

COLLEGE PRO PAINTERS

Safety Program

Prepared by:
College Pro Painters
in association with:
U.S. Compliance Systems, Inc.

COLLEGE PRO PAINTERS POLICY STATEMENT

College Pro Painters has developed a comprehensive safety program that addresses our specific safety concerns and provides guidance for the performance of our individual job tasks within the framework of appropriate occupational safety & health standards.

Safety takes a commitment from all personnel within our organization. Training will be interactive with an opportunity for all to actively participate, ask questions, make suggestions, and refer to our written policies and procedures.

It is the policy of College Pro Painters to provide a work environment that is inherently safe. The safety and health of our employees, franchisees and the employees of the franchisees are of primary importance as they are our most important resource. If you feel that you have not received adequate training, you should contact College Pro Painters at 1-800-327-2468, and review over the material provided in this binder, review the information and video's on CPOWER. You should not proceed in any painting or work associated with College Pro Painters until you feel you understand and can adhere to the rules and regulations provided in this manual.

Safety training needs will be identified by continual reassessment of our work methods, equipment and job sites as well as employee and management input. Observation of unsafe acts will be addressed immediately.

Each employee is encouraged to contact their Supervisor immediately should a safety or health risk exist so that corrective action may be taken immediately.

Safety requires not only that each person understand and perform individual tasks in a safe manner, but also that each individual is aware of his surroundings and is actively involved in the safety of others.

This Policy Statement will be conspicuously posted.

OVERVIEW

This comprehensive safety & health training program has been developed to address our specific safety concerns and to provide guidance for the performance of individual job tasks within the framework of appropriate occupational safety & health standards.

Safety demands a commitment from all personnel within our organization. This program contains policies and procedures to deal with common work-place hazards, specific job related hazards, and potential hazards that may arise.

Hazard assessment, project pre-planning, and engineering controls, where feasible, will be the preferred method of providing a safe workplace. Hazards that remain will be minimized or eliminated through training which provides the ability to recognize workplace hazards and understand the proper procedural and/or personal protective equipment requirements. Safety should be reviewed daily before work begins, and any time there is a potential safety or health risk.

Each person is encouraged to contact their Supervisor immediately should a safety or health risk exist so that corrective action may be taken to eliminate the hazard entirely or deal with the hazard in a safe manner through modified work procedures, Personal Protective Equipment, and/or other appropriate action.

On all job sites, at least one person will be designated a **“competent person”** by virtue of experience or training. This person will most often be the Franchise Manager. This person will have the ability to identify work related hazards, know the corrective procedures, and have the responsibility, ability and authority to stop work if the workplace cannot be made safe.

The Safety Director or a designated competent person will make routine and random site inspections to both identify new hazards and to monitor the effectiveness of the safety & health program.

In the final analysis, the success of the safety effort depends on all of us, from management to the newest employee, demonstrating a commitment to safety by working in a safe manner. Safe job performance is how our safety effort is ultimately measured.

For ease of use, College Pro Painters has divided its safety & health program into three broad categories. These are:

SECTION I

General safety policies and procedures.

SECTION II

Job site safety policies and procedures.

SECTION III

Specific compliance programs with appropriate forms.

Additionally, there are two appendices:

SECTION I

GENERAL SAFETY POLICIES AND PROCEDURES

COLLEGE PRO PAINTERS

SAFETY PROGRAM

SECTION I

GENERAL SAFETY POLICIES AND PROCEDURES

INDEX

TOPIC	PAGE
INTRODUCTION	1
CANADIAN PROVINCES & TERRITORIES	3
ACCIDENT/INJURY PREVENTION	4
SAFETY PROGRAM ADMINISTRATOR	4
EMPLOYEE INVOLVEMENT	5
EMPLOYEE RESPONSIBILITIES	5
SUPERVISOR RESPONSIBILITIES	6
HOUSEKEEPING	6
EMERGENCY ACTION PLAN	7
EMERGENCY MEDICAL RESPONSE	7
FIRE PREVENTION PLAN	7
PORTABLE FIRE EXTINGUISHERS	8
FIRE PROTECTION	9
FIRST AID & FIRST AID KITS	9
CHEMICAL BURNS	10
EYE - FOREIGN OBJECT	10
EYE - WOUNDS	11
EYE - CHEMICAL BURNS	11
HEAT EXHAUSTION	11
HEAT STROKE	11
LIFTING, PUSHING & PULLING	12
SLIPS, TRIPS, AND FALLS	13
DRUGS AND ALCOHOL	13
SMOKING	14
ACCIDENT INVESTIGATION AND REPORTING	14
POSTINGS	14
RECORDKEEPING: INJURIES & ILLNESSES	15
SAFETY MEETINGS	16
ENFORCEMENT	16

GENERAL SAFETY POLICIES AND PROCEDURES

INTRODUCTION

This Managed Safety System, which is used by College Pro Painters throughout Canada, was prepared using the CSA (Canadian Standards Act) standards as its guidelines.

CANADIAN PROVINCES & TERRITORIES

Canada has specific health & safety information in addition to this program. All College Pro Painters working in Canada fall under the legislation of the province where they work.

All Canadian occupational health & safety (OHS) information including standards, postings and forms can be accessed at: <http://www.canoshweb.org/en/programs.html>

The height requirement for Canadian workers is 3 meters. Additionally, fall restraint (preventing the fall in the first place) is preferable to a personal fall arrest system in Canada.

ACCIDENT/INJURY PREVENTION

College Pro Painters will not permit its employees, franchisees or employees of the franchisees to work in conditions that are unsanitary, hazardous, or dangerous to their health or safety.

One lax moment in terms of safety may result in a lifetime of needless pain and suffering. Disregarding safety standards may even be fatal. An accident may happen in an instant, the consequences may last for years.

Accident prevention requires a commitment from all personnel within the company to actively participate in our safety program. All personnel should be aware of job site hazards and follow procedures to eliminate these hazards by proper work methods, use of personal protective equipment, and proper use of tools and equipment. All persons are encouraged to ask questions and make positive suggestions for safety improvement.

Competent persons will be designated to provide job site expertise as well as regular inspections of equipment, materials, and procedures. A competent person will have the authority to stop work if a safety hazard is identified and it cannot be corrected immediately.

All tools, materials, and equipment deemed unsafe will be taken out of service by physically removing from the work area and tagging them as unserviceable.

All tools and items of equipment will be used for the purpose for which they were designed. For example, a ladder is not a horizontal plank; a fire extinguisher is not a cooler!

Never take chances or attempt any job without being aware of the proper procedures, the potential safety hazards, and the methods to reduce or eliminate risk.

SAFETY PROGRAM ADMINISTRATOR

The Franchise Manager has the overall responsibility for the implementation of the safety & health program in their business and will ensure each employee has appropriate safety training for the tasks to be performed.

Additionally, duties of this position include:

- a. the actual training of personnel.
- b. maintenance of training records.
- c. random inspections to verify adherence to safety rules and policies.

The duties of this position may be delegated to other personnel who are competent persons by virtue of training or experience.

The responsibilities of this position may not be further delegated.

EMPLOYEE INVOLVEMENT

All employees are encouraged to participate actively in the health & safety program. Do not hesitate to point out perceived safety deficiencies to your supervisor or the competent person -- you may prevent an injury to yourself or a fellow worker. With the goal of providing a safer worksite, employee suggestions for improving safety management are welcomed and encouraged.

EMPLOYEE RESPONSIBILITIES

Employees are expected, as a condition of employment, to exercise care in the course of their work to prevent injuries to themselves and others.

As an employee, you must:

- a. Report all unsafe conditions and acts to your supervisor.
- b. Be individually responsible to keep yourself, fellow employees, and equipment free from mishaps.
- c. Keep the work area clean and orderly at all time.
- d. Follow prescribed procedures during an emergency.
- f. Report all accidents immediately to your supervisor.
- g. Be certain you understand instructions completely before starting work.
- h. Lift and handle materials properly.
- i. Avoid engaging in any horseplay and distracting others.
- j. Know how and where needed medical help may be obtained.
- k. Not damage or destroy any warning or safety device, or interfere with any employee's use of them.
- l. Report all injuries, no matter how minor, to your supervisor.
- m. Attend all scheduled training sessions.
- n. It is the Franchise Manager's responsibility to provide safety information, equipment in good working order, and to train people in the use of this equipment, it is the employee's responsibility to ensure that you are following the safety rules and regulations, and using the correct equipment on the jobsite. You should not perform any work on a job in which you are in question of the safety of the site.

SUPERVISOR RESPONSIBILITIES

Within their job site(s), each Supervisor is fully responsible and accountable for compliance with the Safety and Waste Disposal Practices outlined by College Pro Painters and the federal and provincial regulations. As a Supervisor, it is your responsibility to ensure that:

- a. All injuries are investigated to determine the cause of the injury and the required written accident reports are submitted with 24 hours.
- b. All hazardous tasks are covered by specific work rules to minimize injury and property damage potential.
- c. All personnel are briefed and fully understand safe work procedures and existing policies.
- d. All employees, new and old, are trained, and when necessary, retrained in the accepted way each hazardous job must be accomplished.
- f. Necessary safety equipment and protective devices for each job are available and are used properly.

- g. Prompt, corrective action is taken whenever hazards are recognized or unsafe acts are observed.
- h. All employees are instructed and understand the use and need for protective equipment for specific hazardous jobs.

HOUSEKEEPING

Employees are to maintain a neat and orderly work area *as far as practical*. Housekeeping and general cleanliness have a direct effect on safety and health. Proper housekeeping can prevent slips and falls, allow easy egress in the event of an emergency, prevent falling object injuries, and enhance fire safety. Below listed are general housekeeping rules:

- a. walking/working surfaces shall be kept clean and dry.
- b. do not allow debris to accumulate.
- c. stored materials will be neatly stacked at the job site.
- d. containers must always be suitable for their contents; sealed when not in use; and clearly labeled.
- e. no objects will be left unattended on stairways.
- f. equipment will be stored away from hazards, i.e., furnace or open fire.
- g. tools shall be properly cleaned and put away after use.
- h. every night, electrical switch plates will be replaced.
- i. each night, the job site area will be cleaned-up and inspected.

EMERGENCY ACTION PLAN

An Emergency Action Plan, if appropriate, will be posted at the job sites along with emergency telephone numbers and an escape route diagram.

After a hazard assessment of a job site, if the Franchise Manager or other Safety Director determines that conditions may warrant possible evacuation, an Emergency Action Plan will be developed to address the threat.

EMERGENCY MEDICAL RESPONSE

Should an injury occur that requires an emergency medical responder, the below listed actions will be taken in order given:

1. Call 911.
2. Provide any medical assistance you are trained and certified to do.
DO NOT provide any medical assistance you are not trained to do. Designate an individual to direct the emergency responders to the injured person and provide Material Safety Data Sheets if applicable.
3. Notify the competent person (the Franchise Manager), who, in turn, will notify the office. Call the College Pro head office at 800-465-2839. Identify who you are and ask to speak to someone at the head office to report the injury (please note that injuries must be reported to the head office and to the insurance company within 24 hours).

FIRE PREVENTION PLAN

Fire Prevention deals not with handling a fire emergency, but rather preventing a fire in the first place.

To reduce the likelihood of a fire, personnel are to adhere to the following rules:

1. Smoking is not allowed on the job-sites.
2. All chemical products will be handled and stored in accordance with the procedures noted on their individual MSDS.
3. Combustible liquids must be stored in approved containers.
4. Chemical spills must be cleaned up immediately. This is particularly important for combustible and reactive liquids. Damaged chemical containers and cleanup materials must be properly disposed.
[Note: Exercise care! Information on appropriate personal protective equipment; proper disposal; proper cleanup procedures; required ventilation, etc. is found on the product's MSDS.]
5. Combustible liquids and trash must be segregated and kept from ignition sources.
6. Keep clear access to fire hydrants as well as portable fire extinguishers.
7. Personnel will be notified by their Supervisor or the competent person of any unusual fire hazard conditions existing on a job site.

