



**Coating
Specialist LLC**

SILICA EXPOSURE CONTROL PLAN

PURPOSE:

This Respirable Crystalline Silica Program was developed to prevent employee exposure to hazardous levels of Respirable Crystalline Silica that could result through construction activities or nearby construction activities occurring on worksites. Respirable Crystalline Silica exposure at hazardous levels can lead to lung cancer, silicosis, chronic obstructive pulmonary disease, and kidney disease. It is intended to meet the requirements of the Respirable Crystalline Silica Construction Standard (29 CFR 1926.1153) established by the Occupational Safety and Health Administration (OSHA).

All work involving chipping, cutting, drilling, grinding, blasting, or similar activities on materials containing Crystalline Silica can lead to the release of respirable-sized particles of Crystalline Silica (i.e. Respirable Crystalline Silica). Crystalline Silica is a basic component of soil, sand, granite and many other minerals. Quartz is the most common form of Crystalline Silica. Many materials found on construction sites include Crystalline Silica; including but not limited to – cement, concrete, asphalt, pre-formed structures (inlets, pipe, etc.) and others. Consequently, this program has been developed to address and control these potential exposures to prevent our employees from experiencing the effects of occupational illnesses related to Respirable Crystalline Silica exposure.

SCOPE:

This Respirable Crystalline Silica Program applies to all employees who have the potential to be exposed to Respirable Crystalline Silica when covered by the OSHA Standard. The OSHA Respirable Crystalline Silica Construction Standard applies to all occupational exposures to Respirable Crystalline Silica in construction work, except where employee exposure will remain below 25 micrograms of Respirable Crystalline Silica per cubic meter of air (25 µg/m³) as an 8-hour time-weighted average (TWA) under any foreseeable conditions.

RESPONSIBILITIES:

Coating Specialist, LLC firmly believes protecting the health and safety of our employees is everyone's responsibility. This responsibility begins with upper management providing the necessary support to properly implement this program. However, all levels of the organization assume some level of responsibility for this program including the following positions.

Management:

- Ensure all applicable elements of this Respirable Crystalline Silica Program are implemented on the project including the selection of a Competent Person.
- Assist the Safety Coordinator in conducting job site assessments for Silica containing materials and perform employee Respirable Crystalline Silica hazard assessments in order to determine if an Exposure Control Plan (ECP), exposure monitoring, and medical surveillance is necessary.
- Assist in the selection and implementation of the appropriate control measures in accordance with the Construction Tasks identified in OSHA's Construction Standard Table 1; and potentially including (but not limited to) - a written Exposure Control Plan (ECP), exposure monitoring, Hazard Communication training, medical surveillance, housekeeping and others.
- Ensure that employees using respirators have been properly trained, medically cleared, and fit-tested in accordance with the company's Respiratory Protection Program. This process will be documented.
- Ensure that work is conducted in a manner that minimizes and adequately controls the risk to workers and others. This includes ensuring that workers use appropriate engineering controls, work practices, and wear the necessary PPE.
- Where there is risk of exposure to Silica dust, verify employees are properly trained on the applicable contents of this program, the project-specific ECP, and the applicable OSHA Standards (such as Hazard Communication). Ensure employees are provided appropriate PPE when conducting such work.

Safety Coordinator:

- Conduct job site assessments for Silica containing materials and perform employee Respirable Crystalline Silica hazard assessments in order to determine if an employee's exposure will be above 25 µg/m³ as an 8-hour TWA under any foreseeable conditions
- Select and implement into the project's ECP the appropriate control measures in accordance with the Construction Tasks identified in OSHA's Construction Standard Table 1; and potentially including (but not limited to) - a written Exposure Control Plan (ECP), exposure monitoring, Hazard Communication training, medical surveillance, housekeeping and others.

NOTE: OSHA's Construction Standard Table 1 is a list of 18 common construction tasks along with acceptable exposure control methods and work practices that limit exposure for those tasks.

