, and are readily accessible to employees. All affected employees must wash their hands and face prior to eating, drinking, smoking, or applying cosmetics in the lunchroom area. Employees may not enter lunchroom facilities with protective work clothing or equipment unless surface lead dust has been removed by vacuuming, down draft booth, or other cleaning method.

Lavatories

An adequate number of separate lavatory facilities are maintained for employees who work in lead-controlled process areas.

END OF DAY PROCEDURES

The Company shall ensure that workers who are exposed to lead above the permissible exposure limit follow these procedures at the end of their workday:

- Place contaminated clothes, including work shoes and personal protective equipment to be cleaned, laundered, or disposed of, in a properly labeled closed container
- Take a shower and wash their hair. Where showers are not provided, employees must wash their hands and face at the end of the work shift
- Change into street clothes in clean change areas

PERSONAL PROTECTIVE EQUIPMENT (PPE)

If an employee is exposed to lead above the PEL, without regard to the use of respirators or where the possibility of skin or eye irritation exists, The Company will provide at no cost to the employee appropriate protective work clothing and equipment such as, but not limited to:

- Coveralls or similar full-body work clothing
- Gloves, hats, and shoes or disposable shoe coverlets
- Face shields, vented goggles, or other appropriate protective equipment
- Welding or abrasive blasting helmets
- Respirators

Protective clothing shall be cleaned and laundered at least weekly. Clothing shall also be properly disposed and repaired or replaced, as necessary.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 301 of 407

Cleaning and Replacement

The Company will:

- Provide the protective clothing in a clean and dry condition at least weekly, and daily to employees whose exposure levels without regard to a respirator are over 200 ug/m (3) of lead as an 8-hour TWA
- Provide for the cleaning, laundering, or disposal of protective clothing and equipment
- Repair or replace required protective clothing and equipment as needed to maintain their effectiveness
- Ensure that all protective clothing is removed at the completion of a work shift only in change rooms provided for that purpose
- Ensure that contaminated protective clothing which is to be cleaned, laundered, or disposed of, is placed in a closed container in the change-room which prevents dispersion of lead outside the container
- Inform in writing any person who cleans or launders protective clothing or equipment of the potentially harmful effects of exposure to lead
- Ensure that the containers of contaminated protective clothing and equipment are labeled as follows:

**CAUTION: CLOTHING CONTAMINATED WITH LEAD
DO NOT REMOVE DUST BY BLOWING OR SHAKING
DISPOSE OF LEAD CONTAMINATED WASH WATER
IN ACCORDANCE WITH APPLICABLE
LOCAL, STATE, OR FEDERAL REGULATIONS**

- Prohibit the removal of lead from protective clothing or equipment by blowing, shaking, or any other means which disperses lead into the air.

Employees must leave the respirator use area to wash their faces and respirator facepieces, as necessary. In addition, The Company may require their employees to use HEPA vacuuming, damp wiping, or another suitable cleaning method before removing a respirator to clear loose particle contamination on the respirator and at the face-mask seal.

RESPIRATORY PROTECTION

Although engineering and work practice controls are the primary means of protecting workers from exposure to lead, source control at construction sites sometimes is insufficient to control exposure.

In these cases, airborne lead concentrations may be high or may vary widely. Respirators often must be used to supplement engineering controls and work practices to reduce worker lead exposures below the PEL. When respirators are required, The Company shall provide them at no cost to workers.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 302 of 407

When respirators are used to supplement engineering and work practice controls to comply with the PEL and all other requirements have been met, employee exposure, for the purpose of determining compliance with the PEL, may be at the level provided by the protection factor of the respirator for those periods the respirator is worn. Those periods may be averaged with exposure levels during periods when respirators are not worn to determine the employee's daily TWA exposure. The respiratory protection program will be conducted in accordance with 29 CFR 1910.134. The Company shall provide a powered air-purifying respirator when an employee chooses to use this type of respirator and such a respirator provides adequate protection to the employee.

Employees must be provided with a full face-piece respirator instead of half mask respirators for protection against lead aerosols that cause eye or skin irritation at the use concentrations. b) HEPA filters for powered and non-powered air-purifying respirators.

Powered air-purifying respirator (PAPR) instead of a negative pressure respirator when an employee chooses to use a PAPR, and it provides adequate protection to the employee.

The company prohibits the use of half mask respirators as protection against lead aerosols that may cause skin or eye irritation.

Respirators must be used during:

- Periods necessary to install or implement engineering or work-practice controls
- Work operations for which engineering, and work-practice controls are not sufficient to reduce employee exposures to or below the permissible exposure limit
- In emergencies
- Periods when an employee requests a respirator

Respiratory Protection Program for Lead

When respirators are required at a worksite, The Company shall implement a respiratory protection program in accordance with the OSHA standard on respiratory protection, 29 CFR 1910.134.

At a minimum, an acceptable respirator program for lead must include:

- Procedures for selecting respirators appropriate to the hazard
- Fit testing procedures
- Procedures for proper use of respirators in routine and foreseeable emergency situations, including cartridge change schedules
- Procedures and schedules for cleaning, disinfecting, storing, inspecting, repairing, discarding, and otherwise maintaining respirators
- Training of employees in the respiratory hazard to which they are potentially exposed during routine and emergency situations



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 303 of 407

- Training of employees in the proper use of respirators, including putting on and removing them, any limitations of their use, and their maintenance
- Procedures for regularly evaluating the effectiveness of the program
- Procedures to ensure air quality when supplied air is used
- A written program and designation of a program administrator
- Recordkeeping procedures

In addition, the construction industry lead standard stipulates medical evaluations of employees required to use respirators. If an employee has difficulty in breathing during a fit test or while using a respirator, The Company shall make a medical examination available to that employee to determine whether he or she can wear a respirator safely.

ADMINISTRATIVE CONTROLS

If it is determined that engineering controls alone are not sufficient to reduce exposures below the PEL, a program to reduce the exposure through Administrative Controls must be implemented in addition to the engineering controls.

If administrative controls are used as a means of reducing employees TWA exposure to lead, The Company shall establish and implement a job rotation schedule which includes:

- Name or identification number of each affected employee
- Duration and exposure levels at each job or workstation where each affected employee is located
- Other information which may be useful in assessing the reliability of administrative controls to reduce exposure to lead

Administrative control information and records will be maintained as an addendum to this written program.

MEDICAL SURVEILLANCE PROGRAM

The Company shall institute a medical surveillance program for all employees who are or may be exposed at or above the action level for more than 30 days per year. Medical examinations and procedures shall be performed by or under the supervision of a licensed physician.

When an employee's airborne exposure is at or above the AL for more than 30 days in any consecutive 12 months, an immediate medical consultation is required when the employee notifies the employer that he or she:

- Has developed signs or symptoms commonly associated with lead-related disease
- Has demonstrated difficulty in breathing during respirator use or a fit test
- Desires medical advice concerning the effects of past or current lead exposure on the employee's ability to have a healthy child
- Is under medical removal and has a medically appropriate need



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 304 of 407

The medical surveillance is provided without cost to the employees and consists of the following:

- The name, social security number, and description of the duties of the employee
- A copy of the physician's written opinions
- Results of any airborne exposure monitoring done for that employee and the representative exposure levels supplied to the physician
- Any employee medical complaints related to exposure to lead
- A copy of the medical examination results including medical and work history
- A description of the laboratory procedures and a copy of any standards or guidelines used to interpret the test results or references to that information
- A copy of the results of biological monitoring

MEDICAL REMOVALS

Temporary medical removal can result from an elevated blood level or a written medical opinion. More specifically, The Company is required to remove from work an employee with a lead exposure at or above the AL each time periodic and follow-up (within two weeks of the periodic test) blood sampling tests indicate that the employee's blood level is at or above 50 µg /dl.

The Company shall remove employees with lead exposure at or above the AL each time a final medical determination indicates that the employee needs reduced lead exposure for medical reasons. If the physician who is implementing The Company's medical program makes a final written opinion recommending the employee's removal or other special protective measures, The Company shall implement the physician's recommendation.

For an employee removed from exposure to lead at or above the AL due to a blood lead level at or above 50 µg/dl, The Company may return that employee to former job status when two consecutive blood sampling tests indicate that the employee's blood lead level is below 40 µg /dl.

For an employee removed from exposure to lead due to a final medical determination, the employee must be returned when a subsequent final medical determination results in a medical finding, determination, or opinion that the employee no longer has a detected medical condition that places the employee at increased risk of lead exposure.

The Company shall remove any limitations placed on employees or end any special protective measures when a subsequent final medical determination indicates they are no longer necessary. If the former position no longer exists, the employee is returned consistent with whatever job assignment discretion The Company would have had if no removal occurred.

Records for Medical Removal

In the case of medical removal, The Company's records must include:

- The worker's name and social security number



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 305 of 407

- The date of each occasion that the worker was removed from current exposure to lead
- The date when the worker was returned to the former job status
- A brief explanation of how each removal was or is being accomplished
- A statement indicating whether the reason for the removal was an elevated blood lead level

MULTI CONTRACTOR SITES

If employees working immediately adjacent to a lead abatement activity are exposed to lead due to the inadequate containment of such job, The Company shall either remove the employees from the area until the enclosure breach is repaired or perform an initial exposure assessment.

DEFINITIONS

Action level - Employee exposure, without regard to the use of respirators, to an airborne concentration of lead of 30 micrograms per cubic meter of air (30 ug/m³) calculated as an 8-hour time-weighted average (TWA).

Assistant Secretary - The Assistant Secretary of Labor for Occupational Safety and Health, U.S. Department of Labor, or designee.

Competent person - One who can identify existing and predictable lead hazards in the surroundings or working conditions and who has authorization to take prompt corrective measures to eliminate them.

Director - The Director, National Institute for Occupational Safety and Health (NIOSH), U.S. Department of Health and Human Services, or designee.

Lead Abatement - Removal and Disposal of lead and lead containing materials.

Lead - Metallic lead, all inorganic lead compounds, and organic lead soaps. Excluded from this definition are all other organic lead compounds.

RECORDKEEPING

The Company shall maintain any employee exposure and medical records to document ongoing employee exposure, medical monitoring, and medical removal of workers. This data provides a baseline to evaluate the employee's health properly.

Employees or former employees, their designated representatives, and OSHA must have access to exposure and medical records in accordance with 29 CFR 1910.1020. Rules of agency practice and procedure governing OSHA access to employee medical records are found in 29 CFR 1913.10.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 306 of 407

The Company shall establish and maintain an accurate record of all monitoring and other data used to conduct employee exposure assessments. The exposure assessment records must include:

- The dates, number, duration, location, and results of each sample taken, including a description of the sampling procedure used to determine representative employee exposure
- A description of the sampling and analytical methods used and evidence of their accuracy
- The type of respiratory protection worn if any
- The name, social security number, and job classification of the monitored employee and all others whose exposure the measurement represents
- Environmental variables that could affect the measurement of employee exposure

The Company shall maintain an accurate record for each employee and subject to the following:

- Medical Surveillance
- Medical Removal
- Objective Data
- Documents for OSHA and NIOSH

Documents for OSHA and NIOSH Review

The Company shall make all records--including exposure monitoring, objective data, medical removal, and medical records available upon request to affected employees, former employees, and their designated representatives and to the OSHA Assistant Secretary and the Director of the National Institute for Occupational Safety and Health (NIOSH) for examination and copying in accordance with 29 CFR 1910.1020.

TRAINING

Lead Awareness Training

Lead awareness training shall be provided for affected company employees who may contact lead containing materials but who do not disturb the material during the performance of their duties. It shall be held prior to their assignment to work in areas that contain lead. Refresher training shall be given annually and shall be documented via records that at a minimum contain the dates of training, employee names, and the name of the trainer.

Lead Abatement Training

The Company shall provide a training program for each employee who has potential exposure to lead prior to the time of initial job assignment and annually. Employees shall be informed of Appendices A and B of the regulation. All affected employees are required to attend initial and annual training programs.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 307 of 407

The Company shall provide a training program for each employee who has potential exposure to lead prior to the time of initial job assignment and annually. Employees shall be informed of Appendices A and B of the regulation. All affected employees are required to attend initial and annual training programs.

The employees should be informed of the specific nature of the operations which could result in exposure to lead above the action level, the purpose, proper selection, fitting, use, and limitation of respirators, engineering controls, purpose and a description of the medical surveillance program and the medical removal program.

Employee training will consist of:

- Specific OSHA requirements contained in:
 - [29 CFR 1926.62](#) – Construction Industry
 - [29 CFR 1910.1025](#) - OSHA Lead Standard
 - [29 CFR 1910.1025 Appendices A](#) - Substance data sheet for occupational exposure to lead
 - [29 CFR 1910.1025 Appendices B](#) - Employee standard summary
- Specific nature of the operations which could result in exposure to lead above the action level
- Purpose, proper selection, fitting, use, and limitations of respirators
- Purpose and a description of the medical surveillance program, and the medical removal protection program including information concerning the adverse health effects associated with excessive exposure to lead (with particular attention to the adverse reproductive effects on both males and females)
- Engineering controls and work practices associated with the employee's job assignment
- Contents of the company compliance plan
- Instructions that chelating agents should not routinely be used to remove lead from their bodies and should not be used at all except under the direction of a licensed physician
- Materials pertaining to the Occupational Safety and Health Act.

A copy of the OSHA standard [29 CFR 1910.1025](#) and its appendices will be readily available to all affected employees.

Lead awareness training will be documented including dates of training, employee name, and trainer name.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 308 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 309 of 407

Lockout Tagout - Control of Hazardous Energy

PURPOSE

The purpose of this document is to outline the Lockout Tagout Program for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company." Control of Hazardous energy is the purpose of the Lockout Tagout Program.

This program establishes the requirements for the isolation of both kinetic and potential electrical, chemical, thermal, hydraulic, pneumatic, and gravitational energy prior to equipment repair, adjustment, or removal.

Reference: OSHA Standard [29 CFR 1910. 147](#), The Control of Hazardous Energy.

POLICY

Hazards

Improper or failure to use Lockout Tagout procedures may result in:

- Electrical shock
- Chemical exposure
- Skin burns
- Lacerations and amputation
- Fires and explosions
- Chemical releases
- Eye injury
- Death

HAZARD CONTROLS

- Only authorized and trained employees may engage in tasks that require the use of Lockout Tagout procedures
- All equipment has single sources of electrical power
- Lockout procedures have been developed for all equipment and processes
- Restoration from Lockout is a controlled operation

Potential energy may include any source of electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other energy.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 310 of 407

AUTHORIZED EMPLOYEES TRAINING

All Maintenance Employees, Department Supervisors, and Janitorial employees will be trained to use the Lock and Tagout Procedures. To ensure the knowledge and skills required for the safe application, usage, and removal of energy controls are acquired by employees.

The training will be conducted by the Maintenance Supervisor or Safety Coordinator at the time of initial hire. Retraining shall be held at least annually. The training will consist of the following:

- Review of General Procedures
- Review of Specific Procedures for machinery, equipment, and processes
- Location and the use of Specific Procedures
- Procedures when questions arise
- Recognition of hazardous energy sources
- Type and magnitude of the energy available
- Methods and means necessary for energy isolation and control
- All affected employees are instructed in the purpose and use of the energy control procedure
- The tag is never to be ignored or defeated in any way

Lockout or tagout shall be performed only by the authorized employees who are performing the servicing or maintenance.

AFFECTED EMPLOYEE TRAINING

- Only trained and authorized employees will repair, replace, or adjust machinery, equipment, or processes
- Affected employees may not remove Locks, locking devices, or tags from machinery, equipment, or circuits
- Purpose and use of the lockout procedures
- All affected employees are instructed in the purpose and use of the energy control procedure
- When tagout systems are used including the limitations of a tag (tags are warning devices and do not provide physical restraint)
- The tag is never to be ignored or defeated in any way

OTHER EMPLOYEE TRAINING

- Only trained and authorized employees will repair, replace, or adjust machinery or equipment
- Other employees may not remove Locks, locking devices, or tags from machinery, equipment, or circuits
- Any other employee whose work operations are or may be in an area where energy control procedures may be utilized



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 311 of 407

- The tag is never to be ignored or defeated in any way

RETRAINING

Retraining is required when there is a change in job assignments, machines, a change in the energy control procedures, or a new hazard is introduced.

All training and retraining shall be documented, signed, and certified.

PREPARATION OF LOCK OUT AND TAG OUT TRAINING

A Lockout Tagout Survey has been conducted to locate and identify all energy sources to verify which switches or valves supply energy to machinery and equipment. Dual or redundant controls have been removed.

Devices shall indicate the identity of the employee applying the device.

A Tagout Schedule has been developed for each piece of equipment and machinery. This schedule describes the energy sources, location of disconnects, type of disconnect, special hazards, and special safety procedures. The schedule will be reviewed each time to ensure employees properly lock and tag out equipment and machinery. If a Tagout Schedule does not exist for a particular piece of equipment, machinery, and process, one must be developed prior to conducting a Lockout Tagout. As repairs and/or renovations of existing electrical systems are made, standardized controls will be used.

ROUTINE MAINTENANCE AND MACHINE ADJUSTMENTS

Lock and Tag Out procedures are not required if equipment must be operating for proper adjustment. This rare exception may be used only by trained and authorized employees when specific procedures have been developed to safely avoid hazards with proper training. All considerations shall be made to prevent the need for an employee to break the plane of a normally guarded area of the equipment by use of tools and other devices.

LOCKS HASPS AND TAGS

All Qualified Maintenance Personnel will be assigned a lock with one key, hasp, and tag. All locks will be keyed differently, except when a specific individual issues a series of locks for complex Lockout Tagout tasks. In some cases, more than one lock, hasp, and tag are needed to completely de-energize equipment and machinery. Additional locks may be checked out by the Department or Maintenance Supervisor on a shift-by-shift basis. All locks and hasps shall be uniquely identifiable to a specific employee.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 312 of 407

REQUIREMENTS FOR LOCKOUT TAGOUT DEVICES

Lockout devices and tagout devices shall be singularly identifiable; shall be the only device(s) used for controlling energy; shall not be used for other purposes; and shall meet the following requirements:

- **Durable**
 - Lockout and tagout devices shall be capable of withstanding the environment to which they are exposed for the maximum period that exposure is expected
 - Tagout devices shall be constructed and printed so that exposure to weather conditions or wet and damp locations will not cause the tag to deteriorate or the message on the tag to become illegible
 - Tags shall not deteriorate when used in corrosive environments such as areas where acid and alkali chemicals are managed and stored
- **Standardized**
 - Lockout and tagout devices shall be standardized within the facility in at least one of the following criteria: Color; shape; or size; and additionally, in the case of tagout devices, print and format shall be standardized
- **Substantial**
 - Lockout devices. Lockout devices shall be substantial enough to prevent removal without the use of excessive force or unusual techniques, such as the use of bolt cutters or other metal-cutting tools
 - Tagout devices. Tagout devices, including their means of attachment, shall be substantial enough to prevent inadvertent or accidental removal. Tagout device attachment means shall be of a non-reusable type, attachable by hand, self-locking, and non-releasable with a minimum unlocking strength of no less than 50 pounds and having the general design and basic characteristics of being at least equivalent to a one-piece, all environment-tolerant nylon cable tie
- **Identifiable**
 - Lockout devices and tagout devices shall indicate the identity of the employee applying the device(s)

GENERAL LOCK AND TAGOUT PROCEDURES

Before working on, repairing, adjusting, or replacing machinery and equipment, the following procedures will be utilized to place the machinery and equipment in a neutral or zero mechanical state. The circuits and equipment to be worked on shall be disconnected from all electric energy sources. Control circuit devices, such as push buttons, selector switches, and interlocks, may not be used as the sole means for de-energizing circuits or equipment. Interlocks for electric equipment may not be used as a substitute for lockout and tagging procedures.

Stored electric energy which might endanger personnel shall be released. Capacitors shall be discharged, and high capacitance elements shall be short-circuited and grounded if the stored electric energy might endanger personnel.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 313 of 407

Note: If the capacitors or associated equipment are handled in meeting this requirement, they shall be treated as energized.

Stored non-electrical energy in devices that could reenergize electric circuit parts shall be blocked or relieved to the extent that the circuit parts could not be accidentally energized by the device.