PORTABLE FIRE EXTINGUISHERS

All personnel will receive instruction on the proper use of fire extinguishers.

- a. Fire extinguishers will be inspected routinely for general condition and adequate charge. They will be serviced and certified by qualified personnel at least annually.
- b. Portable fire extinguisher locations will be clearly identified and easily accessible.

Portable fire extinguishers will be distributed as indicated below:

<u>CLASS</u>	<u>DISTRIBUTION</u>	<u>NOTES</u>
A "A" on a green triangle	75 feet or less travel distance between the employee and the extinguisher	Use on wood, paper, trash.
B "B" on a red square	50 feet or less travel distance between hazard area and the employee	Use on flammable liquid, gas.
C "C" on a blue circle	Based on the appropriate pattern for the existing Class A or Class B hazards	Use on electrical fires.

College Pro Painters will use appropriate portable fire extinguishers as noted above.

Using the wrong fire extinguisher on some fires can actually spread the fire. Using a Type A extinguisher on an electrical fire, for example, could cause serious injury. It is imperative to use the proper extinguisher.

It is College Pro's recommendation that a fire extinguisher is also kept with the Franchise Manager in their production vehicle at all times.

FIRE PROTECTION

If there is a fire, please call 911.

If a fire should occur, all personnel and the local fire department should be notified. As in all emergency situations, per the American Trauma Society, people calling the fire department should:

- a. Remain calm.
- b. Speak clearly and slowly.
- c. Give the exact location.
- d. Describe the situation.
- e. Give the phone number from where you are calling.
- f. Do not hang up until told to do so.

FIRST AID & FIRST AID KITS

Should a medical emergency occur, professional medical assistance will be called. Please call 911 in the case of any medical emergencies.

Below are general guidelines to be followed in a medical emergency, per the American Trauma Society:

DON'T provide medical assistance unless trained to do so. Seek help.

DO Stay Calm.

DO check first to make sure the victim has an open airway, is breathing and has a heartbeat. (If not, immediate action is necessary before taking care of any other injuries.)

DO control bleeding promptly.

DO treat the injured person gently, reassure him/her that help is coming, and keep him/her as quiet as possible.

DO tell the rescue crew as much as you can about what happened, what the victim's condition was when you first saw him, and what you did.

DO let the emergency crew do their job and keep other people out of the way.

DON'T move the victim unnecessarily.

DON'T try to remove an object that is impaled in the body.

DON'T give the injured person anything to eat or drink -- NEVER give alcohol.

DON'T delay calling for help.

First Aid Kits are worthless if not readily accessible. Therefore, they will not be locked up on job sites.

First Aid Kits will be replenished as items are used. Sterile items will be wrapped and sealed and used only once. Other items such as tape or scissors can be reused and should be kept clean. In the absence of plentiful amounts of clean water, eye flush will be available.

First aid supplies should include: adhesive bandages, bandage compresses, scissors, tweezers, triangular bandages, antiseptic soap or pads, eye dressing, and other items that a consulting physician may recommend.

The main purpose of a bandage, the most commonly used item in a first aid kit, is not really to stop the bleeding, but to keep the wound clean.

The following two pages lists procedures to be taken per the American Trauma Society for various job site injuries and medical conditions. Most procedures involve seeking professional help and **NOT** doing procedures for which one is not trained.

CHEMICAL BURNS

(Spilled liquid or dry chemical on skin)

Liquid: Flush with large amounts of water immediately (keep water flow gentle).

Dry: Brush as much off as possible before flushing with water.

After flushing at least 5 minutes, cover with sterile dressing.

Seek medical attention promptly.

DO NOT use anything but water on burned area.

DO NOT break open blisters.

EYE - FOREIGN OBJECT

(Object visible; feeling of something in the eye)

Have patient pull upper eyelid over lower eyelid.

Run plain water over eye.

If object does not wash out, cover both eyes with a gauze dressing.

Seek medical attention promptly.

DO NOT rub the eye.

EYE - WOUNDS

(Wound on eyelid or eyeball; pain;
history of blow to eye area; discoloration)

Apply loose sterile dressing over both eyes.

Seek medical help immediately.

For bruising, cold compress or ice pack may relieve pain and reduce swelling.

DO NOT try to remove any embedded object.

DO NOT apply pressure to eye.

EYE - CHEMICAL BURN

(Chemical splashed or spilled in eye)

Flush immediately with water over open eye for at least 10 minutes (20 minutes if alkali). It may be necessary to hold patient's eyelid open.

Cover both eyes with sterile dressing.

Seek medical help immediately.

DO NOT put anything but water in eye.

HEAT EXHAUSTION

(Fatigue; weakness; profuse sweating; normal temperature;
pale clammy skin; headache; cramps; vomiting; fainting)

Remove from hot area.

Have victim lay down and raise feet.

Apply cool wet cloths.

Loosen or remove clothing.

Allow small sips of water if victim is not vomiting.

HEAT STROKE

(Dizziness; nausea; severe headache; hot dry skin;
confusion; collapse; delirium; coma and death)

Call for immediate medical assistance.

Remove victim from hot area.

Remove clothing.

Have victim lay down.

Cool the body (shower, cool wet cloths)

DO NOT give stimulants.

LIFTING, PUSHING & PULLING

Back injuries are often caused by the obvious -- putting excessive strain on the lower back by lifting an object that is too heavy or awkward, or by bending and/or twisting while lifting.

However, lifting injuries are also caused by less obvious reasons:

- a. poor physical condition
- b. poor posture
- c. poor judgment (lifting, pulling, pushing an object that is obviously too heavy or awkward without seeking assistance.)
- d. lack of exercise
- e. excessive body weight

Proper lifting techniques are important for employee safety. Below are lifting techniques that will reduce the likelihood of injury:

- a. lift objects comfortably -- do not strain.
- b. lift, push, and pull with your legs -- not with your arms or back.
- c. when changing direction while moving an object, turn with your feet -- not by twisting at the waist.
- d. avoid lifting higher than your shoulder height.
- e. when standing while holding an object, stand straight.
- f. when walking, maintain an erect posture; wear slip-resistant, supportive shoes.

- g. when carrying heavy objects, carry them close to the body and avoid carrying them in one hand.
- h. when stepping down from a height of more than eight inches, step down backwards, not forward.
- i. lift gradually and smoothly. Avoid jerky motions.
- j. maintain a clear line of vision.

SLIPS, TRIPS, AND FALLS

Slips, trips, and falls are common job site accidents and they are easily preventable. Below are some of the causes of slips, trips, and falls:

- a. running on the job site.
- b. engaging in horseplay.
- c. working off a ladder that is not firmly positioned.
- d. carrying an object that blocks line of vision.
- e. wearing work boots that are not laced or buckled.
- f. using ladders that have oil and grease on the rungs.
- g. not using a handrail on steps.
- h. allowing debris to accumulate.
- i. not paying attention to what one is doing.

This list can go on and on, but all the above are easily preventable by adherence to common safety procedures, common sense, and awareness of potential hazards on the job site.

DRUGS AND ALCOHOL

With the exception of over the counter drugs such as aspirin or drugs prescribed by a physician, there shall be no drugs or alcohol on any job site. Alcohol and drug abuse cause an unacceptable level of safety hazard not only for the offending person, but for others in the vicinity. Those found to be under the influence of drugs and/or alcohol will be immediately removed from the job site by the competent person and further disciplinary action will be taken by the Franchise Manager, Competent Person, or College Pro full time employee.

Employees taking prescription medication that reduces motor skills should report this to their supervisor for appropriate work assignment.

Chemical dependency is a devastating problem for not only the employee, but also the employee's family and co-workers. For obvious safety reasons, it cannot be tolerated in the workplace. Those with such a problem should seek professional help.

SMOKING

There shall be no smoking except in designated smoking areas. Under no circumstances will there be smoking within 50 feet of flammable materials.

ACCIDENT INVESTIGATION & REPORTING

The purpose of Accident Investigation is to prevent the same type of accident from reoccurring. An accident investigation will begin immediately after the medical crisis is resolved. The competent person/supervisor on the job site will complete an Accident Investigation Form as soon as feasible. The five questions that must be answered are: Who? What? When? Where? and most importantly, Why did the accident happen?

After determining the cause of the accident, steps can be taken to prevent a reoccurrence. Near-miss mishaps, events which result in no injury or damage, should be investigated because even though the outcomes are different, the causes are the same.

It is the policy of College Pro Painters to have all accidents reported immediately or within 24 hours – whichever is the feasible. Please call 1-800-465-2839 and the franchise manager after calling for help on any accident.

POSTINGS

On every job site there will be an area for postings. Everyone must be aware of this policy. Certain postings are required as a matter of law in all cases and other postings are required depending on circumstances and types of work being done.

In all cases, the following must be posted to meet requirements:

- a. WCB/WSIB Safety Info.
- b. Emergency phone numbers and site address for emergency response.

If appropriate, the following must be posted:

- a. OHS/CSA citations.
- b. Notice of informal hearing conference.
- c. Emergency action plan.

RECORDKEEPING: INJURIES & ILLNESSES

WSIB/WCB Forms are used to record and classify occupational injuries and illnesses. The information on the WSIB/WCB Form related to employee health and must be used in a manner that protects the confidentiality of the employees to the extent possible. Recordable injuries and illnesses must be entered on WSIB/WCB forms within seven (7) days of receiving information that a recordable injury or illness has occurred.

Retention of Forms:

WSIB/WCB Forms will be retained for five years following the year to which they relate.

Items to be recorded on WSIB/WCB Forms:

Work related injuries and illnesses and fatalities are to be recorded.

Injuries and illnesses must be recorded if they result in death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, loss of consciousness, or if the injury or illness involves a significant injury diagnosed by a physician or licensed health care professional even if it does not meet the foregoing conditions.

Location of WCB/WSIB Forms:

As a general rule, the WCB/WSIB will be available at the local hospital, CPOWER and at our main office. They can also be found on the internet at the following addresses:

Nova Scotia	http://www.wcb.ns.ca	Ontario	http://www.wsib.on.ca
Manitoba	http://www.wcb.mb.ca	Alberta	http://www.wcb.ab.ca
BC	http://wcb.bc.ca	Saskatchewan	http://www.wcb.sk.ca
Quebec	http://www.csst.qc.ca – this site is French only, for English information call 514-906-3000		

Catastrophic Reporting Requirements:

Within eight (8) hours after the death of any employee from a work-related incident or the in-patient hospitalization of three (3) or more employees as a result of a work-related incident, either in person or by telephone, the WSIB/WCB Office nearest to the site of the incident will be notified.

Employee Involvement:

All work-related accidents and injuries are to be immediately reported to the competent person/franchisee on a job site who will complete an accident investigation form. This will be forwarded to the CPP head office.

SAFETY MEETINGS

Scheduled safety meetings provide an opportunity for reinforcing the importance of general safety as well as specific work related procedures applicable to the work at hand. Properly prepared safety meetings will focus on one or two topics and be direct and to the point. All safety questions will be addressed and interactive participation encouraged.

ENFORCEMENT

It is expected that all employees will abide by our safety rules and guidelines not only to protect themselves, but also to protect their fellow workers from harm. Should a safety violation occur, the following steps will be taken by the employee's immediate supervisor:

- a. **Minor Safety Violations:** Violations which would **not** reasonably be expected to result in serious injury.
 1. The hazardous situation will be corrected.
 2. The employee will be informed of the correct procedures to follow and the supervisor will ensure that these procedures are understood.
 3. The supervisor will make a written report of the occurrence using the Enforcement Documentation Form located in Appendix A and inform the employee that this documentation will be forwarded to the Safety Director for a retention period of one year.
 4. A repeat occurrence of the same minor safety violation is considered substantially more serious than the first.