- Ensure that the materials, tools, equipment, personal protective equipment (PPE), and other resources (such as worker training) required to fully implement and maintain this Respirable Crystalline Silica Program are in place and readily available if needed.
- Ensure that Project Managers, Site Managers, Competent Persons, and employees are educated in the hazards of Silica exposure and trained to work safely with Silica in accordance with OSHA's Respirable Crystalline Silica Construction Standard and OSHA's Hazard Communication Standard. Managers and Competent Persons may receive more advanced training than other employees.

- Maintain written records of training (for example, proper use of respirators), ECPs, inspections (for equipment, PPE, and work methods/practices), medical surveillance (under lock and key), respirator medical clearances (under lock and key) and fit-test results.
- Conduct an annual review (or more often if conditions change) of the effectiveness of this program and any active project ECP's that extend beyond a year. This includes a review of available dust control technologies to ensure these are selected and used when practical.
- Coordinate work with other employers and contractors to ensure a safe work environment relative to Silica exposure.

Competent Person:

- Make frequent and regular inspections of job sites, materials, and equipment to implement the written ECP.
- Identify existing and foreseeable Respirable Crystalline Silica hazards in the workplace and take prompt corrective measures to eliminate or minimize them.
- Notify the Management and Safety Coordinator of any deficiencies identified during inspections in order to coordinate and facilitate prompt corrective action.
- Assist the Management and Safety Coordinator in conducting job site assessments for Silica containing materials and perform employee Respirable Crystalline Silica hazard assessments in order to determine if an ECP, exposure monitoring, and medical surveillance is necessary.

Employees:

- Follow recognized work procedures (such as the Construction Tasks identified in OSHA's Construction Standard Table 1) as established in the project's ECP and this program.
- Use the assigned PPE in an effective and safe manner.
- Participate in Respirable Crystalline Silica exposure monitoring and the medical surveillance program.
- Report any unsafe conditions or acts to the Competent Person.
- Report any exposure incidents or any signs or symptoms of Silica illness.

DEFINITIONS:

If a definition is not listed in this section, please contact your supervisor. If your supervisor is unaware of what the term means, please contact the Competent Person or your Safety Department.

Action Level: A concentration of airborne Respirable Crystalline Silica of 25 µg/m³, calculated as an 8-hour TWA.

Competent Person: An individual who is capable of identifying existing and foreseeable Respirable Crystalline Silica hazards in the workplace and who has authorization to take prompt corrective measures to eliminate or minimize them.

Employee Exposure: The exposure to airborne Respirable Crystalline Silica that would occur if the employee were not using a respirator.

High-Efficiency Particulate Air (HEPA) Filter: A filter that is at least 99.97 percent efficient in removing monodispersed particles of 0.3 micrometers in diameter.

Objective Data: Information, such as air monitoring data from industry-wide surveys or calculations based on the composition of a substance, demonstrating employee exposure to Respirable Crystalline Silica associated with a particular product or material or a specific process, task, or activity. The data must reflect workplace conditions closely resembling or with a higher exposure potential than the processes, types of material, control methods, work practices, and environmental conditions in the employer's current operations.

Permissible Exposure Limit (PEL): The employer shall ensure that no employee is exposed to an airborne concentration of Respirable Crystalline Silica in excess of 50 $\mu\text{g}/\text{m}^3$, calculated as an 8-hour TWA.

Physician or Other Licensed Health Care Professional (PLHCP): An individual whose legally permitted scope of practice (i.e., license, registration, or certification) allows him or her to independently provide or be delegated the responsibility to provide some or all of the particular health care services required by the Medical Surveillance Section of the OSHA Respirable Crystalline Silica Standard.

Respirable Crystalline Silica: Quartz, Cristobalite, and/or Tridymite contained in airborne particles that are determined to be respirable by a sampling device designed to meet the characteristics for respirable-particle size-selective samplers specified in the International Organization for Standardization (ISO) 7708:1995: Air Quality-Particle Size Fraction Definitions for Health-Related Sampling.