[1910.333\(b\)\(2\)\(ii\)\(B\)](#)

A lock and tag shall be placed on each disconnecting means to de-energize circuits and equipment on which work is to be performed. Each tag shall contain a statement prohibiting the unauthorized operation of the disconnecting means and removal of the tag.

A Qualified Person

A qualified person shall verify that the equipment cannot be restarted as well as test and verify that the circuit elements and equipment part(s) are de-energized. A qualified person shall conduct tests and visual inspections to verify all tools, shorts, grounds, etc. have been removed so that circuits and equipment can be safely energized [1910.333\(b\)\(2\)\(v\)\(A\)](#).

SHIFT OR PERSONNEL CHANGES

Specific procedures shall be utilized during shift or personnel changes to ensure the continuity of lockout or tagout protection, including provision for the orderly transfer of lockout or tagout device protection between off going and oncoming employees, to minimize exposure to hazards from the unexpected energization or start-up of the machine or equipment or the release of stored energy.

ENERGY ISOLATING DEVICE

If an energy-isolating device is not capable of being locked out, The Company energy control program shall utilize a tagout system. If an energy isolating device is capable of being locked out, The Company's energy control program shall utilize lockout, unless The Company can demonstrate that the utilization of a tagout system will provide full employee protection as set forth in [1910.147\(c\)\(2\)\(iii\)](#) paragraph [\(c\)\(3\)](#) of this section. After January 2, 1990, whenever replacement or a major repair, renovation, or modification of a machine or equipment is performed, and whenever new machines or equipment are installed, energy isolating devices for such machine or equipment shall be designed to accept a lockout device.

FULL EMPLOYEE PROTECTION

When a tagout device is used on an energy-isolating device that is capable of being locked out, the tagout device shall be attached at the same location that the lockout device would have been attached, and The Company shall demonstrate that the tagout program will provide a level of safety equivalent to that obtained by using a lockout program [1910.147\(c\)\(3\)\(i\)](#).



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 314 of 407

In demonstrating that a level of safety is achieved in the tagout program which is equivalent to the level of safety obtained by using a lockout program, The Company shall demonstrate full compliance with all tagout-related provisions of this standard together with such additional elements as are necessary to provide the equivalent safety available from the use of a lockout device. Additional means to be considered as part of the demonstration of full employee protection shall include the implementation of additional safety measures such as the removal of an isolating circuit element, blocking of a controlling switch, opening of an extra disconnecting device, or the removal of a valve handle to reduce the likelihood of inadvertent energization.

Notification of Employees

Affected employees shall be notified by The Company or authorized employee of the application and removal of lockout devices or tagout devices. The notification shall be given before the controls are applied, and after they are removed from the machine or equipment [1910.147\(c\)\(9\)](#).

Preparation for Shutdown

- Before authorized or affected employees turn off a machine or piece of equipment, the authorized employee will have knowledge of the type and magnitude of the energy, the hazards of the energy to be controlled, and the means to control the energy
- An orderly shutdown must be utilized to avoid any additional or increased hazard(s) to employees because of the equipment stoppage
- Notify all affected employees that the machinery, equipment, or process will be out of service

Machine or Equipment Shutdown

- The machine or equipment will be turned or shut down using the specific procedures for that specific machine
- An orderly shutdown will be utilized to avoid any additional or increased hazards to employees because of equipment de-energization
- If the machinery, equipment, or process is in operation, follow normal stopping procedures (depress the stop button, open the toggle switch, etc.)
- Move switch or panel arms to "Off" or "Open" positions and close all valves or other energy-isolating devices so the energy source(s) is disconnected or isolated from the machinery or equipment

Machine or Equipment Isolation

- All energy control devices that are needed to control the energy to the machine or equipment will be physically located and operated in such a manner as to isolate the machine or equipment from the energy source prior to maintenance being performed



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 315 of 407

Protective Materials and Hardware

- Locks, tags, chains, wedges, key blocks, adapter pins, self-locking fasteners, or other hardware shall be provided by The Company for isolating, securing, or blocking machines or equipment from energy sources
- Lockout devices and tagout devices shall be singularly identified; shall be the only device(s) used for controlling energy; shall not be used for other purposes; and shall meet the requirements for [29 CFR 1910.147](#)

Lockout or Tagout Device Application

- Lockout or tagout devices will be affixed to energy-isolating devices by authorized employees
- Lockout devices will be affixed in a manner that will hold the energy-isolating devices from the "safe" or "off" position
- Where tagout devices are used they will be affixed in such a manner that will clearly state that the operation or the movement of energy-isolating devices from the "safe" or "off" positions is prohibited
- The tagout devices will be attached to the same point a lock would be attached
- If the tag cannot be affixed at that point, the tag will be located as close as possible to the device in a position that will be immediately obvious to anyone attempting to operate the device
- Lock and tag out all energy devices by use of hasps, chains, and valve covers with an assigned individual lock

Stored Energy

- Following the application of the lockout or tagout devices to the energy-isolating devices, all potential or residual energy will be relieved, disconnected, restrained, and otherwise rendered safe
- Where the re-accumulation of stored energy to a hazardous energy level is possible, verification of isolation will be continued until the maintenance or servicing is complete, or until the possibility of such accumulation no longer exists
- Release stored energy (capacitors, springs, elevated members, rotating flywheels, and hydraulic/air/gas/steam systems) must be relieved or restrained by grounding, repositioning, blocking, and/or bleeding the system

Verification of Isolation

- Prior to starting work on machines or equipment that have been locked or tagged out, the authorized employees will verify that isolation or de-energization of the machine or equipment has been accomplished
- After assuring that no employee will be placed in danger, evaluate all lock and tag outs by following the normal start-up procedures (depress start button, etc.)

Caution: After the test, place the controls in the neutral position.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 316 of 407

GROUP LOCKOUT SETTINGS/MULTIPLE WORKERS

Where a crew of authorized employees may use a lockout or tagout device, the following procedures shall be followed to ensure the group of employees a level of protection equal to that provided by a personal lockout or tagout device.

An authorized employee will be designated to have primary responsibility for a set number of employees working under the protection of a group lockout or tagout device.

- A pre-work kick-off safety meeting will be held to review the lockout tagout procedure for the project
- Each employee shall attach a personal lockout or tagout device to the group's device while he/she is working and then removes it when finished
- During shift change or personnel changes, there should be specific procedures to ensure the continuity of lockout or tagout procedures
- Documentation shall be specific and shall be retained

Extended Lockout Tagout

Should the shift change before the machinery or equipment can be restored to service, the lock and tag out must remain. If the task is reassigned to the next shift, those employees must lock and tag out before the previous shift may remove their lock and tag.

Release from Lockout Tagout

Before lockout or tagout devices are removed and the energy restored to the machine or equipment, the following actions will be taken:

- The work area will be thoroughly inspected to ensure that nonessential items have been removed and that machine or equipment components are operational
- The work area will be checked to ensure that all employees have been safely positioned or removed. Before the lockout or tagout devices are removed, the affected employees will be notified that the lockout or tagout devices are being removed
- Each lockout or tagout device will be removed from each energy-isolating device by the employee who applied the device

LOTO PROCEDURE FOR ELECTRICAL PLUG TYPE EQUIPMENT

This procedure covers all Electrical Plug-Type Equipment such as Battery Chargers, some Product Pumps, Office Equipment, Powered Hand Tools, Powered Bench Tools, Lathes, Fans, etc.

When working on, repairing, or adjusting the above equipment, the following procedures must be utilized to prevent accidental or sudden startup:

- Unplug Electrical Equipment from the wall socket or in-line socket
- Attach the "Do Not Operate" Tag and Plug Box and Lock on the end of the power cord



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 317 of 407

An exception is granted to not lock and tag the plug if the cord and plug remain in the exclusive control of the Employee working on, adjusting, or inspecting the equipment.

- Test Equipment to assure the power source has been removed by depressing the "Start" or "On" Switch
- Perform required operations
- Replace all guards removed
- Remove the Lock, Plug Box, and Tag
- Inspect the power cord and socket before plugging equipment into a power source
- Any defects must be repaired before placing the equipment back in service

Note: Occasionally used equipment may be unplugged from the power source when not in use.

LOTO PROCEDURE INVOLVING MORE THAN ONE EMPLOYEE

In the preceding SOPs, if more than one employee is assigned to a task requiring a lock and tag out, each must also place his or her own lock and tag on the energy-isolating device(s).

MANAGEMENT OF LOCK AND TAGOUTS

Only the employee that locks and tags out machinery, equipment, or processes may remove his/her lock and tag. However, should the employee leave the facility before removing his/her lock and tag, the Maintenance Manager may remove the lock and tag. The Maintenance Manager must be assured that all tools have been removed, all guards have been replaced and all employees are free from any hazard before the lock and tag are removed and the machinery, equipment, or process are returned to service. Notification of the employee who placed the lock is required prior to lock removal.

REMOVAL OF AN AUTHORIZED EMPLOYEE'S LOCKOUT TAGOUT BY THE COMPANY

Locks/tags will only be removed in cases where the authorized employee who applied for it is not available. When the authorized employee who applied the Lockout Tagout device is not available to remove it, that device may be removed by the safety manager or their designee by following the specific procedure.

Each location must develop written procedures that comply with [29 CFR 1910.147\(e\)\(3\)](#).

Emergency procedures for removing Lockout Tagout should include the following:

- Making all reasonable efforts to contact the authorized and affected employees to inform them that their LOTO device has been removed
- Verification by The Company that the authorized employee who applied the LOTO device is not at the facility by checking timecards, parking lot, radio announcement, etc.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 318 of 407

- Chris Harrington shall make A thorough inspection of the machine or device to confirm that the machine or equipment components are operationally intact
- **Chris Harrington** or designee shall remove the LOTO device, providing that they have determined that the starting up of the machine/equipment will not endanger other personnel
- Informing and providing the employee whose locks/tags were removed with replacement locks/tags

LOCKOUT OR TAGOUT DEVICES REMOVAL

Each lockout or tagout device shall be removed from each energy-isolating device by the employee who applied the device. When the authorized employee who applied the lockout or tagout device is not available to remove it, that device may be removed under the direction of The Company, provided that specific procedures and training for such removal have been developed, documented, and incorporated into The Company's energy control program. The Company shall demonstrate that the specific procedure provides equivalent safety to the removal of the device by the authorized employee who applied it [29 CFR 1910.147 \(e\)\(3\)](#).

The specific procedure shall include at least the following elements:

- Verification by The Company that the authorized employee who applied the device is not at the facility
- Making all reasonable efforts to contact the authorized employee to inform him/her that his/her lockout or tagout device has been removed; and
- Ensuring the authorized employee has this knowledge before he/she resumes work at that facility

If an energy isolating device is **not** capable of being locked out, The Company's energy control program under this section shall utilize a tagout system. If an energy isolating device is capable of being locked out, the employer's energy control program under this section shall utilize lockout, unless The Company can demonstrate that the utilization of a tagout system will provide full employee protection as set forth in paragraph (c)(3) of section [1910.147\(c\)\(3\)\(iii\)](#).

After January 2, 1990, whenever replacement or a major repair, renovation, or modification of a machine or equipment is performed, and whenever new machines or equipment are installed, energy isolating devices for such machine or equipment shall be designed to accept a lockout device.

TESTING OR POSITIONING OF MACHINES, EQUIPMENT OR COMPONENTS

In situations in which lockout or tagout devices must be temporarily removed from the energy isolating device and the machine or equipment energized to test or position the machine, equipment, or component thereof, the following sequence of actions in accordance to [29 CFR 1910.147 \(f\)\(1\)\(i\)](#) shall be followed:



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 319 of 407

- Clear the machine or equipment of tools
- Remove employees from the machine or equipment area
- Remove the lockout or tagout devices as specified in [29 CFR 1910.147 \(e\)\(3\)](#)
- Energize and proceed with testing or positioning
- Deenergize all systems and reapply energy control measures

INSPECTION

The Company shall conduct a periodic inspection of the energy control procedure, at least annually, to ensure the procedure and the requirements of this standard are being followed. Periodic inspection shall be performed by an authorized company employee other than the ones(s) utilizing the energy control procedure being inspected. Periodic inspection is to be conducted to correct any deviations or inadequacies identified.

Where the tagout is used for energy control, the periodic inspection shall include a review, between the inspector and each authorized and affected employee, of that employee's responsibilities under the energy control procedure being inspected.

The Company shall certify that the periodic inspections have been performed.

The certification shall identify the machine or equipment on which the energy control procedure was being utilized, the date of the inspection, the employees included in the inspection, and the person performing the inspection [1910.147\(c\)\(6\)\(i\) through 1910.147\(c\)\(6\)\(ii\)](#).

CONTRACTORS

Contractors working on company property and equipment must use this Lockout Tagout procedure while servicing or maintaining equipment, machinery, or processes.

DEFINITIONS

Authorized (Qualified) Employees are the only ones certified to lock and tagout equipment or machinery. Whether an employee is qualified will depend upon various circumstances in the workplace. It is for an individual to be considered "qualified" in certain equipment in the workplace, but "unqualified" as to other equipment. An employee who is undergoing on-the-job training and who, during such training, has demonstrated an ability to perform duties safely at his or her level of training and who is under the direct supervision of a qualified person, is "qualified" for the performance of those duties.

Affected Employees are those employees who operate machinery or equipment upon which lockout or tagging out is required under this program. All affected employees will be notified before the application of lockout or tagout devices. Training of these individuals will be less stringent in that it will include the purpose and use of the lockout procedures.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 320 of 407

Other Employees are identified as those that do not fall into the authorized, affected, or qualified employee category. It will include all other employees. These employees will be provided instructions on what the program is and not to touch any machine or equipment when they see that it has been locked or tagged out.

Zero Energy State is a condition in which all sources of energy have been removed or neutralized.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 321 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 322 of 407

Manual Lifting

PURPOSE

The purpose of this document is to outline safety policy and procedures surrounding safe manual lifting techniques for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company."

RESPONSIBILITIES

Management

- Ensure all employees are trained in safe manual lifting techniques

Employees

- Follow safe manual lifting guidelines and techniques outlined in this program

POLICY

The main hazards associated with manual material handling are back injuries and musculoskeletal disorders (MSDs.) Back injuries are often caused by improper lifting techniques or attempting to lift an awkward or heavy object alone.

Musculoskeletal disorders (MSDs) are injuries or pain in the joints, ligaments, muscles, nerves, tendons, and structures that support the limbs, neck and back. MSDs can be caused by a sudden exertion (e.g., lifting a heavy object), they from making the same motions repeatedly repetitive strain or from repeated exposure to force, vibration, or awkward posture.

By following this program, employees should be able to effectively eliminate, or control work related musculoskeletal disorders (MSD) and hazards. It is the employee's responsibility to plan for lifting, ask for help when needed, and to follow manual lifting best practices.

HAZARD ASSESSMENT

Before manual lifting is performed, a hazard assessment must be completed. The assessment must consider size, bulk, and weight of the object(s), if mechanical lifting equipment is required, if two-man lift is required, whether vision is obscured while carrying and the walking surface and path where the object is to be carried. While also taking into consideration of high-frequency and/or long-duration lifting, inadequate handholds, and environmental factors.

The company management team will evaluate work conditions, technologies, and procedures to assess the risk to workers of sustaining manual lifting injuries and to incorporate correct measures in the design phase of the work.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 323 of 407

TRAINING

Training should include general principles of ergonomics, hazards of improper lifting, proper lifting techniques, ways to avoid work related musculoskeletal disorders (WMSDs), recognition of hazards and injuries, procedures for reporting hazardous conditions, and methods and procedures for early reporting of injuries. Additionally, job specific training should be given on safe lifting and work practices, hazards, and controls.

Administrative Controls and Training

Employees shall be trained to minimize hazards.

- **Administrative Controls**
 - Rotating of employees, providing a short break every hour, or using a two-person lift may be helpful.
 - Rotation is not simply a different job but must be a job that utilizes a completely different muscle group from the ones that have been over-exerted.
 - Standing for extended periods places excessive stress on the back and legs. Solutions include a footrest or rail, resilient floor mats, height-adjustable chairs or stools, and opportunities for the employee to change position.
 - Where employees are seated, the chairs or stools must be properly chosen.
 - Proper adjustable lumbar support may be provided.
 - Static seated postures with bending or reaching should be avoided.
- **Worker Training and Education**
 - Training should include general principles of ergonomics, recognition of hazards and injuries, procedures for reporting hazardous conditions, and methods and procedures for early reporting of injuries. Additionally, job specific training should be given on safe work practices, hazards, and controls.
 - Strength and fitness training can reduce compensation costs.

PRECAUTIONS

All **Pro Painting & Drywall Inc.** employees are responsible for reducing the risk or workplace incidents when handling and moving materials.

- Employees shall be trained in proper manual lifting procedures:
 - Use available lifting aids provided by **Pro Painting & Drywall Inc..**
 - Refrain from using sudden or jerky movements.
 - Only lift when there is proper footing and space.
 - Begin lifts close to the body.
 - Do not twist or bend while lifting.
 - Keep lifts between shoulder and knuckle height.
 - Seek assistance if needed.
 - Do not lift materials from the floor while seated.
- Material handling tasks should be designed to minimize the weight, range of motion, and frequency of the activity.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 324 of 407

- Work methods and stations should be designed to minimize the distance between the person and the object being handled.
- Platforms and conveyors should be built at about waist height to minimize awkward postures. Conveyors or carts should be used for horizontal motion whenever possible. Reduce the size or weight of the object(s) lifted.
- High-strength push-pull requirements are undesirable but pushing is better than pulling. Material handling equipment should be easy to move, with handles that can be easily grasped in an upright posture.
- Workbench or workstation configurations can force people to bend over. Corrections should emphasize adjustments necessary for the employee to remain in a relaxed upright stance or fully supported seated posture. Bending the upper body and spine to reach into a bin or container is highly undesirable. The bins should be elevated, tilted or equipped with collapsible sides to improve access.
- Repetitive or sustained twisting, stretching, or leaning to one side are undesirable. Corrections could include repositioning bins and moving employees closer to parts and conveyors.
- Store heavy objects at waist level.
- Provide lift-assist devices, and lift tables

SAFE PRACTICES

All employees are expected to follow these safe practices when performing manual material handling:

- Use the proper lifting techniques when lifting, moving and/or positioning materials.
- Wear appropriate Personal Protective Equipment.
- Get help with an oversized load (or use a cart etc.), or anything more than you can comfortably lift.
- "Push" rather than "Pull" when possible.
- Move in as close as possible to the load before lifting.
- Get close to the load, brace your back and lift with your legs.
- Materials that must be manually lifted will be placed at "power zone" height, about mid-thigh to mid-chest. Special care will be taken to ensure proper lifting principles are used. Maintain neutral and straight spine alignment whenever possible. Usually, bending at the knees, not the waist, helps maintain proper spine alignment.
- Place materials that are to be manually lifted at "power zone" height, about mid-thigh to mid-chest. Maintain neutral and straight spine alignment whenever possible. Usually, bending at the knees, not the waist, helps maintain proper spine alignment.
- Order supplies in smaller quantities and break downloads off-site. When possible, request that vendors and suppliers break downloads prior to delivery.
- Avoid twisting, especially when bending forward while lifting. Turn by moving the feet rather than twisting the torso.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 325 of 407

- Keep your elbows close to your body and keep the load as close to your body as possible.
- Use mechanical lifting equipment whenever possible.

INJURY INVESTIGATION

Musculoskeletal injuries caused by improper lifting will be investigated and documented as outlined in The Company Incident Investigation and Reporting Policy.

Incorporation of investigation findings into work procedures must be accomplished to prevent future injuries.

Employees must use The Company provided manual lifting equipment by employees.

The company shall perform incident investigations and root causes analyses when company workers sustain injuries related to manual lifting. The findings of the investigation and corrective actions will be incorporated into safe work processes to prevent future injuries.

TWO MAN LIFTS

Where use of lifting equipment is impractical or not possible, two-man lifts must be used.

The following guidelines will be used when determining if assistance in lifting is needed.

