

Watson Commercial Painting, Ltd.

Safety Program

Table of Contents

1. Policy Statement
2. Employee Conduct and Work Rules Policy
3. Incident Investigation and Injury Reporting
4. Background Investigation Procedures
5. Firearm, Drug and Alcohol Policy/Substance Abuse Procedure
6. Imminent Danger
7. Management /Employee Responsibilities
8. Workplace Violence Prevention
9. Progressive Discipline
10. Worker's Compensation Insurance
11. PPE Equipment
12. Blood Borne Pathogens Exposure Control Plan
13. Fall Protection
14. Floor Openings
15. Confined Spaces
16. Scaffold Installation
17. Maintenance of Tools
18. Fire Protection/Prevention
19. Housekeeping Directive
20. Sanitation
21. Stairways and Ladders
22. Flammable and Combustible Liquids
23. Control of Gases, Vapors, Fumes & Mists
24. Material Handling and Storage
25. Illumination
26. Motorized Vehicles and Equipment
27. Heat Stress Prevention Program
28. Hazard Communications Program
29. HCS Pictograms and Hazards
30. Silica Written Exposure Control Plan
31. Employee Acknowledgement

Watson Commercial Painting, Ltd.

Safety Program

POLICY STATEMENT (Last Revised August 22, 2022)

Watson Commercial Painting, Ltd., referred to herein after as WCP, desires a safe work place, and is committed to the safety of its employees, our subcontractors, the surrounding community, and the environment. We at WCP welcome all questions and suggestions regarding the safety of our employees and subcontractors and are interested in constantly improving our safety practices. At WCP our goal is to provide an injury and incident free project for everyone involved. To achieve this goal, it is the responsibility of everyone involved in the project, from labor to management, to dedicate themselves to the principles of safety and teamwork throughout the entire evolution of the project. With this attitude, and continuous safety training, WCP will provide the best possible conditions for its employees, our subcontractors, and the community that it can.

Employee Conduct and Work Rules Policy

In order to minimize accidents/injuries, all employees are expected to abide by the following rules:

1. Report any unsafe conditions to your supervisor as soon as possible.
2. Use eye and face protection where there is danger from flying objects or particles.
3. Dress properly. Wear appropriate work clothes, gloves and safe shoes or boots. Loose clothing and jewelry must not be worn while around heavy machinery or equipment.
4. Never operate any machines unless all guards and safety devices are in place and in proper operating condition.
5. Keep all tools in safe working condition. Never operate defective tools or equipment. Report unsafe tools and equipment to your immediate supervisor.
6. Properly care for and be responsible for all personal protective equipment.
7. Do not operate machinery if you are not an authorized operator.
8. Do not leave materials or equipment in aisles, walkways, stairways, roads or other points of entrance or exit. Practice good housekeeping at all times.
9. When riding in company vehicles or moving equipment, securely fasten the seatbelt.
10. Never use electronic devices while operating a company vehicle.

Watson Commercial Painting, Ltd.

Safety Program

11. No smoking near flammable materials.
12. When working with flammable materials, a fire extinguisher must be close at hand at all times.
13. The use of or being under the influence of intoxicating beverages or illegal drugs while on the job is prohibited.
14. All posted safety rules must be obeyed and must not be removed except by management's authorization.
15. Horseplay causes accidents and will not be tolerated.

YOU MUST REPORT ANY ACCIDENT/INJURY TO YOUR IMMEDIATE SUPERVISOR AS SOON AS POSSIBLE, AS A SLIGHT INJURY WITHOUT PROPER CARE MAY LEAD TO SERIOUS COMPLICATIONS.

It is the policy of the company to:

1. Provide a safe and healthful place of employment for all employees and to abide by all regulations as they pertain to the company's endeavors.
2. Require all employees to abide by the safety guidelines as established by the company.
3. Require all employees to abide by the procedures and provisions for the reporting and treatment of injuries.

Incident Investigation and Injury Reporting

It is your responsibility as an employee to assure a safe working environment for yourself and your co-workers. If the company determines that the accident was due to negligence or extreme carelessness by you, an Employee Warning Notice will be issued to you with a copy to be placed in your personal file. Repeated acts of negligence or failure to comply with safety rules can lead to further disciplinary action, up to and including termination.

All injuries, no matter how slight, must be reported to your Supervisor. WCP provides coverage for all employees in the event of an injury on the job. You are requested to exercise caution at all times while working, in order to minimize on site accidents. Failure to report all work-related accidents/illnesses may be grounds for disciplinary action.

All onsite incidents must be reported to WCP immediately. All incidents resulting in injuries, illnesses, or property damage occurring on the jobsite will be thoroughly

Watson Commercial Painting, Ltd.

Safety Program

investigated. The investigation will be conducted by the controlling employer's supervisor in coordination with WCP this includes injuries and illnesses of workers whether or not the injury resulted in medical treatment and /or property damage cases. Completion of appropriate forms must be accomplished immediately after each occurrence.

The initial incident investigation is to be completed and submitted to WCP within 24 hours of the incident. Identification and review of the root causes of the incident must be completed. Corrective actions, identification for persons responsible for corrective actions, and date of completion must be established.

If injured on our projects or jobsites; when and only when you have received a RETURN TO WORK order by your treating physician after work related injury will you be allowed to return to work. Additionally, you will have the next business day to report to work or to contact your supervisor by telephone. If you do not contact the company within the next business day, you will be subject to dismissal.

Background Investigation Procedures

WCP at the time of new – hire obtains all necessary documentation necessary to be compliant with New Hire Reporting. New Hire procedures include obtaining Social Security Verification, I-9 Forms, Background Check, and Pre-hire Drug Screening.

Firearms, Drug and Alcohol Policy

Firearms, intoxicating beverages, and non-prescription illegal drugs are strictly prohibited. If you are taking prescribed medications that physically impair you in some manner, do not come to work.

If the company is to continue to fulfill its responsibility to provide reliable and safe service to customers and a safe work environment for employees, employees must be physically and mentally fit to perform their duties safely and efficiently.

Substance abuse recognition training is provided at time of employment and revisited by safety coordinator periodically through safety meetings for all supervisors and employees

Watson Commercial Painting, Ltd.

Safety Program

I. Introduction

- A. This policy is not intended and will not be used to discriminate against any protected class defined by race, color, religion, sex, age, national origin, veteran status, disability, or other legally-protected status.
- B. Employees are expected to report to work and remain at work in condition to perform assigned duties free from the effects of alcohol and drugs.
 - 1. Alcohol abuse or illegal drug use and its physiological effects represent a threat to the well-being and security of employees and could cause extensive damage to the Company's reputation and community standing. Drug abuse could also instigate the shutdown of vital Company installations, should the public authorities conclude that Company personnel couldn't continue operation of these facilities responsibly.
 - 2. Any involvement with alcohol/drugs that adversely affects the workplace or the work environment will not be tolerated.
 - 4. Off-the-job illegal drug activity or alcohol abuse that could have an adverse effect on an employee's job performance or that could jeopardize the safety of other employees, the public, Company equipment, or the Company's relations with the public will not be tolerated.
- C. Illegal drugs are those drugs defined as illegal under federal, state, or local laws. They include, but are not limited to:
 - Marijuana
 - Heroin
 - Hashish
 - Cocaine
 - Hallucinogens
 - Depressants and stimulants not prescribed for current personal treatment by an accredited physician.
 - Synthetic Drugs
 -

II. Consequences of Alcohol/Drug/Substance Abuse

In an effort to provide a safe working environment WCP has strict procedures in place regarding drug and alcohol use, and drug testing requirements are as follows.