Specialist: An American Board Certified Specialist in Pulmonary Disease or an American Board Certified Specialist in Occupational Medicine.

REQUIREMENTS:

When possible and applicable, Coating Specialist, LLC will conduct activities with potential silica exposure to be consistent with OSHA’s Construction Standard Table 1. Supervisors will ensure each employee under their supervision and engaged in a task identified on OSHA’s Construction Standard Table 1 have fully and properly implemented the engineering controls, work practices, and respiratory protection specified for the task on Table 1 (unless Coating Specialist, LLC has assessed and limited the exposure of the employee to Respirable Crystalline Silica in accordance with the Alternative Exposure Control Methods Section of this program).

Table 1: Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
≤ 4 hours/shift		>4 hours/shift		
1	Stationary masonry saws	<ul style="list-style-type: none"> • Use saw equipped with integrated water delivery system that continuously feeds water to the blade. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. 	None	None
2a	Handheld power saws (any blade diameter) when used outdoors	<ul style="list-style-type: none"> • Use saw equipped with integrated water delivery system that continuously feeds water to the blade. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. 	None	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
2b	Handheld power saws (any blade diameter) when used indoors or in an enclosed area	<ul style="list-style-type: none"> • Use saw equipped with integrated water delivery system that continuously feeds water to the blade. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. 	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask

3	Handheld power saws for cutting fiber-cement board (with blade diameter of 8 inches or less) for tasks performed outdoors only	<ul style="list-style-type: none"> • Use saw equipped with commercially available dust collection system. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency. 	None	None
4a	Walk-behind saws when used outdoors	<ul style="list-style-type: none"> • Use saw equipped with integrated water delivery system that continuously feeds water to the blade. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. 	None	None
Construction Task or Equipment Operation		Engineering and Work Practice Control Methods		Required Respiratory Protection
≤ 4 hours/shift			>4 hours/shift	
4b	Walk-behind saws when used indoors or in an enclosed area	<ul style="list-style-type: none"> • Use saw equipped with integrated water delivery system that continuously feeds water to the blade. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. 	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
5	Drivable saws for tasks performed outdoors only	<ul style="list-style-type: none"> • Use saw equipped with integrated water delivery system that continuously feeds water to the blade. • Operate and maintain tool in accordance with manufacturer's 	None	None

		instructions to minimize dust emissions.		
6	Rig-mounted core saws or drills	<ul style="list-style-type: none"> • Use tool equipped with integrated water delivery system that supplies water to cutting surface. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. 	None	None
7	Handheld and stand-mounted drills (including impact and rotary hammer drills)	<ul style="list-style-type: none"> • Use drill equipped with commercially available shroud or cowling with dust collection system. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. • Use a HEPA-filtered vacuum when cleaning holes. 	None	None
8	Dowel drilling rigs for concrete for tasks performed outdoors only	<ul style="list-style-type: none"> • Use shroud around drill bit with a dust collection system. • Dust collector must have a filter with 99% or greater efficiency and a filter cleaning mechanism. • Use a HEPA-filtered vacuum when cleaning holes. 	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
9a	Vehicle-mounted drilling rigs for rock and concrete	<ul style="list-style-type: none"> • Use dust collection system with close capture hood or shroud around drill 	None	None

		bit with a low-flow water spray to wet the dust at the discharge point from the dust collector.		
9b	Vehicle-mounted drilling rigs for rock and concrete	<ul style="list-style-type: none"> • Operate from within an enclosed cab and use water for dust suppression on drill bit. 	None	None
10a	Jackhammers and handheld powered chipping tools when used outdoors	<ul style="list-style-type: none"> • Use tool with water delivery system that supplies a continuous stream or spray of water at the point of impact. 	None	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
≤ 4 hours/shift		>4 hours/shift		
10b	Jackhammers and handheld powered chipping tools when used indoors or in an enclosed area	<ul style="list-style-type: none"> • Use tool with water delivery system that supplies a continuous stream or spray of water at the point of impact. 	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
10c	Jackhammers and handheld powered chipping tools when used outdoors	<ul style="list-style-type: none"> • Use tool equipped with commercially available shroud and dust collection system. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. 	None	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
10d	Jackhammers and handheld powered chipping tools when used indoors or in an enclosed area	<ul style="list-style-type: none"> • Use tool equipped with commercially available shroud and dust collection system. 	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask

		<ul style="list-style-type: none"> • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. 		
11	Handheld grinders for mortar removal (i.e., tuckpointing)	<ul style="list-style-type: none"> • Use grinder equipped with commercially available shroud and dust collection system. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism. 	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	Powered Air-Purifying Respirator (PAPR) with P100 Filters
12a	Handheld grinders for uses other than mortar removal for tasks performed outdoors only	<ul style="list-style-type: none"> • Use grinder equipped with integrated water delivery system that continuously feeds water to the grinding surface. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. 	None	None

12b	Handheld grinders for uses other than mortar removal when used outdoors	<ul style="list-style-type: none"> • Use grinder equipped with commercially available shroud and dust collection system. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism. 	None	
<ul style="list-style-type: none"> • to minimize dust emissions. 		None	None	
13b	Walk-behind milling machines and floor grinders	<ul style="list-style-type: none"> • Use machine equipped with dust collection system recommended by the manufacturer. • Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. • Dust collector must provide the air flow recommended by the manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. • When used indoors or in an enclosed area, use a HEPA-filtered vacuum to remove loose dust in between passes. 	None	None
14	Small drivable milling machines (less than half-lane)	<ul style="list-style-type: none"> • Use a machine equipped with supplemental water sprays designed to suppress dust. 	None	None

		<ul style="list-style-type: none"> • Water must be combined with a surfactant. • Operate and maintain machine to minimize dust emissions. 		
15a	Large drivable milling machines (half-lane and larger) for cuts of any depth on asphalt only	<ul style="list-style-type: none"> • Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust. • Operate and maintain machine to minimize dust emissions. 	None	None
15b	Large drivable milling machines (half-lane and larger) for cuts of four inches in depth or less on any substrate	<ul style="list-style-type: none"> • Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust. • Operate and maintain machine to minimize dust emissions. 	None	None
15c	Large drivable milling machines (half-lane and larger) for cuts of four inches in depth or less on any substrate	<ul style="list-style-type: none"> • Use a machine equipped with supplemental water spray designed to suppress dust. • Water must be combined with a surfactant. • Operate and maintain machine to minimize dust emissions. 	None	None

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
≤ 4 hours/shift		>4 hours/shift		
16	Crushing machines	<ul style="list-style-type: none"> • Use equipment designed to deliver water spray or mist for dust suppression at crusher and other points where dust is generated (e.g., 	None	None

		<p>hoppers, conveyers, sieves/sizing or vibrating components, and discharge points).</p> <ul style="list-style-type: none"> • Operate and maintain machine in accordance with manufacturer's instructions to minimize dust emissions. • Use a ventilated booth that provides fresh, climate-controlled air to the operator, or a remote control station. 		
17a	Heavy equipment and utility vehicles used to abrade or fracture silica-containing materials (e.g., hoe-ramming, rock ripping) or used during demolition activities involving silica-containing materials	<ul style="list-style-type: none"> • Operate equipment from within an enclosed cab. 	None	None
17b	Heavy equipment and utility vehicles used to abrade or fracture silica-containing materials (e.g., hoe-ramming, rock ripping) or used during demolition activities involving silica-containing materials	<ul style="list-style-type: none"> • When employees outside of the cab are engaged in the task, apply water and/or dust suppressants as necessary to minimize dust emissions. 	None	None
18a	Heavy equipment and utility vehicles for tasks such as grading and excavating but not including demolishing, abrading, or fracturing silica-containing materials	<ul style="list-style-type: none"> • Apply water and/or dust suppressants as necessary to minimize dust emissions. 	None	None
18b	Heavy equipment and utility vehicles for tasks such as grading and excavating but not including demolishing, abrading, or	<ul style="list-style-type: none"> • When the equipment operator is the only employee engaged in the task, operate equipment from within an enclosed cab. 	None	None

	fracturing silica-containing materials			
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ALTERNATIVE EXPOSURE CONTROL METHODS:

Alternative Exposure Control Methods apply for tasks not listed in OSHA’s Construction Standard Table 1, or where Coating Specialist, LLC cannot not fully and properly implement the engineering controls, work practices, and respiratory protection described in Table 1.