- b. **Major Safety Violations:** Violations which would reasonably be expected to result in serious injury or death.
 1. The hazardous situation will be corrected.
 2. The employee will be informed of the correct procedures to follow and will impress upon the individual the severity of the violation and the likely consequences should this type of violation be repeated. The supervisor will ensure that the individual understands the correct procedures and will be cautioned that a reoccurrence could result in disciplinary action up to and including discharge.
 3. The supervisor will make a written record of the occurrence and using the Enforcement Documentation Form found Appendix A and inform the employee that this documentation will be forwarded to the Safety Director and College Pro Painters for a retention period of one year.

- c. **Willful Major Safety Violations:** Intentional violation of a safety rule which would reasonably be expected to result in serious injury to the employee or a fellow worker.
 1. The hazardous situation will be corrected.
 2. The employee will be removed from the job site, the event will be documented and forwarded to the Safety Director, College Pro Painters, and the employee will be discharged.

It is important to understand that the primary purpose of documenting safety violations is to ensure that the important business of safety is taken seriously and that the potential for injury is reduced to the lowest possible level.

Schedule of Enforcement Actions for Violations within a 1 Year Period

Minor Violation

Offense	Action	Repeat of Same Offense	Action
1st	Written Notice	1st	1 Day Off
2nd	Written Notice	2nd	3 Days Off
3rd	1 Day Off	3rd	Dismissal
4th	2 Days Off		
5th	3 Days Off		
6th	Dismissal		

Major Violation

Offense	Action	Repeat of Same Offense	Action
1st	Written Notice	1st	4 Days Off
2nd	2 Days Off	2nd	Dismissal
3rd	4 Days Off		
4th	Dismissal		

SECTION II

JOB SITE SAFETY POLICIES & PROCEDURES

**COLLEGE PRO PAINTERS
SAFETY PROGRAM
SECTION II
JOB SITE SAFETY POLICIES & PROCEDURES**

INDEX

TOPIC	PAGE
SAFETY POLICIES.....	1
ELECTRICAL SAFETY	1
EXTENSION CORDS.....	2
HAND TOOLS.....	3
ELECTRICAL POWER LINES	4
LADDERS	4
SIGNS & TAGS	5
WASTE DISPOSAL	6
LEAD PAINT	7
LEAD COMPLIANCE	14
DETERMINE IF LEAD IS PRESENT ON THE JOB	22
EXPOSURE ASSESSMENT	24
DETERMINE AND IMPLEMENT REQUIRED PROTECTIVE MEASURES	25
ADDITIONAL IMPORTANT SAFETY PRECAUTIONS/REMINDERS	28
LEAD PAINT NOTIFICATION SIGN.....	29
LEAD PAINT POLICY - REMINDERS AND DEFINITIONS.....	30

JOB SITE SAFETY POLICIES & PROCEDURES

The following general safety procedures will apply to individuals operating the equipment or performing the tasks described.

SAFETY POLICIES

College Pro Painters does not use scaffolds on any job site.

The use of dust masks is allowed for nuisance dusts.

College Pro Painters does not do lead abatement work where there is a possible employee exposure to airborne lead at 30 mg/m³.

All employees must wear heavy duty steel toed shoes or boots with sole protection.

All employees must wear a shirt. Clothing that is loose, torn, greasy or oily as well as jewelry (such as rings or neck chains) are not to be worn on the job site.

The following must be available on every job site:

- a. first aid kit(s).
- b. hard hats for each individual if there is work being performed above workers. See PPE Program.
- c. eye protection (safety goggles). See PPE Program.
- d. safety harness, lanyard, and secure anchorage for each employee working on a walking/working surface nine (9) feet or more above a lower level. See Fall Protection Program.
- e. Material Safety Data Sheets. See Hazard Communication Plan.

ELECTRICAL SAFETY

Electrical current is very dangerous -- it can kill!

Because 115V at 15A is so common, its safety is often taken for granted. The danger is not the voltage, it is the Amps (current). 0.015 Amps is enough current to cause a painful shock. The table below was prepared by the National Safety Council and the Pacific Telegraph Company:

Safe Current Values

Amps		
0.001A	(1mA)	Cannot be felt
0.001 - 0.008A	(1 - 8 mA)	Felt, but not painful: muscle control is not lost.

Unsafe Current Values

Amps		
0.015 - 0.02A	(15 - 20mA)	Painful shock: muscular control lost; cannot let go; not harmful to body organs
0.02 - 0.09A	(20 - 90mA)	Burns; breathing extremely difficult; sore muscles
0.1 - 0.2A	(100mA - 200mA)	*Ventricular Fibrillation (a fatal heart condition)
0.2 - 2A	(200mA - 2A)	Burns; paralysis of the lungs; nerve damaged if above 600V
2A and up	frying currents; severe burns of two types:	1. External - caused by arching on contact 2. Internal - cooking of the organs and flesh. Results in: amputation or destruction of vital organs

*Ventricular Fibrillation is essentially a fluttering of the heart which is useless in circulating blood.

SECTION III

Supervisors will seek immediate medical evaluation for an employee who has received a severe shock even if there is no apparent damage.

The primary electrical hazard encountered by painters is contact or near contact with the electrical wiring that goes into the house. A competent person, before work commences, will inform all employees in the work area of both exposed and concealed electrical hazards. If appropriate, warning tags will be used to prevent accidental contact with electrical energy.

When working around any electrical power circuit, employees will:

- a. protect themselves by deenergizing the circuit and grounding it or by establishing insulation between themselves and the current.
- b. ensure that any conductive materials and equipment that are in contact with any part of their body will be handled in a manner that will preclude contact with exposed energized conductors or circuit parts.
- c. only fiberglass ladders will be used when working near (within 10 feet) electrical wires.
- d. for additional safety, remove or insulate conductive articles of jewelry and clothing that might contact exposed energized parts.

As painters, you will have little use for electrical equipment. If any electrical item of equipment is used, including extension cords, the following applies:

- a. All 15, 20, or 30 amp receptacle outlets that are not part of the permanent wiring of the building or structure and that are used by personnel shall have ground-fault circuit interrupter protection for personnel. Remember, extension cords are considered temporary wiring. Ground fault circuit interrupters will be tested before use.

If any electrical devices are used, the following applies:

- a. Daily, prior to use, all electrical equipment -- including extension cords -- will be inspected and defective items will be tagged out of service and not used.
- b. With the exception of double insulated tools (with UL approval), all electrical tools and equipment will be grounded.
- c. Tools will not be hoisted by their flexible electrical cords.
- d. Temporary wiring and extension cords will be kept off of walking working surfaces and vehicle traffic areas or covered to prevent tripping and vehicle damage.
 1. Electrical cords will not be suspended with staples, hung from nails, or suspended by wire.
 2. Worn or frayed electric cords or cables will not be used.
- e. Hands will be dry when working on electrical equipment including plugging in extension cords.

The above electrical safety measures are not all inclusive, however they cover many normal job site events. If in doubt about any safety procedure, contact your supervisor or the competent person for clarification.

EXTENSION CORDS

Extension cords shall not replace permanent wiring and the following safety precautions will be adhered to:

- a. Inspect the cord for cracks and cuts.
- b. Cord must have a three prong plug for grounding.
- c. Most importantly, an extension cord used on a job site **MUST** be used with a ground fault circuit interrupter (GFCI).

HAND TOOLS

SECTION III

Hand tools shall be used only for the purpose for which they are designed.

Hand tools will be kept clean.

Hand tools which are damaged will not be used.

Hand held cutting tools will be kept sharp and will be sheathed or retracted when not in use.

When using a striking tool such as a hammer or chisel, safety glasses or safety goggles will be used.

Do not force tools.

If you are unfamiliar with the proper procedure for using a tool, ask your Supervisor for instruction.

Power tools may be operated only by those persons who are qualified by training or experience.

Do not alter guards on power tools; wear appropriate PPE.

Electrical tools must be grounded and, in the absence of permanent wiring, a Ground Fault Circuit Interrupter must be used.

ELECTRICAL POWER LINES

Except where electrical lines into the house being painted have been deenergized and visibly grounded at point of work or where insulating barriers have been erected to prevent physical contact with the lines, the following clearance -- between any piece of equipment or fiberglass ladder and the line -- will be observed:

<u>Line Rating</u>	<u>Minimum Clearance</u>
220 Volts	10 feet
Over 220 Volts	20 feet

An overhead wire will be considered energized unless the owner of the line or the electrical utility authorities indicate that it is not energized and it has been visibly grounded.

It is important that OSHA laws and common sense are followed when working around power lines.

You should ensure that you never work around any power line that may be live with any ladders, extension poles, or any other metal substance that may conduct electricity. If you are unsure about whether a power line is live, or if it has been de-energized, do not proceed to do any work around the power line, and do NOT touch the power line. Call the Franchise Manager, the homeowner and the local power company to verify that the line is safe to work around.

College Pro Painters advises that on any job where there are power lines going into the house above ground, that the Power company be contacted and asked to shut down the power (de-energize the power line), or ensure that the lines are properly wrapped to ensure that work may be performed safely around the wires with the appropriate material.

Please allow some lead time to the power company to make arrangements to ensure the proper steps are taken in advance of any work being performed on the house.

College Pro Painters recommends that only fiberglass ladders and fiberglass extension poles are used when working on job-sites.

SECTION III

LADDERS

Ladder accidents are often quick and devastating. The primary hazards are: falls and electrical shock. Always use a fiberglass ladder around electricity. Additional hazards include:

- a. materials falling on persons below.
- b. tripping over ladders that are lying on the ground. When not in use, keep ladders properly stored.
- c. injury from lifting heavy ladders. Always get assistance when carrying any heavy object.
- d. striking persons or objects while transporting ladders. Be aware of your surroundings and watch where you are going.

Ladders, which should be inspected before use, should meet the following requirements:

- a. have a good, straight frame.
- b. have a rope for extending and lowering.
- c. not be painted. Paint can hide structural defects as well as obliterate the data plate that indicates the load carrying capacity of the ladder.

During routine job site inspections, supervisors should be constantly vigilant for violations of the below ladder safety rules and take immediate corrective action to ensure the safety of our employees:

- a. a stairway or a ladder will be provided at all personnel points of access where there is a break in elevation of 19 inches or more.
- b. When setting up a ladder for ascension, you must use the 4 feet up to every 1 foot out rule.
- c. ladder rungs, cleats, and steps must be parallel, level, and uniformly spaced when a ladder is in position for use.
- d. ladders will not be tied or fastened together unless they are so designed.
- e. portable ladders used for gaining access to an upper level will extend at least 3 feet above the upper landing surface, the ladder will be secured to prevent displacement (tied off) **and** be on a level surface.
- f. ladders must be free of oil, grease, or other slipping hazards.
- g. ladders must be used for the purpose for which they were designed.
- h. non-self supporting ladders will be used at an angle that the horizontal distance from the top support to the foot of the ladder is approximately $\frac{1}{4}$ of the working length of the ladder.
- i. ladders will only be used on stable and level surfaces unless secured to prevent displacement.
- j. ladders shall not be used on slippery surfaces unless secured or provided with slip-resistant feet to prevent accidental displacement.
- k. ladders placed in any location where they can be displaced by workplace activities or traffic will be secured to prevent accidental displacement, or a barricade will be used to keep the activities or traffic away from the ladder.
- l. the area around the top and bottom of the ladder shall be kept clear.
- m. ladders shall not be moved, shifted, or extended while occupied.
- n. the top step of a stepladder shall not be used as a step. Never stand on the top step or pail shelf. Ensure the legs are fully opened and the braces locked.
- o. portable ladders with structural defects will be immediately marked in a manner that readily identifies them as defective and removed from service.
- p. when ascending or descending a ladder, one must face the ladder.
- q. employees must use at least one hand to grasp the ladder when progressing up and/or down the ladder.
- r. employees are not to carry any object or load that could cause loss of balance and a resultant fall.