One person should be able to lift an object weighing up to 50 pounds:

- If the object is within 7 inches from the front of his or her body
- If the object is at waist height and directly in front of the person
- If there is no twisting involved
- If there is a handle on the object
- If the load inside doesn't shift once lifted
- If any of the above conditions are not met, then the load would be considered unsafe. To make it a safe lift, the weight of the load must be decreased, or it needs to be a "two-person" lift

For a safe, correct, two-person lift:

- Work with a person about your height
- Decide in advance which person will direct the move
- Keeping knees bent and back straight, lift and raise the load together
- Move smoothly together as you carry, keeping the load at the same level
- Unload at the same time, keeping knees bent
- If moving something up or down stairs, the taller person should be at the lower level



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 326 of 407

WORK STATION CONFIGURATION

If an employee's job consists of assembling products or product parts, they still run the risks of injury. In addition to repetitive motion problems such as Carpal Tunnel Syndrome or tendonitis, there are other hazards that can be caused by their workstation.

Supervision/Management will periodically evaluate work areas and employees' work techniques to assess for improper manual lifting techniques and to provide positive correction for the prevention of potential injuries.

New operations will be evaluated to engineer out hazards before work processes are implemented. Ensuring proper engineering controls such as lift assists, mechanical lifting devices, and other suitable engineering controls are utilized to mitigate the hazards caused by manual lifting.

Workstation hazards often develop over time as opposed to a single incident and are more chronic in nature. These problems can be caused by:

- Frequent and repeated motion
- Holding items in place for extended periods
- Working in awkward positions
- Excessive reaching
- Prolonged sitting or standing
- Exposure to vibrations from power tools

Using proper ergonomics will reduce or eliminate many of the risks of this type of work. Where practical, the company will:

- Use adjustable chairs and worktables to keep work at a neutral level
- Use padded mats and wearing comfortable shoes to reduce leg strain when standing
- Use jigs, stands, or vacuum devices to hold objects in place
- Position tools and parts within 16 inches of the employee's work area
- Use angled bins, or gravity-fed chutes for parts to reduce reaching and wrist strain

Use power tools with counterweights and padded handles to reduce arm strain and vibration.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Basic PPE is essential when you're handling material. At a minimum, your PPE should consist of:

- Gloves to protect your hands from sharp or rough edges
- Steel-toed safety shoes to protect from rolling equipment or falling material
- Safety glasses or goggles to protect your eyes from flying particles
- Back support to prevent muscle strain



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 327 of 407

The Company shall provide all necessary PPE to employees at no cost.

ADDITIONAL ENGINEERING CONTROLS

Manual lifting equipment such as dollies, hand trucks, lift-assist devices, jacks, carts, hoists will be provided for employees.

Other engineering controls such as conveyors lift tables, and workstation design will be considered by The Company as appropriate.

HEAVY LIFTING - NIOSH LIFTING RECOMMENDATION

NIOSH has developed a formula for assessing the hazard of a lifting situation. The formula looks at the following elements involved in the lift:

- Distance the load is held in front of the body,
- Height the load is lifted from and to,
- Height of the load,
- Frequency of lifting,
- The hand load coupling, and
- The amount of torso twisting that is involved with the load lifting motion.

Using these parameters NIOSH, has established that, for occasional lifting where the load is held close to the body, with no twisting, and at about waist height and where the load has good hand holds, the typical industrial worker could lift about 51 pounds without a significant increase in risk of injury. As these factors deviate from the ideal, the amount of weight that can safely be lifted by an employee is decreased.

Key Benefits

- Calculates the composite lifting index (CLI) for multiple lifting tasks
- Uses equations approved by NIOSH ergonomists, who were the original creators of the NIOSH Lifting Equation (NLE)
- Promotes better musculoskeletal health
- Raises workers' awareness about their job tasks
- Helps workers make informed decisions about the potential hazards to their musculoskeletal health
- Serves as job design guidelines for manual lifting tasks
- Can be used as a research tool to collect manual lifting data

NIOSH Lifting Equation

(R)ecommended (W)eight (L)imit = LC x HM x VM x DM x AM x FM x CM



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 328 of 407

Where LC is the load constant (51 lbs) and other factors in the equation are:

- HM = Horizontal Location of the object relative to the body (the Horizontal Multiplier factor)
- VM = Vertical Location of the object relative to the floor (the Vertical Multiplier factor)
- DM = Distance the object is moved vertically (the Distance Multiplier factor)
- AM = Asymmetry Angle or twisting requirement (the Asymmetric Multiplier factor)
- FM = Frequency and Duration of lifting activity (the Frequency Multiplier factor)
- CM = Coupling or quality of the workers grip on the object (the Coupling Multiplier factor)

The NIOSH Lifting Equation is widely accepted as valid in the field of [occupational ergonomics](#), providing occupational health and safety professionals an objective ergonomic risk assessment tool for manual material handling tasks. The NIOSH Lifting Equation is a great way to identify ergonomic opportunities and prioritize ergonomic improvement efforts, and it also provides an objective baseline from which you can document ergonomic improvements.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 329 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 330 of 407

New Hire Safety Orientation

PURPOSE

The purpose of this document is to outline the New Hire Safety Orientation program for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company." New employee safety orientation is the process of introducing new, inexperienced, and/or transferred workers to the organization, their supervisors, co-workers, work areas, jobs, and especially the health and safety requirements of their work. All new employees are required to attend new hire safety orientation.

RESPONSIBILITIES

Management

- Ensure employees receive all training and resources needed to be successful in their position
- Prepare and deliver overall orientation of Health and Safety in the workplace

Personnel

- Always adhere to the policies contained herein
- Be open-minded
- Be teachable
- Be available

POLICY

The Company will ensure that all personnel who perform work for The Company will have completed new hire safety orientation. New employees will complete the safety orientation within day 5 of employment.

A Supervisor or experienced employee/mentor will be responsible to complete the new employee checklist with the new hire. The orientation will be completed within a reasonable timeframe. The Company will ensure the employee has the proper equipment, PPE, and/or tools to be successful. The Company will ensure the employee has the necessary information technology resources, including access to programs necessary for performing their job duties. The Company will ensure the employee's supervisor is not scheduled to be off when the new employee arrives, and he or she has plenty of time to meet with the employee. The Company will ensure meaningful work is prepared for the first day and that all required forms and documents are prepared.

The safety orientation will provide an overview, direction, and necessary health and safety information to new employees to indicate the importance of maintaining a safe environment. It will be practical and hands-on, and it should focus on the skills the employee must develop to be



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 331 of 407

successful and safe at their job. It will include but not be limited to the following common topics to discuss during safety orientation:

Rights and Responsibilities

- Reporting accidents
- Reporting unsafe working conditions
- Rights to refuse unsafe work

Safety Programs and Procedures

- The Company's safety procedures will be explained in full detail as they pertain to the new employee's job description. Expectations for the employee will be outlined and requirements to adhere to all standards

First Aid

- First aid providers will be introduced and areas, where first aid kits can be located, will be communicated. The process to call for first aid for themselves and/or co-workers will be explained

Fire Protection

- Proper use of fire extinguishers and fire hazards common to the worker's job description will be explained

Accident/Injury Reporting Procedures

- Company processes and procedures will be explained. Contact people for reporting injuries/incidents will be identified and communication methods established

Emergency Procedures and Preparedness

- Review The Company's emergency personnel contact info; evacuation plan, including exit routes; evacuation signals and sirens; location of eyewash stations and showers, fire extinguishers, and alarm pull boxes; identify fire marshal(s); and identify exposures

Identifying Hazards

- Common hazards associated with the worker's job description and recognition of hazardous conditions and how to document them will be reviewed

Slips, Trips, and Falls, and Manual Lifting

- Housekeeping and watching for slip, trip, and fall hazards, will be reviewed. Proper lifting techniques will be explained



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 332 of 407

Personal Protective Equipment

- Required PPE will be reviewed for specific jobs or job tasks, including the appropriate use, how to obtain, proper fit, storage, maintenance, and location

Hazard Communication

- Hazardous materials and locations will be communicated. Review of the labeling system, appropriate symbols, and where to find an SDS.

RECORD KEEPING

The Company will keep a record of the safety orientation training for all workers/employees. When an employee completes orientation, the company will provide the worker/employee with written proof of completion. The Company will keep records available to the worker/employee for up to 6 months after the worker's employment has been terminated.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 333 of 407

NEW EMPLOYEE ORIENTATION CHECKLIST

Instructions: Each employee must be given a safety orientation before beginning work. This checklist documents that each required item was explained to the employee. The supervisor is to place a check in each box after the item has been explained.

Employees are not to sign this form unless all items have been explained and all questions have been answered satisfactorily.

The employee _____ has been:

- ☐ Told about parts of the written safety program that describe the employer's safety efforts.
- ☐ Given a copy of the employee safety manual and general safety rules and has read it.
- ☐ Told when required safety meetings are scheduled.
- ☐ Told to report all injuries and shown how to do this.
- ☐ Told to report all hazards to her/his supervisor and shown how to do this.
- ☐ Shown where the first aid supplies are located and who to call for first aid.
- ☐ Shown where the exits are located and the route from the assigned workstation.
- ☐ Told what to do during any emergencies that could be expected to occur.
- ☐ Shown how to operate a fire extinguisher.
- ☐ Trained on chemical hazards according to the Chemical Hazard Communication Program training requirements.
- ☐ Shown where to find the Safety Data Sheet (SDS) file and program document.
- ☐ Taught how to read labels and use the SDS.
- ☐ Told what kinds of chemicals we use and their hazards.
- ☐ Informed about the hazards and precautions related to chemicals he/she will be using.
- ☐ Trained on safe methods to perform the job/task the employee was assigned including any hazards associated with that job/task.

Initial job/task assignment:

- ☐ Given any personal protective equipment (PPE) required and trained on how to use and care for it. PPE required for this job:
- ☐ Provided any formal training required to do his/her job such as proper lifting, etc.

Initial formal training given:

The signatures below document that the above orientation was completed on the date below. Both parties accept responsibility for keeping our workplace safe and healthful.

Employee: _____

Date: _____

Supervisor: _____

Date: _____



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 334 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 335 of 407

Personal Protective Equipment (PPE)

PURPOSE

The purpose of this document is to outline the Personal Protective Equipment (PPE) Program for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company." The Company provides all employees with the required PPE to suit the task and known hazards. This program covers the requirements for Personal Protective Equipment except for PPE used for hearing conservation and respiratory protection or PPE required for hazardous material response to spills or releases, which are covered under separate programs.

RESPONSIBILITIES

Management

- Conduct hazard assessments to identify specific PPE for specific tasks
- Train employees in the selection, use, inspection, storage, cleaning, and limitations of specific PPE

Supervisors

- Monitor the use of PPE
- Provide replacement PPE when needed
- Identify any new hazards that would require the use of PPE

Employees

- Use and care for assigned PPE
- Immediately inform the supervisor if PPE is damaged or not effective

POLICY

General Rules

Protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields and barriers, must be provided, used, and maintained in a sanitary and reliable condition.

Where employees provide their own protective equipment, The Company will assure its adequacy, including proper maintenance, and sanitation of such equipment.

HAZARD ASSESSMENT AND EQUIPMENT SELECTION

Hazard analysis procedures shall be used to assess the workplace to determine the known hazards and the potential for additional hazards, which necessitate the use of personal protective equipment. To identify and assess hazards, employers, and workers:



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 336 of 407

- Collect and review information on present hazards or hazards that are likely to be present in the workplace
- Conduct initial and periodic workplace inspections to identify new or reoccurring hazards
- Investigate injuries, illnesses, incidents, and near-misses to determine underlying hazards, their causes, and prevention methods
- Group similar incidents and identify trends in injuries, illnesses, and hazards reported
- Consider hazards associated with emergencies or nonroutine situations
- Determine the severity and likelihood of incidents that may result from each identified hazard

The certifier's name, signature, and date(s) will be present on the assessment documents. If such hazards are present, or likely to be present, the following actions will be taken:

- Select and have each affected employee use the proper PPE
- Communicate selection decisions to each affected employee
- Select PPE that properly fits each affected employee

[1910.132\(d\)\(1\)\(i\)](#)

The employer will verify that the required hazard assessment was performed through a written certification that identifies the workplace evaluated, the person certifying that the assessment has been performed, and the date(s) of the assessment. [1910.132\(d\)\(2\)](#).

DEFECTIVE AND DAMAGED EQUIPMENT

Defective or damaged personal protective equipment shall not be used. PPE that is in disrepair must be discarded or removed from service until repaired. Employees who find PPE defective or in disrepair must inform their direct supervisor immediately.

Monitoring PPE

PPE is monitored regularly to ensure its effectiveness and that it is being used in accordance with the JSA and/or manufacturer's guidance.

EMPLOYEE-OWNED EQUIPMENT

Where employees provide their own protective equipment, the employer shall be responsible for assuring its adequacy, including proper maintenance, and sanitation of such equipment.

Ref. [1910.132\(b\)](#).

When an employee provides adequate PPE he or she owns, the employer must allow the employee to use it and is not required to reimburse the employee for that equipment. The employer must not require that an employee provides or pays for their own PPE unless the PPE is described under OSHA's "Personal Protective Equipment" standard [1910.132\(h\)\(2\)-\(h\)\(5\)](#) stating what the employer is not required to pay for.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 337 of 407

PAYMENT FOR PROTECTIVE EQUIPMENT

The employer is responsible for covering the costs of PPE for their employees.

The employers **ARE** required to pay for PPE that complies with OSHA standards, including:

- Hard hats
- Goggles
- Gloves
- Safety shoes
- Safety glasses
- Welding helmets and goggles
- Face shields
- Chemical protective equipment
- Fall protection equipment

The employer is **NOT** required to pay for the following PPE:

- Non-specialty safety-toe protective footwear (including steel-toe shoes or steel-toed boots)
- Non-specialty prescription eyewear
- Logging boots required by [29 CFR 1910.266\(d\)\(1\)\(v\)](#)
- Everyday clothing (long-sleeve shirts, long pants, street shoes, and normal work boots)
- Ordinary clothing, skin creams, or other items used for protection against the weather (raincoats, winter coats, jackets, rubber boots, sunglasses, and sunscreen)

When the employer provides metatarsal guards and allows the employee, at his or her request, to use shoes or boots with built-in metatarsal protection, the employer is not required to reimburse the employee for the shoes or boots.

The employer must pay for replacement PPE, except when the employee has intentionally damaged or lost the PPE.

PPE SELECTION

Controlling Hazards

PPE devices alone should not be relied on to protect against hazards but should be used in conjunction with guards, engineering controls, and sound manufacturing practices.

Selection Guidelines

The general procedure for the selection of protective equipment is to:

- Become familiar with the potential hazards and the type of protective equipment that is available, and what it can do, i.e., splash protection, impact protection, etc.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 338 of 407

- Compare the hazards associated with the environment, i.e., impact velocities, masses, projectile shape, and radiation intensities, with the capabilities of the available protective equipment
- Select the protective equipment which ensures a level of protection greater than the minimum required to protect employees from the hazards
- Fit the user with the protective device and give instructions on care and use of the PPE. End users must be made aware of all warning labels and limitations of their PPE

FITTING DEVICE

Careful consideration must be given to comfort and fit. PPE that fits poorly will not offer the necessary protection. Continued wearing of the device is more likely if it fits the wearer comfortably. Protective devices are available in a variety of sizes. Care should be taken to ensure that the right size is selected.

DEVICES WITH ADJUSTABLE FEATURES

Adjustments should be made on an individual basis for a comfortable fit that will maintain the protective device in the proper position. Care should be taken in fitting devices for eye protection against dust and chemical splash to ensure that the devices are sealed to the face. In addition, proper fitting of helmets is important to ensure that they will not fall off during work operations. In some cases, a chin strap may be necessary to keep the helmet on an employee's head. (Chin straps should break at a low force, however, to prevent a strangulation hazard). Where manufacturer's instructions are available, they should be followed carefully.

EYE AND FACE PROTECTION

Most occupational eye injuries can be prevented using suitable/approved safety spectacles, goggles, or shields. Approved eye and face protection shall be worn when there is a reasonable possibility of personal injury.

- Each employee shall use appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation
- Each employee shall use eye protection that provides side protection when there is a hazard from flying objects. Detachable side protectors are acceptable
- Each employee who wears prescription lenses while engaged in operations that involve eye hazards shall wear eye protection that incorporates the prescription in its design or shall wear eye protection that can be worn over the prescription lenses without disturbing the proper position of the prescription lenses or the protective lenses
- Eye and face PPE shall be distinctly marked to facilitate identification of the manufacturer



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 339 of 407

- Each employee shall use equipment with filter lenses that have a shade number appropriate for the work being performed for protection from injurious light radiation

Typical hazards that can cause eye and face injuries are:

- Splashes of toxic or corrosive chemicals, hot liquids, and molten metals
- Flying objects, such as chips of wood, metal, and stone dust
- Fumes, gases, and mists of toxic or corrosive chemicals
- Aerosols of biological substances

Prevention of eye accidents requires that all persons who may be in eye hazard areas wear protective eyewear. This includes employees, visitors, contractors, or others passing through an identified eye-hazardous area. To provide protection for personnel, activities shall procure enough heavy-duty goggles and/or plastic eye protectors which afford the maximum amount of protection possible. If personnel wear personal glasses, they shall be provided with a suitable eye protector to wear over them.

Eye/Face Protection Specifications

Eye and face protectors procured, issued to, and used by employees, contractors and visitors must conform to the following design and performance standards:

- Provide adequate protection against the hazards for which they are designed
- Fit properly and offer the least possible resistance to movement and cause minimal discomfort while in use
- Be durable
- Be easily cleaned or disinfected for or by the wearer
- Be clearly marked to identify the manufacturer
- Persons who require corrective lenses for normal vision, and who are required to wear eye protection, must wear goggles or spectacles of one of the following types:
 - Spectacles with protective lenses which provide an optical correction
 - Goggles that can be worn over spectacles without disturbing the adjustment of the spectacles
 - Goggles that incorporate corrective lenses mounted behind the protective lenses

EYE AND FACE PROTECTOR USE

Safety Spectacles

Protective eyeglasses are made with safety frames, tempered glass or plastic lenses, temples, and side shields which provide eye protection from moderate impact and particles encountered in job tasks such as carpentry, woodworking, grinding, scaling, etc.

Single Lens Goggles

Vinyl framed goggles of soft pliable body design provide adequate eye protection from many hazards. These goggles are available with clear or tinted lenses, perforated, port-vented, or non-



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 340 of 407

vented frames. Single-lens goggles provide similar protection to spectacles and may be worn in combination with spectacles or corrective lenses to ensure protection along with proper vision.

Welders/Chippers Goggles

These goggles are available in rigid and soft frames to accommodate single or two eyepiece lenses.

- Welders' goggles provide protection from sparking, scaling, or splashing metals and harmful light rays. Lenses are impact resistant and are available in graduated shades of filtration
- Chippers/grinders goggles provide eye protection from flying particles. The dual protective eye cups house impact-resistant clear lenses with individual cover plates

Face Shields

These normally consist of adjustable headgear and face shield of tinted/transparent acetate or polycarbonate materials, or a wire screen. Face shields are available in assorted sizes, tensile strength, impact/heat resistance, and light ray-filtering capacity.

Face shields will be used in operations when the entire face needs protection and should be worn to protect the eyes and face against flying particles, metal sparks, and chemical/ biological splashes.

Welding Shields

These shield assemblies consist of a vulcanized fiber or glass fiber body, a ratchet/button type adjustable headgear or cap attachment, and a filter and cover plate holder. These shields will be provided to protect worker's eyes and face from infrared or radiant light burns, flying sparks, metal spatter and slag chips encountered during welding, brazing, soldering, resistance welding, bare or shielded electric arc welding, oxyacetylene welding, and cutting operations.

Filter Lenses for Protection Against Radiant Energy			
Operations	Electrode Size 1/32 in	Arc Current	Protective Shade
Shielded metal arc welding	Less than 3	Less than 60	7
	3-5	60-160	8
	5-8	160-250	10
	More than 8	250-550	11
Torch brazing			3
Torch soldering			2
Note: as a rule of thumb, start with a shade that is too dark to see the weld zone. Then go to a lighter shade which gives a sufficient view of the weld zone without going below the minimum. In oxyfuel gas welding or cutting where the torch produces a high yellow light, it is desirable to use a filter lens that absorbs the yellow or sodium line in the visible light of the (spectrum) operation.			



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 341 of 407

Selection Chart Guidelines for Eye and Face Protection

The following chart provides general guidance for the proper selection of eye and face protection to protect against hazards associated with the listed hazard "source" operations.

