



Benzene Exposure Compliance Program for Construction

The purpose of this program is to inform interested persons, including employees, that the EMA is complying with the OSHA Benzene standard, Title 29 Code of Federal Regulations 1926.1128, which simply references 29 CFR 1910.1028, by:

- Ensuring that no employee is exposed to benzene at concentrations greater than 1 ppm of air averaged over an eight (8) hour period or the STEL of 5 ppm over 15 minutes.
- Knowing when respirators are used to limit employee exposure as required by paragraph (c) of Section 1910.1028, and all requirements of paragraphs (g) of Section 1910.1028, have been met, employee exposure may be considered to be at the level provided by the protection factor of the respirator for those periods the respirator is worn. Those periods may be averaged with exposure levels during periods when respirators are not worn to determine the employee's daily TWA exposure.

This program applies to all abatement, construction, demolition, or renovation work where one of our employees may be occupationally exposed to benzene. All work related to construction, alteration, including painting is included.

Administrative Duties

The Project Manager is responsible for its implementation and maintenance of this program. Copies of this written program may be obtained in EMA written Safety and Health manual or at the corporate office.

This written safety plan covers the multiple potential job sites of EMA

Exposure Assessment

Protection of Employees during Exposure Assessment

When tasks are presumed to generate Benzene exposures greater than the permissible exposure limit (PEL) of 1 ppm of air averaged over an eight hour period, or the STEL of 5 ppm over 15 minutes, we treat affected employees as if they were exposed above the PEL and implement procedures to protect workers until we perform an employee exposure assessment and document that an employee's benzene exposure is not above the PEL.

Based on historical data from previous jobs, we will take measures as recommended in 29 CFR 1910.1028 to protect our employees. These measures include but are not limited to:

- Appropriate respiratory protection (protection factor of 10, 50, or 100 depending on the tasks involved and the estimated exposures).
- Proper personal protective clothing and equipment
- Change areas
- Hand washing facilities
- Biological monitoring

- Training

Initial Determination

We assess each new project to determine if employees may be exposed to Benzene at or above the Action Level of .5 ppm of air as an eight hour TWA or the Short Term Exposure Level (STEL) of 5 ppm over 15 minutes. This initial determination can be based on:

- Employee exposure monitoring.
- Objective data demonstrating that under expected conditions, specific processes, operations, or activities involving benzene cannot result in employee exposure to benzene at or above the PEL or STEL.
- Previous monitoring for benzene exposures within the last 12 months during work operations conducted under workplace conditions closely resembling the processes, types of materials, control methods, work practices, and environmental conditions used and prevailing in your operations.

We base initial determinations on employee exposure data. Our employee exposure monitoring data includes:

- Information, observations, or calculations which would indicate employee exposure to benzene.
- Previous measurements of airborne benzene.
 - Any employee complaints of symptoms which may be attributable to exposure to benzene.

Initial Determination Results

If our initial determination reveals employee exposures to be below the action level, we will conduct periodic air monitoring during operations to confirm that airborne Benzene levels are below the PEL/STEL.

If our initial determination reveals employee exposures to be at the PEL/STEL, we will conduct air monitoring and personal air sampling of 25% of the represented work force.

If our initial determination reveals that employee's exposures will be above the PEL, attempts will be made through administrative and engineering controls to reduce exposures below the PEL. If this should fail to reduce the exposure level, employees shall wear the appropriate level of PPE necessary to reduce exposures below the PEL.

Additional Exposure Assessments

If changes in equipment, process, control, personnel or tasks occur after initial determination, we reevaluate to determine if employees are exposed to higher concentrations of benzene. We will conduct periodic air monitoring of the work site to determine if changes occur in the exposure levels.

Employee Notification

Within five (5) working days of completing an exposure assessment we notify each employee in writing of his/her assessment results. Our procedure for this notification process is that we will post all air monitoring results for employees to review within five (5) working days.

Methods of Compliance

This program is our written strategy and schedule for protecting our workers from benzene exposure. It incorporates all relevant information that relates to this goal, so that we determine whether we appropriately analyzed problems and solutions (including alternatives) relating to benzene exposure.

This program is intended to reduce employee exposure to at or below the PEL/STEL. When all feasible engineering and work practice controls that can be instituted are not sufficient to reduce employee exposure to acceptable levels, appropriate respiratory protection will be provided to supplement such controls.

Our job sites, equipment, and materials are regularly inspected. This company reviews this program at least every six months to revise it as necessary.

To reduce and maintain employee exposures to Benzene at or below the PEL, we have implemented state-of-the art engineering and work practices to include, but not limited to, negative pressure air systems and necessary PPE.

Work Practice Programs

Our jobs are typically multi-employer worksites. The procedure we use to cooperate with other contractors and inform all employees of potential exposure to benzene shall as follows:

- All contractor employees shall receive a site safety orientation to include the hazards of benzene of the site prior to beginning work to include potential operations which may result in benzene exposure.
- Provide a copy of the standard, 1910.1028, to affected employers to ensure they understand their responsibilities under the benzene standard.

As an employer we want to keep our employees fully informed of all aspects of this plan. Our Project Manager/Competent Person will make frequent and regular inspections of the job site, materials, and equipment, and ensure a copy of this written plan is available at the worksite. We review and update our written plan every six months to reflect the current status of the program.