SECTION III

Because ladders are such an integral part of residential painting, below are additional safety procedures:

1. Use ladder stabilizers when there are no means of tying off the top of your ladder
2. Do not reach beyond one arm's length from the side rail -- move the ladder.
3. Do not carry materials in your hands while ascending or descending a ladder -- use a hoist or attach them to your belt.
4. When accessing a roof, you must tie off the ladder and it must extend least 3 feet above the upper landing surface. Where a portable ladder must bear against a vertical surface and there's no means to tie the top off, a ladder stabilizer can provide additional stability.
5. Never stand higher on a ladder than the third rung from the top.
6. Never use a metal ladder near electrical wires -- use fiberglass.
7. Never use any ladder close to unprotected live wires.
8. Never lean a ladder against an unstable support.
9. Never remove ladder safety feet.
10. Never raise the height of a ladder by setting it on boxes or other unstable items.
11. It is required that you always maintain at least three points of contact with the ladder at all times (2 hands on the ladder, and 1 foot, or 2 feet on the ladder with one hand on the ladder).
12. Never rest a ladder on glass.
13. Never use a ladder as a horizontal plank.
14. Never straddle the space between the ladder and another object.

It is the Policy of College Pro Painters to only allow the use of Ladders on jobsites. No additional rigging material, scaffolding or hoisting machinery such as cranes, or cherry pickers may be used. If it is determined that the jobsite can not be completed without the use of additional equipment, College Pro recommends that you do not take the job or hire an outside company to perform the work.

College Pro Painters also mandates, per the franchise agreement, that the Franchisees are only allowed to paint up to 35 vertical feet in the air.

SIGNS & TAGS

When appropriate, signs and tags will be used to warn of specific hazards. Types of signs are classified according to their use, and their design is regulated by CSA standard. All personnel will be instructed in the meaning of the various types of signs. Sign usage includes:

- a. Danger Signs (Red, Black & White): indicates immediate danger and denotes that special precautions are necessary.
- b. Caution Signs (Yellow Background): warns of a potential hazard or cautions against an unsafe practice.
- c. Safety Instruction Signs (White Background): used to provide general instructions and suggestions relative to safety measures.

The wording on signs must be positive, clear, concise, and easy to understand or the sign loses its value.

SECTION III

Accident prevention tags are to warn of hazardous or potentially hazardous conditions that are out of the ordinary, unexpected, or not readily apparent. They are not used where signs, guarding or other positive means of protection are used.

All tags must have a signal word and a major message.

Signal words are: "Danger"; "Caution"; "Warning"; BIOHAZARD (or its symbol).

The major messages would indicate the specific hazardous condition such as: "High Voltage" or "Do not start".

The color scheme is basically the same as for signs:

red = danger
yellow = caution
orange = warning
fluorescent orange = biological hazard.

- a. Danger Tags: indicate an immediate hazard that presents a threat of death or serious injury.
- b. Caution Tags: indicate a non-immediate hazard or unsafe practice that presents a lesser threat of injury.
- c. Warning Tags: indicate a hazard between "Danger" and "Caution".
- d. BIOHAZARD Tags: indicate the actual or potential presence of a biological hazard and identify equipment, rooms, containers, etc., that may be contaminated.

Pay attention to signs and tags and realize that they are in place for only one reason -- your safety.

You should ensure, that when you are transporting ladders, that a red tag is placed on the back of the ladder that hangs over the transporting vehicle. This tag should be attached to the ladder and is there to let motorists traveling behind the vehicle that there is a danger and that there are ladders extending beyond the base of the vehicle.

WASTE DISPOSAL

The Environmental Protection Agency (EPA) has strict guidelines when it comes to disposing of wastes properly. Failure to comply with these laws could result in a major fines or even criminal prosecution. Below are actions that actually constitute criminal activity:

- a. Knowingly disposing of waste in violation of EPA regulations.
- b. Knowingly concealing or misrepresenting any fact.
- c. Knowingly placing another in imminent danger of death or serious bodily harm.

Methods to manage and minimize wastes include:

- a. Manage your inventory well.
- b. Use only the amount of raw materials needed to perform the task.
- c. Clearly label all products and wastes and make certain that they are properly stored.
- d. On all labels, make sure there is an accumulation start date and, if the contents are hazardous (used thinner), clearly write HAZARDOUS on the label.
- e. In all cases where possible, substitute a non-hazardous product for a hazardous one.
- f. Ensure that all containers are tightly closed to minimize spills.
- g. Reuse and recycle materials when possible.

Waste Management Agencies for all provinces can be accessed on the internet

From these web sites, information can be gathered concerning local hazardous waste collection programs as well as the necessity (and method) of obtaining permits

Disposing of paints and chemical products

LATEX-BASED PRODUCTS

- Water-based
- Not considered hazardous by federal definition
- Let paint dry by removing the lid and allowing the water portion to evaporate.
- This must be done in well-ventilated area protected from flame, children, pets, and rain.
- Stirring the paint every day will speed up the drying process.
- The clean-up water can be poured directly into a private drainage system (down the sink in your private home ONLY as long as your home drains to a waste water treatment plant).
- If there is too much paint or clean-up water, use an absorbent (such as kitty litter) to mix with it. When the liquids are absorbed, dry the mixture out and dispose of the material in the trash. When setting a dried paint can out for trash collection, leave the lid off so that the trash collector can see the paint is hardened.

OIL-BASED PRODUCTS

- Solvent-based
- Example: paint thinners and primers
- For thinner, you must pour the liquid into a clearly labeled container and seal it with a tight lid. Allow the paint particles (sludge) to settle to the bottom.
- You can then pour the clear liquid back into the original paint thinner can for reuse. Dispose of the residue (sludge) after allowing it to dry.
- Adding an absorbent material such as kitty litter or sawdust will speed up the drying process.
- Dispose of the material in a household hazardous waste facility.
- For paints, tightly close the can and dispose of it at your local hazardous Waste Collection Sites.
- Soak soiled rags immediately after use in a water-filled closed metal container. Rags used with oil-based products may spontaneously combust and should never be left in a pile or non-ventilated area to dry.

Alternative Paint Disposal Methods

1. Leave paint with homeowner for touch-ups.
2. Give extra paint to someone who can use it such as a friend; a local theater group; house rehabilitation organizations; low-income housing programs; schools for use in theater, woodworking & construction classes.
3. Take paint to a paint exchange or "swap and drop" program.

AT NO POINT CAN PAINT, PAINT WASTE OR ANY CHEMICAL OR HAZARDOUS MATERIALS BE DISPOSED OF BY POURING THE CONTENTS INTO THE LAWN, RIVER, OR SEWER. DISPOSING OF WASTES OUTSIDE OF THE EPA REGULATIONS IS A SERIOUS MATTER AND WILL NOT BE TOLERATED.

LEAD PAINT

The use of lead paint was banned in residential construction by 1970. Lead may be found in paint that was applied before this ban. Lead is a heavy, toxic metal which can be absorbed into your body by ingestion and/or inhalation. It is a cumulative poison which can stay in your body for decades.

All homes built prior to 1970 should be tested, while homes built before 1960 must be tested, for the presence of lead with a swab test which may be obtained from the local paint store.

Before a house which has lead paint can be repainted, paint that is peeling, bubbling, or failing must be abated (removed).

Lead overexposure is a leading cause of workplace illness in the painting industry. Exposure to lead can damage a person's blood and circulatory system, the nervous system, kidneys, liver, brain, and the reproductive systems of both men and women.

SECTION III

INTRODUCTION—THE HAZARDS OF EXPOSURE

Lead overexposure is a leading cause of workplace illness. Exposure to lead can damage a person's blood and circulatory system, the nervous system, kidneys, liver, brain, and the reproductive systems of both men and women.

Over the last 25 years, we have become increasingly more aware of the effects of lead on the environment and on our bodies. In general populations, lead may be present at hazardous concentrations in food, water, and air. Sources can include types of paint, urban dust, and gasoline. Lead exposure is a major potential public health risk, and the leading environmentally induced illness in our children. Brain and organ damage was discovered in children who played with or ate chips of lead-based paint in older housing units. Because of these risks, by 1970, the use of lead paint in all residential buildings was banned. It is now primarily used in non-residential places such as bridges, ships, and lighthouses.

There are two types of lead: Organic and Inorganic

1. Organic Lead—is not commonly encountered and can be absorbed through the skin.
2. Inorganic Lead—is more commonly encountered and cannot be absorbed through the skin, but enters the body through inhalation and ingestion. The rate of absorption depends upon its chemical and physical form and on the physiological characteristics of the person exposed. Once in the blood, the lead is distributed primarily among three compartments—Blood, soft tissue (kidney, bone marrow, liver and brain) and mineralising tissue (bones and teeth).

Inorganic Lead can get into the body when employees:

- A. Breathe in lead dust and fumes (inhalation)
- B. Eat food or smoke cigarettes that have been contaminated by lead dust (ingestion)

Significant exposures can occur in situations such as: surface preparation prior to painting, painting with lead-based paint, and lead-based paint abatement.

Symptoms of Lead Poisoning can include:

POOR APPETITE	HYPERACTIVITY	ANXIETY
SKAKING OF ARMS	METALLIC TASTE	NAUSEA
SLEEPLESSNESS	BLUE LEAD LINE (GUMS)	CONSTIPATION
NUMBNESS	WEAKNESS OF MUSCLES	DIZZINESS
JOINT PAIN	HEADACHES	PALE SKIN

The long-term effects of lead on the body can be fatal. In extreme cases, lead can affect the brain, leading to seizures, coma, and even death.

Some long-term effects of Lead Exposure can include:

ANEMIA
HYPERTENSION
NERVOUS SYSTEM PROBLEMS
KIDNEY AND LIVER PROBLEMS
REPRODUCTIVE PROBLEMS IN MEN AND WOMEN

The danger of lead is that it is a cumulative poison and, once it gets into the body, can accumulate in blood, bones and main organs. The lead poisoning affect can be acute or chronic.

Acute: It takes place fast at a high level of exposure

Chronic: It accumulates at lower exposure concentrations over a longer period of time

Both can be extremely dangerous and can occur in jobs as short as one or two weeks, with the health damages being temporary or permanent. The body can get rid of some of the lead by normal processes, but not all of it. Some,

SECTION III

including lead that gets into the bones, can stay for years—or for life. The accumulated level of lead in the body is called the “lead burden”.

4-Step Approach to understanding the lead standard

1. Determine if lead is present on the job—Prior to starting at a new job site, be sure to check with your manager to determine if he/she has tested if lead is present or not. If lead is not present, you can proceed on the job. If lead is present, please follow steps 2 through 4.
2. During the scraping phase of house preparation an approved dust mask and gloves must be worn.
3. It is imperative that absolutely no paint chips be left on the ground on a work site where lead is present. Use a drop cloth to collect chips and sweep or vacuum the area thoroughly.
4. No smoking or eating is permitted on job sites where lead is present. Painters must wash their hands and face prior to eating, drinking, or leaving the job site.