Watson Commercial Painting, Ltd.

Safety Program

1. Pre-hire drug testing.
 2. Random drug testing.
 3. Required testing for suspicion of drug/alcohol use, after work related incidents/accidents, performance related incidents.
- B. Drug/Substance Abuse. The use, sale, or personal possession (e.g. on the person or in a tool box, desk, vehicle, etc.) of illegal drugs while on the job, including rest periods and meal periods, or on Company property is a dischargeable offense and may result in criminal prosecution. Any illegal drugs found will be turned over to the appropriate law enforcement agency.
- C. Alcohol Abuse. The use or personal possession (e.g. on the person or in a desk, tool box, locker, etc.) of alcohol during work time or on Company property is a dischargeable offense.
1. For all employees, alcohol consumption is prohibited during the workday, including rest periods and meal periods.
 2. The possession of alcohol in a Company vehicle, on or off of Company property is prohibited.
- D. Where there is obvious evidence of consumption of alcohol or drugs during regular work time, including breaks and meal periods, the following will apply.
1. For the purpose of this policy, an employee will be considered under the influence when, in the judgment of the supervisor, the employee's ability to perform his or her job safely and effectively is affected by the use of alcohol or drugs.
 2. Any employee, in any job, who is perceived to be under the influence of alcohol or drugs will be immediately removed from service and evaluated by medical personnel, if reasonably available. Management may take further appropriate disciplinary action.
 3. An employee in a job involving public contact or safety related considerations that are not perceived to be under the influence of alcohol or drugs, but who displays evidence of alcohol or drug consumption, will be immediately removed from service. Management may take appropriate disciplinary action.
 - 4.

Watson Commercial Painting, Ltd.

Safety Program

5. An employee not in a job involving public contact or safety related considerations that are not perceived to be under the influence of alcohol or drugs, but who displays evidence of alcohol or drug consumption, may be subject to appropriate disciplinary action.
- E. Off-the-job selling, distributing, or manufacturing of illegal drugs by an employee is a discharge offense. Likewise, illegal selling, distributing or manufacturing of alcohol is a dischargeable offense. The management shall make decisions regarding discharge.

III. Special Action

- A. To protect the best interests of employees, the public, and the Company, the Company will take whatever measures are necessary to find out if alcohol or illegal drugs are located or being used on Company property. These measures will not be taken unreasonably, but when the Company believes them to be completely justified and necessary. The measures that may be used will include, but not limited to, the following.
1. Federal, state, or local authorities may be called upon to assist in an investigation.
 2. Unannounced drug screens of groups of employees may be conducted where a reason to suspect exists. Refusal to participate in a drug screen will result in immediate removal from service and may result in termination for insubordination.
 3. Searches of Company property, facilities, or equipment may be conducted by authorized personnel.
 4. Management may conduct searches of people, and of personal property located on company premises. Searches of the person and of non-Company property (where reason to suspect exists) will not be conducted if an individual refuse to submit to a search. Upon refusal to submit to such a search, the purpose of the requested search and the potential implications of refusal will be carefully explained to the employee. Further refusal to submit will result in immediate removal from service and may result in termination for insubordination.
- B. Physical searches of employees and property searches may be conducted with management approval.

Watson Commercial Painting, Ltd.

Safety Program

C. As a supplement to other means of detecting drug and alcohol use, urine and blood testing may be conducted according to the following:

1. Drug tests may be conducted for all regular full-time and regular part-time job applicants prior to employment. Offers of employment may be made contingent upon satisfactorily meeting these requirements. If the drug screening procedures indicate the presence of drugs or controlled substances, the applicant will not be considered for employment.
2. Drug tests may be conducted as a routine part of promotion and transfer of all employees being considered for positions for which a Company- mandated physical is required for which may directly affect public or employee safety. If a drug screening indicates the presence of drugs, other than prescription drugs, the employee will not receive further consideration for the position. Positive results on a drug screening for promotion or transfer will be cause for consideration of disciplinary action.
3. Drug tests may be conducted as a routine part of Company mandated physicals for certain positions considered sensitive from a health and safety standpoint. Positive results on a drug screening will be cause for consideration of disciplinary action.
4. Drug and alcohol testing will be conducted as a part of the investigation of an accident (vehicular or personal) or “near-accident” in which safety precautions were violated or unusually careless acts were performed. Also, where the employee’s work record indicates a history of accidents, “near-accidents”, or accidents that are the fault of the employee, testing may result.
5. Drug and alcohol testing may be conducted when an employee’s supervisor has cause to believe that the employer is “unfit for duty”.
6. Drug testing may be conducted when there is reason to suspect use or possession of illegal drugs.
7. When there is a change in group-behavior, a high rate of accidents or injuries, reliable information about drug involvement, or reason to suspect the use of illegal drugs within a work group. The Company may, from time to time, institute random drug testing of company employees.

8.

Watson Commercial Painting, Ltd.

Safety Program

- D. In cases where a drug screen indicated illegal drug use, the following steps may be taken:
1. The employee may be subject to disciplinary action up to and including dismissal.
 2. The employee may be suspended without pay. If the employee is suspended without pay, the following steps may be taken:
 - a. The employee will be required to seek treatment for drug abuse from a recognized professional or institution. Refusal to do so will be viewed as insubordination and the employee will be subject to discharge. The employee will be required to cooperate in carrying out responsibilities to coordinate the treatment process.
 - b. The employee must have a negative test result within a certain period of time from the date of suspension. In the event the employee fails to do so within this period, the employee will be discharged. If, after negative results within such period, an employee is unable to return to work for good reason (e.g. participation in a treatment program is not yet completed), the time at which the employee shall return to work may be extended beyond the end of the period.
 3. Employees who have been suspended following a positive drug screen and who subsequently have had a negative test result will be subject to random screening of an indefinite period of time.
 4. Employees in positions where a physical is required or which may affect public or employee safety who have a first-time positive drug screen and a negative follow-up screen may be allowed to return to their positions only upon providing to their Supervisor, certified documentation from a recognized professional that would give a reasonable degree of confidence that the individual would be capable of performing his or her assigned job duties without impairment. Until certification acceptable to the Company is provided, the Company may, but shall have no obligations to provide a work assignment.
 5. Employees who have been suspended for a positive drug screen and allowed to return to work, in accordance with this procedure, will be discharged for a positive test result on a subsequent drug screen.

Watson Commercial Painting, Ltd.

Safety Program

IV. Coordination with Law Enforcement Agencies

The sale, use, purchase, transfer or possession of an illegal drug or Drug Paraphernalia is a violation of the law. The Company will report information concerning possession, distribution, or use of any illegal drugs to law enforcement officials and any such substances found during a search of an individual or property. Searches will only be conducted of individuals' vehicles, lockers, desks, and closets based on reasonable cause. The Company will cooperate fully in the prosecution and/or conviction of any violation of the law.