First, Coating Specialist, LLC will assess the exposure of each employee who, is or may reasonably be expected to be, exposed to Respirable Crystalline Silica at or above the Action Level in accordance with either the Performance Option or the Scheduled Monitoring Option.

Performance Option:

Coating Specialist, LLC will assess the 8-hour TWA exposure for each employee on the basis of any combination of air monitoring data or objective data sufficient to accurately characterize employee exposures to Respirable Crystalline Silica.

Scheduled Monitoring Option:

- Coating Specialist, LLC will perform initial monitoring to assess the 8-hour TWA exposure for each employee on the basis of one or more personal breathing zone air samples that reflect the exposures of employees on each shift, for each job classification, and in each work area. Where several employees perform the same tasks on the same shift and in the same work area, Coating Specialist, LLC will plan to monitor a representative fraction of these employees. When using representative monitoring, Coating Specialist, LLC will sample the employee(s) who are expected to have the highest exposure to Respirable Crystalline Silica.
- If initial monitoring indicates that employee exposures are below the Action Level, Coating Specialist, LLC will probably discontinue monitoring for those employees whose exposures are represented by such monitoring.
- Where the most recent exposure monitoring indicates that employee exposures are at or above the Action Level but at or below the PEL, Coating Specialist, LLC will repeat such monitoring within six months of the most recent monitoring.
- Where the most recent exposure monitoring indicates that employee exposures are above the PEL, Coating Specialist, LLC will repeat such monitoring within three months of the most recent monitoring.
- Where the most recent (non-initial) exposure monitoring indicates that employee exposures are below the Action Level, Coating Specialist, LLC will repeat such monitoring within six months of the most recent monitoring until two consecutive measurements, taken seven or more days apart, are below the Action Level, at which time Coating Specialist, LLC will probably discontinue monitoring for those employees whose exposures are represented by such monitoring, except when a reassessment is required. Coating Specialist, LLC will reassess exposures whenever a change in the production, process, control equipment, personnel, or work practices may reasonably be expected to result in new or additional exposures at or above the Action Level, or when Coating Specialist, LLC has any reason to believe that new or additional exposures at or above the Action Level have occurred.

Coating Specialist, LLC will ensure that all Respirable Crystalline Silica samples taken to satisfy the monitoring requirements of this program and OSHA are collected by a qualified individual (i.e. a Certified Industrial Hygienist) and the samples are evaluated by a qualified laboratory.

Within five working days after completing an exposure assessment, Coating Specialist, LLC will individually notify each affected employee in writing of the results of that assessment or post the results in an appropriate location accessible to all affected employees.

Whenever an exposure assessment indicates that employee exposure is above the PEL, Coating Specialist, LLC will describe in the written notification the corrective action being taken to reduce employee exposure to or below the PEL.

Where air monitoring is performed, Coating Specialist, LLC will provide affected employees or their designated representatives an opportunity to observe any monitoring of employee exposure to Respirable Crystalline Silica. When observation of monitoring requires entry into an area where the use of protective clothing or equipment is required for any workplace hazard, Coating Specialist, LLC will provide the observer with protective clothing and equipment at no cost and shall ensure that the observer uses such clothing and equipment.