Source	Hazard	Protection
IMPACT - Chipping, grinding machining, masonry work, woodworking, sawing, drilling, chiseling, powered fastening, riveting, and sanding	Flying fragments, objects, large chips, particles, sand, dirt, etc.	Spectacles with side protection, goggles, and face shield For severe exposure, use a face shield
HEAT - Furnace operation and arc welding	Hot sparks	Face shields, spectacles with side. For severe exposure use a face shield.
CHEMICALS - Acid and chemical handling, degreasing, plating	Splash	Goggles, eyecup, and cover types. For severe exposure, use a face shield.
DUST - Woodworking, buffing, general, buffing, general dusty conditions.	Nuisance dust	Goggles, eyecup, and cover type

HEAD PROTECTION

Hats and caps have been designed and manufactured to provide workers protection from impact, heat, electrical, and fire hazards. These protectors consist of the shell and the suspension combined as a protective system. Safety hats and caps will be of nonconductive, fire and water-resistant materials. Bump caps or skull guards are constructed of lightweight materials and are designed to provide minimal protection against hazards when working in congested areas.

Head protection will be furnished to and used by all employees and contractors engaged in construction and other miscellaneous work in head-hazard areas. Head protection will also be required to be worn by engineers, inspectors, and visitors at construction sites.

Bump caps/skull guards will be issued to and worn for protection against scalp lacerations from contact with sharp objects. They will not be worn as substitutes for safety caps/hats because they do not afford protection from high-impact forces or penetration by falling objects.

Selection Guidelines for Head Protection

All head protection is designed to provide protection from impact and penetration hazards caused by falling objects. Head protection is also available which provides protection from electric shock and burns. When selecting head protection, knowledge of potential electrical hazards is important. Class A helmets, in addition to impact and penetration resistance, provide electrical protection from low-voltage conductors (they are proof tested to 2,200 volts). Class B helmets, in addition to impact and penetration resistance, provide electrical protection from high-voltage conductors (they are proof tested to 20,000 volts). Class C helmets provide impact and penetration resistance



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 342 of 407

(they are usually made of aluminum which conducts electricity) and should not be used around electrical hazards.

Where falling object hazards are present, helmets must be worn. Some examples include working below other workers who are using tools and materials which could fall; working around or under conveyor belts that are carrying parts or materials; working below machinery or processes which might cause material or objects to fall; and working on exposed energized conductors.

FOOT PROTECTION

General Requirements

Each affected employee shall wear protective footwear when working in areas where there is a danger of foot injuries due to falling or rolling objects, or objects piercing the sole, and where the employee's feet are exposed to electrical hazards.

Selection Guidelines for Foot Protection

Safety shoes and boots provide both impact and compression protection. Where necessary, safety shoes can be obtained which provide puncture protection.

In some work situations, metatarsal protection should be provided, and in other special situations electrically conductive or insulating safety shoes would be appropriate. Safety shoes or boots with impact protection would be required for carrying or handling materials such as packages, objects, parts, or heavy tools, which could be dropped; and, for other activities where objects might fall onto the feet. Safety shoes or boots with compression protection would be required for work activities involving skid trucks (manual material handling carts) around bulk rolls (such as paper rolls) and around heavy pipes, all of which could potentially roll over an employee's feet. Safety shoes or boots with puncture protection would be required where sharp objects such as nails, wire, tacks, screws, large staples, scrap metal, etc., could be stepped on by employees causing a foot injury.

HAND PROTECTION

General Requirements

Hand protection is required when employees' hands are exposed to hazards such as those from skin absorption of harmful substances; severe cuts or lacerations; severe abrasions; punctures; chemical burns; thermal burns; and harmful temperature extremes.

Skin contact is a potential source of exposure to toxic materials; the proper steps must be taken to prevent such contact. Gloves should be selected based on the material being managed, the hazard involved, and their suitability for the operation being conducted. One type of glove will not work in all situations.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 343 of 407

Most accidents involving hands and arms can be classified under four main hazard categories: chemicals, abrasions, cutting, and heat. There are gloves available that can protect workers from any of these individual hazards or a combination of hazards.

Gloves should be replaced periodically, depending on the frequency of use and permeability to the substance(s) managed. Gloves overtly contaminated should be rinsed and then carefully removed after use.

Gloves should also be worn whenever it is necessary to manage rough or sharp-edged objects and hot or very cold materials. The type of glove materials to be used in these situations include leather, welder's gloves, aluminum-backed gloves, and other types of insulated glove materials.

Careful attention must be given to protecting your hands when working with tools and machinery. Power tools and machinery must have guards installed or incorporated into their design that prevent the hands from contacting the point of operation, power train, or other moving parts. To protect the hands from injuries due to contact with moving parts, it is important to:

- Ensure that guards are always in place and used
- Always lock out machines or tools and disconnect the power before making repairs
- Treat a machine without a guard as inoperative
- Do not wear gloves around moving machinery, such as drill presses, mills, lathes, and grinders

Selection Guidelines for Hand Protection

Selection of hand PPE shall be based on an evaluation of the performance characteristics of the hand protection relative to the task(s) to be performed, conditions present, duration of use, and the hazards and potential hazards identified. Gloves are often relied upon to prevent cuts, abrasions, burns, and skin contact with chemicals that can cause local or systemic effects following dermal exposure. No glove provides protection against all potential hand hazards, and commonly available glove materials provide only limited protection against many chemicals.

Therefore, it is important to select the most appropriate glove for a particular application and to determine how long it can be worn, and whether it can be reused. It is also important to know the performance characteristics of gloves relative to the specific hazard anticipated, e.g., chemical hazards, cut hazards, flame hazards, etc. Before purchasing gloves, request documentation from the manufacturer that the gloves meet the appropriate test standard(s) for the hazard(s) anticipated. Other factors to consider for glove selection in general include:

- If the performance characteristics are acceptable, in certain circumstances, it may be more cost-effective to continually change cheaper gloves than to reuse more expensive types
- The work activities of the employee should be studied to determine the degree of dexterity required, the duration, frequency, and degree of exposure to the hazard, and the physical stresses that will be applied



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 344 of 407

SELECTION OF GLOVES FOR CHEMICAL HAZARDS

The first consideration in the selection of gloves for use against chemicals is to determine, if possible, the exact nature of the substances to be encountered. Read instructions and warnings on chemical container labels and SDSs before working with any chemical. Recommended glove types are often listed in the section for personal protective equipment.

All glove materials are eventually permeated by chemicals. However, they can be used safely for limited time periods if specific use and glove characteristics (i.e., thickness and permeation rate and time) are known. The safety office can assist in determining the specific type of glove material that should be worn for a particular chemical.

- The toxic properties of the chemical(s) must be determined; by the ability of the chemical to cause local effects on the skin and/or to pass through the skin and cause systemic effects
- Any "chemical resistant" glove can be used for dry powders
- For mixtures and formulated products (unless specific test data are available), a glove should be selected based on the chemical component with the shortest breakthrough time, since it is possible for solvents to carry active ingredients through polymeric materials
- Employees must be able to remove the gloves in such a manner as to prevent skin contamination

ELECTRICAL (PPE)

Employees working in areas where there are potential electrical hazards shall be provided with and shall use electrical protective equipment that is appropriate for the specific parts of the body to be protected and for the work to be performed. Protective equipment shall be maintained in a safe, reliable condition and shall be periodically inspected or evaluated.

If the insulating capability of protective equipment may be subject to damage during use, the insulating material shall be protected. (For example, an outer covering of leather is sometimes used for the protection of rubber-insulating material).

Employees shall wear nonconductive head protection wherever there is a danger of head injury from electric shock or burns due to contact with exposed energized parts.

Employees shall wear protective equipment for the eyes or face wherever there is a danger of injury to the eyes or face from electric arcs or flashes or flying objects resulting from electrical explosions.

General Protective Equipment and Tools

When working near exposed energized conductors or circuit parts, each employee shall use insulated tools or handling equipment if the tools or handling equipment might contact such



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 345 of 407

conductors or parts. If the insulating capability of insulated tools or handling equipment is subject to damage, the insulating material shall be protected.

Fuse handling equipment, insulated for the circuit voltage, shall be used to remove, or install fuses when the fuse terminals are energized.

Ropes and handlines used near exposed energized parts shall be non-conductive. Protective shields, protective barriers, or insulating materials shall be used to protect each employee from shock, burns, or other electrically related injuries while that employee is working near exposed energized parts that might be accidentally contacted or where dangerous electric heating or arcing might occur.

When normally enclosed live parts are exposed for maintenance or repair, they shall be guarded to protect unqualified persons from contact with the live parts.

ALERTING TECHNIQUES

The following alerting techniques shall be used to warn and protect employees from hazards that could cause injury due to electric shock, burns, or failure of electric equipment parts:

- **Safety signs, safety symbols, or accident prevention tags** - Shall be used where necessary to warn employees about electrical hazards
- **Barricades** - Shall be used in conjunction with safety signs where it is necessary to prevent or limit employee access to work areas by exposing employees to uninsulated energized conductors or circuit parts. Conductive barricades may not be used where they might cause an electrical contact hazard
- **Attendants** - If signs and barricades do not provide sufficient warning and protection from electrical hazards, an attendant shall be stationed to warn and protect employees

TRAINING

All employees who are required to use PPE shall be trained to know at least the following:

- When PPE is necessary
- What PPE is necessary
- How to properly don, remove, adjust, and wear PPE
- The limitations of the PPE
- The proper care, maintenance, useful life, and disposal of the PPE

Each affected employee shall demonstrate an understanding of the training and the ability to use PPE properly, before being allowed to perform work requiring the use of PPE. When there is a reason to believe that any employee who has been trained does not have the required understanding and skill or there are changes in the workplace, the employee must be retrained.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 346 of 407

Certification of training for PPE is required by OSHA and shall be accomplished by using the Job Safety Checklist to verify that each affected employee has received and understood the required PPE training. PPE training will be documented.

Note: Retraining of the employee is required when the workplace changes, making the earlier training obsolete, the type of PPE changes, or when the employee demonstrates a lack of use, improper use, or insufficient skill or understanding.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 347 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 348 of 407

Shop Safety

PURPOSE

To outline general procedures surrounding shop safety. This program provides a framework for hazard identification, control methods, training, and record keeping that is designed to minimize potential shop hazards that could occur while working in the shop for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company."

Please Note: It may be necessary to tailor the program for each shop space, addressing unique hazards. Specific procedures developed for different shop situations must be created. Not all topics in this program may be applicable.

RESPONSIBILITIES

Safety Coordinator

- Ensure that all personnel working in and around The Company Shop, are aware of all aspects of this shop safety policy
- Ensure that all affected personnel are trained as a competent person prior to operating any equipment in the shop

Personnel

- Follow all aspects of this safety policy
- Report all injuries to shop/maintenance manager as soon as possible
- Ask shop/maintenance manager questions about safe operating procedures if unclear

POLICY

The Company shall furnish to each of its employees a workplace that is free from recognized hazards that are causing or likely to cause death or serious physical harm.

GENERAL SHOP SAFETY GUIDELINES

The following general safety practices apply to most shops. The Company may apply rules and enforce requirements that are more restrictive than the minimums listed below:

- Always wear appropriate personal protective equipment.
- Avoid practical jokes or other disruptive behavior.
- Tie back long hair and beards and avoid wearing loose clothes and jewelry.
- Food, drink, tobacco products, gum, medications, and cosmetics are prohibited in work areas.
- Avoid distractions (ear buds, cell phone, etc.).



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 349 of 407

- Avoid working alone in the shop, but when unavoidable, make arrangements with the shop supervisor, or a colleague to check on your status periodically.
- Obtain approval from the shop supervisor before using any machines or tools.
- Know the hazards associated with the work.
- Ensure you are fully educated on the proper use and operation of any tool before beginning work.
- Ensure adequate ventilation to prevent exposure when working with glues, lacquers, paints, dust, and fumes (welding).
- Ensure equipment guards and shields are in place.
- Return tools to their proper locations.
- Report damaged equipment to the monitor or supervisor.
- Keep all work areas and aisles clean and unobstructed.
- Know emergency procedures.

Hazardous Chemicals

A shop using hazardous chemicals (solvents, paints, etc.) must comply with the OSHA Right-to-Know standard. Safety data sheets (SDS) for all the chemicals or product in the shop must be available to all users, and an annual chemical inventory must be submitted to EHS. Waste must be handled in accordance with OSHA CFR 1926.252 Materials Handling, Storage, Use, and Disposal. Waste or unwanted chemicals must be accumulated in designated areas. The accumulation area must be marked by postings and signage.

Any task that utilizes chemical substances, a training program on the handling, hazards, storage, exposure risks, symptoms of chemical exposure, and first aid will be part of any new employee's orientation training.

Housekeeping

The Company shall ensure the shop is properly cleaned at the end of each work period, and that all waste is disposed of in accordance with OSHA CFR 1926.252. Tools, materials, and equipment should be returned to their proper storage locations at the end of work period. Housekeeping may include but not limited to:

- All work sites must be clean and orderly.
- All work surfaces must be kept dry or appropriate means taken to assure that surfaces are slip-resistant.
- All spill materials or liquids should be cleaned up immediately and combustible scrap, debris and waste stored safely and removed from the shop promptly.
- Any accumulations of combustible dust must be routinely removed from elevated surfaces including the overhead structure of buildings.
- Combustible dust should be cleaned up with a vacuum system to prevent the dust going into suspension.
- Metallic or conductive dust must be prevented from entering or accumulating on or around electrical enclosures or equipment.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 350 of 407

- Covered metal waste cans are provided for oily and paint-soaked waste.
- Use them. All oil and gas fired devices must be equipped with flame failure controls that will prevent flow of fuel if pilots or main burners are not working.
- Paint spray booths, dip tanks, etc., must be cleaned regularly.
- Washing facilities are provided, so wash your hands after handling materials.

Maintenance and Inspection

Shop equipment must be maintained according to manufacturer's specifications or established guidelines. Inspections of equipment for damage, corrosion, wear, contamination, must be performed and documented on a routine basis. Damaged or defective equipment must be tagged or removed from service.

Posters and Signage

Postings and signage are used to identify hazards, communicate procedures to follow, and provide guidance during emergencies. The Safety Rules Poster containing the minimum requirements for working in each space, shall be displayed at the shop entrance. The poster must be tailored to the specific hazards in the shop environment.

The interior of the shop MUST be posted with the following:

- A Hazardous Waste Satellite Accumulation Area sign containing emergency contact information, container type, labeling requirements, and EHS contact information
 - Place the orange sign where you intend to accumulate waste or unwanted chemicals for collection.
 - Consult the Waste and Recycling Guidelines for details.
- Signs identifying the locations of safety equipment (fire extinguisher, safety shower, eyewash fountain, etc.)
- Signs, labels and/or warning/caution tape to identify designated use and storage areas for materials or equipment requiring special procedures (welding)
- Hazard communication signage at the main entrance to the shop
- Door signage with a current chemical inventory

Refer to specific information on signage requirements and posting locations as discussed in the Safety Equipment section

The Company will post employment related information, such as state and federal labor law, and right to know posters in a conspicuous place.

The required information is maintained on bulletin board where employees can find the following required posters:

- Various state and federal orders regulating the Wages, Hours and Working Conditions in certain industries



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 351 of 407

- Pay Day Notice, Anti-Discrimination Poster, Equal Employment Opportunity is the Law (EEOC form), OSHA Safety and Health Protection on the Job, Notice of Workers Compensation Carrier, and other Notices to Employees
 - Unemployment Insurance and Disability Insurance Notice
 - Employee Polygraph Protection Act (form WH 1462)
 - Access to Medical and Exposure Records Notice to Employees
 - Time Off to Vote

In addition to the above listed notices, a copy of this injury prevention program, a log and summary of Occupational Injuries and Illnesses, a copy of The Company's code of Safe Work Practices and a Fire Prevention and Evacuation Plan will be posted.

Site Specific Safety

Site specific safety measures, in addition to general shop safety guidelines, will be developed based on specific hazard analysis of the shop space and equipment. Site specific safety measures can include, but are not limited to additional or specific PPE, training, rules, competency validation, or environmental controls.

Standard Operating Procedures

Written standard operating procedures (SOPs) are recommended for all operations involving hazardous chemicals, machinery, or processes. An SOP provides a standardized reference during instruction, training, and competence verification on individual machines or processes.

Tool Inventory

Shop equipment should be inventoried using an equipment inventory form that includes the equipment type size, manufacturer, model number, and serial number.

HAZARD SPECIFIC SAFETY PRACTICES

Compressed Gases and Compressed Gas Cylinders

Compressed and liquefied gases pose significant chemical and physical hazards to shop users. Safe practices include:

- Ensure gas cylinders are secured, stored away from heat sources and capped when not in use.
- Ensure hazardous gas (corrosive, flammable, and toxic) quantities are below maximum allowed volumes and are stored in a ventilated cabinet when required.
- Transport cylinders on freight-only elevators where possible to avoid potential exposure to passengers.
- Do not ride with gas cylinders in elevators.
- Use an appropriate hand truck or cart to transport gas cylinders (do not drag or roll), ensure the valve protection caps are in place, and handle only one container at a time.
- Cylinders must be legibly marked to identify clearly the gas contained.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 352 of 407

- Ensure proper maintenance and use of regulators, manifolds, and safety valves.
- Always wear safety goggles when performing any operation with compressed or liquefied gases. Additional protection may be required based on the gases used (face shield, insulated gloves, chemical resistant gloves, and/or an apron).
- After assembly of a gas supply system, test all connections using a soapy water solution or a gas detection device. Retest the system periodically and when leaks are suspected.

For more details see [OSHA CFR 1910.101](#).

Electrical Safety

Electrical voltages as low as 12-volts, can be dangerous and cause injury. When working with or around electrically powered equipment follow these general precautions:

- Shop equipment must be powered by an appropriate electrical source matched to the power requirements recommended by the manufacturer.
- All electrical equipment must be UL listed and have either a grounded plug (three prong) or be double insulated.
- Protect electrical power cords from damage. Immediately replace cords that are worn, frayed, or otherwise damaged.
- Extension cords are for temporary use only (less than 72 hours).
- Electrical equipment used within six feet of water or in wet or damp environments must be plugged into a Ground Fault Circuit Interrupter (GFCI).
- Do not connect multiple pieces of equipment to the same power source. Shop equipment should be plugged directly into a wall outlet and not a multi-plug power strip.
- Grasp the plug to remove it from the socket – never pull the cord.
- Always unplug electrical equipment before attempting any repair or maintenance.

Lockout/Tagout (LOTO) Procedures

Lockout/tagout (LOTO) procedures are required when unexpected energization of equipment during maintenance or service could cause injury. This section applies to the control of energy during servicing and/or maintenance of machines and equipment. The Company shall utilize procedures for affixing appropriate lockout devices or tagout devices to energy isolating devices, and to otherwise disable machines or equipment to prevent unexpected energization, start up or release of stored energy to prevent injury to employees.

Note: When other standards in this part require the use of lockout or tagout, they shall be used and supplemented by the procedural and training requirements.

All machinery or equipment capable of movement must be de-energized or disengaged and blocked or locked out during cleaning, servicing, adjusting, or setting up operations, whenever required.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 353 of 407

Lockout Tagout must be performed by trained personnel authorized to perform maintenance or service on powered equipment. LOTO procedures are not required for work on equipment that can be unplugged and controlled from the power source.

Hand and Portable Power Tools

Hand tools are non-powered tools such as saws, screw drivers, hammers, chisels, and wrenches. Hand tools should be properly maintained after each use.

Portable power tools are powered by an electrical power source (cord or battery) or gasoline. Examples include drill, circular saw, grinder, router, jigsaw, and sander. Pneumatic tools are powered by compressed air. These include drill, impact wrench, grinder, ratchet, sander, and a cut-off tool.