V. Reservation of Rights

The Company reserves the right to: interpret, change, suspend, cancel or dispute with or without notice all or any part of this Policy or procedures or benefits discussed herein. Employees will be notified before implementation of any change. Although adherence to this Policy is considered a condition of continued employment, nothing in this Policy alters an employee's status and shall not constitute nor be deemed a contract or promise of employment. Employees remain free to resign their employment at any time for any or no reason without notice, and the Company retains the right to terminate any employee at any time for any or no reason without notice.

VI. Other Laws and Regulations

The provisions of the Policy shall apply in addition to and shall be subordinated to any requirements imposed by applicable federal, state or local laws, regulations or judicial decisions. Unenforceable provisions of the Policy shall be deemed to be deleted.

Imminent Danger

An Imminent Danger Condition is any condition in the workplace or any work practices in a place of employment which could reasonably be expected to cause death or serious physical harm to employees immediately. Through daily task hazard analysis, tool box talks and strict safety compliance expected by WCP employees this condition is not anticipated. However, if an imminent danger condition should occur on any of our projects, the following immediate measures will take place to ensure everyone's safety:

Watson Commercial Painting, Ltd.

Safety Program

- 1) Evaluate who is at risk.
- 2) Remove worker or workers from area and secure hazard zone.
- 3) Derive best method for eliminating the hazard using all available resources.
- 4) Put plan in motion to resolve the hazard.
- 5) Communicate to all parties that the hazard has been mitigated.
- 6) Evaluate how the danger is going to be avoided in the future.

Management / Employee Responsibilities

All management, personnel at WCP (Owners and its agents ie; Foreman, Project Managers, Employees) shall be responsible for upholding all safety protocol mandated in this plan. These responsibilities shall include, but are not limited to, training, individuals in safety practices, monitoring workers during the performance of tasks, stopping work when unsafe work practices are noted, and enforcement of safety compliance when needed. Additionally, all unsafe work practices noticed by anyone on the WCP team at any of our projects will be promptly noted and corrected.

- All employees working for WCP will be expected to strictly adhere to the safety policies outlined in this manual. Any employee questioning an unsafe condition or the safety of a task to be performed is encouraged to seek out a management team member for advice and resolution to the problem before initiating that task. Employees are also required to stay alert to the safety of others and to help ensure the safe work practices of all employees on site.
- All subcontractors and tiered subcontractors are responsible for the actions of those they supervise, for maintaining safe and healthy working conditions in their areas of responsibility, and for strictly enforcing all authorized safety and health rules and regulations. It is understood that by identification of onsite competent person or persons, the assignment of this responsibility is made. Subcontractors are also responsible for reporting any hazardous conditions to WCP.

Workplace Violence Prevention

WCP is committed to preventing workplace violence and to maintaining a safe work environment. Given the increasing violence in society in general, WCP has adopted the following guidelines to deal with intimidation, harassment, or other threats of (or actual) violence that may occur during business hours or on its premises.

Watson Commercial Painting, Ltd.

Safety Program

1. All employees, including supervisors and temporary employees, should be treated with courtesy and respect at all times. Employees are expected to refrain from fighting, “horseplay”, or other conduct that may be dangerous to others. Firearms, weapons, and other dangerous or hazardous devices or substances are prohibited from the premises of WCP without proper authorization.
2. Conduct that threatens, intimidates, or coerces another employee, a customer, or a member of the public at any time, including off-duty periods, will not be tolerated. This prohibition includes all acts of harassment, including harassment that is based on an individual’s sex, race, age, or any characteristic protected by federal, state, or local law.
3. All threats of (or actual) violence, both direct and indirect, should be reported as soon as possible to your immediate supervisor or any other member of management. This includes threats by employees, as well as threats by customers, vendors, solicitors, or other members of the public. When reporting a threat of violence, you should be as specific and detailed as possible.
4. All suspicious individuals or activities should also be reported as soon as possible to a supervisor. Do not place yourself in peril. If you see or hear a commotion or disturbance near your work station, do not try to intercede or see what is happening.
5. WCP will promptly and thoroughly investigate all reports of threats of (or actual) violence and of suspicious individuals or activities. The identity of the individual making a report will be protected as much as is practical. In order to maintain workplace safety and the integrity of its investigation, WCP may suspend employees, either with or without pay, pending investigation.
6. Anyone determined to be responsible for threats of (or actual) violence or other conduct that is in violation of these guidelines will be subject to prompt disciplinary action up to and including termination of employment.
7. WCP encourages employees to bring their disputes or differences with other employees to the attention of their supervisors or the President before the situation escalates into potential violence. WCP is eager to assist in the resolution of employee disputes, and will not discipline employees for raising such concerns.

Progressive Discipline

The purpose of this policy is to state WCP’s position on administering equitable and consistent discipline for unsatisfactory conduct in the workplace. The best disciplinary measure is the one that does not have to be enforced and comes from good leadership and fair supervision at all employment levels.

Watson Commercial Painting, Ltd.

Safety Program

WCP's own best interest lies in ensuring fair treatment of all employees and in making certain that disciplinary actions are prompt, uniform, and impartial. The major purpose of any disciplinary action is to correct the problem, prevent reoccurrence, and prepare the employee for satisfactory service in the future.

Although employment with WCP is based on mutual consent and both the employee and WCP have the right to terminate employment at will, with or without cause or advance notice, WCP may use progressive discipline at its discretion.

Disciplinary action may call for any of four steps—verbal warning, written warning, suspension with or without pay, or termination of employment—depending on the severity of the problem and the number of occurrences. There may be circumstances when one or more steps are bypassed.

Progressive discipline means that, with respect to most disciplinary problems, these steps will normally be followed: a first offense may call for a verbal warning; a next offense may be followed by a written warning; another offense may lead to a suspension; and, still another offense may then lead to termination of employment.

WCP recognizes that there are certain types of employee problems that are serious enough to justify either a suspension, or, in extreme situations, termination of employment, without going through the usual progressive discipline steps.

While it is impossible to list every type of behavior that may be deemed a serious offense, the Employee Conduct and Work Rules Policy includes examples of problems that may result in immediate suspension or termination of employment. However, the problems listed are not all necessarily serious offenses, but may be examples of unsatisfactory conduct that will trigger progressive discipline.

By using progressive discipline, we hope that most employee problems can be corrected at an early stage, benefiting both the employee and WCP.

Worker's Compensation Insurance

WCP provides a comprehensive workers' compensation insurance program at no cost to employees. This program covers any injury or illness sustained in the course of employment that requires medical, surgical, or hospital treatment. Subject to applicable legal requirements, workers' compensation insurance provides benefits after a short waiting period or, if the employee is hospitalized, immediately.

Employees who sustain work-related injuries or illnesses should inform their supervisor immediately. No matter how minor an on-the-job injury may appear, it is important that it be reported immediately. This will enable an eligible employee to qualify for coverage as quickly as possible.

Watson Commercial Painting, Ltd.

Safety Program

Neither WCP nor the insurance carrier will be liable for the payment of workers' compensation benefits for injuries that occur during an employee's voluntary participation in any off-duty recreational, social, or athletic activity sponsored by WCP.

