Currently under construction to meet the June 2017 requirements

Purpose

The purpose of an exposure control plan (ECP) is to set out our approach to protecting workers from harmful exposure to airborne silica dust.

A combination of control measures will be required to achieve this objective. We commit to being diligent in our efforts to select the most effective control technologies available, and to ensure that the best practices, as described in this ECP, are followed at our worksites.

The work procedures we establish will protect not only our workers but all workers on our worksites.

Definitions

- **Action level** means a concentration of airborne respirable crystalline silica of 25 µg/m3, calculated as an 8-hour TWA.
- **Assistant Secretary** means the Assistant Secretary of Labor for Occupational Safety and Health, U.S. Department of Labor, or designee.
- **Director** means the Director of the National Institute for Occupational Safety and Health (NIOSH), U.S. Department of Health and Human Services, or designee.
- **Competent person** means an individual who is capable of identifying existing and foreseeable respirable crystalline silica hazards in the workplace and who has authorization to take prompt corrective measures to eliminate or minimize them. The competent person must have the knowledge and ability necessary to fulfill the responsibilities set forth in paragraph (g) of this section.
- **Employee exposure** means the exposure to airborne respirable crystalline silica that would occur if the employee were not using a respirator.
  High-efficiency particulate air [HEPA] filter means a filter that is at least 99.97 percent efficient in removing mono-dispersed particles of 0.3 micrometers in diameter.
- **Objective data** means information, such as air monitoring data from industry-wide surveys or calculations based on the composition of a substance, demonstrating employee exposure to respirable crystalline silica associated with a particular product or material or a specific process, task, or activity. The data must reflect workplace conditions closely resembling or with a higher exposure potential than the processes, types of material, control methods, work practices, and environmental conditions in the employer's current operations.

- **Physician or other licensed health care professional [PLHCP]** means an individual whose
  legally permitted scope of practice (i.e., license, registration, or certification) allows him or her
  to independently provide or be delegated the responsibility to provide some or all of the particular health care services required by paragraph (h) of this section.
- **Respirable crystalline silica** means quartz, cristobalite, and/or tridymite contained in airborne particles that are determined to be respirable by a sampling device designed to meet the
  characteristics for respirable-particle-size-selective samplers specified in the International
  Organization for Standardization (ISO) 7708:1995: Air Quality – Particle Size Fraction Definitions
  for Health-Related Sampling.
- **Specialist** means an American Board Certified Specialist in Pulmonary Disease or an American Board Certified Specialist in Occupational Medicine.

Key Responsibilities

Due to the significant risk posed by respirable silica, it is critical that all personnel involved in operations that could potentially create silica dust take specific action to ensure that, as much as possible, a hazard is not created.

COMPANY is responsible for:

- Substitution of less hazardous products for those that contain crystalline silica is required.
- Ensuring that the materials (e.g., tools, equipment, personal protective equipment) and other resources (i.e., worker training materials) required to fully implement and maintain this exposure control plan (ECP) are readily available where and when they are required.
- Providing a job-specific ECP for each project, which outlines in detail the work methods and practices that will be followed on each site. Considerations will include
- Availability and delivery of all required tools/equipment
- Scope and nature of grinding work to be conducted
- Control methods to be used and level of respiratory protection required
- Coordination plan
- Conducting a periodic review of the effectiveness of the ECP. This would include a review of the available dust-control technologies to ensure these are selected and used when practical.
- Initiating sampling of worker exposure to concrete dust when there are non-standard work practices for which the control methods to be used have not been proven to be adequately protective.
- Ensuring that all required tools, equipment, and personal protective equipment are readily available and used as required by the ECP.
- Ensuring supervisors and workers are educated and trained to an acceptable level of competency.

- Maintaining records of training, fit-test results, crew talks, and inspections (equipment, PPE, work methods/practices).
- Coordinating the work with the prime contractor and other employers to ensure a safe work environment.