Stationary power tools are large, non-portable and powered by sources such as electricity, gravity, pneumatic, or hydraulics. Maintain an inventory of power tools and equipment using an Equipment Inventory Form. Follow these guidelines for general tool safety:

- Use a tool for its intended purpose and only if you have been trained on the tool.
- Inspect all tools before use. Repair or replace them when damaged or defective and report problems to the shop supervisor.
- Keep tools sharp.
- Direct sharp cutting tools away from yourself and others.
- Keep all guards in place.
- Avoid distractions and pay attention when operating power tools.
- Do not rely on strength to perform an operation. The correct tool, blade, and method should not require excessive force.
- Never reach into the point of operation while equipment is running.
- Disconnect or unplug the power source before clearing jams or blockages.
- Never disable or tamper with safety releases or switches.
- Whenever possible use a push stick or pad to move material through a machine.
- Use the right tool for the job.
- Keep a firm grip on portable power tools.
- When possible, secure work pieces with a clamp or vise.
- Keep bystanders away from moving machinery.
- Store tools in a manner that prevents them from being damaged.

Laser Safety (if applicable)

Class 3B and 4 lasers emit amplified visible and non-visible light radiation and may cause immediate harm to eyes and skin. All users of Class 3B and 4 lasers must be pre-approved by the Laser Safety Officer and must adhere to the safety requirements outlined in the shop laser safety manual.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 354 of 407

Machine Guarding

Moving machine parts must be safeguarded to protect operators from injury. Belts, gears, shafts, fly wheels, chains, and other moving parts must be guarded to prevent contact with the operator.

If at any point a guard needs be removed, LOTO procedures must be followed, and the guard replaced after performing the required tasks or maintenance.

Before operating any machine in the shop, every employee must have completed a training program on safe methods of machine operations. Safe procedures include:

- All machinery and equipment must be kept clean and properly maintained.
- There must be sufficient clearance provided around and between machines.
- All equipment and machinery should be securely placed, and anchored when necessary.
- Machinery should be bolted to the floor to prevent falling during an earthquake, and the electrical cord to the machinery fixed with a breaker or other shut-off device to stop power in case of machine movement.
- There must be a power shut-off switch within reach of the operator's position.
- Electrical power to each machine shall be capable of being locked out for maintenance.
- The foot-operated switches are guarded and/or arranged to prevent accidental actuation by personnel or falling objects.
- All the pulleys and belts which are within 7 feet of the floor or working level are properly guarded.
- All moving chains and gears must be properly guarded.
- All splash guards mounted on machines that use coolant must be positioned to prevent coolant from splashing the employees.
- The machinery guards must be secure and arranged so they do not present a hazard.
- All revolving drums, barrels and containers should be guarded by an enclosure that is interlocked with the drive mechanisms, so that revolution cannot occur unless the guard enclosure is in place.
- All arbors and mandrels must have firm and secure bearings and be free of play.

Noise

Shop equipment produce sound levels that can be damaging to hearing. The Company shall ensure that noise hazard areas or equipment requiring hearing protection have signs or are labeled. Engineering controls will be used to reduce excessive noise levels. When engineering controls are not feasible, administrative controls will be used to minimize employee exposure. An ongoing preventive health program will be utilized to educate employees in safe levels of noise, exposure, effects of noise on their health, and use of personal protection. Approved hearing protective equipment will be available to every employee working in areas where continuous noise



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 355 of 407

levels exceed 85 db. To be effective, ear protectors must be properly fitted, and employees will be instructed in their use and care.

Respiratory Hazards and Protection

Fabrication, finishing, or painting operations may produce hazardous levels of airborne dust, particulates, or vapors. Engineering controls such as ventilation hoods or snorkels may be in place to mitigate these hazards. However, if these controls are not feasible, respirator use may be an appropriate means of protection. The issuance of respirators to employees must be completed as specified in the OSHA Respiratory Protection standard CFR 1910.134 to ensure proper respirator selection, fit-testing, medical surveillance, and to meet regulatory requirements.

Welding, Cutting, and Brazing

Welding and cutting are two forms of hot work that require special safety considerations. These operations must be performed in a designated area by trained individuals, with appropriate SOP's including PPE requirements and ventilation instructions. Hot work operations that cannot be performed in designated areas must be conducted according to the OSHA CFR 1910.252 Welding, Cutting and Brazing. When welding:

- Ensure that the welding helmet visor is dark enough to provide adequate protection.
- Wear fireproof apron and gloves.
 - If necessary, use a welding curtain to protect bystanders from UV radiation.
- In addition to the general guidelines for welding and cutting, follow these specific guidelines for safe welding operations:
 - Ensure the welding area has a non-reflective, noncombustible surface.
 - Ensure that adequate ventilation is installed and is functional.
 - Ensure that electrical cords are properly grounded.
 - Keep cylinder fittings and hoses free from oil and grease.
 - Ensure acetylene/oxygen systems are equipped with flame or flashback arrestors.
 - Replace defective or damaged hoses.
 - Carefully purge hoses and torches before connecting to a cylinder.
 - Always use the minimum acceptable flow rate.
 - Never use a match to light a torch. Use an approved lighter or striker.
 - Do not tamper with or attempt to repair cylinders, valves, or regulators.
 - Ensure flammable and combustible materials are not in the vicinity during hot work operations.
 - Close cylinder valves after each use.

Material Handling

Using mechanical equipment to move and store materials increases the potential for employee injuries. Workers must be aware of both manual handling safety concerns and safe equipment operating techniques. Employees should avoid overloading equipment when moving materials mechanically by letting the weight, size, and shape of the material being moved dictate the type



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 356 of 407

of equipment used. All materials handling equipment has rated capacities that determine the maximum weight the equipment can safely handle and the conditions under which it can handle that weight. Employers must ensure that the equipment-rated capacity is displayed on each piece of equipment and is not exceeded except for load testing.

When picking up items with a powered industrial truck, workers must do the following:

- Center the load on the forks as close to the mast as possible to minimize the potential for the truck tipping or the load falling.
- Avoid overloading a lift truck because it impairs control and causes tipping over.
- Do not place extra weight on the rear of a counterbalanced forklift to allow overload.
- Adjust the load to the lowest position when traveling.
- Follow the truck manufacturer's operational requirements.
- Pile and cross-tier all stacked loads correctly when possible.

When moving materials manually, workers should attach handles or holders to loads. In addition, workers should always wear appropriate personal protective equipment and use proper lifting techniques. To prevent injury from oversize loads, workers should seek help in the following:

- When a load is so bulky that employees cannot properly grasp or lift it
- When employees cannot see around or over a load
- When employees cannot safely handle a load

Using the following personal protective equipment prevents needless injuries when manually moving materials:

- Hand and forearm protection, such as gloves, for loads with sharp or rough edges
- Eye protection
- Steel-toed safety shoes or boots
- Metal, fiber, or plastic metatarsal guards to protect the instep area from impact or compression

EMERGENCY PLANS AND PROCEDURES

Emergency Action Plan

Each shop shall develop an Emergency Action Plan (EAP) that provides contact information and procedures to be followed in the event of an emergency such as:

- Fire
- Intruder
- Medical
- Severe weather
- Spill or release
- Utility outage
- Vandalism



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 357 of 407

Post a shop specific Emergency Action Plan near the shop exit for easy access during an incident. The plan should be reviewed and updated annually. All shop users must be trained on the emergency action plan as part of the site specific training.

Evacuation Procedures

Aisles, exits, and clear access to emergency equipment must be maintained, to ensure the ability to respond in emergency situations. Post evacuation routes and meeting locations for emergencies such as fire, severe weather, and chemical spills.

Identify building alarm pull station locations (fire alarm, chemical spill, severe weather). Shop employees must know how and when to activate alarms.

Fire Emergencies

In the event of a fire:

- **Activate the Alarm**

If a fire has started, no matter how small, activate the alarm system with a fire alarm pull station to alert building occupants.

- **Call 911**

Notify responders. The building alarm should initiate a response, but calling 911 will inform responders there is an actual emergency. You will also be able to provide critical information. Rapid response minimizes loss of life and property.

Respond Only if it is Safe

- Extinguish a fire only if you have been, the fire is small, and you have a safe exit route. *However, you are not required to do this, it is always OK to get out.
- Shut down hazardous operations.
- Exit the building immediately by the shortest and safest exit route. DO NOT TAKE THE ELEVATOR!
- Assist injured or impaired persons if you are able.
- Close doors behind you.
- Stay low if you encounter smoke.
- Refer to your Emergency Map for the nearest exit.
- Respond to your designated Meeting Place.
- Do not re-enter the building until the fire department has cleared the building for reentry, even if the alarms have been silenced.
- Go to and stay at your designated safe location. Notify supervisors and responders of:
 - Injured or disabled persons
 - Missing or unaccounted personnel
 - Provide their last known
 - Location or places they might be working
 - Hazardous operations or areas in the building



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 358 of 407

SAFETY EQUIPMENT

Eyewash

An eyewash fountain must be readily accessible in all areas where corrosives, hot liquids, or other eye-irritating materials (formaldehyde) are used or stored. During development of an Emergency Action Plan, personnel must identify eyewash fountain locations, verify proper function, and determine if additional eyewash fountains are required in the shop. The Company shall ensure that eyewash fountain locations are marked with a sign, typically green or white and posted at eye level above the fountain. Eyewash fountains should be flushed monthly by shop personnel.

Fire Extinguishers

Each shop must have unobstructed access to at least one fire extinguisher located at or near an exit. During development of an Emergency Action Plan, personnel must identify fire extinguisher locations and determine if available extinguishers are appropriate for planned shop activities. Ensure that fire extinguisher locations are marked with a red/white "fire extinguisher" sign posted at eye level above the device. Monthly fire extinguisher inspections are required. Annual extinguisher testing is performed by EHS. Fire Safety and Extinguisher Training is required for all shop personnel. It is recommended that personnel take the hands-on training, if it is their first time completing the training.

The fire extinguisher must be secured on a hanger, on a bracket, or in a cabinet/wall recess. The pressure gauge reading should be in the operable position. Verify monthly these requirements are met. Fire extinguishers should be the appropriate type for the hazard and within 50 feet of travel from the operations involving electrical hazards and chemicals, and 75 feet for ordinary combustibles. Ideally fire extinguishers should be located within the shop but a corridor location is acceptable if within the stipulated travel distance.

First Aid Kits

The Company shall ensure minimal contents of a generic first aid kit is described in American National Standard (ANSI) Z308.1-1998 "Minimum Requirements for Workplace First-aid Kits." The contents of the kit listed in the ANSI standard should be adequate for small worksites. When larger operations or multiple operations are being conducted at the same location, employers should determine the need for additional first aid kits at the worksite, additional types of first aid equipment and supplies and additional quantities and types of supplies and equipment in the first aid kits.

The Company shall ensure a properly stocked first aid kit shall be available to shop personnel. First-aid kits and required contents are maintained in a serviceable condition. Contents shall include items such as scissors, tweezers, tubes of ointments with caps, or rolls of adhesive tape, need not be individually wrapped, sealed, or disposed of after a single use or application. Individual packaging and sealing shall be required only for those items which must be kept sterile in a first aid kit.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 359 of 407

Safety Cabinets

Flammable safety cabinets are storage cabinets (typically metal) manufactured to isolate flammable materials from a potential fire that may occur in the shop. No more than 25 gallons of flammable liquids shall be stored in a room outside of an approved storage cabinet. For more details see OSHA CFR 1926.152.

Safety Cans

Flammable safety cans are containers (typically metal) with self-closing spouts and integral flame arresters used to store flammable liquids for quantities greater than four liters (~1 gal.). Safety cans must be properly labeled and readily available.

Personal Protective Equipment

Minimum personal protective equipment (PPE) requirements for entering a shop will be posted at the door on the Safety Rules poster.

Any PPE required above the minimum will be determined through completion of a job hazard assessment or development of a standard operating procedure (SOP). PPE should be included in the SOP for the process. Shop users are expected to use assigned PPE when called for by the hazard assessment, standard operating procedure, container label or safety data sheet. PPE shall be maintained by the user in a clean, sanitary, and usable condition.

Safety Shower

An easily accessible, drench-type safety shower shall be available within ten seconds travel time of each area where corrosive or toxic liquids are used or stored. In some buildings, shops may need to rely on safety showers outside the shop. During development of an Emergency Action Plan, personnel must identify safety shower locations and verify proper function by contacting the building area mechanic. Ensure that safety shower locations are marked with a sign (typically green/white, available from EHS) posted at eye level below the shower.

Spill Kits

A properly stocked spill control kit shall be available in each shop. While there are many OSHA and EPA requirements on how to be prepared for spills, the regulations do not specifically require spills kits. However, spill kits are a good best practice. A spill kit can:

- Reduce the potential of slips, trips, and falls
- Reduce exposure to employees
- Prevent chemical release to sewer and waterways
- Be integrated as part of a quick response plan for a quick and safe response protocol
- Reduce risk and limit impacts of spills

What you put in the spill kit depends on the potential spill size, type of spill, and if workers will have the appropriate PPE available.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 360 of 407

EXPOSURE ASSESSMENT AND MEDICAL SURVEILLANCE

The Company shall implement exposure assessment and medical surveillance when developing shop procedures. Certain chemical, biological, radiological, and physical hazards require specific health monitoring. It is the responsibility of The Company to ensure personnel are receiving appropriate monitoring and/or medical care based on shop hazards.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 361 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 362 of 407

Stop Work Authority

PURPOSE

The purpose of this procedure is to ensure that all employees of **Pro Painting & Drywall Inc.** are given the responsibility and authority to stop work when employees believe that a situation exists which places them, their coworker(s), contracted personnel, or the public at risk or in danger; could adversely affect the safe operation or cause damage to the facility; and provides a method to resolve the issue. Maintaining a diligent questioning attitude is vital to safe execution of work-scope and is a cornerstone to effective Conduct of Operations and Integrated Safety Management.

This procedure extends the authority to stop work to situations where an employee believes there is a need to clarify work instructions; or to propose additional controls.

RESPONSIBILITIES

Management

- Resolve any issues that have resulted in an individual stopping a specific task(s) or activity
- Provide feedback to individual/s and the affected work group who have exercised their Stop Work responsibility on the resolution of their concern prior to resuming work. If the employee that issued a stop work is not available due to reasons such as vacation, PTB, PTO, shift change, or training then the supervisor provides the feedback to the safety representative and union safety representative, prior to resuming work
- Ensure no actions are taken as reprisal or retribution against individuals who raise safety concerns or stop an activity, they believe is unsafe

Safety Officer

- Assist employees, supervision, and management in the resolution of safety issues and concerns
- Immediately contact management and work to resolve issues when an employee has called a situation to their attention that has not been resolved
- Discuss resolution with employees involved in a work stoppage where resolution was completed after their shift or when they were unavailable, or where he/she acted as their representative in reaching resolution
- Work as the agent of an employee that prefers to remain anonymous to work directly in the resolution of the stop work



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 363 of 407

Employees

In supporting safe execution of work, all personnel, have the following responsibilities:

- The responsibility and authority to stop work or decline to perform an assigned task without fear of reprisal, to discuss and resolve work and safety concerns. The Stop Work may include discussions with co-workers, supervision, or safety representative to resolve work related issues, address potential unsafe conditions, clarify work instructions, propose additional controls, etc.
- The responsibility and authority to initiate a Stop Work IMMEDIATELY, without fear of reprisal, when the employee believes a situation exists which places himself/herself, a coworker(s), or the environment in danger or at risk
- The responsibility to report any activity or condition the employee believes is unsafe or for which they have initiated a Stop Work. Notification should be made to the affected worker(s) and to the supervisor or their supervisor's designee at the location where the activity or condition exists
- The responsibility to notify their supervisor if a raised Stop Work issue has not been resolved to their satisfaction through established channels prior to the resumption of work

POLICY

All employees have the authority and obligation to stop any task or operation where concerns or questions regarding the control of EHS risk exist.

Stop work if an activity or condition is believed to be unsafe, such as:

- A situation exists which places them, their coworker(s), contracted personnel, or the public at risk or in danger
- A situation could adversely affect the safe operation or cause damage to the facility
- A situation could result in a release of radiological or chemical effluents to the environment above regulatory requirements or approvals or
- To clarify work instructions or to propose additional controls

A member of management will resolve any issues that have resulted in an employee stopping work or an activity, as well as:

- Involve individuals who initiated the Stop Work or their appropriate safety representatives if the individual is not available, in reaching mutual agreement on the resolution or proposed actions necessary to return to work
- Be sure any necessary corrective or compensatory actions are taken before resuming an activity and are documented

If a Stop Work has not been resolved to the mutual agreement of manager and employee, then the stop work remains in place and the Supervisor will notify the appropriate company management/safety representative.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 364 of 407

No work will resume until all stop-work issues and concerns have been adequately addressed.

Every employee, has the responsibility and authority to stop work IMMEDIATELY, without fear of reprisal, when the employee believes:

- Conditions exist that pose a danger to the health and safety of workers or the public or
- Conditions exist, that if allowed to continue, could adversely affect the safe operation of, or could cause serious damage to, a facility.

REPORTING UNSAFE CONDITIONS

Employees are responsible to initiate a Stop Work Intervention when warranted and management is responsible to create a culture where Stop Work Authority is exercised freely.

When an unsafe condition is identified the Stop Work Intervention will be initiated, coordinated through the supervisor, initiated in a positive manner, notify all affected personnel and supervision of the stop work issue, correct the issue, and resume work when safe to do so.

Employees are expected to report any activity or condition which he or she believes is unsafe. Notification should be made to the affected worker(s) and then to the supervisor or designee at the location where the activity or condition exists.

- Following notification, resolution of the issue resides with the responsible supervisor.

RIGHT TO A SAFE WORKPLACE

Any employee who reasonably believes that an activity or condition is unsafe is expected to stop or refuse work without fear of reprisal by management or coworkers and is entitled to have the safety concern addressed prior to participating in the work.

Any form of retribution or intimidation directed at any individual or company for exercising their right to issue a stop work authority will not be tolerated.

STOP WORK AUTHORITY PROCESS

Stop Work Authority is a several step process:

- **Stop** - when an employee perceives conditions or behaviors that pose imminent danger, he or she must immediately initiate a stop work intervention.
- **Notify** - notify affected personnel and supervision of the stop work action.
- **Investigate** - affected personnel will discuss the situation and come to an agreement on the stop work action.
- **Correct** - Corrective actions will be made according to the corrections agreed upon in the investigation.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 365 of 407

- **Resume** - All affected employees will be notified of what corrective actions were implemented and work will recommence by personnel with restart authority.
- **Follow Up** - A root cause analysis to the stop work will be completed to identify any potential opportunities for improvement.

DOCUMENTATION

All Stop Work Interventions shall be documented for lessons learned and corrective measures to be put into place. Stop Work reports shall be reviewed by a supervisor or manager in order to measure participation, determine quality of interventions and follow-up, trend common issues, identify opportunities for improvement, and facilitate sharing of learnings.

TRAINING

Employees should be trained on Stop Work Authority and the contents of this program prior to beginning work and on an ongoing basis. The training must be documented including the employee's name, the dates of training and subject.

FOLLOW UP

It is the desired outcome of any Stop Work Intervention that the identified safety concern(s) have been addressed to the satisfaction of all involved persons prior to the resumption of work. Most issues can be adequately resolved in a timely manner at the job site, occasionally additional investigation and corrective actions may be required to identify and address root causes.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 366 of 407

Stop Work Authority - US

Page: 366 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 367 of 407

Walking Working Surfaces

PURPOSE

The purpose of this program is to establish the minimum requirements and responsibilities for employees of **Pro Painting & Drywall Inc.**, hereafter referred to as "The Company," when on walking-working surfaces, including elevated work platforms and rooftops.

This program is designed to protect all employees engaged in work activities that expose them to falls when working four (4) feet or more above a lower level as prescribed in the Occupational Safety and Health Administration's (OSHA's) [Walking-Working Surfaces Standard - 29 CFR 1910.21](#) and the [2003 Walking and Working Surfaces; Personal Protective Equipment \(Fall Protection Systems\) Proposed Rule](#).

This written program shall be re-evaluated annually and revised, as necessary.

SCOPE

This program applies to all employees - including faculty - who perform any work activities that expose them to slips, trips, or falls through unguarded floors and wall openings, floor holes, and falls from elevated work platforms and roofs.