WARNING
LEAD WORK AREA



POISON



NO SMOKING OR EATING



College Pro Lead Paint Policy—Reminders and Definitions

*****All homes built prior to 1970 must be tested for the presence of lead*****

****Franchisees must be sure to ask the homeowner if there is lead present on the job before completing an estimate. If lead is present, it will impact the estimate price.****

- Determine if lead is present on the job—Prior to starting at a new job site, be sure to check with your manager to determine if he/she has tested if lead is present or not. If lead is not present, you can proceed on the job. If lead is present, please follow steps the next 3 steps.
- During the scraping phase of house preparation an approved dust mask and gloves must be worn.
- It is imperative that absolutely no paint chips be left on the ground on a work site where lead is present. Use a drop cloth to collect chips and sweep or vacuum the area thoroughly.
- No smoking or eating is permitted on job sites where lead is present. Painters must wash their hands and face prior to eating, drinking, or leaving the job site.
- Paint is considered “Lead Based Paint” if there is any amount of lead in the paint (not based on a threshold level)
- It is imperative that absolutely no paint chips be left on the ground on a work site where lead is present. A plastic film 4 mil thick must be placed around a home containing lead-based paint to catch any and all paint chips—It is imperative that no paint chips be left on the ground.
- Any job site containing lead-based paint must have a sign posted to alert neighbors to the danger. All signs must state:

**WARNING
LEAD WORK AREA
POISON
NO SMOKING OR EATING**

- No smoking or eating is permitted on job sites where lead is present.
- Don't sand any lead paint
- Painters must wash their hands and face prior to eating, drinking, or leaving the job site.

*****It is recommended that exteriors of homes with lead paint be washed down with a garden hose (not a power washer) just prior to scraping to reduce the possibility of aerosolizing lead paint chips.*****

College Pro Painters takes lead-based paint very seriously. If you have any questions, please review the more detailed policy, or contact your manager, or call us at 1-800-465-2839.

College Pro Painters

Sections III (Programs)

SECTION III

SECTION III

SPECIFIC COMPLIANCE PROGRAMS

Fall Protection

Hazard Communication

Personal Protective Equipment - General

FALL PROTECTION

REFERENCE & TRAINING MANUAL

SECTION III

FALL PROTECTION

INDEX

TOPIC	PAGE
OVERVIEW	1
DUTIES OF THE PROGRAM ADMINISTRATOR	2
PRE-PROJECT PLANNING	2
DEFINITIONS	3
WHERE FALL PROTECTION IS REQUIRED	7
WALKING/WORKING SURFACES NOT OTHERWISE ADDRESSED`	8
PRE-PAINTING SURVEY	8
FALL PROTECTION SYSTEMS	9
FALL PROTECTION PLAN	12
ACCIDENTS AND NEAR ACCIDENTS	13
TRAINING /RETRAINING	13
FALL PROTECTION AT THE JOB SITE	14

Forms:

Fall Protection Plan (w/Changes)

OVERVIEW

One of the most serious hazards faced by our employees is falls from heights. This Fall Protection Program has been developed to prevent injury from falls of six (6) feet or more from a walking/working surface to a lower level, to prevent objects falling from above and striking persons below, and to prevent job site persons from falling into holes.

Within the context of this program, the term “fall hazard” does not refer to tripping and falling which is addressed in our general safety & health program, nor does it apply to falling off a ladder. Ladder safety is addressed as its own topic.

The Fall Protection **Program** should be readily accessible to anyone painting.

A copy of the Fall Protection **Plan** will be found with the Franchise Manager. If there is no fall protection plan, please call the College Pro head office immediately at 1-800-465-2839.

On all job sites where fall hazards exist, there will be at least one competent person who has the training and ability to identify fall hazards and the authority to ensure that proper fall protection systems are properly implemented.

The following areas of concern are addressed by this Program:

- a. the need to know where fall protection is required.
- b. selection of fall protection systems which are appropriate for given situations.
- c. construction and installation of safety systems.
- d. supervision of employees.
- e. implementation of safe work procedures.
- f. training in selection, use, and maintenance of fall protection systems.

The Fall Protection Program may be reviewed at any time by our employees, the franchise Manager and any of their employees. Should a question arise concerning this Program, personnel are encouraged to consult with their supervisor, the General Manager, or the College Pro head office.

DUTIES OF THE PROGRAM ADMINISTRATOR

The Franchise Manager will ensure that the fall protection program is being followed and will assume the role of the Program Administrator. Duties of the franchise manager include:

- a. training of personnel.
- b. maintenance of training records.
- c. random, unannounced job site inspections to assure compliance with both CSA & OSHA standards and company safety policies.
- d. resolution of specific problems that may present themselves regarding a particular job site situation.
- e. designating a competent (by training or experience) person at each applicable job site who will ensure:
 1. a copy of our fall protection program/plan is readily accessible on appropriate job sites.
 2. a written certification record has been prepared documenting that employees who have potential exposure to fall hazards at the job site have received the required training in protection.
 3. the fall protection system(s) utilized at the job site are appropriate for the hazard(s) present.
 4. that, before any work is initiated, the walking/working surfaces at the job site are capable of supporting both our personnel and equipment.

The Franchise Manager will be familiar with all applicable standards and will keep abreast of developments in the field of fall protection.

PRE-PROJECT PLANNING

Fall protection requires personnel to identify work situations in which fall hazards exist, determine the most appropriate fall protection system to be utilized, and to ensure that all persons understand the proper methods of utilizing the selected fall protection systems. A pre-construction survey by a competent person will often provide the information needed to make these determinations.

Fall protection system requirements may change during a project and the competent person on site will ensure that fall protection is maintained at all times. Care will be taken to assure that load limits are not exceeded on walking/working surfaces and attachment points and hardware is capable of withstanding (with the appropriate safety factor) the potential forces that may be generated during an actual fall incident.

Fall protection hardware and equipment owned, rented, or leased will be CSA approved and it is assumed that the manufacturer's technical specifications and capabilities are accurate.

From the very inception of a potential project (pre-bid) to completion, fall protection needs and costs will be factored in.

DEFINITIONS

There are a number of terms and phrases, not common in everyday life, which must be understood to grasp the thrust of this Program. For those employees directly involved with this Program or affected by it, there are specific requirements and procedures which would be meaningless without an understanding of the "language" of our Fall Protection Program. Words used within the definitions which are themselves defined are printed in bold italic.

ANCHORAGE: a secure point of attachment for *lifelines, lanyards* or *deceleration devices*.

BODY HARNESS: straps which may be secured about the employee in a manner that will distribute the fall arrest over at least the thighs, pelvis, waist, chest, and shoulders with means for attaching it to other components of a *personal fall arrest system*.

BUCKLE: any device for holding the *body harness* closed around the employee's body.

CARABINER: an oval metal ring with a snap link used to fasten a rope to the piton [a spike (attachment) with an eye to

which a rope can be secured.]

COMPETENT PERSON: one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees; and who has authorization to take prompt corrective measures to eliminate them. The Franchise Manager has been trained to identify existing and predictable hazards.

CONNECTOR: a device which is used to couple (connect) parts of the *personal fall arrest system* and *positioning device systems* together. It may be an independent component of the system, such as a *carabiner*, or it may be an integral component of part of the system (such as a *buckle* or dee-ring sewn into a self-retracting *lanyard*).

CONTROLLED ACCESS ZONE (CAZ): an area in which certain work (e.g., *overhand bricklaying*) may take place without the use of *guardrail systems*, *personal fall arrest systems*, or safety net systems; access to the zone is controlled.

DECELERATION DEVICE: any mechanism, such as a *rope grab*, rip-stitch *lanyard*, specially-woven *lanyard*, tearing or deforming *lanyards*, automatic self-retracting *lifelines/lanyards*, etc., which serves to dissipate a substantial amount of energy during a fall arrest, or otherwise limit the energy imposed on an employee during fall arrest.

DECELERATION DISTANCE: the additional vertical distance a falling employee travels from the point at which the *deceleration device* begins to operate before stopping, excluding *lifeline* elongation and *free fall distance*. It is measured as the distance between the location of an employee's *body harness* attachment point at the moment of activation (at the onset of fall arrest forces) of the *deceleration device* during a fall, and the location of that attachment point after the employee comes to a full stop.

EQUIVALENT: alternative designs, materials, or methods to protect against a hazard which the employer can demonstrate will provide an equal or greater degree of safety for employees than the methods, materials or designs specified in the standard.

FAILURE: load refusal, breakage, or separation of component parts. Load refusal is the point where the ultimate strength is exceeded.

FREE FALL: the act of falling before a *personal fall arrest system* begins to apply force to arrest the fall.

FREE FALL DISTANCE: the vertical displacement of the fall arrest attachment point on the employee's *body harness* between onset of the fall and just before the system begins to apply force to arrest the fall. This distance excludes *deceleration distance*, and *lifeline/lanyard* elongation, but includes any *deceleration device* slide distance of *self-retracting lifeline/lanyard* extension before they operate and fall arrest forces occur.

GUARDRAIL SYSTEM: a barrier erected to prevent employees from falling to *lower levels*.

HOLE: a gap or void 2 inches (5.1 cm) or more in its least dimension, in a floor, *roof*, or other *walking/working surface*.

INFEASIBLE: it is impossible to perform the construction work using a conventional fall protection system (i.e., *guardrail system*, safety net system, or *personal fall arrest system*) or that it is technologically impossible to use any one of these systems to provide fall protection.

LANYARD: a flexible line of rope, wire rope, or strap which generally has a *connector* at each end for connecting the *body harness* to a *deceleration device*, *lifeline*, or *anchorage*.

LEADING EDGE: the edge of a floor, *roof*, or formwork for a floor or other *walking/working surface* (such as the deck) which changes location as additional floor, *roof*, decking, or formwork sections are placed, formed, or constructed. A leading edge is considered to be an "unprotected side and edge" during periods when it is not actively and continuously under construction.

LIFELINE: a component consisting of a flexible line for connection to an *anchorage* at one end to hang vertically (vertical lifeline), or for connection to *anchorage's* at both ends to stretch horizontally (horizontal lifeline), and which serves as a means for connecting other components of *personal fall arrest system* to the *anchorage*.

LOW-SLOPE ROOF: a *roof* having a slope less than or equal to 4 in 12 (vertical to horizontal).

LOWER-LEVELS: those areas or surfaces to which an employee can fall. Such areas or surfaces include, but are not limited to, ground levels, floors, platforms, ramps, runways, excavations, pits, tanks, material, water, equipment, structures, or portions thereof.

OPENING: a gap or void 30 inches or more high and 18 inches or more wide, in a wall or partition through which employees can fall to a *lower level*.

PERSONAL FALL ARREST SYSTEM: a system used to arrest an employee in a fall from a working level. It consists of an *anchorage*, *connectors*, a *body harness* and may include a *lanyard*, *deceleration device*, *lifeline*, or suitable combination of these. **The use of body belts for fall arrest is prohibited.**

QUALIFIED PERSON: one who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated his ability to solve or resolve problems relating to the subject matter, the work, or the project.

ROOF: the exterior surface on the top of a building. This does not include floors or formworks which, because a building has not been completed, temporarily become the top surface of a building.

SAFETY-MONITORING SYSTEM: a safety system in which a competent person is responsible for recognizing and warning employees of fall hazards.

SELF-RETRACTING LIFELINE/LANYARD: a *deceleration device* containing a drum-wound line which can be slowly extracted from, or retracted onto, the drum under slight tension during normal employee movement, and which, after onset of a fall, automatically locks the drum and arrests the fall.

SNAPHOOK: a *connector* comprised of a hook-shaped member with a normally closed keeper of similar arrangement which may be opened to permit the hook to receive an object and, when released, automatically closes to retain the object. Snaphooks are generally one of two types:

- (1) the locking type with a self-closing, self-locking keeper which remains closed and locked until unlocked and pressed open for connection or disconnection; or
- (2) the non-locking type with a self-closing keeper which remains closed until pressed open for connection or disconnection. The use of a non-locking snaphook as part of *personal fall arrest systems* and *positioning device systems* is prohibited.