The supervisor (foreman and lead hand) is responsible for:

- Obtaining a copy of the ECP from the employer, and making it available at the worksite Selecting, implementing, and documenting the appropriate site-specific control measures
- Providing adequate instruction to workers on the hazards of working with silica-containing materials (e.g., concrete) and on the precautions specified in the job-specific plan covering hazards at the location
- Ensuring that workers are using the proper respirators and have been fit-tested, and that the results are recorded
- Directing the work in a manner that ensures the risk to workers is minimized and adequately controlled
- Communicating with the prime contractor and other sub-contractors to ensure a safe work environment

The worker is responsible for

- Knowing the hazards of silica dust exposure
- Using the assigned protective equipment in an effective and safe manner
- Setting up the operation in accordance with the site-specific plan
- Following established work procedures as directed by the supervisor
- Reporting any unsafe conditions or acts to the supervisor
- Knowing how and when to report exposure incidents

Silica Properties

Silica is the second most common mineral on earth and makes up nearly all of what we call “sand” and “rock.” Silica exists in many forms—one of these, “crystalline” silica (including quartz), is the most abundant and poses the greatest concern for human health. Some common materials that contain silica include:

- Rock and sand
- Topsoil and fill
- Concrete, cement, and mortar
- Masonry, brick, and tile
- Granite, sandstone, and slate
- Asphalt (containing rock and stone)
- Fibrous-cement board containing silica

Silica is a primary component of many common construction materials, and silica-containing dust can be generated during many construction activities, including:

- Abrasive blasting (e.g., of concrete structures)
- Jackhammering, chipping, or drilling rock or concrete
- Cutting brick or tiles
- Sawing or grinding concrete
- Tuck point grinding
- Road construction
- Loading, hauling, and dumping gravel
- Demolition of structures containing concrete
- Sweeping concrete dust

Unprotected workers performing these activities, or working in the vicinity, can be exposed to harmful levels of airborne silica. Workers in other industries can also be exposed to silica, for example in the manufacture of toothpaste or pottery, or when loading coal (which can contain quartz) into the hold of a ship.

Health Hazards

Exposure to silica has been shown to cause silicosis, lung cancer, pulmonary tuberculosis and other airway diseases. Crystalline silica dust can cause a disabling, sometimes fatal disease called silicosis. The fine particles are deposited in the lungs, causing thickening and scarring of the lung tissue. The scar tissue restricts the lungs' ability to extract oxygen from the air. This damage is permanent, but symptoms of the disease may not appear for many years.

A worker may develop any of three types of silicosis, depending on the concentrations of silica dust and the duration of exposure:

- Chronic silicosis—develops after 10 or more years of exposure to crystalline silica at relatively low concentrations
- Accelerated silicosis—develops 5 to 10 years after initial exposure to crystalline silica at high concentrations
- Acute silicosis—develops within a few weeks, or 4 to 5 years, after exposure to very high concentrations of crystalline silica

Initially, workers with silicosis may have no symptoms; however, as the disease progresses, a worker may experience:

- Shortness of breath
- Severe cough
- Weakness

These symptoms can worsen over time and lead to death. Exposure to silica has also been linked to other diseases, including bronchitis, tuberculosis, and lung cancer.

Code of Practice

COMPANY has a code of practice governing the storage, handling, use and disposal of silica if there is potential for exposure. The code of practice includes measures to be used to prevent the uncontrolled release of silica and the procedures to be followed if there is an uncontrolled

release. Engineering controls such as ventilation or wet methods must be used to control silica-containing dusts.

Risk Identification, Assessment and Control

The potential for worker exposure to silica should be identified during the hazard assessment. A worker's exposure to silica is kept as low as reasonably achievable. Employees must not be exposed to airborne concentrations of silica in excess of 0.025 mg/cubic meter over an 8 hour time period. Atmospheric testing results should be assessed before a worker is exposed.

A key step in developing a silica exposure control plan is to identify the work activities that would put workers at risk of exposure.

- Work activities — that may generate airborne silica dust—For silica, the route of exposure is through the inhalation of airborne dust. The employer should have a qualified person review the planned work activities to identify those that may generate airborne silica.
- Identify workers at risk of exposure—For example, workers who finish concrete would be at greater risk of exposure than plumbers or electrical workers.
- Amount of exposure—Some work activities generate more dust than others, and the amount of exposure should be estimated. Published resources are available that provide air sampling data and compare silica dust levels from various construction activities.
- Duration of exposure—Workers who grind concrete for a full shift would be at greater risk than workers jackhammering for an hour.