Competent Person

By definition, a competent person is one who by means of training, knowledge, or experience, can recognize hazardous or potentially hazardous situations in the workplace, and has the authority to stop work to remedy the problem. When requested WCP will identify our competent persons according to the definition. All subcontractors are required to complete the attached "Competent Person Designation Form" and supply a letter of designation from an officer of the company executive prior to starting work on site.

Jobsite Safety Meetings

- Weekly job site safety meetings will be conducted by a WCP manager or supervisor. Attendance and participation by all WCP employees is mandatory and shall be documented accordingly. Subcontractors are encouraged to have representation at these meetings to ensure they are meeting WCP safety procedures. Once a week, WCP will host a job-wide safety meeting, and attendance is mandatory for all employees assigned to work on our projects.

Personal Protective Equipment (PPE)

- PPE will be closely monitored for compliance for WCP employees. PPE will be worn by all personnel on site (including visitors) at all times whenever they are inside the perimeter fencing.
 - **Hard Hats:** All persons working in or visiting the jobsite shall be provided with (by their employer) and required at all times to wear a Class A (low voltage electrical protection) or Class B (high voltage electrical protection) protective headgear. Head protection shall meet the requirements ANSI Z89.1.
 - **Eye Protection:** All persons entering the job site (working or visiting) will be required to wear eye protection at all times. Additional eye protection may be required depending on the type of work being done e.g. full face shields, goggles, etc. Prescription glasses must be ANSI Z87.1 approved with side shields, or goggles or OTG's will be worn over non-Z87.1 prescription glasses. Eyeglasses and a full face shield are required when doing any type of grinding. Burning goggles must be used when cutting or burning. Eye requirements shall meet the requirements of **29 CFR 1926.102.**

Watson Commercial Painting, Ltd.

Safety Program

- **Clothing:** All persons at the job site (working or visiting) will be required to wear a high-visibility vest or jacket. Employees shall wear clothing suitable for the weather and work conditions. The minimum shall be short-sleeved shirts and long pants. Clothing must be in good condition. Shorts or cut-offs and tennis shoes are not permitted.
- **Foot Protection:** All persons at the job site (working or visiting) are required to wear leather or protective (covered) hard sole shoes or boots. When the type of work being performed subjects an employee to a foot hazard, said employee would be required to wear protective footwear (steel toes or metatarsal guards) meeting the requirements of 29 CFR 1926.96. Tennis shoe style or hiking boot style shoes/boots are not allowed, even if ANSI approved.
- **Hand Protection:** Hand protection (gloves) will be required at all times for all employees. Employees working with cement/concrete will use protective rubber gloves. Heavy work gloves will be worn when handling materials such as lumber, hot metals, etc., or where the danger of skin punctures or abrasions is present. Dyneema or Kevlar gloves may be worn for cut resistance. Any other style of gloves must be approved by the safety team.
- **Hearing Protection:** Depending on the type of work being done, appropriate ear protection may be required and shall be used by those employees performing said work. As a general rule, if you are having to speak up to be heard at a distance of 3'-4', then hearing protection is probably required.
- WCP will be required to supply our employees with approved PPE for various activities for their protection where applicable. All personnel are expected to strictly adhere to this policy.

Blood Borne Pathogens Exposure Control Plan

- No employee at this establishment is required, as part of their job duties, to come in contact with blood and/or other potentially hazardous bodily fluids.
- In the event an employee voluntarily elects to perform a "Good Samaritan" act such as administering minor first aid to a fellow co-worker, they should use the proper personal protective equipment (goggles, and gloves) to eliminate the chance of contact with potentially infectious materials. This personal protective equipment should then be decontaminated or disposed of properly. Local emergency services are provided to perform this task and should be asked to do so.

Watson Commercial Painting, Ltd.

Safety Program

Microbial Contamination Prevention

- Though rare, when conducting activities with a high risk of microbial contamination, workers shall avoid eating, smoking, chewing gum, or rubbing eyes or other mucus membranes.
- Impermeable gloves and suits should be worn when necessary.
- Respirators should be worn when necessary.
- Employees will wash their hands, faces and clothing as soon as possible after work ends.
- Any spills or leaks will be cleaned up using disinfecting solution and absorbent material.

Fall Protection

- Employees and subcontractors working six feet or more off the next lower working/walking surface shall be protected from falling. This protection could include guardrails, safety cable, safety nets, personal fall arrest systems, etc. Where guardrails or safety cable systems are used for fall protection, the top rail of each system shall be able to withstand 200 lbs. of pressure in any direction. The mid-rail of these systems shall be able to withstand a minimum of 150 lbs. of pressure in any direction. Where personal fall arrest systems are used, they must be attached to an anchor point capable of supporting 5000 lbs. Employees are not allowed to anchor their PFAS to a guardrail system.
- All personal fall arrest systems (harnesses and lanyards) shall be inspected daily before use for damage to webbing, D-rings, etc. If any defects or damage is noticed, the harness and/or lanyard shall be taken out of service. If a harness and/or lanyard are involved in a fall, it shall be taken out of service immediately.
- If an employee or subcontractor can prove that the above mentioned fall protection systems are not conducive to the safety of their task, then they must submit, in writing, an alternate fall protection plan to be reviewed by WCP and General Contractor/Construction Manager with whom we are contracted. for approval before continuing their work. Possible scenarios shall include, but are not limited to, warning line systems or controlled access zones. The use of safety monitors for fall protection is prohibited.

Floor Openings

- Covers may be used on all openings 6.25 square feet or less in area and if one dimension is 2.5 feet or less.
- If the holes are to be used for access or to pass material through, they should then be barricaded with a handrail, complete with gates, removable guardrails or chains.

Watson Commercial Painting, Ltd.

Safety Program

- If the opening is decked, aluminum joists or equivalent shall be used, it must be solid with no openings, and no material storage shall be permitted on the deck surface. Personnel access should be under special circumstances.
- Holes with a maximum horizontal dimension of 2" through 12" must be protected so materials cannot fall to levels below. ¾" plywood, at a minimum, must be used. Covers must be secured from displacement, orange in color, and capable of withstanding twice the maximum intended load.
- Unless guardrails or decking are used, holes with a maximum horizontal dimension of greater than 12", up to the maximum size allowed shall be covered with expanded metal grating. The grating shall be painted orange and securely fastened or have hinges and be lockable.
- Subcontractors have the responsibility to protect all floor openings created by their work activities per this policy.

Confined Spaces

- A confined space is an area that is large enough to enter, not designed for continuous human occupancy, and has limited means of access and egress. Confined spaces include, but are not limited to, storage tanks, process vessels, bins, boilers, ventilation or exhaust ducts, sewers, underground utility vaults, tunnels, pipelines, and open top spaces more than four (4) feet in depth, such as pits, tubs, vaults, vessels and excavations.
- PERMIT AND NON-PERMIT CONFINED SPACES:
 - Non-Permit Required Confined Space - A confined space that has no hazardous atmosphere or has an atmosphere that can be maintained in safe condition as defined in Section C, for entry by mechanical ventilation alone. Non-Permit Required Confined Spaces also have no other recognizable hazards.
 - Permit Required Confined Space - A confined space that has a hazard or a hazardous atmosphere present or has the likely potential to develop a hazard or hazardous atmosphere.
 - All confined spaces shall be considered a permit required confined space until the Entry Permit Checklist is completed, and it is determined to be a non-hazard, non-permit confined space.
- At no time will anyone be allowed into a confined space where the atmosphere cannot be maintained below the maximum allowed flammable/explosive limit, the maximum allowed toxic limit, or an oxygen content within the range, as described below.