STEEP ROOF: a *roof* having a slope greater than 4 in 12 (vertical to horizontal).

TOEBOARDS: a low protective barrier that will prevent the fall of material and equipment to *lower levels* and provide protection from falls for personnel.

UNPROTECTED SIDES AND EDGES: any side or edge (except at entrances to points of access) of a *walking/working surface*, e.g., floor, *roof*, ramp, or runway where there is no wall or *guardrail system* at least 39 inches high.

WALKING/WORKING SURFACE: any surface, whether horizontal or vertical, on which an employee walks or works, including, but not limited to, floors, roofs, ramps, bridges, runway, formwork and concrete reinforcing steel; not including ladders, vehicles, or trailers on which employees must be located in order to perform their job duties.

WARNING LINE SYSTEM: a barrier erected on a *roof* to warn employees that they are approaching an unprotected *roof* side or edge, and which designates an area in which *roofing work* may take place **without** the use of guardrail, *body belt*, or safety net systems to protect employees in the area.

WORK AREA: that portion of a *walking/working surface* where job duties are being performed.

WHERE FALL PROTECTION IS REQUIRED

The "key" distance is 9 feet (3 meters). All employees must be aware that if there is a possibility of falling 9 feet or more at least one (1) fall protection system will be implemented. Further, protection from being struck by falling objects from above will be provided on all job sites.

Below are specific situations where, as painters, fall protection systems will be utilized.

UNPROTECTED SIDES AND EDGES:

Each employee on a walking/working surface (horizontal and vertical surface) with an unprotected side or edge which is 9 feet or more above a lower level shall be protected from falling by the use of guardrail systems, safety net systems, or personal fall arrest systems.

HOLES:

Each employee on walking/working surfaces shall be protected from falling through holes (including skylights) more than 9 feet above lower levels by personal fall arrest systems or covers.

- a. Each employee on a walking/working surface shall be protected from tripping in or stepping into or through holes (including skylights) (**regardless of height**) by covers.
- b. Each employee on a walking/working surface shall be protected from objects falling through holes (**regardless of height**) by covers.

RESIDENTIAL CONSTRUCTION:

Each employee engaged in residential construction activities 9 feet or more above lower levels shall be protected by a fall arrest system.

WALL OPENINGS:

Each employee working on, at, above, or near wall openings (including those with chutes attached) where the outside bottom edge of the wall opening is 9 feet or more above lower levels and the inside bottom edge of the wall opening is less than 39 inches above the walking/working surface, shall be protected from falling by the use of a personal fall arrest system.

WALKING/WORKING SURFACES NOT OTHERWISE ADDRESSED:

Each employee on a walking/working surface 9 feet or more above a lower level that is not addressed in the categories will be protected from falling by a personal fall arrest system except when using ladder stabilizers or tying off the ladder.

PRE-PAINTING SURVEY

Prior to the initiation of any painting project, the job site will be surveyed by a competent/qualified person to determine:

- a. if fall protection systems will be required.
- b. if fall hazards exist, the types of conventional fall protection systems to be utilized.
 1. particular attention will be given to anchorage points, location of warning lines, etc..
- c. rescue procedures to be used if a fall actually occurs.
- d. the load-carrying capabilities of the walking/working surface.
- e. assuring that all personnel utilizing a fall protection system have training in that system.

This survey may be made without the use of fall protection because no work will be accomplished during this survey and installing fall protection systems would create a greater hazard.

If it is determined that certain areas within the overall worksite have fall hazards that cannot be addressed with conventional fall protection systems (those areas being limited to leading edge work), **then** a Fall Protection Plan must be prepared to specifically protect employees from these hazards.

FALL PROTECTION SYSTEMS

PERSONAL FALL ARREST SYSTEM:

A personal fall arrest system is, as the name implies, a means of safety decelerating a falling body before a lower level is hit. The three (3) main components of a personal fall arrest system are the:

- a. anchorage point.
- b. lanyard.
- c. body harness.

NOTE: Body belts **will not** be used in a personal fall arrest system.

We will use personal fall arrest systems that comply with the cited criteria.

The tie-off attachment point must be at or above the connection point on the harness to prevent additional free fall distance.

As are guardrails, personal fall arrest systems are “passive” and require no employee involvement once they are properly rigged.

For all practical purposes, dee-rings and locking type snaphooks shall have a minimum tensile strength of 5,000 pounds and lanyards and vertical lifelines shall have a minimum breaking strength of 5,000 pounds. Anchorages must be capable of supporting 5,000 pounds per employee. Anchorages used in personal fall arrest systems must be independent of any anchorage being used to support or suspend platforms.

NOTE: Knots in a rope lanyard or lifeline can reduce its strength by as much as 50% and having a lanyard go over or around sharp edges can completely destroy its effectiveness.

With the exception that harnesses and components may be used as positioning device systems, personal fall arrest system components may not be used for purposes other than that for which they were designed.

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

Personnel should be aware that should a fall occur and self rescue is not possible, equipment and personnel will be available for rescue.

Should a personal fall arrest system actually be used to stop a fall, it will be removed from service and inspected by a competent person to insure it is suitable for reuse.

SAFETY MONITORING SYSTEM:

Specific safety monitoring systems must comply with the CSA.

A safety monitoring system used in conjunction with a warning line system is not considered a “passive system” because it takes active employee involvement and, as such, both the Safety Monitor and the employee(s) being monitored must be alert for fall hazards.

A competent person will perform the duties of Safety Monitor. These duties include:

- a. recognizing fall hazards,

- b. warning the employee when it appears the employee is unaware of a fall hazard or is acting in an unsafe manner,
- c. remaining on the same walking/working surface and within visual sighting of the employee being monitored, and
- d. remaining close enough to communicate orally with the employee being monitored.

The Safety Monitor shall have no other responsibilities which could take the monitor's attention from the monitoring function.

Only the employee engaged in roofing work on low-sloped roofs or an employee covered by a fall protection plan is allowed in the area being protected by the Safety Monitor.

When a safety monitoring system is being used, mechanical equipment will not be used or stored in that controlled zone.

Of course, the employee being monitored is required to comply promptly with the fall hazard warnings from the Safety Monitor.

PROTECTION FROM FALLING OBJECTS:

Specific protection from falling objects criteria are found in the CSA and we will use that criteria to protect our employees from falling objects.

When an employee is at risk from falling objects a CSA approved hard hat must be worn.

FALL PROTECTION PLAN

The foregoing Fall Protection Program is not a Fall Protection Plan per se. However, implementing the preceding guidelines for conventional fall protection systems coupled with certified formal and hands-on training will provide appropriate fall protection.

There may be occasions where conventional fall protection systems just will not work. CSA has determined that these occasions include residential construction work.

The criteria for determination that conventional fall protection systems are infeasible are: 1) it is impossible to perform construction work using conventional fall protection systems, or 2) it is technologically impossible to use conventional fall protection systems. Inconvenience and cost are not acceptable considerations.

Specific Fall Protection Plan criteria are found in the CSA and, if necessary, a Fall Protection Plan will be completed that complies with the cited criteria.

Fall Protection Plans must be prepared by a qualified person and developed specifically for the site where the work is to be performed. All changes to the Plan must be approved by a qualified person.

NOTE: A qualified person is one who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated his ability to solve or resolve problems relating to the subject matter, the work, or the project. CSA has indicated that an employer may use the services of more than one qualified person to comply with these requirements as long as (1) those persons, collectively, are qualified to prepare the fall protection plan and approve any changes; and (2) the resulting plan complies with the applicable requirements of the standards.

Fall Protection Plans must be maintained at the job site and be up to date.

The implementation of the fall protection plan must be under the supervision of a competent person.

A Fall Protection Plan must document reasons why conventional fall protection systems are infeasible and/or offer a detailed explanation why conventional fall protection systems create a greater hazard in their use than non-use.

All measures taken to reduce or eliminate fall hazards (in lieu of conventional fall protection systems) such as the use of ladders or scaffolds shall be discussed.

In each area where a conventional fall protection system cannot be used, a safety monitoring system must be utilized that conforms with the requirements of the CSA.

Either the names of the employees or some other means of employee identification (such as armbands or color coded hard hats) will be used to control access to the controlled access zone.

In the event an employee falls or a serious incident occurs, the circumstances will be investigated and changes to the Fall Protection Plan will be made to prevent a reoccurrence of a similar incident.

After completion of all work and after all fall protection systems have been removed, a competent/qualified person may survey the work areas for inspection purposes without the use of fall protection systems. Care will be taken to assure solid footing and focused attention to potential fall hazards.

There are only two (2) instances where employees may be exposed to fall hazards without the use of fall protection systems. Those times are: pre-construction activities (inspecting, investigating, or assessing the workplace) and post-construction activities. During these times, no actual construction work may take place.

For all practical purposes, there are no situations where conventional personal fall arrest systems will be infeasible.

ACCIDENTS AND NEAR ACCIDENTS

Accidents and near accidents involving fall hazards will be investigated by the Franchise Manager, and if necessary, College Pro Painters to determine the cause of the incident and a method of preventing a reoccurrence. Questions to be considered are:

- a. Was the fall protection system selected appropriate for the hazard?
- b. Was the system properly installed?
- c. Was the person involved in the accident following proper procedures?
- d. Were there contributing factors such as ice, wind, debris, etc.?
- e. Is retraining or a change of the Fall Protection Plan required?

TRAINING/RETRAINING

Training, which must be certified, will include the following topics:

- a. the nature of fall hazards in the work area.
- b. the correct procedures for erecting, maintaining, disassembling, and inspecting the fall protection to be used.
- c. the use and operation of guardrail systems; personal fall arrest systems; safety net systems' warning line systems; safety monitoring systems' controlled access zones; and other protection to be used.
- d. the role of the Safety Monitor and the role of the employee when a safety monitoring system is used.
- e. the limitations on the use of mechanical equipment during the performance of roofing work on low-sloped roofs.
- f. the correct procedures for handling and storage of equipment and materials and the erection of overhead protection.
- g. the role of employees in fall protection plans.

Training will be conducted by competent person(s) using the below listed items as resource materials:

- a. this Fall Protection Program.

- b. the manufacturer's instruction manuals that come with fall protection equipment.
- c. CSA standards pertaining to fall protection
- d. the competent person's work experiences.

Should the competent person, a supervisor, or a Program Administrator suspect that an employee lacks the skills needed for proper fall protection, that employee will be retrained.

Changes in the workplace, types of fall protection systems and equipment will also necessitate retraining.

Only the latest Training Certificate will be kept on file.

FALL PROTECTION AT THE JOB SITE

A quick glance through this Fall Protection Program may leave the reader with the impression that fall protection requires an inordinate amount of attention to small details, which, in practice, would render the fall protection provisions of the CSA unworkable in real work situations.

The opposite is true. CSA has gone to great lengths to make safety user friendly by incorporating performance-orientated criteria (as opposed to specification-orientated criteria) into their standards. Following a hazard assessment, we will select the most advantageous fall protection system that is compatible with our task needs and our protection requirements.

Lastly, while time, equipment, training, and money are devoted to fall protection systems which either physically prevent persons from falling from height, control the rate of deceleration during an actual fall, prevent objects from falling onto persons below, or warn personnel of restricted areas, we must never forget that it is important not to fall in the first place.

Accidents are more likely to occur as we become "adjusted" to working at height. Most slips, trips and falls are preventable. Proper footwear, wearing hard hats when there is a possibility of falling objects, cleaning up of debris, and paying attention to footing, hand holds, and edges is as important as the fall protection systems themselves.