Control Options

Effective control options must be used to eliminate or reduce the risk to workers from the hazards of silica dust exposure. The following hierarchy of control measures must be followed:

- Elimination/substitution (e.g., using products with less silica or using work methods that would eliminate the need for surface grinding)
- Engineering controls (e.g., water, local exhaust ventilation, enclosure)
- Administrative controls (e.g., coordination of tasks with subcontractors, signage)
- Personal protective equipment (e.g., coveralls, respiratory protection)

Our firm commits to developing knowledge and expertise about these controls, and to establishing policies/procedures to protect workers from harmful exposure and to minimize reliance on respirators. Effective engineering controls such as HEPA vacuum attachments and wetting methods, which control silica dust at its source, are readily available. These controls have been proven to reduce airborne dust levels significantly when selected and operated in accordance with best practices. We know that engineering controls alone do not reduce airborne silica to safe levels; so in most cases other control measures, including respiratory protection, will be necessary.

If we take on a job that could release an unusually high amount of dust, and we are unsure of the adequacy of our control measures, we will conduct air sampling in order to ensure that control methods are protective.

We will reduce or eliminate worker exposure to silica dust by selecting a combination of the following controls listed in order of preference:

- Elimination and substitution
- Engineering
- Administrative
- Personal protective equipment

Elimination and Substitution
We recognize the importance of planning the work in order to minimize the amount of silica dust generated. During the project planning phase, we will advocate for the use of methods that reduce the need for cutting, grinding, or drilling of concrete surfaces (e.g., formwork planning). Whenever possible, we will schedule work when concrete is still wet, because we know that much less dust is released at that time.

Engineering Control of Dust
Selecting an appropriate control measure depends on the specifics of the operation. In some cases, local exhaust ventilation (LEV) is more effective at controlling exposure (e.g., during grinding operations) than wetting methods. In a different application, wetting may be more effective (e.g., during cutting operations) than LEV. However, using LEV may reduce the amount of final cleaning required, as the silica dust is captured.

Our dust control systems may employ three well-established techniques:

- Local exhaust ventilation (LEV)
- Wet dust suppression (WDS)
- Restricting or isolating the work activity with barriers or full enclosures (this may be the only option where LEV or WDS is not practical or effective)

Local Exhaust Ventilation (LEV)
When LEV is used in our work, we will employ the following systems and safe work practices:

- Vacuum attachment systems to capture and control the dust at its source whenever possible.
- Dust control systems (used regularly and well maintained).
- Grinding wheels operated at the manufacturers' recommended rpm (operating in excess of this can generate significantly higher airborne dust levels).
- Retrofit shrouds or exhaust cowlings for corner grinding; use manufacturer-specified rpm speeds and a well-maintained HEPA vacuum.
- Diamond stone grinders, which allow for the use of a more efficient suction casing on the grinder, whenever practicable.
- HEPA or good quality, multi-stage vacuum units approved for use with silica dust. [The vacuum units should be capable of creating a target airflow of at least 70 cfm. This

should achieve a face velocity at the shroud of about 1.3 m/s (260 fpm)—the higher the face velocity, the more dust captured at source.]

- Work planning, so that concrete grinding can be completed when wet (dust release can be significantly reduced).
- Good housekeeping work practices (for example, use vacuums with high-efficiency particulate air (HEPA) filters, or use wet sweeping).
- Train workers and supervisors on how to properly use and maintain the equipment.

Wet methods for Dust Control

When water spray systems are used in our work, we will follow these safe work practices:

- Pneumatic grinders will be used instead of electric-powered grinders if water is the method of control.
- Pressure and flow rate of water will be controlled in accordance with tool manufacturers' specifications (for cutting saws, a minimum of 0.5 litres of water per minute should be used).
- When sawing concrete or masonry, we will use only saws that provide water to the blade.
- Wet slurry will be cleaned from work surfaces when the work is completed, using a wet vacuum or wet sweeping.

Barriers and Enclosures

When barriers or enclosures are used in our work, we will follow these safe work practices:

- The site foreman will determine the type and design of barrier or enclosure (based on the work activity and the work area) and ensure it is constructed in accordance with the work plan. Barriers may be simple hazard-flagging ribbon or more restrictive hoarding.
- We will use commercially available negative air units when constructing a full enclosure.

Administrative Controls

We will follow these safe work practices:

- Exposure control plans and the site risk assessment/workplan will be submitted to the general contractor prior to the start of work.
- We will establish procedures for housekeeping, restricting work areas, personal hygiene, worker training, and supervision.
- As part of our project planning, we will assess when silica dust may be generated and plan ahead to eliminate or control the dust at the source. We recognize that awareness and planning are key factors in the prevention of silicosis.
- Warning signs will be posted to warn workers about the hazards of silica and to specify any protective equipment required (for example, respirators).
- Work schedules will be posted at the boundaries of work areas contaminated with silica dust.
- Work that generates silica dust will be conducted after hours, when access to other unprotected workers cannot be restricted.
- We will develop a site-specific exposure control plan to cover project-specific issues (e.g., scope of work, project location and site-specific hazards) and to be kept available at the worksite.

Personal Protective Equipment

Respiratory protection

- All workers who wear respirators will do so in adherence with our respirator program.
- Respirators must be selected based upon measured exposure levels and the assigned protection factor of respirators.
- Only approved respirators will be used.
- Workers who wear respirators will be clean-shaven. Filtering face piece respirators give little or no protection to workers with beards, and even a minor growth of stubble can severely reduce the effectiveness of respiratory protection.
- All workers who wear respirators will be fit-tested.
- Workers will be properly trained in the use of respirators, and a high standard of supervision, inspection, and maintenance will be followed.

Protective clothing

COMPANY will provide workers in a restricted area with protective clothing that protects other clothing worn by the worker from silica contamination, ensure that workers' street clothing is not contaminated by silica, and ensure that a worker does not leave a restricted area until the worker has been decontaminated.

Health monitoring

Exposures to airborne concentrations of Silica must be kept below the permissible exposure limits shown in 29 CFR 1910.1000 Table Z-3.

Full shift personal samples shall be representative of the employees regular, daily exposure to silica.

Documentation

Records must be kept of the following:

- All workers who are exposed to respirable silica dust while on the job
- Worker education and training sessions
- Respirator fit-testing
- Equipment maintenance and repair
- Worksite inspections

The exposure control plan must be reviewed at least annually and updated as necessary by the employer, in consultation with the workplace health and safety committee or the worker health and safety representative.

Education and Training

A worker who may be exposed to silica is to be informed of the health hazards associated with exposure to that substance, is informed of measurements made of airborne concentrations of harmful substances at the work site, and is trained in procedures developed by COMPANY to minimize the worker's exposure.

Training is required prior to using silica-containing materials or working in an environment known to contain airborne concentrations of Silica. Periodic refresher training is also required. We will train all silica dust in the following:

- Hazards associated with exposure to silica dust
- The risks of exposure to silica
- Signs and symptoms of silica disease
- Safe work procedures to be followed (e.g., setup of enclosures, disposal of silica waste, personal decontamination)
- Use of respirators and other personal protective equipment (e.g., donning and doffing of personal protective equipment, and cleaning and maintenance of respirators)
- Use of control systems (e.g., LEV and wet methods)
- How to seek first aid (for example, the location and use of eyewash stations)
- How to report an exposure to silica dust

CONTROL PLAN

Date control plan completed:		
Prime contractor:	Superintendent:	
Project manager:	CSO/First aid attendant:	
Project:	Address:	
Company completing work:		
Address:	Contact:	
Contact phone:	Contact fax:	
On-site supervisor(s):		
Worker(s):		
Scope of work to be completed:		
Work start date:	Duration: ☐ Days ☐ Months ☐ Years	
Employer responsible for:		
Supervisor responsible for:		
Worker responsible for:		

HAZARDS IDENTIFIED (other than silica	**CONTROL MEASURE(S)**
☐ Falls	
☐ Slipping	
☐ Confined space	
☐ Workers above	
☐ Workers below	
☐ Noise	
☐ Electrical	
Overview of work procedure (How are you going to work safely?):	

Workers trained in (training records must be available for review):			
Proper use of grinding equipment	Y☐ N☐	Proper use of admin controls	Y☐ N☐
Proper use of engineering controls	Y☐ N☐	Proper use of PPE	Y☐ N☐
Proper disposal methods	Y☐ N☐	Other (fall protection, swing stages, etc)	Y☐ N☐

Respirators (Refer to ECP for respirator requirements)		
Required: Y☐ N☐	Available: Y☐ N☐	Fit-tested: Y☐ N☐

PPE required for scope of work (other than respirator)

☐ Coveralls ☐ Gloves ☐ Rubber boots ☐ Eye protection ☐ Reflective vest ☐ Hearing protection

Documents to be attached to control plan (☑ if present)

☐ Exposure control program ☐ Respiratory protection program ☐ Training records ☐ SWP (tools and equipment)

Project management signature	Position:	Date:
Contractor supervisor signature	Position:	Date:

Task/risk management matrix (relating to silica dust) use table 1 for codes, separate with a comma (,)

#	Date/Duration		Task	Controls		PPE	Supplies/ Equipment
				Engineering	Administrative		

Notes (For task/risk management matrix above. Use # to indicate which task the note relates to.)

SITE INSPECTION CHECKLIST (complete pre-work & periodically during project)

Engineering controls		Problem noted (DETAIL)	Problem corrected (DETAIL)
Available at site	Y☐		
Operating correctly	Y☐		
Used appropriately	Y☐		
Effective in dust control	Y☐		
Administrative controls			

Available at site	Y☐		
Used appropriately	Y☐		
In place before work start	Y☐		
Effective	Y☐		
Cleanup			
Vacuum used properly	Y☐		
Large pieces picked up	Y☐		
Vacuum capacity maintained	Y☐		
Pre-filters in place	Y☐		
Vacuum attachments used	Y☐		
Collection bags in place	Y☐		
Waste properly disposed of	Y☐		

TABLE 1 (Codes for task/risk management matrix)

Engineering controls		Administrative controls		PPE		Supplies/Equipment	
1	Exhaust fan	1	Signage	1	Respirator	1	Hand grinder
2	LEV	2	After hours work	2	Gloves	2	Ceiling grinder
3	Wetting	3	Scheduling	3	Coveralls	3	Floor grinder
4	Partial enclosure			4	Hearing protection	4	Disposal bags
5	Full enclosure			5	Eye protection	5	HEPA filter (vacuum)
6	Shroud			6	Reflective vest	6	HEPA filter (respirator)
7	Barriers			7	Rubber boots (CSA)	7	Shovel
				8	Fall arrest	8	Lifeline

SITE-SPECIFIC SILICA EXPOSURE CONTROL PLAN

Location: _____ **Date:** _____

Work description:

Primary silica control options (check those options used and explain use if needed)

- Substitution controls (using procedures or products that do not create silica; must review MSDSs)
  - Other means of demo: _____
  - Different products: _____
  - Other substitutions: _____

- Engineering controls (when using ventilation, draw air out and don't expose others to exhaust dusts)
  - Vacuuming: _____
  - Wetting: _____
  - Ventilation: _____
  - Isolation: _____
  - Other means: _____

- Administration controls (reducing exposure by work schedules, timing, or planning options)
  - Control points: _____
  - Work schedule: _____
  - Other means: _____

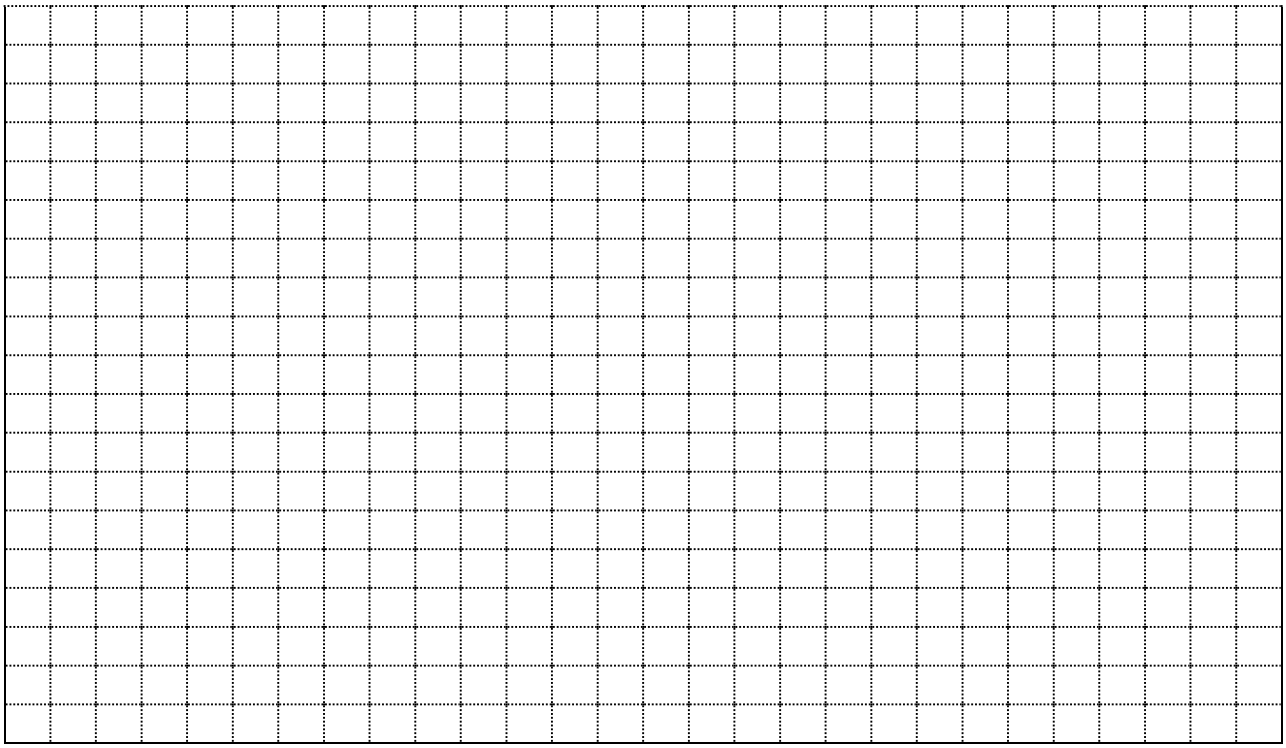
Secondary silica control options (check those options used and explain use if needed)

- Personal protective equipment
  - Half-mask respirators: _____ Cartridge type: _____ Fit tests confirmed: _____
  - Full-face respirators: _____ Cartridge type: _____ Fit tests confirmed: _____
  - Supplied air units: _____
  - Coveralls required: _____

- Hygiene and decontamination options (reducing exposures after work has stopped or during breaks)
  - Water or washing facilities on site: _____
  - Vacuuming clothing/self: _____

  Safe work procedures and other details: _____

Ventilation plan (sketch)



⇦ Show direction of airflow including makeup air locations and discharge air outlets

Area or location in building of ventilation plan (e.g., floor #, wing)

Date plan was reviewed by workers and posted for workers to see

Types of neg. air fans & no.'s *
* Indicate on plan by number the location of the negative air fans

Ventilation safety checklist

- ☐ Makeup air free of possible contaminants
- ☐ Exhaust fan operation has failure warning
- ☐ Dilution fans not stirring up dust
- ☐ Wetting of materials used to keep dust down
- ☐ Workers not placed between contaminants created and exhaust inlet ports
- ☐ Discharge air not affecting others
- ☐ All workers equipped with approved respirators

Note: Attach additional sheets if needed or other documents if required due to hazards or work conditions.

Print supervisor's name

Supervisor's signature