Watson Commercial Painting, Ltd.

Safety Program

- Prior to entry, the Confined Space Entry Permit Checklist, Exhibit 6.09-A in the Appendix, shall be completed to determine if the confined space is safe to enter, and that the following necessary precautions have been taken:
- Air monitoring before a confined space is entered shall include one or more of the following tests, dependent on the type of atmosphere suspected, and using the noted equipment:
 - Oxygen (O₂) level/combustible vapors (LEL).
 - Toxic vapors (solvents/hydrocarbons/H₂S).
- Tests shall be taken during each work shift if it is anticipated that the air quality may change, or if the confined space is left unattended for longer than a normal meal break. These tests must be conducted daily, prior to beginning work, by a Supervisor with training in the proper operation of the air monitoring equipment. Readings are to be taken at all levels of the confined space to determine if the atmosphere is hazardous. The criteria for determining if a confined space atmosphere is safe to enter (non-hazardous) is as follows:
 - Oxygen (O₂) content is between 19.5% and 23.5%.
 - Combustible vapors are less than or equal to 10% of the lower explosive limit (LEL).
 - Toxic levels are below the maximum allowed PPM for the substance being tested.
- An attendee positioned outside of all permit required confined spaces shall, at all times, be in visual or voice contact with the workers inside the confined space.
- When necessary, ventilation/ exhaust systems shall be properly designed and of the positive flow type. Solvents and atomized coating particles are generally heavier than air, and will tend to settle and concentrate in the lowest parts of a confined space. When designing a ventilation system for these areas, particular attention should be paid to the lowest, most remote spots.
- All Employees involved in the confined space entry process shall be trained.

Scaffold Installation

All WCP employees erecting scaffold for work shall do so under the direct supervision of the competent person so designated. Scaffold components and planking shall be inspected before erection to ensure that all components are in good working condition and not damaged. Scaffold erectors and dismantlers are required to follow the 6' fall protection rule.

Watson Commercial Painting, Ltd.

Safety Program

- Scaffold shall be inspected daily by the designated competent person to ensure its safety before anyone shall be allowed to access the scaffold.
- Each scaffold and scaffold component shall be capable of supporting, without failure, its own weight and at least 4 times the maximum intended load applied to it. Each platform on all working levels of scaffold shall be fully planked or decked between the front uprights and the guardrail supports so as not to have more than a 1 inch gap between any members of the decking.
- All decks/platforms shall be free of debris, tools, materials, etc., for safe access along walkways and to prevent tripping/falling. Toe boards shall be installed appropriately so as to prevent materials from falling onto workers below. Guardrails shall be installed when the scaffold reaches 6' in height. The top rail shall be between 38" and 45" in height with a mid-rail equidistant between the top rail and the walking/working surface. All scaffolds shall be restrained from tipping or displacement by the use of guys, ties, and braces to the building in accordance with OSHA standards 1926.451 General Requirements. All access to scaffold decks/platforms shall be achieved with ladders that are firmly secured to the scaffold structure. At no time shall workers ascend or descend the scaffold using the components of the scaffold structure. Scaffolding shall be erected and disassembled according to OSHA guidelines.

Maintenance of Tools

- All subcontractors will be required to inspect and maintain their own tools in accordance with manufacturer's guidelines and OSHA regulations. Any tool found by WCP to be damaged or unsafe shall be removed from service.
- Any special training needed for the operation and maintenance of specific tools will be handled on an "as needed" basis.
- Explosive power tools will be used, stored, and maintained according to federal, state, and local regulations. Only qualified, licensed employees will be allowed to use explosive powered tools.

Fire Protection/Prevention

- When required by contract WCP shall provide fire extinguishers otherwise normally provided by General Contractors/Construction Managers in which we are in contract with.
- All construction equipment will be shut off during refueling operations.
- Our projects shall be kept free from debris, trash, etc. in relation to our immediate work which may become a fire hazard.
- Smoking shall be prohibited in areas that may constitute a fire hazard.

Watson Commercial Painting, Ltd.

Safety Program

Housekeeping Directive

- WCP will designate individual employees to maintain housekeeping duties for our project activities on a daily basis. Subcontractors will be responsible for maintaining housekeeping duties within their own areas.
- If at any time it becomes apparent that Housekeeping is not being maintained, WCP will issue housekeeping directives. Subcontractors will be required to clean up their debris within one day of receipt of the directive. If the subcontractor does not comply with the directive within the time frame allotted, the debris will be cleaned up by WCP forces at the expense of the Subcontractor's account.
- The Housekeeping Directive provides written notice to Subcontractors requesting they perform the cleanup required by their Subcontracts.

Sanitation

- WCP shall provide an adequate supply of drinking water for their employees on site. Containers for dispensing water shall be closed and equipped with a tap. Water shall not be dipped from containers. Individual cups are required; the sharing of cups is prohibited. Trash containers shall be placed next to drinking water for disposal of paper cups when disposable cups are used.
- Contractors for whom we are contracted shall provide portable toilets which should accommodate the of persons as set forth be OSHA guidelines when necessary. They shall be serviced as often as necessary to maintain sanitary conditions by the Contractor which provided them.
- Temporary sanitation and handwashing facilities will also be provided by Contractors for whom we are contracted by when necessary.

Stairways and Ladders

- When Stairways and ladders will be an integral part of the construction of one of our projects. A stairway, ladder, or ramp will be provided at all points of access where there is a break in elevation of 19" or more and where there is no other way to access the next higher or lower elevation.
- All stairways shall be equipped with handrail and be kept free of debris for access and to prevent trip hazards.
- All ladders will be used as per their specifications and their intended use by design. All straight ladders used to access upper elevations will extend at least 36" above the landing surface and be secured to prevent displacement.
- All employees ascending or descending ladders shall do so facing the ladder and shall maintain at least three points of contact at all times.

Watson Commercial Painting, Ltd.

Safety Program

- All ladders shall be inspected daily, before use, for damage to the ladder. Any damaged ladder shall be taken out of service.

Flammable and Combustible Liquids

- Flammable and combustible liquids on any of our Projects shall be contained and maintained in accordance with OSHA Construction standards 1926.152 subpart F.
- All flammable and combustible liquids brought on site by WCP and its Subcontractors shall comply with above-mentioned OSHA standards and shall meet all labeling and containment criteria set forth by those standards.
- Periodic inspections of the site will be conducted to ensure all materials are properly stored in approved containers when not in use. Approved storage cabinets, where required, will be inspected for content and volume. All containers of flammable or combustible liquids, which do not meet the criteria stated above, shall be removed from the site.