RESPONSIBILITIES

Environmental Health and Safety Office (EHSO)

As the administrative department for the Walking/Working Surfaces – Fall Protection Program, EHSO is responsible for:

- Development, implementation, and administration of the Walking/Working Surfaces – Fall Protection Program
- Conducting workplace risk assessments to determine the need for fall protection and assess the condition of walking/working surfaces
- Development and implementation of fall protection training
- Reviewing, updating, and evaluating the overall effectiveness of the Walking/Working Surfaces – Fall Protection Program
- Providing technical support and consultation to departments of affected employees to interpret requirements and establish safe practices

Directors, Supervisors, and Managers/Principal Investigators (PIs)

Directors, supervisors, and managers have primary responsibility for the management and enforcement of the Walking/Working Surfaces – Fall Protection Program in their areas. They are responsible for:

- Ensuring employees can recognize potential fall hazards based on this program



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 368 of 407

- Notifying EHSO of each fall hazard that their employees may face
- Notifying EHSO of the need for fall protection training, including when a new employee is assigned, and when there is reason to suspect a previously trained employee does not have the understanding required to safely work from elevated surfaces
- Ensuring employees attend all required training
- Periodically evaluating the effectiveness of the program as it applies to the work that their affected employees perform and providing EHSO with their conclusions, compliance challenges, and recommendations
- Contacting EHSO for technical support when questions arise regarding compliance and safe procedures
- Ensuring that proper safety equipment is supplied to their affected employees where needed, such as fall arrest systems, guardrail systems, toeboards, stanchions and supports for designated areas, etc.
- Ensuring that all workplaces are safe to conduct the work that their affected employees are expected to perform
- Notifying EHSO if contractors are observed working in an unsafe manner

Employees

All employees are responsible for complying with the rules set forth by this program. They are responsible for:

- Complying with the rules set forth by this program
- Notifying their supervisor when questions arise surrounding safe procedures, the need for fall prevention equipment, and difficulties complying with these requirements
- Reporting all accidents and near miss incidents
- Inspecting all personal fall arrest systems for signs of damage and deterioration prior to each use
- Attending all required Walking/Working Surfaces – Fall Protection Training annually

Contractors

Contractors working on campus are required to comply with [29 CFR 1926.501](#) and all other applicable OSHA workplace safety regulations. Contractor's safety programs shall be available for review upon request by representatives of ESHO. OSHA now requires regular inspections of walking-working surfaces, making the rule more consistent with the agency's construction standards

GENERAL REQUIREMENTS

- All walking/ working surfaces shall be kept clean, dry (where possible), and orderly.
- Every floor, workplace, and passageway shall be kept free from protruding nails, splinters, holes, or loose boards.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 369 of 407

- Walking and working surfaces must have the strength and integrity to support employees.
- Covers and/or guardrails shall be provided to protect personnel from the hazards of open pits, tanks, vats, ditches, etc.
- The floor or roof of a building shall not be overloaded with materials and/or equipment over the approved load limits. Elevated storage and other platforms shall be marked with the load bearing weight.
- All permanent aisles and passageways shall be clearly marked, have adequate space for passage of both moving equipment and employees, have safe clearances at all turns, doors, and passageways, and shall not be obstructed by physical barriers or stored materials.

Safe Means of Access and Egress to and From Walking-Working Surfaces

- Stop slips, trips, and falls.
 - Apply tread tape to stairs, docks, kitchens, and other areas where slippery conditions may pose hazards.
- Highlight emergency egress paths.
 - Offer safe egress paths in power outages, fires, and other lowlight conditions with glow-in-the-dark floor marking.
- Increase visibility.
 - Use reflective tape to call attention to hazards, electrical panels, edges, and more

HOST EMPLOYER'S PROPERTY

When working on a host employers' property, good housekeeping will be maintained - including but not limited to - keeping all places of employment, passageways, storerooms, service rooms, and walking-working surfaces are kept in a clean, orderly, and sanitary condition.

The floor of each workroom is maintained in a clean and, to the extent feasible, in a dry condition. When wet processes are used, drainage must be maintained and, to the extent feasible, dry standing places, such as false floors, platforms, and mats must be provided.

While working on a host employers' property, protection for fixed stairways, ladder openings, hatchway openings, manholes, skylights, ramps, and platforms will be not be compromised. Requests to make any changes shall not take place without direct permission from the host employer.

INSPECTION, MAINTENANCE AND REPAIR

The Company must ensure:

- Walking-working surfaces are inspected, regularly and as necessary, and maintained in a safe condition.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 370 of 407

- Hazardous conditions on walking-working surfaces are corrected or repaired before an employee uses the walking-working surface again. If the correction or repair cannot be made immediately, the hazard must be guarded to prevent employees from using the walking-working surface until the hazard is corrected or repaired.
- When any correction or repair involves the structural integrity of the walking-working surface, a qualified person performs or supervises the correction or repair. [29 CFR 1910.22](#)
- All midrails, screens, mesh, intermediate vertical members, solid panels, and other equivalent intermediate members are capable of withstanding, without failure, a force of at least 150 pounds applied in any downward or outward direction at any point along the intermediate member. [29 CFR 1910.29\(b\)\(5\)](#)

OPENINGS

- Every floor opening, open manhole, open pit doors or platform shall be guarded by a Removeable railing or be constantly attended.
- Toeboards must be installed around floor and wall openings and where the potential exists for tools and other materials to fall on personnel working below.
- All floor and temporary wall openings, including manholes, trapdoors, pits, ladder way floor openings, and chute openings (of which there is a drop of more than 4 feet), shall be guarded.
- Creating or exposing floor holes into which persons cannot accidentally walk (on account of fixed machinery, equipment, or walls) will be protected by a cover that leaves no openings more than 1 inch wide. The cover shall be securely held in place to prevent tools or materials from falling through.
- When an opening is not covered or blocked from access, a person must be assigned for constant attendance to the opening until the cover is replaced.
- Covers must be sound, solid, not easily opened, and cannot project more than one inch above the floor or surface level. All hinges, handles, bolts, or other parts must set flush with the floor or cover surface.
- Barricades that are designed to prevent someone from falling into the opening must be visually noticeable and cannot have additional openings that create additional fall hazards.
- Floor surfaces surrounding the opening shall be free of clutter and slippery material.
- Creating or exposing floor holes into which people cannot accidentally walk (on account of fixed machinery, equipment, or walls) shall be protected by a cover that leaves no openings more than 1 inch wide.
 - The cover shall be securely held in place to prevent tools or materials from falling through.
- Chute openings where there is drop of more than 4 feet will be guarded.
- Any temporary wall openings will also be guarded.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 371 of 407

STEP BOLTS

Installed before Jan. 1, 2018, must be capable of supporting their maximum intended loads.

Installed on or after Jan. 1, 2018, must be constructed of or coated with corrosion-resistant material if they are in areas where corrosion may occur. Must be capable of supporting at least four times their maximum intended loads.

MANHOLE STEPS

Manhole steps installed on or after Jan. 1, 2018, Must meet specific requirements for slip resistance, corrosion resistance, width, and vertical spacing. Manhole steps must be inspected at the start of each work shift.

STAIRWAYS

All stairs must be standard stairs installed at an angle from 30 degrees to 50 degrees from horizontal unless an employer can demonstrate that such stairs are not feasible; then, spiral, ship, or alternating tread-type stairs are acceptable alternatives. When a door or a gate opens directly on a stairway, a platform must be available, and the swing of the door or gate must not reduce the platform's usable depth less than 20 inches. For platforms installed before Jan. 1, 2018. Standard stairs built on or after Jan. 1, 2018, must have a maximum riser height of 9.5 inches and a minimum tread depth of 9.5 inches.

SCAFFOLDS AND ROPE DESCENT SYSTEMS

Scaffolding must meet all of the requirements in Division 3, Subdivision L (Scaffolding). Employees who erect, dismantle, move, or work from a scaffold must be trained according to the requirements in 1926.454, Scaffolding, Training requirements.

FIXED INDUSTRIAL STAIRS

- Standard stair railings and handrails shall be provided on stairs with four (4) or more risers.
- Standard railings, including top rails, midrails, and toe-boards shall be provided on the open sides of all exposed stairways and stair platforms.
- Handrails shall be provided on at least one side of closed stairways, preferably on the right-side descending.
- Fixed stairways must be designed and constructed to carry a load of five (5) times the normal live load anticipated at any one time and be able to safely carry a moving concentrated load of 1000 pounds.
- Fixed stairways shall have a minimum width of twenty-two (22) inches.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 372 of 407

- Fixed stairs shall be installed at angles to the horizontal of between thirty (30) and fifty (50) degrees.
- Stairway platforms shall not be less than the width of a stairway and must be a minimum of thirty (30) inches in length measured in the direction of travel.
- Adequate headroom of seven (7) ft. must be maintained above stair tread.
- Stairs shall be free of clutter, and treads must be slip resistant.

LADDERS

Ladders are used only for the purposes for which they were designed. Ladders are inspected before initial use in each work shift, and more frequently as necessary, to identify any visible defects that could cause employee injury. [29 CFR 1910.23\(b\)\(8\)](#)

Any ladder with structural or other defects is immediately tagged "Dangerous: Do Not Use" or with similar language in accordance with [29 CFR 1910.145](#) and removed from service until repaired or replaced.

Ladders are used only on stable and level surfaces unless they are secured or stabilized to prevent accidental displacement.

Portable Ladders

Portable ladders used to gain access to an upper landing surface have side rails that extend at least 3 feet above the upper landing surface. [29 CFR 1910.23\(c\)\(11\)](#)

Fixed Ladders

Fixed ladders Fixed ladders that extend more than 24 feet above a lower level must be equipped with:

- A personal fall-arrest system, ladder safety system, cage, or well if installed before Nov. 1, 2019.
- A personal fall-arrest system or a ladder safety system if installed on and after Nov. 1, 2019.

By Dec. 1, 2036, all fixed ladders must be equipped with a personal fall arrest system or a ladder safety system

Climbing fixed ladders Before Nov. 1, 2019, when a worker climbs a fixed ladder that does not have a cage, well, personal fall-arrest system, or a ladder safety system, the worker must:

- Receive training and demonstrate the capability to perform the necessary climbs in accordance with 1910.29(h) Fall protection systems, outdoor advertising
- Wear a body harness equipped with an 18-inch rest lanyard
- Keep both hands free of tools and material when climbing on the ladder
- Be protected by a fall protection system upon reaching the work position



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 373 of 407

DOCK-BOARDS (BRIDGE PLATES)

In accordance with [U.S. Department of Commerce publication, Commercial Standard CS 202-56 \(1961\) "Industrial Lifts and Hinged Loading Ramps"](#):

- Portable and powered dock-boards must be of sufficient strength to carry the load imposed on them.
- Portable dock-boards must be secured in position by being anchored or equipped with devices that prevent slippage during use.
- Handholds, or other effective means, shall be provided on portable dock-boards to permit safe handling.

DESIGNATED AREAS

- The work must be of a temporary nature, such as maintenance of rooftop equipment.
- Designated areas must only be established on surfaces that have a slope from the horizontal of 10 degrees or less.
- Designated areas must consist of an area surrounded by a rope, wire, or chain and supporting stanchions.
- After being erected with the line attached, stanchions must be capable of resisting without tipping over - a force of at least 16 pounds applied horizontally against the stanchion.
- The line must have a minimum breaking or tensile strength of 500 pounds.
- The line must be attached at each stanchion in such a way that pulling on one section of the line between stanchions will not result in slack being taken up in adjacent sections before the stanchion tips over.
- The line must be installed in such a manner that its lowest point is no less than 34 inches nor more than 39 inches from the work surface.
- The line forming the designated area must be clearly visible from any unobstructed location within the designated area up to 25 feet away.
- The stanchions must be erected as close to the work area as is permitted by the task.
- The perimeter of the designated area must be erected no less than six (6) feet from the unprotected side or edge.
- Access to the designated area shall be by a clear path formed by two lines attached to stanchions.

FALL PROTECTION SYSTEMS

Employees performing work from walking/working surfaces that are four (4) ft. or higher above a lower level must be protected from falls by passive fall protection systems, i.e., guardrails or parapet walls when feasible.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 374 of 407

When the use of a guardrail system is infeasible, alternative fall protection, i.e., designated areas or personal fall protection equipment will be used. This includes maintenance work on exhaust equipment, Heating Ventilation and Air Conditioning (HVAC) systems, plumbing, etc., as well as inspections and assessments of work conducted on rooftops.

Guardrail Systems

- The top edge height of top rails must be 39- 42 inches above the walking/working level.
- Mid-rails must be installed at a height midway between the top edge of the guardrail system and the walking/working level.
- Guardrail systems must be capable of withstanding - without failure - a force of at least 200 pounds.
- Guardrail systems must be surfaced to prevent injury to an employee from punctures or lacerations, and to prevent snagging of clothing.
- Guardrail systems used on ramps and runways must be erected along each unprotected side or edge.
- Toeboards must be four (4) inches in height from its top edge to the level of the walking/ working surface.
- Toeboards must be securely fastened in place and with not more than 1/4 - inch clearance above the walking/ working surface level.
- Where material is piled to such height that a standard toeboard does not provide protection, paneling from floor to intermediate rail, or to top rail must be provided.

FALL ARREST SYSTEMS

Personal fall arrest systems are designed to stop a fall once it has begun. The system includes an anchorage, full body harness, lanyard, locking snap-hooks, lifeline, and connector, and may include a descent control device.

Body belts are not acceptable as part of a personal fall arrest system. However, the use of body belts in positioning device systems is acceptable. The manufacturer's procedures for the equipment must be followed. In addition, personal fall arrest equipment must comply with the following:

- Harnesses must be attached in the center of the back near shoulder level, above the wearer's head.
- Personal fall arrest systems must limit the maximum arresting force on an employee to 1,800 pounds.
- Systems must bring an employee to a complete stop and limit maximum deceleration distance an employee travels to 3.5 feet.
- Systems must have sufficient strength to withstand twice the potential impact energy of an employee free falling a distance of six feet, or the free fall distance permitted by the system, whichever is less.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 375 of 407

- Systems must be rigged in such a way that an employee can neither free fall more than six feet, nor contact any lower level.

EQUIPMENT ANCHORAGE

Anchoring the fall arrest system is critical. The selection of the anchoring point should be made carefully. When the employee is uncertain about the anchoring point, he/she is expected to consult with a supervisor or EHSO.

The Company shall ensure that no employee uses any anchorage before the employer has obtained written information from the building owner that each anchorage meets OSHA requirements (each anchorage is capable of supporting at least 5,000 pounds, in any direction, for each employee attached. The information must be based on an annual inspection by a qualified person and certification of each anchorage by a qualified person, as necessary, and at least every 10 years.) The employer must keep the information for the duration of the job. [1910.27\(b\)\(1\)\(i\)\(ii\)](#)

Equipment anchorage, tie-off, and use must meet the following conditions:

- Anchoring points must be permanent fixed objects.
- Anchors, to which personal fall arrest equipment is attached, must be capable of supporting at least 5,000 pounds for each attached employee.
- When tying off, the employee must tie off at such a location where there are no obstacles in the potential path of a fall.
- The employee must follow the anchoring tie off and equipment tie off procedures that are specified by the fall arrest system manufacturer **prior** to getting into a position where he/she could fall.

Equipment Care and Inspection

- Follow the manufacturer's instructions and training protocols for equipment maintenance, cleaning, and storage.
- Personal fall arrest systems must be inspected prior to each use for mildew, wear, damage, and other deterioration.
- Immediately remove any defective fall arrest system components.

TRAVEL RESTRAINT SYSTEM

When any portion of a guardrail system, gate, or chains is removed, and an employee must lean through or over the edge of the access opening to facilitate hoisting, the employee is protected from falling by a personal fall arrest system.

The Company shall ensure that each employee is protected from falling through any hole (including skylights) that is 4 feet or more above a lower level by one or more of the following:

- Covers



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 376 of 407

- Guardrail systems
- Travel restraint systems
- Personal fall arrest systems

FALLING OBJECT PROTECTION

When an employee is exposed to falling objects, The Company shall ensure that each employee wears head protection that meets the requirements [29 CFR 1910.28](#). In addition, The Company shall protect employees from falling objects by implementing one or more of the following:

- Erecting toeboards, screens, guardrail systems, or safety nets to prevent objects from falling to a lower level
- Erecting canopy structures and keeping potential falling objects far enough from an edge, hole, or opening to prevent them from falling to a lower level
- Barricading the area into which objects could fall, prohibiting employees from entering the barricaded area, and keeping objects far enough from an edge or opening to prevent them from falling to a lower level

FALL RESCUE

Prompt rescue must be provided in the event of a fall or employees must be able to rescue themselves. When personal fall arrest equipment is used, employees must develop a rescue plan before work begins.

Employers must ensure there is a certified rescuer on site when climbing is to be performed. If there is not a certified rescuer on site, there must be other arrangements for a rescuer such as an off-site certified rescuer or the fire department who can conduct a fall rescue. Arrangements with an off-site rescuer or the fire department must be made before climbing is conducted. These personnel must be made aware beforehand of the climbing operations to ensure there is a certified rescuer who can come to the site to perform a rescue in the event of a fall. A supervisor or other designated employee must have access to the phone number of off-site rescuers in the event one is needed.

OSHA's fall rescue plan for general industry is stated in **CFR 1910.140(c)(21)** which states the employer must provide for prompt rescue of each employee in the event of a fall.

For OSHA's construction standard for fall rescue, see **CFR 1926.502(d)(20)** which states the employer shall provide for prompt rescue of employees in the event of a fall or shall assure that employees are able to rescue themselves.

Note: [ANSI Z359.1 Fall Protection Code](#) recommends that contact be made with a worker within six minutes after a fall. Rescue plans should be determined following the fall protection rescue hierarchy:

- Self-rescue



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 377 of 407

- Assisted rescue
- Professional rescue

If possible, employees should work in teams of two or more, when personal fall arrest systems are used to ensure prompt rescue in the event of a fall.

Note: When an employee uses a fall arrest system alone, alternative methods must be implemented that will provide an equivalent response, as listed above. Alternative methods may include (but not be limited to) notifying an on-site supervisor or other competent person of the type of work being performed, referencing the work location, and providing a review of the rescue plan.

Should a Fall Occur

- The person needing rescue can delay suspension trauma by flexing or pumping the leg muscles or using safety step devices to provide leg support and enhance blood circulation until rescue is provided
- The rescuer can provide emotional support during self-rescue and use a ladder or man-lift to provide assisted rescue
- If the employee was injured during the fall, contact local emergency services by dialing 911 and do not attempt to move or rescue the employee

Any employee involved in a fall must be seen by a health care provider and complete an incident report.

Employers must consider the following when creating a fall rescue plan:

- Accessibility available to complete the rescue
- Potential environmental and weather conditions
- Distance to, location of, and availability of local emergency services
- Communication method between rescuer(s) and fallen worker
- Rescue equipment required and location of equipment on site
- Training and skills requirements for rescuers
- Hazards that may be present during the rescue
- Structural features of work location
- Rescue methods that are available
- Rescue procedure(s) that will allow for safe and timely rescue

Reminder: ensure the local emergency authorities are identified in the rescue plan. If a fall occurs and there is no certified rescuer on-site, call 911 or the local emergency number listed in the rescue plan. If the fall rescue is for a person suspended in their PFAS, ensure the emergency responders are aware that treatment for suspension trauma may be required.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 378 of 407

Do not rely only on calling 911 as your fall rescue plan, emergency services may not always be trained or equipped to respond to specific situations, or they may not be located close enough to get on-site fast enough.

TRAINING REQUIREMENTS

EHSO is responsible for ensuring that Walking Working Surfaces – Fall Protection training is provided to employees exposed to falls when working four (4) feet or more above a lower level. Training will be provided upon initial assignment to a location that requires an employee to work from elevated surfaces and annually thereafter; or whenever there is reason to suspect a previously trained employee does not have the understanding and skill required to safely work from elevated surfaces. The Company shall ensure that each employee is trained by a qualified person.

Training will be overseen by EHSO. Training and instruction will be provided by people knowledgeable in all aspects of fall protection. Outside contractors that are competent in fall protection may provide training, under the following conditions:

- The requirements of this section are satisfied.
- EHSO is provided a copy of the training outline.
- EHSO approves the materials **prior** to the training session.

Training will include the following:

- Instruction on using personal fall arrest equipment by the vendor supplying the equipment, including the following:
 - Methods of use
 - Limitations of the equipment
 - Inspection and storage requirements
 - Proper anchoring and tie-off techniques, including determination of elongation and deceleration distance
- The requirements of [29 CFR 1910.21](#) Walking-Working Surfaces
- The requirements of the 2003 Walking Working Surfaces
- Personal Protective Equipment (Fall Protection Systems) Proposed Rule
- The requirements of all protection systems used at The Company

EHSO will maintain documentation of attendance which will include the employee's name, department, and date of training.