Once air monitoring has been performed, Coating Specialist, LLC will determine its method of compliance based on the monitoring data and the hierarchy of controls. Coating Specialist, LLC will use engineering and work practice controls to reduce and maintain employee exposure to Respirable Crystalline Silica to or below the PEL, unless Coating Specialist, LLC can demonstrate that such controls are not feasible. Wherever such feasible engineering and work practice controls are not sufficient to reduce employee exposure to or below the PEL, Coating Specialist, LLC will nonetheless use them to reduce employee exposure to the lowest feasible level and shall supplement them with the use of respiratory protection.

In addition to the requirements of this program, Coating Specialist, LLC will comply with other programs and OSHA standards, when applicable, where abrasive blasting is conducted using Crystalline Silica-containing blasting agents, or where abrasive blasting is conducted on substrates that contain Crystalline Silica.

Control Methods:

Coating Specialist, LLC will provide control methods that are either consistent with Table 1 or otherwise minimize worker exposures to Silica. These exposure control methods can include engineering controls, work practices, and respiratory protection. Listed below are control methods to be used when Table 1 is not followed:

Task:

Abrasive Blasting

Material(s):

Asphalt and/or Concrete

Equipment and Control(s):

Respiratory Protection – Abrasive Blasting

Task/Control Description:

All abrasive blasting of asphalt will require the use of a forced air hood, which provides fresh air to the operator while covering the operator's head, neck and shoulders to protect against rebounding blasting media.

Respiratory Protection:

Where respiratory protection is required by this program, Coating Specialist, LLC will provide each employee an appropriate respirator that complies with the requirements of the company's Respiratory Protection Program and the OSHA Respiratory Protection Standard (29 CFR 1910.134).

Respiratory protection is required where specified by the OSHA Construction Standard Table 1, for tasks not listed in Table 1, or where the company has not fully and properly implemented the engineering controls, work practices, and respiratory protection described in Table 1.

Situations requiring respiratory protection include:

- Where exposures exceed the PEL during periods necessary to install or implement feasible engineering and work practice controls;
- Where exposures exceed the PEL during tasks, such as certain maintenance and repair tasks, for which engineering and work practice controls are not feasible; and
- During tasks for which an employer has implemented all feasible engineering and work practice controls and such controls are not sufficient to reduce exposures to or below the PEL.

OTHER CONSIDERATIONS:

All equipment, dust collection systems, and vacuums listed in this program shall be operated and maintained in accordance with manufacturer's recommendations to minimize dust emissions and exposure's.

HOUSEKEEPING:

Coating Specialist, LLC does not allow dry sweeping or dry brushing where such activity could contribute to employee exposure to Respirable Crystalline Silica unless wet sweeping, HEPA-filtered vacuuming, or other methods that minimize the likelihood of exposure are not feasible.

Vacuums equipped with HEPA filters to be used to clean latent dust from field operations, as well as to remove latent dust from clothing. Employees are to wash exposed areas with water, rather than brushing off. Compressed air shall not be used to remove dust from surfaces, clothing, or persons.

All containers or bags containing dust are to remain tightly closed to prevent release of materials.

SAFETY OF OTHERS:

Access to work areas where respirable crystalline silica may be a hazard to be restricted to only essential personnel to the operation. Access may be restricted by erecting barricades, the use of Danger tape, the use of vehicles to prevent access to work area, or by coordinating with General Contractor to have access restricted for our operation.

WORKER TRAINING:

Employees are to be provided training to recognize tasks which may create an exposure to respirable crystalline silica. Employees are to be trained in effective measures to minimize and mitigate exposure, as well as in the use of the proper equipment and controls to assist in exposure mitigation. Employees are to be trained in the health hazards associated with respirable crystalline silica, and the medical surveillance provided by the company to ensure the health of the employee is monitored. All employees shall be provided a copy of the Silica Exposure Control Plan, as well as all other safety plans and programs, and may access plans and program document at any time.

MEDICAL SURVEILLANCE:

Medical surveillance shall be provided by the Company to employees for any employee who may utilize any form of respirator for more than 30 days per year.