Control of Gases, Vapors, Fumes & Mists

- Where concentrations of gases, vapors, fumes, & mists are higher than the threshold limit value (TLV) as specified by the American Conference of Governmental Industrial Hygienists, employees shall wear the appropriate PPE for their protection.
- When it is feasible, engineering and administrative controls shall be implemented for employee protection. When it is not feasible, appropriate personal protective equipment (PPE) shall be supplied to the employee for their protection.
- When PPE is to be used for compliance with Threshold Limit Values, the method of PPE shall be approved by a competent person, industrial hygienist, or other technically qualified person.
- Any employee needing to wear a tight-fitting respirator will be required to have a respirator physical performed.

2. Material Handling and Storage

- Material handling (loading and unloading) will be an extensive on-going effort by Watson Commercial Painting, LTD. Communication between all parties involved will play a major role in our success. Because of limited space on the site, planning for access / egress, methods of loading and unloading, and storage of materials will be paramount.

Watson Commercial Painting, Ltd.

Safety Program

- Subcontractors, vendors, etc., bringing materials on site, shall contact site supervisor to ensure that material handling is done properly and safely in accordance with OSHA construction standards 1926.251 Subpart H.
- Storage space and procedures shall also be predetermined and coordinated with management to ensure no materials block or impede other contractors during the construction process.
- Periodic inspections will be done throughout the site to ensure that all materials are stored properly.
- Whenever possible, loading and unloading of materials will be monitored by site safety personnel.

3. Illumination

- Construction areas, aisles, stairs, ramps, runways, corridors, offices, shops, and storage areas where work is in progress, shall be lighted with either natural or artificial illumination.
- Temporary lighting will be provided by the electrical contractor at each level in accordance with OSHA regulations. The location of temporary lighting will be coordinated with the Contractors Site Superintendent.
- Specific task lighting required above temporary lighting shall be provided by each subcontractor at the work point needed. Additional lighting for evening and night time hours shall be provided when needed. Light plants and tower crane lighting shall also be provided when necessary during night work.

4. Motorized Vehicles and Equipment

- All motorized vehicles and heavy equipment will be maintained in good working order. All vital parts of said equipment shall be inspected by the operators daily.
- Observe posted speed limits.
- **At no time** will personnel be allowed to ride in the cargo bed of pick-ups or as a passenger on other equipment.
- When conditions warrant, all vehicles shall be equipped with two headlights and two taillights in operable condition. They shall also have brake lights in operable condition.
- All equipment shall be equipped with an adequate audible warning device (horn) and an audible back-up alarm.
- Seat belts will be in good condition and will be used at all times.
- All heavy equipment / material handling equipment shall be equipped with rollover protective structures in accordance with OSHA construction standards 1926.1000 Subpart

Watson Commercial Painting, Ltd.

Safety Program

W. In addition, overhead protection shall be installed in accordance with OSHA Construction Standards 1926.1003 Overhead Protection for Operators of Agricultural and Industrial Tractors.

- Operators of motorized equipment shall operate their equipment in a safe manner with regard to other vehicular and pedestrian traffic on site. Any reckless or unsafe practices shall be addressed immediately.
- Anyone operating a motorized vehicle will need a valid driver's license.

43. Heat Stress Prevention Program

1.0 Purpose

This Heat Stress Prevention Program has been developed to provide workers with the training and equipment necessary to protect them from heat related exposures and illnesses.

2.0 Training

All employees who are or may be exposed to potential heat related illnesses will receive training on the following:

1. The environmental and personal risk factors that cause heat related illnesses;
2. The employer's procedures for identifying, evaluating and controlling exposures to the environmental and personal risk factors for heat illness;
3. The importance of frequent consumption of small quantities of water
4. The importance of acclimatization;
5. The different types of heat illness and the common signs and symptoms of heat illness;
6. 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.
7. The employer's procedures for responding to symptoms of possible heat illness, including how emergency medical services will be provided should they become necessary;
8. 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;
9. How to provide clear and precise directions to the work site.

Watson Commercial Painting, Ltd.

Safety Program

3.0 Supervisor Responsibilities

- A. All supervisors will be provided a copy of this program and training documents prior to assignment of employees working in environments where heat exposures may occur.
- B. Supervisors will be provided the procedures to follow to implement the applicable provisions of this program.
- C. Supervisors will be provided the procedures to follow when an employee exhibits symptoms consistent with possible heat illness, including emergency response procedures.

4.0 Provision of Water

Employees shall have access to potable water. Water shall be provided in sufficient quantity at the beginning of the work shift and throughout the day.

5.0 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 for a period of no less than five minutes. Such access to shade shall be permitted at all times. Shade areas may include, but are not limited to trees, buildings, canopies, lean-tos, or other partial and/or temporary structures that are either ventilated or open to air movement.

6.0 Heat Stress Disorders

6.1 Heat Rash (Prickly Heat)

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.

Watson Commercial Painting, Ltd.

Safety Program

6.2 Heat Cramps

Symptoms:

- Loss of salt through excessive sweating.
- Cramping in back, legs and arms.

Treatment:

- Stretch and massage muscles.
- Replace salt by drinking commercially available carbohydrate/electrolyte replacement fluids.

6.3 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.

Symptoms:

- Weakness.
- Difficulty continuing work.
- Headache.
- Breathlessness.
- Nausea or vomiting.
- Feeling faint or actually fainting.

Treatment:

- Call 911.

Help the victim to 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.

6.4 Heat Stroke

Heat stroke occurs when the body can no longer cool itself and body temperature rises to critical levels.

Watson Commercial Painting, Ltd.

Safety Program

Symptoms:

- Confusion.
- Irrational behavior.
- Loss of consciousness.
- Convulsions.
- Lack of sweating.
- Hot, dry skin.
- Abnormally high body temperature.

Treatment:

- Call 911.

Provide immediate, aggressive, general cooling.

- Place in cool shower; or
- Spray with cool water from a hose; or
- Wrap victim in cool, wet sheets and fan rapidly; or
- Place wet cool rags or ice packs in underarms, behind knees, behind neck, in groin area.
- Ensure victim is transported to hospital.

Do not give anything by mouth to an unconscious victim.

7.1 Supervisors Responsibilities

Supervisors are responsible for performing the following:

1. Give workers frequent breaks in a cool area away from heat.
2. Adjust work practices as necessary when workers complain of heat stress.
3. Oversee heat stress training and acclimatization for new workers and for workers who have been off the job for a period of time.
4. Monitor the workplace to determine when hot conditions arise.
5. Provide potable water in required quantities and in locations close to the work area. Ensure water is kept cool and workers do not have to drink hot or warm water.
6. Determine whether workers are drinking enough water.
7. Monitor daily weather reports and be extra vigilant during heat waves when air temperatures rise above normal. High temperatures are typical during the summer months in Texas.
8. Make available to all workers, cooling devices (hard hat liners/bibs/neck bands) to help rid bodies of excessive heat.

7.2 Workers

Workers are responsible for performing the following:

Watson Commercial Painting, Ltd.

Safety Program

1. Follow instructions and training for controlling heat stress.
2. Be alert to symptoms in yourself and others.
3. Determine if any prescription medications you're required to take can increase heat stress.
4. Wear light, loose-fitting clothing that permits the evaporation of sweat.
5. Wear light colored garments that absorb less heat from the sun.
6. Drink small amounts of water throughout the day.
7. Avoid beverages such as tea, coffee, or energy drinks with caffeine.
8. Avoid eating hot, heavy meals.