Respiratory Protection

As our engineering controls and work practices are generally sufficient to reduce exposures to at or below the PEL/STEL without the use of respirators, unless an employee specifically requests a respirator, respiratory protection will not be routinely used on our worksites.

During our exposure assessment to document that our employees are not exposed above the PEL/STEL, or during emergencies, we treat employees performing certain operations as if they were exposed above the PEL/STEL. This means providing respiratory protection. Our respirator program includes a co the requirements of 29CFR1910.1028(g). We provide NIOSH approved respirators, recommended in Table 1 of 29 CFR 1910.1028, to employees who request them. Any employee may ask his supervisor for a respirator and one will be provided upon that request in accordance with company policy.

We provide powered air purifying respirators (PAPR) instead of respirators recommended in Table 1 of 29CFR1910.1028 to employees who request them. Any employee who requests a

PAPR through the Project Manager will be provided one upon that request in accordance with company policy.

A copy of our respiratory protection program is include in our written Safety and Health manual.

Protective Work Clothing and Equipment

We provide personal protective equipment as interim protection for employees during exposure assessment, since our employees may be exposed to Benzene (1) above the PEL/STEL without regard to the use of respirators, or (2) to benzene compounds which may cause skin or eye irritation. This outline of our Protective Work Clothing and Equipment policy is included as part of the site plan when required. We provide protective clothing and equipment at no cost to our employees. Eye and face protection shall meet the requirements of 1910.133.

The types of protective clothing provided by our company shall include, but is not limited to: Cotton tyvek coveralls, with hood; Saranex coated tyvek coveralls with hood; latex gloves with taped interfaces, safety glasses, and hardhats where necessary. This equipment is considered disposable, and is to be disposed of at the job site.

We will replace or repair any damaged equipment providing the employee notifies his supervisor of the damage to his protective clothing.

Housekeeping

Our company believes that a rigorous housekeeping program is necessary in jobs where benzene exposure or the potential of benzene exposure to keep airborne benzene levels below permissible limits. This requires a regular housekeeping schedule adapted to exposure conditions on the site.

Hygiene Facilities and Practices

We provide hygiene facilities for our workers and assure they follow good hygiene practices. We prohibit smoking, eating, applying cosmetics, and the presence of tobacco products, foodstuffs, or cosmetics in all work areas where employees are exposed to benzene above the PEL. We make sure worker will comply with these requirements through regular inspections by supervisory personnel. Employees who fail to follow accepted/proscribed hygiene and safety procedures will be subject to disciplinary actions as prescribed by company policy.

Medical Surveillance

Our company supports the practices necessary for early detection of benzene exposure. The medical surveillance program supplements the primary goals of the benzene exposure control program of preventing disease through elimination or reduction of airborne concentrations of benzene, and sources of ingestion. The medical surveillance provisions incorporate both initial and ongoing medical surveillance.

We provide initial medical surveillance to employees who are occupationally exposed to airborne benzene levels greater than the action level 30 days a year or above the PEL for greater than 10 days a year. This monitoring consists of visits with the physician to include a detailed occupational history and laboratory analysis per 1910.1028(i), as required. To ensure appropriate medical surveillance is performed, we provide to the physician and/or representative copies of the

regulation and appendices, a description of the employees duties, a list of the personal protective equipment worn by the employee, and past exposure assessment data.

All medical examinations, procedures, and blood Benzene level sampling/analysis shall be conducted by licensed healthcare practitioners and/or physicians. Our medical surveillance program shall meet the requirements of 29CFR1910.1028(i).

Medical Removal Protection

We remove employees from work who have exposures to benzene at or above the action level each time a periodic and a follow-up bioassay indicate hematological findings pursuant to 1910.1028 (i)(8)(i) or (ii). We also remove employees from work who have exposures to benzene at or above the action level when a health care professional determines that they have medical conditions which, when exposed to benzene, places them at greater risk for those health problems. Employees who are removed from work will receive all wages, benefits, for a period of 6 months without loss of seniority or promotion opportunities. The company reserves the right to place an employee in a position, of equal responsibility, where the employee will not be exposed occupationally to benzene.

Employee Education and Training

Employees can do much to protect themselves from the risks of occupational benzene exposure if they know about them. In our training programs we inform employees of the specific hazards associated with their work environment, protective measures which can be taken, and their rights under the standard (Including the contents of 29 CFR 1910.1028 and appendices A & B) prior to the time of initial assignment

Signs

Because exposure to benzene is a serious health hazard, we post signs that warn employees of benzene hazards and of the possible need to use respirators and other protective equipment in the area. Appropriate benzene warning signs will be provided at all entrances and exits to the work area. Additionally, employees will be instructed as to the meanings of the various signs at the worksite during training.

Record keeping

We maintain accurate biological and environmental monitoring records of employee exposures to potentially toxic materials, including benzene. We allow employees unlimited access to their records.

We include the following exposure monitoring records:

- Exposure assessment
- Medical surveillance results
- Medical removals
- Objective data for exemption from requirement for initial monitoring
- Procedures for making records available
- Procedures for transfer of records