Baseline medical exams to be provided to each employee, in where the medical provider will perform an exam to include a) medical and work history, with emphasis on respirable crystalline silica exposures and respiratory system; b) physical examination with emphasis on respiratory system; c) chest x-rays; d) pulmonary function test; e) testing for tuberculosis infection, as well as other testing deemed necessary by the medical provider to ensure employee safety.

Periodic medical evaluations shall be provided by the Company to the employee a minimum of every three (3) years, or as deemed necessary by the medical provider. The Company shall be responsible for providing to the medical provider a) a copy of the employee's job description, including any previous, current, or future required tasks which may include an exposure to respirable crystalline silica; b) levels of occupational exposure to respirable crystalline silica; c) information regarding all personal protective equipment utilized by the employee, with durations; and d) any relevant medical information regarding the employee which is in the control of the Company.

The Company shall ensure that the medical provider will provide to the employee, within thirty (30) days of the medical exam; a) a copy of the written medical report, as well as ensures the employee understands the information contained in the report. The written report shall contain a) a statement including the results of the report and any medical conditions found which may place the employee at an increased health risk from exposure to respirable crystalline silica; b) any medical conditions which may require further testing, evaluation, or treatment; c) a recommendation limitations with regard to the employees exposure to respirable crystalline silica; and d) a recommendation for the employee to be examined by a specialists when medical provider deems necessary following examination chest x-rays. A copy of the written medical opinion shall be provided to the employee within thirty (30) days of any medical exam performed in accordance with this policy.

Should the written medical opinion contain information stating that the employee has been recommended for examination by a specialist, the Company shall make an appointment available within thirty (30) days of the receipt of the written medical opinion. The Company shall provide to the specialists all information previously submitted to medical provider during initial examination. The Company shall ensure that the specialists will provide to the employee, within thirty (30) days of the medical exam, a copy of the written medical report, as well as ensures the employee understands the information contained in the report. The Company will also obtain a copy of the written medical opinion from the specialists within thirty (30) days of the exam.

RECORDKEEPING:

Coating Specialist, LLC will make and maintain an accurate record of all exposure measurements taken to assess employee exposure to Respirable Crystalline Silica. This record will include at least the following information:

- The date of measurement for each sample taken;
- The task monitored;
- Sampling and analytical methods used;
- Number, duration, and results of samples taken;
- Identity of the laboratory that performed the analysis;
- Type of personal protective equipment (PPE), such as respirators, worn by the employees monitored; and
- Name, social security number, and job classification of all employees represented by the monitoring, indicating which employees were actually monitored.

The employer shall make and maintain an accurate record of all objective data relied upon to comply with the requirements of the OSHA Respirable Crystalline Silica Construction Standard. This record shall include at least the following information:

- The Crystalline Silica-containing material in question;
- The source of the objective data;
- The testing protocol and results of testing;
- A description of the process, task, or activity on which the objective data were based; and
- Other data relevant to the process, task, activity, material, or exposures on which the objective data were based.

Coating Specialist, LLC will make and maintain an accurate record for each employee enrolled in the Medical Surveillance portion of this program. The record shall include the following information about the employee:

- Name and social security number;
- A copy of the PLHCPs' and/or Specialists' written medical opinions; and
- A copy of the information provided to the PLHCPs and Specialists.

Coating Specialist, LLC will ensure that exposure records, objective data, and medical records are maintained and made available in accordance with 29 CFR 1910.1020. Exposure records and objective data records will be kept for at least thirty (30) years. Medical records will be kept under lock and key for at least the duration of employment plus thirty (30) years.

It is necessary to keep these records for extended periods because Silica-related diseases such as cancer often cannot be detected until several decades after exposure. However, if an employee works for an employer for less than one year, the employer does not have to keep the medical records after employment ends, as long as the employer gives those records to the employee.

PROGRAM EVALUATION:

This program will be reviewed and evaluated on an annual basis by the Safety Coordinator unless changes to operations, the OSHA Respirable Crystalline Silica Construction Standard, or another applicable OSHA Standard require an immediate evaluation or revision of this program.