Hazard Communication Program

Watson Commercial Painting, Ltd.

Safety Program

2022

OSHA Inspections

Compliance Visits – Should OSHA conduct a Compliance Visit at the project, Watson Commercial Painting Ltd. shall notify the owner and subcontractors via radio or cell phone communication. All onsite subcontractors' superintendents will be notified of the opening conference conducted by the compliance officer to address his / her questions and understand the reason for the visit. Should a site inspection take place, Watson Commercial Painting Ltd. and a representative of each subcontractor, if allowed by the CSHO, shall be present during the inspection.

1. Introduction

The management of **Watson Commercial Painting, LTD** is committed to preventing accidents and ensuring the safety and health of our employees. We will comply with all applicable federal and state health and safety rules. Under this program employees are informed of the contents of the OSHA Hazard Communications Standard, the hazardous properties of chemicals with which they work, safe handling procedures and measures to take to protect themselves from these chemicals. These chemicals may be physical or health-related. This written hazard communication plan is available at the following location for review by all employees: **Employee Handbook, Watson Commercial Painting, Ltd. office at 15040 TX-110, Whitehouse, TX 75791, and on jobsites per requested documentation.**

2. Identifying Hazardous Chemicals

A list is attached to this plan that identifies all hazardous chemicals with a potential for employee exposure at this workplace. Detailed information about the physical, health, and other hazards of each chemical is included in a Safety Data Sheet (SDS); the product identifier for each chemical on the list matches and can be easily cross-referenced with the product identifier on its label and on its Safety Data Sheet.

3. Identifying Containers of Hazardous Chemicals

The labeling system to be used by **Watson Commercial Painting, LTD.** will follow the requirements in the 2012 revision of the OSHA Hazard Communication Standard to be consistent with the United Nations Globally Harmonized System (GHS) of Classification of Labeling of Chemicals. The label on the chemical is intended to convey information about the hazards posed by the chemical through standardized label elements, including symbols, signal words and hazard statements.

All hazardous chemical containers used at this workplace will have:

1. The original manufacturer's label that includes a product identifier, an appropriate signal word, hazard statement(s), pictogram(s), precautionary statement(s) and the name, address, and telephone number of the chemical manufacturer, importer, or other responsible party
2. A label with the appropriate label elements just described
3. Workplace labeling that includes the product identifier and words, pictures, symbols, or combination that provides at least general information regarding the hazards of the chemicals.

Watson Commercial Painting, Ltd.

Safety Program

The competent personnel onsite will ensure that all containers are appropriately labeled. No container will be released for use until this information is verified. Workplace labels must be legible and in English.

Information in other languages is available at: **Sherwin-Williams stores and via internet at Sherwin Williams website.**

Small quantities intended for immediate use may be placed in a container without a label, provided that the individual keeps it in their possession at all times and the product is used up during the work shift or properly disposed of at the end of the work day. However, the container should be marked with its contents.

4. Keeping Safety Data Sheets (previously known as Material Safety Data Sheets)

The manufacturer or importer of a chemical is required by OSHA to develop a Safety Data Sheet (SDS) that contains specific, detailed information about the chemical's hazard using a specified format. The distributor or supplier of the chemical is required to provide this SDS to the purchaser.

SDS's are readily available to all employees during their work shifts. Employees can review SDS for all hazardous chemicals used at this workplace. **This information should be stored in the General contractors designated office/jobsite building per contract documents.**

The SDS's are updated and managed by **the foreman onsite**. If a SDS is not immediately available for a hazardous chemical, employees can obtain the required information by calling **Safety Coordinator for Watson Commercial Painting @ 903-581-0393**

5. Training Employees about Chemical Hazards

Before they start their jobs or are exposed to new hazardous chemicals, employees must attend a hazard communication training that covers the following topics:

- An overview of the requirements in OSHA's Hazard Communication Standard.
- Hazardous chemicals present in their workplace.
- Any operations in their work area where hazardous chemicals are used.
- The location of the written hazard communication plan and where it may be reviewed.
- How to understand and use the information on labels and in Safety Data Sheets.
- Physical and health hazards of the chemicals in their work areas.
- Methods used to detect the presence or release of hazardous chemicals in the work area.
- Steps we have taken to prevent or reduce exposure to these chemicals.
- How employees can protect themselves from exposure to these hazardous chemicals through use of engineering controls/work practices and personal protective equipment.
- An explanation of any special labeling present in the workplace
 - What are pictograms?
 - What are the signal words?
 - What are the hazard statements?
 - What are the precautionary statements?

Watson Commercial Painting, Ltd.

Safety Program

- Emergency procedures to follow if an employee is exposed to these chemicals.

The Safety Coordinator is responsible to ensure that employees receive this training. After attending the training, employees will sign a form verifying that they understand the above topics and how the topics are related to our hazard communication plan.

Prior to introducing a new chemical hazard into any department, each employee in that department will be given information and training as outlined above for the new chemical hazard.

6. Informing Employees who do Special Tasks

Before employees perform special (non-routine) tasks that may expose them to hazardous chemicals, their supervisors will inform them about the chemicals' hazards. Their supervisors also will inform them about how to control exposure and what to do in an emergency. The employer will evaluate the hazards of these tasks and provide appropriate controls including Personal Protective Equipment all additional training as required.

Examples of special tasks that may expose employees to hazardous chemicals include the following:

- 1) Opening up a can of paint.
- 2) Cleaning up rig equipment with solvents
- 3) Sanding existing conditions

7. Informing contractors and other employers about our hazardous chemicals

If employees of other employer(s) may be exposed to hazardous chemicals at our workplace (for example, employees of a construction contractor working on-site) It is the responsibility of the safety Coordinator to provide contractors and their employees with the following information:




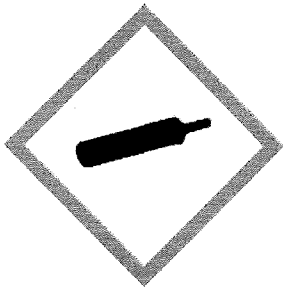
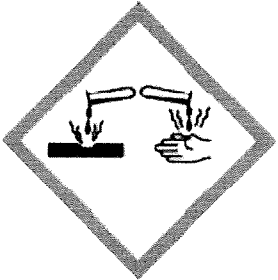

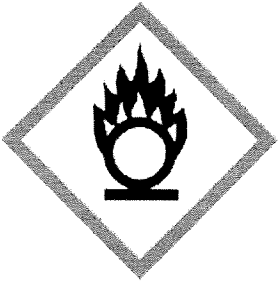


- The identity of the chemicals, how to review our Safety Data Sheets, and an explanation of the container labeling system.
- Safe work practices to prevent exposure.

The Safety Coordinator will also obtain a Safety Data Sheet for any hazardous chemical a contractor brings into the workplace.

Watson Commercial Painting, Ltd.