HAZARD COMMUNICATION

REFERENCE & TRAINING MANUAL

SECTION III

HAZARD COMMUNICATION

INDEX

TOPIC	PAGE
OVERVIEW	1
DEFINITIONS	1
CHEMICAL TYPES AS THEY RELATE TO HEALTH	2
HAZARD DETERMINATION	3
LABELS	3
MATERIAL SAFETY DATA SHEETS (MSDS)	4
LIST OF HAZARDOUS CHEMICAL PRODUCTS	6
TRAINING	7
NON-ROUTINE TASKS	7
SHARING OF INFORMATION	7
CANADIAN PROVINCE WASTE DISPOSAL INFORMATION	14
EXAMPLE MSDS SHEETS (ONLY IN HARD COPY OF BINDER)	18

Forms:

List of Hazardous Chemicals

OVERVIEW

Paint products, thinner, even job site hand cleaner -- these are typical job site chemical products. What do these products have in common? They are all chemicals and their properties may cause harm to an employee if inhaled, ingested, or absorbed into the skin. A common error is thinking that a hazard communication plan is not needed because there are no "hazardous" chemicals such as nitroglycerin or sulfuric acid on the job site. Hazard communication addresses the health and physical hazards associated with essentially all the chemical and chemical products found on the job site.

There may be a tendency to think of common everyday products such as hand cleaners as just that -- hand cleaners. However, even these items are job site chemicals and, if misused, have a health hazard.

This hazard communication plan is designed to make all employees aware that most, if not all, job site chemicals have a downside if improperly used, spilled, transferred or stored. The hazard may be a physical hazard such as an explosion or a health hazard such as cancer.

DEFINITIONS

Article:	a manufactured item which is formed to a specific shape or design during manufacture; has end use [Note: Articles are exempt from function(s) dependent in whole or in part upon its the Hazard Communication shape or design during end use; and does not ^{standard} release, or otherwise result in exposure to a hazardous chemical under normal conditions of use.
Hazardous Chemical:	any chemical which is a physical or a health hazard.
Physical Hazard:	a chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric (will ignite spontaneously in air at a temperature of 130°F or below), unstable (reactive) or water-reactive.
Health Hazard:	a chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principals that acute or chronic health effects may occur in exposed employees.

CHEMICAL TYPES AS THEY RELATE TO HEALTH

Below is a list of categories of hazardous chemical types as they relate to health:

- a. Carcinogen or potential carcinogen (cancer-causing).
- b. Corrosive: A chemical that causes visible destruction of, or irreversible alterations in, living tissue by chemical action at the site of contact.
- c. Highly Toxic: A chemical which is lethal to test animals under specific doses and time limits.
- d. Irritant: A chemical which is not a corrosive, but which causes a reversible inflammatory effect on living tissue by chemical action at the site of contact.
- e. Sensitizer: A chemical that causes a substantial proportion of exposed people or animals to develop an allergic reaction in normal tissue after repeated exposure.
- f. Toxic: A chemical which is lethal to test animals under specific doses and time limits.

g. Target Organ Effects:

1. Hepatotoxins: Chemicals which produce liver damage
2. Nephrotoxins: Chemicals which produce kidney damage
3. Neurotoxins: Chemicals which produce their primary toxic effects on the nervous system
4. Agents which act on the blood or hemotopoietic system: decrease hemoglobin function; deprive the body tissue of oxygen
5. Agents which damage the lungs: chemicals which irritate or damage the pulmonary tissue.
6. Reproductive toxins: Chemicals which affect the reproductive capabilities including chromosomal damage (mutations) and effects on fetuses
7. Cutaneous hazards: Chemicals which affect the dermal (skin) layer of the body

Eye hazards: Chemicals which affect the eye or visual capacity

The above is to illustrate the broad scope of health hazards.

HAZARD DETERMINATION

The determination of chemical hazards is primarily the responsibility of the manufacturer and/or importer.

We will rely on the evaluations of the chemical product's manufacturers or importers.

LABELS

A label is any written, printed, or graphic material displayed on or affixed to containers of hazardous chemicals.

All chemicals used in or on the job site will be properly labeled using the manufacturer's labeling system. Labels will not be removed or defaced. If a chemical is not labeled, it will not be used with the following exception which is quite common with painters:

portable containers into which hazardous chemicals are transferred from labeled containers need not be labeled if they are for immediate use of the employee who makes the transfer.

To simplify the above, one may take a hazardous chemical (*example*: paint) out of a labeled container and put it into a smaller, unlabeled container (*example*: paint tray), for immediate use. "Immediate use" is defined as being under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.

The label must clearly state:

- a. the identity of the hazardous chemical(s).
- b. the appropriate hazard warning.
- c. the name and address of the manufacturer.

Appropriate hazard warnings would contain:

- a. instruction for proper and safe use. This would include obvious information such as, "do not ingest" or "do not spray in eyes" as well as less obvious information such as, "caustic, wear rubber gloves"
- b. first aid instructions
- c. fire containment instructions
- d. storage
- e. disposal instructions

Treat empty containers of hazardous materials as if they were full. Proper disposal is a must!

MATERIAL SAFETY DATA SHEETS (MSDS)

It is required that material safety data sheets (MSDS) be maintained for all hazardous chemicals in our inventory. The information contained on MSDS must be readily accessible to the individual(s) using the products and we will share that information with whom we may work.

Chemicals come in all forms of matter: liquid, solid, and gas; they can be found as sludge, vapor, mist, dust, etc..

How would one know what a chemical smelled or looked like? How would one be able to administer first aid quickly? Where would you find the proper procedure for cleaning up a spill? Where would you find a listing of symptoms caused by inadvertent exposure to a chemical or chemical mixture? Where would you find fire fighting procedures? These questions and many others are answered on Material Safety Data Sheets (MSDS).

Personnel utilizing a new chemical product will review the MSDS before initial use. New chemical products will be added to our List of Hazardous Chemicals.

While there is no specific format, the following information will be found on an MSDS:

- a. identity (chemical or common name) which will be the same as on the label and on the required list of hazardous chemicals.
- b. hazardous chemical ingredients -- both the chemical and common name(s).
- c. physical and chemical characteristics such as boiling point, flash point, solubility in water, etc.. Two of the most important items to be found in this category are appearance and odor. It is important to be able to identify chemicals rapidly and appearance and odor are of great value in initial determination.
- d. physical hazards which would include the potential for explosion, fire, and reactivity. Also included in this section are the flash point and auto ignition temperature. Special fire fighting procedures are also noted and should be carefully studied by potential users.
- e. health hazards which include first aid procedures, signs and symptoms of exposure, medical dangers, exposure limits, routes of entry, precautions for safe handling, potential carcinogen information, and whether professional medical response is required after a mishap.
- f. chemical reactivity which includes stability, incompatibility with other chemicals, hazardous decomposition products and hazardous polymerization. Special conditions to avoid may also be included.
- g. spill and/or leak procedures which include approved waste disposal methods.
- h. special handling information which includes appropriate hygienic practices, protective equipment requirements, and needed ventilation.

- i. special precautions which would include applicable control measures known to the manufacturer and/or importer. Should it be determined there are special advisories that pertain to our company, the advisories will be placed in this section of the MSDS.
- j. the name, address and telephone number as well as the date of preparation or revision must be included.

You are not required to memorize nor are you expected to know all the information contained on an MSDS. You are expected to know where to find information when it is needed.

Particular attention should be paid to:

- a. Identification/detection of a hazardous chemical. This would include odor and color as well as container labeling.
- b. Physical hazards of the hazardous chemical. This information would include the potential for fire, explosion, and reactivity. Reactivity, in chemistry, is defined as "the reciprocal action of chemical agents upon each other; chemical change." The MSDS will indicate proper procedures for fire extinguishing, including special precautions, if needed.
- c. The health hazards of the chemical. Routes of entry are noted. A chemical may enter the body through ingestion, inhalation, absorption, or injection. Signs and symptoms are indicated such as irritation of the skin, redness of the eyes, nausea, etc.. Health hazards are defined as acute, chronic or both. Carcinogenicity is indicated. First Aid procedures are explained as well as notes to a treating physician, if appropriate.

Methods to lessen or prevent exposure are explained. The need for protective equipment such as rubber gloves, disposable suits, respirators, goggles, etc. is explained. Hygienic work practices are re-enforced such as keeping the product away from food and washing hands after use.

Should an employee not be able to read English, the information contained on MSDS and labels (and any other warning sign) will be given orally or written in that employee's language. The actual labels, MSDS, and all warning signs must be written in English (or in Quebec – French).

LIST OF HAZARDOUS CHEMICAL PRODUCTS

A list will be maintained of all hazardous chemical products in our inventory. This list will be arranged alphabetically by trade or common name and be readily available to our employees. This will also be the order in which our MSDS are filed.

TRAINING

The Safety Program Administrator (Franchise Manager) is responsible for employee training and will ensure that all employees understand, prior to working with chemical products:

- a. Methods and observations used to detect the presence or release of a hazardous chemical in the work area. The primary method to detect the presence of a release is sight and smell. The appearance and odor of a chemical product can be found on its MSDS.
- b. Physical and health hazards of the chemicals in the workplace. Again, this information is found on the appropriate MSDS.
- c. Measures to take to protect the employee from chemical hazards. This information, too, can be found on the MSDS.

With the introduction of each new hazard, not necessarily each new chemical, training will be given with specific emphasis on emergency procedures as noted on the MSDS. This training will include procedures for handling leaks and spills, personal protection equipment if required, decontamination procedures, etc.

NON-ROUTINE TASKS

Prior to performing a non-routine task, an employee will be given information by a competent person or supervisor concerning the hazardous chemicals to which he may be exposed. This information will include:

- a. Specific chemical hazards
- b. Protective/safety measures the employee may take.
- c. Measures taken to lessen the hazards including ventilation, respirators, presence of another employee and emergency procedures.

SHARING OF INFORMATION

The competent person on the job site will inform those with whom we work of any hazardous chemical products we are using and will provide them with the appropriate MSDS for their review. MSDS for all chemical products used on the job site will be readily available.

Should a new chemical product be introduced to the job site that contains a physical or health safety hazard, the product's MSDS will accompany that product and, before use, employees will be given instruction on the products hazards. This information will be shared with other contractors with whom we may be working. Painters are to be kept informed of the chemical products being used by other contractors if they pose a safety hazard.

You have a right to know about the products that you are using on the job. The MSDS sheets will provide you with a lot of useful information. Other resources available to you include the paint distributor, the franchise managers, College Pro Painters, and OSHA to name a few. Please don't hesitate to contact one or more of these sources if you want more information.

Please refer to the following Province information:

Each province has its own regulations on how to dispose of excess paint. Please read the guidelines for your province.

All provincial governments will refer to the Hazardous Waste Manifest document put out through Environment Canada and Transport Canada. Information on the Hazardous Waste Manifest is available at http://www.ec.gc.ca/tmb/eng/manifest_e.html. This answers the basic questions of how and why to fill out the documentation. This manifest is mandatory if you are shipping or carrying the waste yourself to a commercial waste disposal center.

The federal government has a regulation codebook for the description of hazardous waste called the Dangerous Goods Classification (TDGR). You will need this information to fill out the Hazardous Waste Manifest or a Generator Number.

Waste paint or paint related materials falls under the Product Identification Number (PIN) UN 1263. The Chemical classification is 3, and the Packing Group is II. Some specialty paints do have corrosive characteristics. If you are using this type of product the PIN is UN 3066, the Classification Group 8 and the Packing Group is II or III. Please contact your local environment ministry to verify the classification(s) is still valid in your province. Your local paint store will be able to provide you with a Material Safety Data Sheet.

