 BURNT MOUNTAIN SERVICES LLC.	Burnt Mountain Services Safety Management System	Initial Issue Date	08/11/2024
		Revision Date:	Initial Version
	MEDICAL SURVEILLANCE PROGRAM		Revision No.

Purpose

The purpose of this Medical Surveillance Program is to ensure the health and safety of employees by identifying and mitigating occupational health risks through regular medical examinations and monitoring, in compliance with OSHA standards for both the General Industry (29 CFR 1910) and Construction Industry (29 CFR 1926).

Scope

This program applies to all employees who are exposed to hazardous substances, noise, respirable crystalline silica, asbestos, lead, or any other regulated substances or conditions as specified by OSHA. It covers the requirements for both General Industry and Construction Industry operations.


Key Responsibilities

- **Program Administrator:** The Program Administrator is responsible for implementing, managing, and maintaining the Medical Surveillance Program. This includes scheduling medical examinations, ensuring compliance with OSHA standards, and maintaining accurate records.
- **Supervisors/Managers:** Supervisors and managers are responsible for identifying employees who require medical surveillance, ensuring their participation, and coordinating with the Program Administrator.
- **Employees:** Employees are responsible for participating in scheduled medical examinations, reporting any symptoms or conditions that may be work-related, and complying with all program requirements.

Medical Surveillance Requirements

A. General Industry (29 CFR 1910)

1. **Respiratory Protection (1910.134):**
 - Medical evaluations must be provided to employees required to wear respirators.
 - A physician or other licensed healthcare professional (PLHCP) must assess the employee's ability to wear a respirator through a medical questionnaire and/or examination.
2. **Hazardous Waste Operations and Emergency Response (HAZWOPER) (1910.120):**
 - Medical surveillance is required for employees exposed to hazardous substances or engaged in emergency response operations.
 - Baseline, periodic, and termination medical examinations must be conducted.
3. **Asbestos (1910.1001):**
 - Medical surveillance is required for employees exposed to asbestos above the permissible exposure limit (PEL).
 - Initial, periodic, and exit medical examinations must be provided.
4. **Lead (1910.1025):**
 - Medical surveillance is required for employees exposed to lead at or above the action level.

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- Baseline, periodic, and exit medical examinations are mandatory.

5. **Benzene (1910.1028):**

- Medical surveillance is required for employees exposed to benzene at or above the action level.
- Initial, periodic, and termination examinations are required.

6. **Other Specific Substances:**

- Medical surveillance may be required for employees exposed to other hazardous substances such as formaldehyde, ethylene oxide, and chromium (VI).

B. Construction Industry (29 CFR 1926)

1. **Respiratory Protection (1926.103):**

- Medical evaluations must be provided to employees required to wear respirators.
- Evaluation includes a medical questionnaire and/or physical examination conducted by a PLHCP.

2. **Asbestos (1926.1101):**

- Medical surveillance is required for employees exposed to asbestos above the PEL.
- Medical examinations must be provided prior to assignment, annually, and at termination.

3. **Lead (1926.62):**

- Medical surveillance is required for employees exposed to lead at or above the action level.
- Baseline, periodic, and termination examinations must be provided.

4. **Silica (1926.1153):**

- Medical surveillance is required for employees exposed to respirable crystalline silica at or above the action level.
- Initial, periodic (every three years), and termination medical examinations must be provided.

5. **Noise (1926.52 and 1926.101):**

- Hearing conservation programs must include medical surveillance for employees exposed to noise at or above the action level.
- Audiometric testing must be conducted annually.

6. **Hazardous Waste Operations and Emergency Response (HAZWOPER) (1926.65):**

- Medical surveillance is required for employees involved in hazardous waste operations or emergency response.
- Baseline, periodic, and exit medical examinations must be provided.

Medical Examinations and Procedures

- **Initial/Baseline Examination:** A comprehensive health evaluation must be conducted before the employee starts working in a position that requires medical surveillance.
- **Periodic Examinations:** Ongoing health monitoring must be conducted at regular intervals as

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specified by OSHA standards (e.g., annually or every three years).

- **Exit Examination:** A final medical examination must be conducted when an employee leaves a position that required medical surveillance.
- **Additional Examinations:** Supplemental examinations may be required if an employee shows symptoms related to occupational exposure, experiences an incident, or if recommended by the PLHCP.

Recordkeeping

- **Medical Records:** All medical examination results and related records must be maintained for the duration of employment plus 30 years, as required by OSHA (29 CFR 1910.1020).
- **Access to Records:** Employees have the right to access their medical records upon request.
- **Confidentiality:** All medical records are confidential and must be stored securely to protect employee privacy.

Training and Communication

- **Training:** Employees covered by the Medical Surveillance Program must receive training on the potential health risks associated with their job tasks, the purpose of medical surveillance, and their rights under OSHA regulations.
- **Communication:** Information regarding the Medical Surveillance Program must be communicated to all affected employees, and they must be informed of any updates or changes to the program.

Program Evaluation and Review

- **Annual Review:** The Program Administrator must review the Medical Surveillance Program annually to ensure compliance with OSHA standards and effectiveness in protecting employee health.
- **Continuous Improvement:** Recommendations for program improvements must be implemented promptly to address any identified deficiencies or emerging health risks.

Compliance and Enforcement

- **Compliance:** Strict adherence to this program is mandatory for all employees. Non-compliance may result in disciplinary action, up to and including termination.
- **OSHA Inspections:** The company will cooperate fully with OSHA inspections related to medical surveillance and provide all requested documentation and access.