RECORDKEEPING

All documented training and logbooks of equipment use, and inspections shall be retained and maintained by The Company for at least one year.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 379 of 407

DEFINITIONS

Anchor - A secure point of attachment for lifelines, lanyards, or deceleration devices.

Body Belt (Safety Belt) - A strap with means both for securing it about the waist and for attaching it to a lanyard, lifeline, or deceleration device.

Body Harness - Straps which may be secured about the employee in a manner that will distribute the fall arrest forces over at least the thighs, pelvis, waist, chest, and shoulders with means for attaching it to other components of a personal fall arrest system.

Connector - A device which is used to couple (connect) parts of the personal fall arrest system and positioning device systems together. It may be an independent component of the system, such as a carabiner, or it may be an integral component of part of the system (such as a buckle or dee-ring sewn into a body belt or body harness, or a snap-hook spliced or sewn to a lanyard or self-retracting lanyard).

Designated Area - A space which has a perimeter barrier erected to warn employees when they approach an unprotected side or edge and serves also to designate an area where work may be performed without additional fall protection.

EHSO - Environmental, Health and Safety Office.

Fall Restraint System - A fall protection system that prevents the user from reaching a fall hazard and/or entering free fall. Typically, the worker is restrained by a fixed-length lanyard and a body harness or body belt, where the lanyard prevents the worker from reaching the leading edge. The system is comprised of either a body belt or body harness, along with an anchorage, connectors, and other necessary equipment.

Floor Opening - An opening measuring 12 inches or more in its least dimension, in any floor, platform, pavement, or yard through which persons may fall, such as a hatchway, stair or ladder opening, pit, or large manhole. Floor openings occupied by elevators, dumb waiters, conveyors, machinery, or containers are excluded from this subpart.

Free Fall - The act of falling before a personal fall arrest system begins to apply force to arrest the fall.

Free Fall Distance - The vertical displacement of the fall arrest attachment points on the employee's body belt or body harness between onset of the fall and just before the system begins to apply force to arrest the fall. This distance excludes deceleration distance, and lifeline/lanyard elongation, but includes any deceleration device slide distance or self-retracting lifeline/lanyard extension before they operate and fall arrest forces occur.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 380 of 407

Guardrail System - A barrier erected to prevent employees from falling to lower levels.

Walkway - A minimum width of 18 inches is acceptable for a walkway used for maintenance and gaining access to equipment and would comply with the intent of Section 1910.37, OSHA General Industry Standards.

Handrail - A single bar or pipe supported on brackets from a wall or partition, as on a stairway or ramp, to furnish persons with a handhold in case of tripping.

Lanyard - A flexible line of rope, wire rope, or strap which has a connector at each end for connecting the body belt or body harness to a deceleration device, lifeline, or anchorage.

Lifeline - A component consisting of a flexible line for connection to an anchorage at one end to hang vertically (vertical lifeline), or for connection to anchorages at both ends to stretch horizontally (horizontal lifeline), and which serves as a means for connecting other components of a personal fall arrest system to the anchorage.

Lower Levels - Those areas or surfaces to which an employee can fall. Such areas or surfaces include, but are not limited to, ground levels, floors, platforms, ramps, runways, excavations, pits, tanks, material, water, equipment, structures, or portions thereof.

Midrail - A rail midway between the guardrail and platform, used when required, and secured to the uprights erected along the exposed sides and ends of platforms.

Personal Fall Arrest System - A system used to arrest an employee in a fall from a working level. It consists of an anchorage, connectors, a body belt, or body harness and may include a lanyard, deceleration device, lifeline, or suitable combinations of these. As of January 1, 1998, the use of a body belt for fall arrest is prohibited.

Platform - A working space for persons, elevated above the surrounding floor or ground, such as a balcony or platform for the operation of machinery and equipment. Platforms may also be an extended step or landing, breaking a continuous run of stairs.

Positioning Device System - A body belt or body harness system rigged to allow an employee to be supported on an elevated vertical surface, such as a wall, and work with both hands free while leaning.

Riser - The upright member of a step situated at the back of a lower tread and near the leading edge of the next higher tread.

Runway - A passageway for persons elevated above the surrounding floor or ground level, such as a foot-walk along shafting or a walkway between buildings.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 381 of 407

Snap-hook - A connector comprised of a hook-shaped member with a normally closed keeper, or similar arrangement, which may be opened to permit the hook to receive an object and, when released, automatically closes to retain the object. When used in personal fall arrest systems or positioning device systems, snap-hooks must be of the locking type with a self-closing, self-locking keeper which remains closed and locked until unlocked and pressed open for connection or disconnection.

Stairs/Stairway - A series of steps leading from one level or floor to another, or leading to platforms, pits, boiler rooms, crossovers, or around machinery, tanks, and other equipment that are used continuously or routinely by employees, or only occasionally by specific individuals. A series of steps and landings having three or more risers constitutes stairs or stairway.

Stair Railing - A vertical barrier erected along exposed sides of a stairway to prevent falls.

Standard Railing - A vertical barrier erected along exposed edges of a floor opening, wall opening, ramp, platform, or runway to prevent falls of persons.

Toe-board - A low protective barrier that will prevent the fall of materials and equipment to lower levels and provide protection from falls for personnel.

Unprotected Sides and Edges - Any side or edge (except at entrances to points of access) of a walking/working surface, e.g., floor, roof, ramp, or runway where there is no wall or guardrail system at least 42 inches (1.0 m) high.

Wall Opening - An opening at least 30 inches high and 18 inches wide, in any wall or partition, through which persons may fall, such as a yard-arm doorway or chute opening.

Walking/Working Surface - Any surface, whether horizontal or vertical on which an employee walks or works, including, but not limited to, floors, roofs, ramps, bridges, runways, formwork, and concrete reinforcing steel but not including ladders, vehicles, or trailers, on which employees must be located in order to perform their job duties.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 382 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 383 of 407

Workplace Housekeeping (STF)

PURPOSE

The purpose of this document is to establish the procedures and responsibilities for routine housekeeping for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company," to ensure work areas are maintained in a safe, clean manner and present an acceptable appearance.

RESPONSIBILITIES

The Company shall:

- Ensure the requirements of this safety policy remain current with the applicable regulatory directives
- Plan for the necessary funding to ensure good housekeeping standards are maintained

Supervisors will:

- Ensure the requirements and procedures of this safety program are being followed by conducting inspections, reviews, spot-checks, and other warranted follow-up actions
- Conduct or arrange for inspections in their area of responsibility
- Ensure that each work area under their supervision is maintained at an acceptable level of appearance and cleanliness
- Initiate corrective action for deficient items noted during inspections

Workers will:

- Follow all aspects of this program

POLICY

Lack of housekeeping is a major contributor to occupational injuries and illnesses. The guidelines outlined in this document represent the acceptable housekeeping practices for The Company. An employee's failure to follow the policies and procedures outlined in this document could lead to disciplinary action, up to and including, termination.

All personnel will work towards maintaining their respective workplace in a clean and orderly manner.

Housekeeping encompasses all activities related to the cleanliness of workplace facilities, materials, and equipment and the elimination of nonessential materials and hazardous conditions.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 384 of 407

The following general housekeeping practices must be applied to all areas within The Company and all areas where personnel perform maintenance, construction, or other activities.

IMPORTANCE OF PROPER HOUSEKEEPING

The Company must provide employees with proper housekeeping practices to keep workers safe on the job. When proper housekeeping practices are not followed, injuries may occur. Hazards due to poor housekeeping may include:

- **Slips, trips, and falls** – One of the most common types of hazards created by poor housekeeping
- **Ergonomic-related injuries** – Musculoskeletal Disorders (MSDs) may occur affecting the worker's body and work production
- **Struck-by incidents** – Caused by falling objects, objects placed in dimly lit walkways, or poorly stacked materials and equipment
- **Fires** – Due to accumulations of flammable or combustible material or dust

Proper housekeeping practices can reduce or prevent workplace hazards and worker injuries. Good housekeeping practices also keep the workplace clean, organized, and free of obstructions.

MAINTENANCE

The maintenance of buildings and equipment may be the most essential element of good housekeeping. Maintenance involves:

- Keeping buildings, equipment, and machinery in safe, efficient working order and good repair
- Maintaining sanitary facilities and regularly painting and cleaning walls
- Replacing or fixing broken or damaged items as quickly as possible
- The inspection, maintenance, upkeep, and repair of tools, equipment, machines, and processes

All enclosed workplaces will be constructed, equipped, and maintained, so far as reasonably practicable, as to prevent the entrance or harborage of rodents, insects, and other vermin. A continuing and effective extermination program shall be instituted where their presence is detected.

DUST/DIRT REMOVAL

Enclosures and exhaust ventilation systems may not adequately collect dust, dirt, and chips. Vacuum cleaners are suitable for removing light dust and dirt which is not dangerous otherwise.

- Industrial models have special fittings for cleaning walls, ceilings, ledges, machinery, and other hard-to-reach areas where dust and dirt can build up



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 385 of 407

Special vacuums are useful to remove dangerous products. Vacuum cleaners fitted with High-Efficiency Particle Air (HEPA) filters can be used to capture fine particles of asbestos or fiberglass.

Dampening (wetting) floors or using sweeping compounds before sweeping reduces airborne dust. Dust and grime in places such as shelves, piping, conduits, light fixtures, reflectors, windows, cupboards, and lockers may require manual cleaning.

Compressed air must not be used for removing dust, dirt, or chips from equipment or work surfaces.

Light Fixtures

Dirty light fixtures can dramatically reduce essential light levels. Light fixtures must be kept clean to ensure efficient lighting.

- The areas in which a worker is present, and the means of access to and egress from those areas, will be sufficiently illuminated
- A light bulb used in a temporary lighting system must be enclosed by a mechanical protection device

FLOORS/AISLES AND STAIRWAYS

Floors

Poor floor conditions are a major cause of incidents, so it is important to clean spilled oil and other liquids immediately.

The accumulation of chips, shavings, and dust can also cause incidents. Collecting chips, shavings, and dust before they hit the ground or regularly tidying up can prevent them from accumulating.

Areas that cannot be continuously cleaned, such as entrance areas, will have anti-slip flooring. Floors that are not in good order (i.e., torn, ripped, or damaged flooring) pose a risk of tripping and shall be replaced.

Floors in all work rooms must be maintained and kept in a dry condition. Work areas that have wet work processes must maintain all drainage, mats, and false floors. Other dry standing places will be provided where practicable.

Aisles and Stairways

It is important to keep the aisles and stairs clear. They must not be used for the temporary storage of "overflow" or "bottleneck." Stairways and aisles will be equipped with sufficient lighting.

Aisle space must allow for the movement of people, products, and materials. The Company shall ensure aisles will be wide enough to accommodate people and vehicles safely and comfortably.

- Warning signs and mirrors will be in place to improve sightlines in blind corners



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 386 of 407

- Personnel will use properly arranged aisles so that shortcuts are not taken through hazardous areas

Spill Control

The best way to control spills is to stop them before they occur.

- Drip pans and guards must be used where spills may occur

When spills do occur, they must be cleaned up immediately.

- Absorbent materials can be used for wiping up greasy, oily, or other liquid spills
- Used absorbents must be disposed of properly and safely

SLIPS, TRIPS, AND FALLS (STF)

STFs are among the most frequent types of reported injuries for employees. Slip, Trip, and Fall hazards can occur in every type of workplace.

According to NIOSH, some of the top hazards include:

- Contaminants on the Floor
- Indoor Surface Irregularities
- Outdoor Surface Irregularities
- Weather Conditions: Ice and Snow
- Inadequate Lighting
- Stairs and Handrails
- Stepstools and Ladders
- Tripping Hazards: Tools, Cords, etc.
- Improper Use of Floor Mats
- Poor Drainage: Pipes and Drains

Human Factors

- Health and physical conditions may affect the vision, judgment, and balance of a person
- The transport or movement of cumbersome objects or too many objects that impede your vision, impairs your balance, and prevents you from holding onto the handrails
- Not paying attention: distractions (e.g., using a cell phone, talking, and not watching where you are going, etc.)
- Taking shortcuts, not using designated walkways or clear pathways, or moving with haste (rushing)

Contaminants on the Floor

Water, grease, and other fluids can make the surfaces slippery. Highly polished floors like marble, terrazzo, or ceramic tiles can be extremely slippery even in dry conditions. Freshly waxed surfaces can be dangerous as well. Dry contaminants may also be a STF hazard, such as wood dust, flour, etc.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 387 of 407

Some potential and appropriate controls for these hazards include:

- Keep floors clean and dry
- Use proper cleaning procedures for floors
- Wear slip-resistant shoes
- Prevent entry into wet areas
- Use wall-mounted spill pads and high visibility caution signs warning others of a slip/fall hazard

Indoor Surface Irregularities

Damaged, warped, buckled, or uneven flooring surfaces inside facilities can cause employees to stumble, trip, slip, or fall.

Some potential fixes or solutions to these hazards include:

- Replace loose or buckled carpets and other floorings
- Remove and replace vinyl tiles or broken ceramic tiles
- Create visual indications
- Show changes in the elevation of the walkway with Safety Yellow warning paint
- Replace smooth flooring materials with rougher floors in areas normally exposed to water, grease, and/or particulate matter when renovating or replacing floors

Outdoor Surface Irregularities

Poorly maintained, irregular ground, projecting structures, holes, rocks, leaves, and other debris can cause tripping, slipping, or falling. Sloping pavement areas shall be emphasized with Safety Yellow paint.

Some potential fixes or solutions to these hazards include:

- Patch or fill cracks in walkways larger than 1/2 " wide
- Patch, fill, or repave outdoor areas with deep grooves, cracks, or holes
- Create visual signs
- Highlight curb or walkway elevation changes with Safety Yellow warning paint
- Concrete wheel stops in parking lots can be a tripping hazard and should not be used
- Ensure the structures of the underground irrigation system are covered or highlighted

Stairs and Handrails

Proper design and maintenance of stairs and handrails can reduce hazards. Stairs that are badly marked or uneven, as well as handrails that are not in the right size, height, or condition, can lead to missteps and cause employees to stumble.

Some potential fixes or solutions to these hazards include:

- Marking step edges and transition areas (height changes)



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 388 of 407

- Use non-slip strips
- Ensure the stairs are lit and have handrails
- Ensure the stairs are kept free of ice, snow, and other slippery contaminants
- Check that stairwells have adequate lighting

Tripping Hazards

In storage areas, work areas, corridors, and sidewalks, clutter can accumulate, which can lead to a slip, trip, or fall incident. Exposed cords on the floor, stretched across walkways, and tangled near workspaces can catch the foot of an employee and lead to a fall.

Some potential fixes or solutions to these hazards include:

- Organize storage areas to remove clutter
- Clear walkways
- Bundle cords using cord organizers
- Cover cords on the floor with a covering or tape cords on the floor
- Mount cords near or below the desk

Floor Mats

Mats are used to absorb fluids and remove dirt, debris, and liquid from shoes. This minimizes STF's by providing non-slip treads. Mats are only effective if they are safely used and maintained. Old or poorly placed mats can contribute to slips, trips, and falls.

Some potential fixes or solutions to these hazards include:

- Mats and runners at the entrances should be large enough so that several steps fall onto the mat and remove dirt from the shoes before the shoes touch the ground
- If necessary, place additional mats in the entrances for ice, snow, and rain
- If there is water on the floor past the last mat, additional mats or runners may be required
- Non-slip mats shall be used in areas where employees may routinely encounter wet floors. Beveled, flat, and continuous or interlocking mats will be used
- Mats that are curled, ripped, or worn will be replaced

Exit Access

Employees shall keep exits free from obstruction. Access to exits must always remain clear of obstructions.

TOOLS AND EQUIPMENT

Tool housekeeping is very important, whether in a tool room, on the rack, or the bench:

- Suitable fixtures with marked locations are provided and required to be used to maintain an orderly arrangement
- Tools must be promptly returned after use to reduce the chance of them being misplaced or lost



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 389 of 407

- Responsible persons will regularly inspect, clean, and repair all tools and take any damaged or worn tools out of service
- Tools shall not be placed in the middle of walkways or other travel paths that would create an obstruction or tripping hazard
- Never leave tools on stairs, ladders, or other places that would increase the risk of slips or trips

WASTE DISPOSAL

Regular collection, grading, and sorting of scrap is necessary for good housekeeping practices. It also allows the separation of recyclable materials from those going to waste disposal facilities.

Materials are not allowed to build up on the floor:

- The Company shall place scrap containers near the area in which the waste is produced
- All waste receptacles will be clearly labeled (e.g., recyclable glass, plastic, scrap metal, etc.)

Scraps and Left-Over Dangerous Debris

During construction, alteration, or repairs, form and scrap lumber with protruding nails, and all other debris, shall be kept cleared from work areas, passageways, and stairs, in and around buildings or other structures. [1926.25 \(a\)\(b\)\(c\)](#)

Combustible scrap and debris shall be removed at regular intervals during construction. Safe means shall be provided to facilitate such removal.

Containers shall be provided for the collection and separation of waste, trash, oily and used rags, and other refuse. Containers used for garbage and other oily, flammable, or hazardous wastes, such as caustics, acids, harmful dust, etc. shall be equipped with covers. Garbage and other waste shall be disposed of at frequent and regular intervals.

EMPLOYEE FACILITIES

Employee facilities will be adequate, clean, and well-maintained.

- Lockers or a secured area will be provided for storing employees' personal belongings
- Washroom facilities are required to be cleaned once or more each shift and should also have a good supply of soap, towels/hand dryers, plus disinfectants if needed.

The Company shall provide special precautions as needed if workers are using hazardous products such as showers, washing facilities, and changing rooms.

- Workers affected by hazardous materials must shower off workplace contaminants to reduce the chance of contaminating street clothing



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 390 of 407

Smoking, eating, or drinking in the work area where hazardous products are handled is prohibited.

A separate eating area shall be provided and will be thoroughly cleaned each shift. A separate eating area shall be provided and will be thoroughly cleaned each shift. Employees shall have access to potable drinking water and, if applicable, for washing and cooking. Where it is not plumbed or otherwise continuously supplied, it shall be provided in sufficient quantity throughout the work shift. Portable drinking water dispensers shall be designed, constructed, and serviced so that sanitary conditions are maintained and will be capable of being closed. All portable containers will be equipped with a tap.

MATERIAL/EQUIPMENT STORAGE

All storage areas will be clearly marked. Material or equipment at a project will be stored and moved in a manner that does not endanger a worker. Material and equipment at a project must be piled or stacked in a manner that prevents them from tipping, collapsing, or rolling.

No material will be stored, stacked, or piled closer than 6 feet to:

- An opening in a floor or roof
- The open edge of a floor, roof, or balcony
- An excavation

The location of the stockpiles should not interfere with work, but they should still be readily available when required.

- Stored materials must allow at least three (3) feet of clear space under sprinkler heads
- Stacking cartons and drums on a firm foundation and cross-tying them, where necessary, reduces the chance of their movement
- Stored materials must not obstruct aisles, stairs, exits, fire equipment, emergency eyewash fountains, emergency showers, or first aid stations
- **Combustible, corrosive, or toxic substances** must be stored in suitable containers
- **Non-compatible materials** shall be segregated in storage
- **Storage cylinders** for **compressed gas** will be secured in an upright position
- The control valve of a storage cylinder for compressed gas, other than a cylinder connected to a regulator, supply line, or hose must be covered by a protective cap that is secured in its proper position
- A spent storage cylinder will **not** be stored inside a building
- No storage cylinder for propane will be placed closer than ten (10) feet to an ignition source or fire

A **flammable liquid or gas** will be stored in a building or storage tank that is suitable for the purpose and, if practicable, no less than 330 feet from a magazine for explosives.