British Columbia

British Columbia has a paint stewardship program in place. You must call the Paint and Product Care hotline at 1-800-505-0139. When you contact this number they will provide you with the nearest recycling depot where you will be able to drop off the unused paint.

Alberta

You may obtain information on hazardous waste at the following website: www.gov.ab.ca/env/waste/indhaz/Manifest.html. You are required to have a Generator number that can be obtained online at the following website: www.gov.ab.ca/env/protenf/forms/HazWasteConsignor.pdf.

You are unable to dispose of waste products on your own. Please consult your local yellow pages to find a commercial waste disposal service. The waste broker will pick up from you or some brokers may allow you to bring your waste directly to them. In areas where there is more than one franchise manager, you could save disposal costs by accumulating the wastes at one location. Rates will vary based on the quantity.

If you need assistance in classifying your waste, please contact the Transportation of Dangerous Goods Department at 1-800-272-9600.

Saskatchewan

You may obtain information on hazardous waste at the following website: www.serm.gov.sk.ca/environment/protection/hazardous/recycle/initiatives. You are required to have a Generator number that can be obtained at 1-800-667-2757.

You are unable to dispose of waste products on your own. Please consult your local yellow pages to find a commercial waste disposal service. The waste broker will pick up from you or some brokers may allow you to bring your waste directly to them. In areas where there is more than one franchise manager, you could save disposal costs by accumulating the wastes at one location. Rates will vary based on the quantity.

Manitoba

You must have a generator number. You are unable to dispose of waste products on your own. Please consult your local yellow pages to find a commercial waste disposal service. The waste broker will pick up from you or some brokers may allow you to bring your waste directly to them. In areas where there is more than one franchise manager, you could save disposal costs by accumulating the wastes at one location. Rates will vary based on the quantity.

Ontario

You must have a generator number. You are unable to dispose of waste products on your own. Please consult your local yellow pages to find a commercial waste disposal service. The waste broker will pick up from you or some brokers may allow you to bring your waste directly to them. In areas where there is more than one franchise manager, you could save disposal costs by accumulating the wastes at one location. Rates will vary based on the quantity.

Quebec

Each manager must contact his/her local ministry of the environment for information regarding waste disposal in his/her specific area. Questions to ask when calling:

- Do I need a generator number or is a manifest sufficient?
- Am I able to dispose of the waste myself or must a waste broker be contacted?
- If there are other franchise managers close by is it possible to have only one generator number for all of us?

Nova Scotia

There is currently proposed legislation to introduce a paint stewardship program. This will mean that you only need to contact a hotline to find the nearest recycling depot.

New Brunswick

You must have a generator number. New Brunswick requires that only flammable products have the generator number. It is your responsibility to know your paint product.

You are unable to dispose of waste products on your own. Please consult your local yellow pages to find a commercial waste disposal service. The waste broker will pick up from you or some brokers may allow you to bring your waste directly to them. In areas where there is more than one franchise manager, you could save disposal costs by accumulating the wastes at one location. Rates will vary based on the quantity.

Prince Edward Island

You must have a generator number. You are unable to dispose of waste products on your own. Please consult your local yellow pages to find a commercial waste disposal service. The waste broker will pick up from you or some brokers may allow you to bring your waste directly to them. In areas where there is more than one franchise manager, you could save disposal costs by accumulating the wastes at one location. Rates will vary based on the quantity.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

[General]

REFERENCE & TRAINING MANUAL

SECTION III

PERSONAL PROTECTIVE EQUIPMENT (PPE)

[General]

INDEX

TOPIC	PAGE
OVERVIEW	1
DUTIES OF THE PPE PROGRAM ADMINISTRATOR	1
HAZARD ASSESSMENT AND PPE SELECTION	1
DISSEMINATION OF PPE SELECTION INFORMATION	2
ANSI STANDARDS AND PPE	2
SIZING AND FITTING	2
CARE AND MAINTENANCE OF PPE	3
TRAINING	3
EYE AND FACE PROTECTION	4
HEAD PROTECTION	4
FOOT PROTECTION	5
HAND PROTECTION	5
RESPIRATORY PROTECTION	5
SUMMARY	5

OVERVIEW

This Personal Protective Equipment (PPE) Program has been prepared to inform our employees of potential hazards in the workplace and to identify the proper PPE to be used to reduce or eliminate these hazards. This Program relies on a cooperative effort by all personnel to understand the reasons for PPE and to protect themselves from harm.

The use of PPE does not lessen a persons obligation to use safe work practices and procedures. People are expected to be aware of the hazards within their area of responsibility and properly use prescribed PPE.

The operations, work methods and individual job sites present specific hazards which must be identified, analyzed, and matched with the appropriate PPE through a continuing hazard assessment process.

DUTIES OF THE PPE PROGRAM ADMINISTRATOR

The primary duties of the Program Administrator include: hazard assessment; PPE selection; PPE training; and monitoring of our PPE Program. Certain types of PPE may require hands-on training before on the job use (primarily for sizing and fitting) and this training may be further delegated to competent persons.

The Franchise Manager is the Program Administrator.

HAZARD ASSESSMENT AND PPE SELECTION

A careful, systematic personal protective equipment selection process is used to identify what, if any, protection is required to reduce or eliminate the possibility of eye, hand, foot, limb, or head injury.

Hazard assessment starts with a thorough knowledge of job sites, work procedures and methods of operation. The basic hazard categories are: impact; penetration; compression; chemical; heat; harmful dust; and light radiation.

Identifying the source of the above hazards allows for consideration of administrative or engineering controls to eliminate the hazard as opposed to providing protection against it. Examples would include: ventilation, temporary weather barriers, non-slip surfaces, etc..

Because administrative and engineering controls are passive -- no employee involvement is required -- they are preferable to PPE.

A PPE selection is made by analyzing the above information and evaluating the type of risk, the level of risk, the potential for injury and the possible seriousness of that injury. PPE, which is compatible with the above risks and work situation, is considered.

In all situations where it has been determined that a particular type of PPE is to be used, it will be used regardless of job title or function.

DISSEMINATION OF PPE SELECTION INFORMATION

Employees must understand when PPE is necessary and what type(s) of PPE are necessary.

All persons for whom PPE will provide a measure of safety will be given appropriate training on that item of PPE as well as an explanation of the importance of its use.

ANSI STANDARDS AND PPE

Most PPE safety products are manufactured in accordance with ANSI standards. Because products are tested in the manner in which they are designed to be used, ANSI certification is valid only if the user follows the manufacturer's instructions for proper sizing, fitting, wearing, and adjusting. For example, a hard hat worn with the bill toward the rear may provide adequate protection from impact, however, because it is tested with the bill toward the front, this improper use is cause for a safety violation.

Individually owned PPE must be approved for use. Further, such equipment must be properly maintained and cleaned in accordance with the manufacturer's instructions.

SIZING AND FITTING

The word "personal" in the phrase "personal protective equipment" correctly implies that the equipment is for a specific person. As such, sizing and fitting are important for a variety of reasons.

- a. Function: an improperly fitted piece of PPE may not do its job.
- b. Comfort: the likelihood of continued use is increased if the PPE selected is comfortably fitted.
- c. Safety: ill-fitting PPE may actually cause an accident.

Most PPE come in a variety of sizes and within those size groups, adjustments may be made to affect a perfect fit. It is important to understand the procedures for donning, adjusting, using, and removing PPE. Each person who is required to use any type of PPE will be taught, before initial issue, the specific procedures for properly donning, adjusting, using, and removing the specific PPE.

CARE AND MAINTENANCE OF PPE

PPE will be visually inspected before each use and if defects are noticed, it will not be used. Some types of PPE are expendable (cotton gloves) and have a limited life span after which they are discarded and new PPE is reissued. Plastic safety glasses become scratched and they too must be exchanged for new ones when vision is impaired. Other types of safety equipment consist of both non-expendable and expendable components. A hard hat is non-expendable, yet the head band does wear out and becomes expendable. PPE will be maintained in accordance with the manufacturer's instructions and, where appropriate, kept in a sanitary condition.

Cleanliness takes on an added importance when dealing with PPE designed to protect the eyes and face. Dirty or fogged lenses can impair vision and, rather than offer protection from a hazard, actually becomes a contributory factor in causing an accident.

Lastly, should PPE become contaminated with a chemical substance and decontamination is impossible, the PPE will be properly disposed of following the disposal instructions on the Material Safety Data Sheet for that substance.

TRAINING

Affected people will be given an understanding of:

- a. when PPE is necessary;
- b. what PPE is necessary;
- c. how to properly put on, take off, adjust, and wear PPE;
- d. the limitations of the PPE; and,
- e. the proper care, maintenance, useful life and disposal of the PPE.

Retraining will be given in situations when changes in PPE requirements render the previous training obsolete or it is noticed that an employee is not following our PPE policies -- specifically, not properly wearing the selected PPE in identified locations or work situations.

As a contractor, we are not required to have a PPE Program, per se, nor is the hazard assessment a *specific* requirement. In fact, there is no hand protection standard. Construction standards are short and to the point. The complete standard for head protection is printed below:

Title: Head protection.

- (a) Employees working in areas where there is a possible danger of head injury from impact, or from falling or flying objects, or from electrical shock and burns, shall be protected by protective helmets.
- (b) Helmets for the protection of employees against impact and penetration of falling and flying objects shall meet the specifications contained in the CSA.
- (c) Helmets for the head protection of employees exposed to high voltage electrical shock and burns shall meet the specifications contained in the CSA.

Most PPE requirements are obvious and PPE wear is so simple that training is almost unnecessary.

What is important -- vitally important -- is actually using the proper PPE when it is required.

EYE AND FACE PROTECTION

Eye (and face) protection is required when one is exposed to flying particles, chemicals, or injurious light radiation. Types of eye protection include: impact resistant safety glasses; safety glasses with side shields; goggles; goggles with a face seal; face masks; and shaded goggles with varying degrees of darkness.

Affected employees who wear prescription lenses will wear eye protection over the prescription lenses without disturbing the proper positioning of the prescription lenses, or will wear eye protection that incorporates their prescription into the design.

All prescription glasses should be made with impact-resistant lenses. Hardened lenses are resistant to impact and breakage. Safety lenses are similar to hardened lenses but are 1 mm thicker.

All employees who wear contact lenses must also wear appropriate eye and face protection in hazardous environments.

HEAD PROTECTION

Head protection is required when there is a possibility of injury to the head from falling objects and when working near exposed electrical conductors which could contact the head.

FOOT PROTECTION

When purchasing new protective footwear, ensure that it complies with ANSI Z41-1991, "American National Standard for Personal Protection-Protective Footwear".

Certain types of footwear can offer traction, crush protection, penetration protection, dryness, cushion, or ankle-protection.

College Pro Painters strongly recommends wearing steel tip work boots on the jobsite.

HAND PROTECTION

There are numerous types of hand protection (gloves) available -- each with a specific purpose. The most common are general purpose cotton work gloves which provide protection from minor skin abrasions and cold. Proper hand protection must do more than protect your hand; it must allow you to accomplish your job assignment with efficiency as well as safety.

RESPIRATORY PROTECTION

Employees who, by nature of their work, are exposed to harmful aerosols or vapors will be provided negative pressure respirators after training, medical evaluation, and fit testing per a respiratory protection program.

Dust masks may be worn when abatement (removal) of lead paint by scraping is required.

SUMMARY

The true beneficiary of PPE utilization is the user. The whole thrust of this Program is to protect our employees from injury. This is accomplished by, among other things, explaining the process of hazard assessment; the reasons for PPE use; and the necessity of using the PPE selected.

It is the end user's responsibility to ensure the use of the proper PPE on the job site. Please make sure that if you have any questions about the use of the materials that you ask.