Safety Program

HCS Pictograms and Hazards

 <ul style="list-style-type: none"> ▪ Carcinogen ▪ Mutagenicity ▪ Reproductive Toxicity ▪ Respiratory Sensitizer ▪ Target Organ Toxicity ▪ Aspiration Toxicity 	 <ul style="list-style-type: none"> ▪ Flammables ▪ Pyrophorics ▪ Self-Heating ▪ Emits Flammable Gas ▪ Self-Reactives ▪ Organic Peroxides 	 <ul style="list-style-type: none"> ▪ Irritant (skin and eye) ▪ Skin Sensitizer ▪ Acute Toxicity ▪ Narcotic Effects ▪ Respiratory Tract Irritant ▪ Hazardous to Ozone Layer (Non-Mandatory)
<p style="text-align: center;">Gas Cylinder</p>  <ul style="list-style-type: none"> ▪ Gases Under Pressure 	<p style="text-align: center;">Corrosion</p>  <ul style="list-style-type: none"> ▪ Skin Corrosion/Burns ▪ Eye Damage ▪ Corrosive to Metals 	<p style="text-align: center;">Exploding Bomb</p>  <ul style="list-style-type: none"> ▪ Explosives ▪ Self-Reactives ▪ Organic Peroxides
<p style="text-align: center;">Flame Over Circle</p>  <ul style="list-style-type: none"> ▪ Oxidizers 	<p style="text-align: center;">Environment (Non-Mandatory)</p>  <ul style="list-style-type: none"> ▪ Aquatic Toxicity 	<p style="text-align: center;">Skull and Crossbones</p>  <ul style="list-style-type: none"> ▪ Acute Toxicity (Fatal or Toxic)

Watson Commercial Painting, Ltd.

Safety Program

44. SILICA WRITTEN EXPOSURE CONTROL PLAN

PURPOSE

Exposure to crystalline silica can lead to silicosis, a serious and sometimes fatal respiratory disease, lung cancer, other respiratory diseases and kidney disease. The primary root of exposure is through inhalation. Excessive amounts of silica dust may be generated during activities such as: sandblasting, rock drilling, roof bolting, foundry work, stonecutting, drilling, quarrying, brick/block/concrete cutting, gunite operations, drywall sanding, lead-based paint encapsulating applications, asphalt paving, cement products manufacturing, demolition operations, hammering, and chipping and sweeping concrete or masonry. This section applies to all occupational exposures to respirable crystalline silica in construction work, except where employee exposure will remain below 25 micrograms per cubic meter of air (25 µg/m³) as an 8-hour time-weighted average (TWA) under any foreseeable conditions.

The following written exposure control plan is designed to protect employees who may come into contact with silica during the course of their work. Operations that may contain exposure crystalline silica will comply with 29CFR 1926.1153 Respirable Crystalline Silica.

Watson Commercial Painting, Ltd.

Safety Program

099000 Specific Silica Procedures for our work Category.

Person Completing the Plan, Title:

Paul A Henshaw IV (Project Manager)

Methods of Exposure:

1) Equipment:

a. Spray equipment

- i. Spray equipment is a vessel, a means of application. During application, silica containing materials may be used/become airborne and proper OSHA approved masks/respirators shall be used.**

b. Mechanical and hand operated sanders

- i. Foreign materials, paints, primers, or other products being sanded to acquire desired finish to substrates may contain silica, proper protection must be used during the sanding process of new and existing substrates.**
 - 1. Prior to sanding, please notify other trades on site. Their health is just as important to sustain as our own.**

2) See MSDS pages to identify materials containing

1. COMPETENT PERSON(S)

- a. _____ (foreman)**
- b. _____ (Field Superintendent)**

2. TRAINING

- a. Employees will be trained in the following:**
 - i. Health hazards associate with silica exposure**
 - ii. Tasks in the workplace that could result in silica exposure**
 - iii. Protective measures to protect employees from silica exposure including engineering controls, work practices, and respiratory protection**
 - iv. The identity of the competent person(s)**

Watson Commercial Painting, Ltd.

Safety Program

- v. The purpose and a description of the medical surveillance program

3. MEDICAL SURVEILLANCE

- a. Medical surveillance will be made available at no cost for each employee who will be required to use a respirator for 30 or more days per year. Medical surveillance will be in compliance with 29CFR1926.1153(h)

4. WORKPLACE INSPECTIONS

- a. Routine workplace inspections will be conducted on the project to assess potential dust generating tasks and implement adequate control methods.

5. DESCRIPTION OF TASKS: Performed by Watson Commercial Painting & other trades work to be aware of:

- a. All work that will be conducted will be outdoors in an open, non-confined area. All tasks that will be conducted include:
 - i. Demolition of work at various location of the project using a hand-held power saw with a diamond blade.
 - ii. Rub and patch work at various location of the project using a hand-held grinder.
 - iii. Drilling for concrete dowel inserts at various location of the project using a hand-held drill.
 - iv. Jack Hammering/Chipping of concrete for demolition of existing concrete.
 - v. Excavation, Grading, etc. throughout the project.
 - vi. Sanding or disturbance to existing painting coatings or other surfaces.
 - vii. Spraying of chemicals: rather produced by Watson Commercial painting or other contractors, Each trade should have an identifiable plan of protection verbalized to all affected in the area.

6. CONTROL METHODS

Construction General:

- a. Use hand-held power saw equipped with an integrated water delivery system that continuously feeds water to the blade. Follow Manufacturers requirements/recommendations to minimize dust emission. Water shall be applied at the flow rate specified by the manufacturer.
- b. Use hand-held grinders equipped with commercially available shroud and dust collection system. Dust collector must provide 25 cubic feet per minute or greater of airflow per inch of wheel diameter and have a filter

Watson Commercial Painting, Ltd.

Safety Program

- c. with 99% or greater efficiency and a cyclonic pre-separator of filter-cleaning mechanism.
- d. Use hand-held (hammer) drill with commercially available shroud or cowling with dust collection system. Utilize “hollow” drill bits if applicable.
- e. Use Jack Hammering and/or chipping tool with a water delivery system that supplies a continuous stream or spray of water at the point of impact OR use the tool equipped with commercially available shroud and dust collection system.
- f. All Excavation and Dirt Work shall be performed with water and/or a dust suppressant to minimize dust emissions.
 - i. Painting related:
 - ii. Spray equipment to be used properly to minimize volume of overspray and airborne contamination
 - iii. During spraying: if applicable partition of the zone of spraying to eliminate exposure to other trades.
 - 1. If not possible due to acceleration of project: Notify superintendent so other trades will be aware of painting application and its method and means of protecting themselves if required to be within the zone of exposure
 - iv. During sanding: strongly discourage the presence of other trades not using proper PPE for the given application. Notify superintendent of personnel not abiding by OSHA Regulations given to our exposure.

7. HOUSEKEEPING

- a. Dust containing silica on work surfaces and equipment must be cleaned up using a sweeping agent or wet method for disposal.
- b. Compressed air use or dry sweeping for removal of silica dust is prohibited.
- c. Used vacuum bags must be kept into a sealed container and disposed of properly.

8. RESTRICTION TO WORK AREAS

- a. Our goal is to schedule work where employees will not be exposed. Employees will be trained and notified of silica exposed areas and will be instructed to stay away from the areas. Warning signs will be placed in areas of silica exposure.

Watson Commercial Painting, Ltd.

Safety Program

Employee Acknowledgement:

I _____, have read and understand
Watson Commercial Painting, Ltd's Safety Program.

Date: _____