- No more than one workday's normal supply of a flammable liquid may be stored in a building or structure on a project unless it is stored:



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 391 of 407

- In a container that is suitable for the hazards of the liquid
- In a controlled access area or a room that:
 - Has sufficient window area to provide explosion relief to the outside
 - Is remote from the means of egress from the building or structure

A portable container used to store, or transport flammable liquids must:

- Be approved for use for that liquid by a recognized testing laboratory
- Have a label stating the use for which the container is approved and the name of the testing laboratory which gave the approval

The Company ensures the storage of materials shall meet all requirements specified in the fire codes and the regulations of environmental and occupational health and safety agencies.

INSPECTIONS

Inspections will be performed at a frequency that ensures The Company's desired level of cleanliness and appearance are maintained. During inspections, any safety-related deficiencies that constitute hazardous conditions will be given priority attention.

Inspection Guidelines

- Receptacles are available for waste and debris
- Cleaning and removal of waste, debris, and dust are being performed regularly
- Enough waste receptacles are available to make their use convenient
- Aisles and stairways are free from loose material and debris and are not used for storage
- Tools, cords, and other materials are not strewn about where they may cause tripping or other safety hazards
- Employee facilities are being constantly maintained in a sanitary condition
- Deficiencies in physical appearance (such as a need for painting and other appearance-related maintenance items) should be noted during the inspections
- Deficiencies in corrective maintenance such as leaking valves or fittings, excessive motor vibrations, etc., should be noted during the inspections

For inspection, maintenance, and repair of walking-working surfaces, the employer must ensure:

- Walking-working surfaces are inspected regularly and as needed and maintained in a safe condition
- Hazardous conditions on walking-working surfaces are corrected or repaired because an employee is allowed to use the walking-working surface. If the correction or repair cannot be done immediately, the hazard must be guarded to prevent employees from using the walking-working surface until the hazard has been corrected or repaired
- When correction or repair involves the structural integrity of the walking-working surface, a qualified person performs or supervises the correction or repair



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 392 of 407



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 393 of 407

Workplace Violence

PURPOSE

The purpose of this document is to establish guidelines and procedures for taking preventative measures to minimize potential Workplace Violence for **Pro Painting & Drywall Inc.**; hereafter referred to as "The Company."

RESPONSIBILITIES

Management

- Provide support to all investigations of instances of violence in the workplace
- Identifying the vulnerable locations and work activities most susceptible to workplace violence
- Provide training for Managers, Supervisors, and Employees
- Demonstrate concern for workers' emotional and physical health and safety by communicating that violence is not permitted
- Ensuring the following policy is enforced
- Ensure compliance with this safety policy and procedure through the auditing process
- Not tolerate violence or harassment in the workplace, and will take corrective action against any employee who subjects another employee to harassment
- Develop emergency signaling, alarms, and/or monitoring systems

Supervisors

- Assist managers in the identification of vulnerable locations and work activities within their organization
- Report all instances of workplace violence and harassment
- Assist employees in reporting workplace violence
- Assist in all investigations

Employees

- Follow the company guidelines regarding violence and harassment
- Report any acts of violence or threatening behaviors to supervisors, or their Personnel Representative
- Participate in training required by this policy and procedure

POLICY

It is the policy of The Company to provide a place of employment that is free from recognized hazards that cause or are likely to cause death or serious physical harm to employees or the public.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 394 of 407

The Company is committed to maintaining a safe, healthful, and efficient working environment where employees and the public are free from the threat of workplace violence. When these workplace violence hazards are recognized and identified then proper training and appropriate security measures will be implemented.

Response to violence in the workplace will depend on the nature of the incident and will focus on reducing the negative impacts of the incident and discovering ways to prevent similar incidents in the future.

The Company will not tolerate harassment in the workplace.

DEFINITIONS

Violence (Whether at a work site or work-related) - Means the threatened, attempted, or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm and includes domestic or sexual violence.

Harassment - Any single incident or repeated incidents of objectionable or unwelcome conduct, comment, bullying, or action by a person that the person knows or ought to know will or would cause offense or humiliation to a worker, or adversely affects the worker's health and safety, and includes:

- Conduct, comment, bullying, or action because of race, religious beliefs, color, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, gender, gender identity, gender expression, and sexual orientation
- A sexual solicitation or advance but excludes any reasonable conduct of an employer or supervisor in respect of the management of workers or a work site

PROHIBITED BEHAVIOR

Prohibited behaviors are those behaviors that are defined in this program and behaviors that:

- Threaten the safety of an employee and/or customer
- Affect the health, life, or well-being of an employee and/or customer
- Result in damage to the company, employee, or public property (excluding vehicle and equipment accidents)

Such acts include, but are not limited to:

- Threatening, intimidating, coercing, harassing, or assaulting an employee or the public
- Sexually harassing an employee or the public
- Allowing unauthorized personnel access to buildings without management permission



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 395 of 407

- Using, duplicating, or possessing keys to buildings or offices within the building without authorization
- Damaging, or attempting to damage the property of The Company, an employee, or the public

Carrying weapons (concealed or exposed) on The Company property unless the employee possession of a weapon:

- Complies with State law
- Is authorized by The Company
- Is by an employee who is a certified law enforcement officer
- Is required as a part of the employee's job duties with The Company
- Relates to training received by the employee to perform the responsibilities of their job with The Company

Any unacceptable personal conduct as provided in The Company's Personnel Manual Policy shall subject the employee to disciplinary action up to and including dismissal. In situations considered to be potentially volatile or where fitness for duty concerns exist, management has the option to consider the use of a management-directed referral to an Employees' Assistance Program.

The Company will ensure that a worker is advised to consult a health professional of the worker's choice for treatment or referral if the worker:

- Reports an injury or adverse symptom resulting from workplace violence
- Is exposed to workplace violence

NOTIFICATION

Employees will notify a supervisor as soon as safely possible if an incident involving violence occurs.

If there is an imminent danger of harm and the situation demands the presence of emergency responders, an employee should contact the appropriate authorities or see that a supervisor contacts them. Employees should report any criminal act immediately to the police if safely possible and keep a line of communication open with the authorities until police arrive.

All worksites will have the means to alert others to an emerging incident. Such means include alarms, codes, and signals. These procedures shall be set in place and shared with employees before an incident occurs, to ensure their effectiveness.

REPORTING AND INVESTIGATION

Any employee (including a supervisor or manager) who has been threatened, is a victim of a violent act, witnesses any threats or violent acts, or learns of any threats or violent acts, is to report such activity immediately to their supervisor or the HR Manager.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 396 of 407

Each report will be promptly evaluated and investigated by the management to determine what follow-up actions are necessary. Management has the authority and responsibility to request law enforcement intervention if it is thought to be necessary.

The designated competent person at the completion of the investigation must provide The Company with a written report with conclusions and recommendations.

Upon completion of the investigation:

- A record will be kept of the report
- A copy of the report will be provided to the safety committee without disclosing the identity of the persons involved unless they consent

Controls must be implemented to prevent a recurrence of workplace violence.

CONFIDENTIALITY

Information about an incident or threat will be disclosed only on a need-to-know basis so that a fair and thorough investigation can be conducted, and appropriate corrective action can be taken. The Company will make every effort to ensure the safety and privacy of the individuals involved.

Nothing in this Harassment Policy Statement will discourage or prevent a worker from referring a harassment complaint to The Company, the Department of Labor, or exercising any other legal rights available under any other law.

DISCIPLINE

An employee who engages in prohibited behavior will be subject to appropriate disciplinary action, as determined by the findings of the investigation. Such discipline may include warnings, demotion, suspension, or immediate dismissal. In addition, certain actions may cause the employee to be held legally liable under state or federal law.

Where harassment has not been substantiated, no action will be taken against a worker who has made a complaint in good faith. However, a deliberate false accusation of harassment will be met with strong discipline.

RETALIATION

Episodes of workplace violence can only be eliminated if employees are willing and able to report threats, violent acts, and other unsafe conditions. To encourage employees to come forward without the fear of retaliation, The Company promises to promptly investigate all complaints of retaliation and impose appropriate disciplinary action, up to and including dismissal.



PRO PAINTING & DRYWALL

Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 397 of 407

COUNSELING

Dealing with or being exposed to a violent or abusive situation can be emotionally unsettling. The Company will provide for appropriate counseling to reduce tension and stress. Follow-up counseling services may be provided and arranged by employee supervisors as requested by affected employees. If employees prefer external counseling for emotional and/or family support, they should be encouraged to contact the HR Manager. In all instances, confidentiality is assured.

TYPES OF WORKPLACE VIOLENCE

Workplace violence is violence or the threat of violence against workers. It can occur at or outside the workplace and can range from threats and verbal abuse to physical assaults and homicide.

Violence during a Crime

Workplace violence that occurs during a crime is usually committed by an individual who has no legitimate relationship with the workplace. While he or she may feign being a customer as a pretext to enter the establishment, his primary motive is to commit a robbery or other criminal act.

Employees who are at greatest risk from this type of violence have face-to-face contact and exchange money with the public. They often work alone or in small numbers, and work late at night and early into the morning. Prime hours for such attacks are between 7 PM and 2 AM.

This type of violence accounts for most workplace homicides and represents irregular occurrences in the daily life of any at-risk establishment.

Characteristics of At-Risk Employees

- Have face-to-face contact with the public
- Exchange money with the public
- Are responsible for guarding valuable property
- Work during late night/early morning hours
- Work alone or in small numbers
- Work in high-crime areas or community settings

Engineering Steps to Lower Risk of Workplace Violence

- Increase visibility, especially in high-risk areas. Use cameras and curved mirrors in hallways, and ensure good lighting is in the workplace and parking lots
- Arrange furniture and other objects with safety in mind. Be mindful of objects or furniture that can easily be turned into weapons
- Restrict movement of the public and employees with appropriate barriers and card- or key-controlled access



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Safety Coordinator:
Chris Harrington

Page: 398 of 407

Violence by a Current/Former Client or Customer

Threats and other acts of violence committed by current or former clients and customers are increasing in number and represent a daily occurrence. At greatest risk from this type of violence are employees who provide professional, safety, law enforcement, administrative, or business services. For other service providers, violence may be brought on by an attempt to resist treatment or by a general dissatisfaction with the services received. In some cases, it may just be a matter of being in the wrong place at the wrong time and getting caught in the violent actions of others.

Violence that is Employment-Related

Employment-related violence is not associated with any specific type of workplace. The assailant may be a current or former employee, supervisor, or manager. This individual may also be a spouse, relative, friend, or acquaintance of an employee. In most cases, the assailant's actions are motivated by psychological factors, as well as by difficulties in his/her relationship with the victim. The primary target of employment-related violence is a co-worker, supervisor, or manager. In committing the assault, the individual is typically seeking revenge for what is perceived as unfair treatment. Some circumstances that may trigger an attack include:

- An unsatisfactory review
- Disciplinary action
- Unresolved conflicts
- Drawn-out grievance period
- Unfavorable grievance resolution
- Loss of pay or benefits
- Demotion
- Dismissal or reduction in force
- Increased productivity demands
- Increased performance expectations

This type of violence involves domestic or romantic disputes. In such cases, an employee is threatened in the workplace by an individual with whom he or she is having a relationship outside of work. While most employment-related violence is limited to threats, verbal harassment, and non-fatal injuries, fatalities often attract significant media attention. As a result, they are made to appear much more common than they are. Statistics prove, however, that the other two types of workplace violence account for most fatal episodes.

Violence Prevention Assessment

Evaluate the physical layout of the facility. Check for and consider the following:

- External lighting to cover walkways and parking areas
- Controlled access to all building entry points
- Video surveillance cameras at critical points
- Procedures for allowing access to the facility
- Number/gender of employees on-site between 10 p.m. and 5 a.m.



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Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 399 of 407

WORKPLACE HARASSMENT

"Harassment" means any objectionable conduct, comment, or display by a person that:

- Is directed at a worker
- Constitutes a threat to the health or safety of the worker

The Company shall make every reasonably practicable effort to ensure no worker is subjected to harassment. Any worker who believes they have been subjected to harassment is encouraged to make clearly and firmly known to the alleged harasser that the harassment is objectionable and must stop.

Where circumstances prevent a worker from acting, or the action taken is unsuccessful, the worker should report the alleged harassment to the Safety Coordinator.

Where the worker has reported the alleged harassment to the person designated, that person will immediately bring the complaint to the attention of senior management.

The Company will not disclose the name of the complainant or an alleged harasser, or the circumstances related to the complaint to any person except where disclosure is:

- Necessary for the purposes of investigating the complaint or taking corrective action with respect to the complaint
- Required by law

RECORDKEEPING

This policy will be reviewed, and these reviews must be documented at least once a year or under the following circumstances:

- Following a workplace violence incident or report
- To make needed changes or improvements to the policy
- To identify new training or refresher training needs

TRAINING

The Company will ensure that workers are instructed in:

- How to recognize workplace violence
- The policy, procedures, and workplace arrangements that effectively minimize or eliminate workplace violence
- The appropriate response to workplace violence, including how to obtain assistance
- Procedures for reporting, investigating, and documenting incidents of workplace violence
- Procedures for identifying hazard escalation, techniques for de-escalating conflict, and other appropriate incident responses



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Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 400 of 407

Training and preparation may include drills and simulations for a violent incident.

All employees, including supervisors and The Company's safety policy and procedure on workplace violence, as well as cover procedures for reporting and investigating threats, violent acts, and unsafe work conditions.

In addition, employees will be informed of their responsibilities and of the measures they can take to protect themselves and their co-workers from workplace violence.

Note: A copy of the violence and harassment prevention policy will be posted in a conspicuous place at the workplace.

TRAINING GUIDELINES

Supervisor and Manager Training

When employees are respected and their concerns are addressed in a fair and timely manner, they are far less likely to resort to violence as a way of responding to conflicts.

Creating this type of caring and harmonious work environment requires that supervisors and managers:

- Treat all employees fairly and respectfully
- Are clear and consistent in their expectations
- Involve employees in the decision-making process
- Provide assignments that will keep employees interested and challenged
- Provide assignments that are appropriate for the employees' skill levels
- Set realistic workloads, deadlines, and performance standards
- Ensure employees have the resources they need to complete assignments
- Permit flexibility in working conditions for employees experiencing challenging times
- Acknowledge and follow through on employee requests and concerns
- Provide regular and constructive feedback
- Give recognition for a job well done
- Keep employees informed of what is going on in the organization
- Provide opportunities for professional growth

To help supervisors and managers improve their overall effectiveness in these areas, they will receive periodic training on the following management skills:

- Communication
- Team building
- Mentoring
- Problem-solving
- Counseling



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Safety Coordinator:
Chris Harrington

Page: 401 of 407

Despite The Company's best efforts to create a healthy work atmosphere, there are bound to be some performance- and behavior-related problems. To keep these problems from spiraling out of control, supervisors and managers should be trained to recognize and handle them at the lowest possible level. This can be accomplished by providing training on:

- Conflict resolution
- Non-violent responses
- Disciplinary procedures
- Crisis management

Employee Training

Incidents of workplace violence can also be reduced if employees are effective in their interactions with customers, visitors, and co-workers. Since not all employees join the workforce with the necessary "people skills," the following skills will be taught to each employee:

- Customer service
- Communication
- Team building
- Problem-solving
- Conflict resolution
- Non-violent response

It is also important that employees receive "awareness training" which addresses:

- The Company's position on workplace violence (e.g., zero tolerance)
- Behaviors that are prohibited by The Company policy
- Disciplinary action that will result from policy violations
- Procedures for reporting and investigating threats, violent acts, and unsafe conditions
- Measures that will be taken to ensure confidentiality
- Steps The Company has taken to increase security



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Pro Painting & Drywall Inc.

Safety Coordinator:
Chris Harrington

Page: 402 of 407

ASSAULT/THREAT REPORT FORM

Assault/Threat Report Form <i>(Attach additional sheets as necessary)</i>									
Employee Information									
Name:					Telephone:				
Address:				Employee Classification:					
Manager's Name:					Telephone:				
Incident Information									
Name of Assailant:				Is he/she an Employee?	Yes		No		
Date of Incident:			Location of Incident:						
This Incident Occurred:	Over the Phone		In person	Over the internet		Other			
Please Explain:									
Were There Any Witnesses?									
		Yes	No	<i>(Please provide relevant information below and attach statements)</i>					
Witnesses									
Name:					Telephone:				
Address:					Witness Roll <i>(e.g., employee, customer)</i>				
Name:					Telephone:				
Address:					Witness Roll <i>(e.g., employee, customer)</i>				
Threat Information									
As closely as possible, what were the exact words used?									
Was the assailant able to conduct the threat immediately?									
How serious do you believe the threat was and why?									



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Safety Coordinator:
Chris Harrington

Page: 403 of 407

Assault/Threat Report (PG. 2)

Assault Information

What (if anything) happened to set off the assault?

Did the assailant say anything during the assault? What?

How did the assailant attack? (*e.g., punching, kicking, knife, words*)

What injuries, if any, did you sustain? Did injuries require medical treatment?

What ended the assault?

How did you leave the site of the assault?

Employee Actions

What actions did you take later? (*e.g., worker's comp claim, medical treatment, sick leave*)

Do you request company action at this time related to the assault? What? (*If none, please specify "None."*)

Law Enforcement Information (*Attach Police Report When Possible*)

Law Enforcement Agency Contacted/Name of Official:

Date Contacted:

Telephone Number:

Was a written report completed?

Yes

No

(*Indicate any action promised*)

Manager Actions

Directions given to employee:

Manager Recommendation:

Prosecution

Restraining Order

Letter to Threatener

Other (*Please Specify:*)

Legal Counsel Actions



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Safety Coordinator:
Chris Harrington

Page: 404 of 407

RISK ASSESSMENT SUMMARY REPORT FORM

RISK ASSESSMENT SUMMARY REPORT

A Risk Assessment has been conducted at:			
Work Site:		Date:	
By:			

Name of Management and Worker Representatives	

The Following Potential Risks of Violence Were Identified



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Safety Coordinator:
Chris Harrington

Page: 405 of 407

SEXUAL HARASSMENT COMPLAINT FORM

Sexual Harassment Complaint Form			
<i>Please write legibly and fill out form completely. Attach additional sheets if necessary. Submit completed form to appropriate manager.</i>			
Complaint:		Alleged Harasser:	
Department:		Department:	
Job Title:		Job Title:	
Mailing Address:		Other relevant information about Alleged Harasser:	
Home Phone:			
Work Phone:			
Details of Incident			
What exactly occurred or was said?			
When did it occur and is it ongoing?			
Where did it occur?			
How often did it occur?			
How did it affect you?			
What response did you make when the incident(s) occurred or afterwards, and how did you react?			
Has your job been affected in any way?			
Was anyone present when the alleged harassment occurred? List any third-party witnesses:			



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Safety Coordinator:
Chris Harrington

Page: 406 of 407

Sexual Harassment Complaint Form (PG.2)

Please write legibly and fill out form completely. Attach additional sheets if necessary. Submit completed form to appropriate manager.

Are there any persons who have relevant information?

Did you tell anyone about it?

Did anyone see you immediately after episodes of alleged harassment?

Did the person who harassed you harass anyone else?

Do you know whether anyone complained about harassment by that person?

Are there any notes, physical evidence, or other documentation regarding the incident(s)?

Do you know of any other relevant information?

How would you like to see the situation resolved?

I am aware that false accusations of sexual harassment can have serious effects on innocent persons. I further understand that if it is determined, after investigation, that I have maliciously or recklessly made false accusations, I will be subject to appropriate sanctions, including discharge.

Complainant's printed name: _____

Complainant's signature: _____

Date: _____

Received by: _____

Signature: _____

Date: _____



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Safety Coordinator:
Chris Harrington

Page: 407 of 407

SUSPECT INFORMATION FORM

SUSPECT INFORMATION

General Appearance

Sex:

Male

Female

Age:

Height:

Weight:

Race:

Hair:

Eyes:

Complexion:

Scars/Identifying Marks:

Tattoos:

Clothing

Jewelry:

Hat:

Coat

Shirt/Blouse:

Pants/Skirt:

Tie:



Facial Appearance

Write below specific details that you remember

Skin or hair color

Hair texture

Ear size and shape

Cheeks (full or sunken)

Shape of nose

Neck/Adam's apple

Wrinkles

Shape of brow

Size and shape of eyes

Mouth and lips

Moustache or beard

What did the suspect say?

Describe any weapon or tool seen.

Vehicle



Body Style

Color

Make

Model

License number

Damage or Rust

Wheel Covers

Antenna

Bumper Sticker

Direction of Travel: