SECTION 8 - SCAFFOLDING SAFETY

Standard References: 29 CFR 1926.451, 29 CFR 1926.452, 29 CFR 1926.453, 29 CFR 1926.454

8.1 Scope

Demo Company LLC uses scaffolding to provide elevated working platforms on roofing jobs, particularly for:

- Roof edge access on multi-story structures
- Eave and fascia work
- Parapet wall repair and flashing installation
- Any situation where ladders are impractical for extended work

8.2 Competent Person Requirements

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Foundation:

- Set scaffold on level, stable base - use mudsills (minimum 2×10 lumber) under each leg
- Adjust screw jacks to level frames - screw jacks must not extend more than 18 inches beyond the base plate, or per manufacturer specifications, whichever is less
- All casters (mobile scaffolds) must be locked before anyone climbs the scaffold

Frames and Cross Bracing:

- Use scaffold components only when they fit together without force and maintain structural integrity; mixed-manufacturer components require competent-person/manufacturer compatibility confirmation before use
- Install all cross braces - never omit or remove them
- Coupling pins must be fully inserted and locked
- Plumb the scaffold within 1/4 inch per 3 feet of height in any direction

Planking:

- Scaffold planks must be scaffold-grade lumber or manufactured scaffold decking rated for the intended load
- Planks must extend 6-12 inches beyond the end support (overhang), or be cleated to prevent movement
- Planks must be laid tight - no gaps greater than 1 inch between planks
- Never use damaged, cracked, or painted planks

Access:

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- Midrail: Approximately halfway between top rail and platform
- Toeboard: Minimum 3.5 inches high at all open sides and ends
- All rails must withstand 200 lbs applied in any direction

8.4 Scaffold Load Capacity

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8.5 Moving Scaffolding (Rolling/Mobile Scaffolds)

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- [ ] All frames plumb and cross braces in place
- [ ] Screw jacks within 18-inch extension limit
- [ ] Mudsills in place and undisturbed
- [ ] All planks solid, properly lapped, and free from damage
- [ ] Guardrails and toeboards intact at all required levels
- [ ] Ladder or stair access present and secured
- [ ] No debris accumulation on platforms
- [ ] No indication of settling or sinking at base
- [ ] Casters (if mobile) locked

Any failed item = scaffold out of service until corrected.

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All employees who work on scaffolding must be trained per 29 CFR 1926.454 before using scaffolding. Training covers:

- Nature of electrical, fall, and falling object hazards
- Maximum intended load and capacity
- Proper scaffold erection, use, and dismantling
- Inspection procedures
- Procedures for dealing with overhead power lines (minimum 10-foot clearance from energized lines)

Training is documented and signed by the employee.

SECTION 9 - HEAT ILLNESS PREVENTION PROGRAM

Standard Reference: OSHA General Duty Clause, Section 5(a)(1) of the OSH Act; NIOSH Recommended Exposure Limits (RELs)

9.1 Policy Statement

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Heat illness is a serious, preventable hazard for roofing crews. Working on dark roofing surfaces in direct sunlight can create radiant heat temperatures far exceeding air temperature. Demo Company LLC maintains a comprehensive heat illness prevention program applicable whenever employees work outdoors in warm or hot conditions.

Heat-related illness can escalate rapidly from heat cramps to heat exhaustion to fatal heat stroke. Every supervisor and employee must know the signs, prevention measures, and emergency response.

9.2 Heat Index Action Levels

Demo Company LLC uses the OSHA/NIOSH heat index chart as a guide:

Heat Index | Risk Level | Action Required
Below 80 deg F | Lower Risk | Normal precautions - hydration, shade access
80-90 deg F | Precautionary | Provide water and shade access; remind workers of heat illness signs at toolbox talk; monitor new and returning employees per acclimatization schedule; supervisors aware of forecast
91-103 deg F | Moderate Risk | Mandatory rest breaks, cool water every 15 min, buddy system
103-115 deg F | High Risk | Increase rest break frequency, move heavy work to cooler hours, monitor workers closely
Above 115 deg F | Very High/Extreme | Strongly consider suspending non-essential outdoor work; consult with safety officer before proceeding

Roof surface temperatures can exceed air temperature by 40-70 deg F on clear days. Supervisors must account for radiant heat from dark roofing materials, not just air temperature.

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Acclimatization Schedule:

- Days 1-3: Maximum 50% of full workload in hot conditions
- Days 4-5: Maximum 60% of full workload
- Days 6-10: Gradually increase to 100% workload
- A competent person must monitor new employees during acclimatization

9.4 Hydration Requirements

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- Alcohol, energy drinks, and caffeinated beverages are discouraged during high-heat conditions (they promote dehydration)

9.5 Rest Breaks & Shade

- All employees must have access to shade or a cool rest area (below 85 deg F where feasible) during rest breaks
- Rest areas may include shaded areas on the ground, an air-conditioned vehicle cab, or a temporary shade structure
- In high heat (103 deg F+), mandatory rest breaks of at least 10 minutes per hour in shade are required
- Employees must not be discouraged from taking shade breaks when needed
- Employees who report feeling ill during heat conditions must be immediately moved to a cool/shaded area

9.6 Signs & Symptoms of Heat Illness - Employee Training

Heat Cramps:

- Symptoms: Muscle pain, spasms (usually legs, abdomen)
- Response: Move to shade; drink water/electrolytes; light stretching; monitor for progression

Heat Exhaustion:

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- Symptoms: High body temperature (above 103 deg F); hot, red, dry or damp skin; rapid/strong pulse; confusion, slurred speech, unconsciousness
- Response: Call 911 immediately. Cool the worker by ANY means available - move to shade/cool area, apply ice or cold water to armpits, neck, and groin, fan the worker. Do NOT give water to an unconscious person. Do NOT leave the worker alone.

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During high-heat conditions (Heat Index >= 103 deg F) or for new employees during acclimatization, Demo Company LLC uses a buddy system:

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9.8 Daily Heat Monitoring

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9.9 Communication & Emergency

- All supervisors must have a charged mobile phone or two-way radio on high-heat days
- Before mobilization, the supervisor completes and posts the jobsite emergency action sheet with the actual site address, directions for EMS, nearest appropriate emergency facility, and route map for that specific job location
- Emergency contact: James Mitchell - Site Emergency Coordinator ((512) 438-2107)

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Standard References: 29 CFR 1926.150, 29 CFR 1926.151, 29 CFR 1926.152, 29 CFR 1926.153

10.1 Scope

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- Only trained and authorized employees may operate roofing torches
- New employees must demonstrate proficiency under direct supervision before working independently
- Authorization is documented in the employee's training file
- Maria Gonzalez maintains a current list of authorized torch operators

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- [ ] Hot work permit issued (see 10.4) if required by building owner or GC
- [ ] A fire watch person is designated and present
- [ ] Fire extinguishers selected for the hazard are placed within 30 feet of the work: at minimum, appropriately rated ABC dry-chemical extinguisher(s) for ordinary/flammable-liquid/electrical exposures; water extinguishers may supplement only for Class A combustibles and must not be described as ABC-rated
- [ ] Combustible roofing debris cleared from a minimum 35-foot radius of torch work area
- [ ] Combustible material on walls and parapets protected or removed
- [ ] Propane hose connections inspected for leaks using soapy water solution
- [ ] Propane cylinder stored upright and secured
- [ ] Cylinders not used as a torch rest or step
- [ ] All workers in the area notified of torch work in progress

10.4 Hot Work Permits

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The hot work permit must specify:

- Work location and duration
- Type of hot work
- Fire prevention measures in place
- Name of fire watch
- Signature of issuing supervisor

Hot work permits are retained with project records for a minimum of 3 years (aligned with general training record retention).

10.5 Propane Cylinder & Torch Safety

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- Use torch manufacturer-approved regulator and hose assembly - inspect before every use
- Hose must be inspected for cracks, cuts, abrasions, and connections
- Check all fittings for gas-tight connections (propane leak test: soapy water - never use a flame to check for leaks)
- Use a striker to ignite the torch - never use a lighter or cigarette
- Never point a lit torch at another person
- Extinguish the torch when not actively applying membrane - never leave lit torch unattended
- Maintain clearance from combustible structures - direct flame must not contact combustible substrate
- Pay special attention to roof penetrations, curbs, and parapet walls where flames can track into the building

10.6 Fire Watch Requirements

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10.7 Post-Work Fire Inspection

- After completing torch work and the 30-minute fire watch, the supervisor must conduct a final inspection of the work area
- Check for: smoke, odor, discoloration, or heat in combustible substrates
- Report any concern to Maria Gonzalez and do not leave the site until cleared
- Secure and remove all propane cylinders from the roof at end of each day

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1. Call 911 immediately if fire is beyond incipient stage (larger than a wastebasket fire)
2. Alert all workers on roof and building occupants
3. Use fire extinguisher only if fire is small and you have a clear escape route
4. Evacuate immediately if fire extinguisher fails or fire grows - do not fight a large fire
5. Supervisor reports fire to James Mitchell - Site Emergency Coordinator and completes incident report

SECTION 11 - CHEMICAL HANDLING & EXPOSURE CONTROL

Standard References: 29 CFR 1910.1200, 29 CFR 1926.95, ACGIH TLV guidelines

11.1 Scope

Roofing work involves frequent exposure to potentially hazardous chemicals including adhesives, solvents, coatings, and primers. This section supplements the HazCom Program (Section 4) with handling and exposure control procedures specific to roofing chemicals.

11.2 Common Roofing Chemical Hazards

Solvent-Based Adhesives & Contact Cements:

- Contain flammable solvents (toluene, MEK, heptane, naphtha)
- Health hazards: CNS depression, skin/eye irritation, potential carcinogenic solvents in some products
- Controls: Ventilation, nitrile gloves, chemical goggles, avoid smoking or ignition sources

EPDM/TPO Splice Cleaners & Primers:

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1. Elimination: Use water-based products where performance allows
2. Substitution: Choose lower-VOC or reduced-hazard formulations when available
3. Engineering controls: Work upwind; natural ventilation; avoid low spots or enclosed areas where vapors accumulate
4. Administrative controls: Limit time of exposure; rotate workers; schedule heavy chemical work in coolest part of the day
5. PPE: As required by SDS (Section 5 of this program covers specific PPE requirements)

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- Contain the spill: use absorbent material (vermiculite, sand, or commercial absorbent)
- Eliminate ignition sources in the area immediately if spill is flammable
- Do not allow spill to enter drains, gutters, or storm water systems
- Properly dispose of contaminated absorbent material as waste per SDS guidance
- Report spills that cannot be immediately contained to Maria Gonzalez
- Large spills of hazardous materials may require reporting to local authorities

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- Use proper lifting technique: bend knees, keep back straight, lift with legs, hold load close to body
- Maximum recommended single-person lift: 50 lbs (general guideline - OSHA does not set a specific weight limit; assess each lift based on conditions) - use two people or mechanical assist for heavier loads
- Avoid twisting while lifting - reposition your feet, not your back
- Use knee pads and work gloves when handling roofing materials

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Mechanical Hoist (Material Lift/Forklift):

- Only certified/trained operators may operate material lifts or telehandlers
- Inspect hoist or lift daily before use (forks, hydraulics, tires, capacity plate)
- Never exceed the rated capacity of hoisting equipment
- Establish a fall zone / barricade at the base of the hoist - no workers allowed under suspended loads
- All loads must be stabilized and secured on the lift before elevating
- Use load nets or securing straps for loose bundles of shingles or insulation boards

Ladder Hoist (Gas or Electric Powered):

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- For short distances or light loads only
- Workers carrying materials up ladders must maintain three-point contact where possible, or use a material rope/bucket haul system
- Never carry materials that block the view of ladder rungs

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- Consult structural drawings or building owner before stacking heavy materials (tile, slate, concrete pavers) on any roof structure
- Rooftop material staging: Do not use a generic default roof-load value. Obtain structural capacity confirmation from drawings, owner/GC documentation, manufacturer guidance, a qualified person with actual basis, or a licensed design professional before staging concentrated materials on a roof.
- Distribute material stacks across multiple structural members (joists, trusses) - never place concentrated loads mid-span
- Stack shingles in multiple smaller piles rather than one large pile
- Stacks must not exceed 4 feet in height and must be stable - not at risk of falling over
- Keep roof edges and access points clear of stored materials

12.4 Falling Object Protection

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SECTION 13 - SKYLIGHT & ROOF OPENING PROTECTION

Standard Reference: 29 CFR 1926.501(b)(4)

13.1 Hazard

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The fundamental rule: Every skylight and roof opening must be treated as a potential fall hazard and must be protected before work begins in the area.

13.2 Skylight Protection Requirements

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- Covers must support at least twice the maximum intended load
- Covers must be secured to prevent accidental displacement (screws, clips, or heavy weights as appropriate)
- Covers must be marked "HOLE" or "COVER" in large, visible letters (spray paint or marker is acceptable)
- Plywood or manufactured covers must be selected and installed only when they are capable of supporting the intended employee/equipment/material loads and are secured against displacement; do not rely on generic plywood-thickness rules without qualified basis

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- Important: Warning lines alone do NOT satisfy 29 CFR 1926.501(b)(4) for hole/opening protection. Covers or PFAS must remain the primary protection method.
- Warning lines may be erected as an additional visual barrier at least 6 feet from the opening in all directions, supplementing cover or PFAS protection
- A safety monitor must be designated when workers are in the warning line zone (same requirements as Section 6.3 Option B)

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- Never walk on a skylight dome under any circumstances, even if it appears strong
- Never store materials on skylight covers
- Never remove a skylight cover without immediately replacing fall protection
- If a cover must be temporarily removed (active work on the opening), PFAS protection must be rigged before the cover is removed

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- Check weather forecast via NOAA, Weather.gov, or a reliable weather app each morning before dispatching crews
- Monitor real-time radar during the workday when adverse weather is possible
- All crew leaders must have a charged mobile phone available for weather alerts and emergency communication

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Condition | Action
Lightning within 10 miles | Clear roof immediately; all workers to shelter
Active rain on roof surfaces | Suspend roof work - wet surfaces increase fall risk dramatically
Winds exceeding 25 mph | Suspend work at roof edge and on scaffolding; evaluate all work per site conditions
Winds exceeding 40 mph | Suspend all roof work - wind creates fall hazard and reduces footing stability
Ice or frost on roof surface | Do not begin work until surface is clear; inspect for remaining ice near north-facing or shaded areas
Air temperature below 25 deg F | Additional precautions for adhesives, cold-weather application requirements; evaluate per manufacturer guidance

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- The 30-30 Rule: If the time between lightning flash and thunder is 30 seconds or less, seek shelter immediately
- Do not resume work until 30 minutes after the last thunder is heard
- Shelter options: substantial building (not a tent or open structure), hard-topped vehicle
- Rooftops, scaffolding, and metal equipment are extremely dangerous during lightning

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- Conduct a site-specific wind assessment on high-rise or exposed sites
- Material stacks must be secured or tarped before end of workday to prevent wind-blown debris
- Lightweight panels, insulation boards, and sheet metal must be handled by two workers in any wind condition

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15.1 Purpose

When a worker is arrested by a Personal Fall Arrest System, the harness suspension creates a risk of suspension trauma (also called harness hang syndrome). Blood pools in the legs during motionless suspension and can cause loss of consciousness and cardiac arrest within 3-30 minutes. Prompt rescue is a life-safety requirement, not a courtesy.

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- A suspended worker should move their legs (march in place, use foot loops if available) to maintain blood circulation
- Workers who feel lightheaded, faint, or experience shortness of breath while suspended must communicate immediately and be rescued without delay
- Never assume a suspended worker is "fine" - begin rescue immediately and call 911 simultaneously

15.6 Rescue Training

- At least one named rescue-trained worker and one named backup/alternate with documented rescue training date must be assigned on the job-specific rescue sheet before PFAS work begins; otherwise PFAS work is delayed until rescue coverage is confirmed
- Rope-assisted rescue procedures, if used, must comply with ANSI Z359.4 and be practiced by trained personnel; do not assign rope rescue to untrained crews
- Training is conducted annually and documented
- The rescue plan is reviewed at the pre-work safety briefing on any job site using PFAS

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Standard Reference: 29 CFR 1926.35

16.1 Purpose

This Emergency Action Plan establishes procedures for responding to emergencies at Demo Company LLC job sites. All employees must be familiar with this plan.

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16.3 Employee Alarm System

- All supervisors must have a functional mobile phone or two-way radio at all times
- Verbal warning ("Clear the roof!") combined with hand signals or horn/whistle serves as the evacuation alarm when a formal alarm system is not available
- All workers must know the emergency signal before work begins (covered in daily pre-work briefing)

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For each job site, the supervisor must:

- Identify all safe exit routes from the roof and building before work begins
- Designate a ground-level Assembly Point at least 100 feet from the building, away from utility lines and traffic
- Communicate the assembly point to all workers at the pre-work briefing
- Conduct a headcount at the assembly point after any evacuation event

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Standard References: 29 CFR 1926.150, 29 CFR 1926.151, 29 CFR 1926.152, 29 CFR 1926.153

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Primary fire hazards on roofing job sites include:

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- Prohibit smoking within 25 feet of any flammable or combustible material
- All flammable liquids (OSHA Class I) must be stored in approved safety containers with self-closing lids
- Maximum storage of flammable liquids in a single work area: 25 gallons in approved safety cans; larger quantities require an approved flammable storage cabinet
- Excess flammable liquids must be stored off the roof at day's end
- Keep the roof and work area clear of combustible debris (dry felt scraps, wood shims, paper packaging)
- Post "No Smoking" signs where combustibles are stored

17.3 Fire Extinguishers

- A minimum of one appropriately rated ABC dry-chemical fire extinguisher must be present at every active job site for ordinary combustibles, flammable liquids, and energized-electrical exposure potential
- Torch-applied roofing operations require extinguisher coverage within 30 feet of torch work, selected by hazard class; water extinguishers may supplement for Class A combustibles only and are not substitutes for ABC dry-chemical protection where flammable-liquid/electrical hazards are present
- Extinguishers must be inspected monthly (pressure gauge in green zone; tamper seal intact)
- Annual professional maintenance/inspection is required
- All supervisors must know the PASS method: Pull, Aim, Squeeze, Sweep
- Replace or recharge any extinguisher that has been used, even partially

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- Hot work permits
- Fire watch requirements (30 minutes post-torch)
- Propane storage and handling
- Post-work fire inspection

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SECTION 18 - FIRST AID & MEDICAL SERVICES

Standard Reference: 29 CFR 1926.50

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Demo Company LLC ensures that first aid is available at all job sites:

- At least one employee trained in first aid and CPR (current AHA or Red Cross certification) must be present on every job site
- A first aid kit meeting ANSI Z308.1 requirements must be maintained and available at each job site
- The jobsite emergency action sheet must identify the actual nearest appropriate emergency facility and EMS route before work begins
- The first aid kit must be inspected weekly and restocked when supplies are used

18.2 First Aid Kit Contents (Minimum)

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- An eye wash station or portable eye wash bottles must be available at every job site where chemicals are handled
- Portable eye wash bottles: minimum 16 oz (per ANSI Z358.1); recommended 32 oz or pressurized station for roofing chemical exposure scenarios
- Eyes contaminated with chemicals: flush for a minimum of 15 minutes with clean water; then seek medical attention

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- All work-related injuries and illnesses, no matter how minor, must be reported to the supervisor before the end of the shift
- Near-misses must also be reported - a near-miss is a valuable warning
- The supervisor completes a First Aid / Incident Report form for every injury
- Injuries requiring more than first aid must be reported to Maria Gonzalez the same day
- OSHA recordable injuries are entered on the OSHA 300 Log within 7 days of occurrence

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Standard References: 29 CFR 1904.39, 29 CFR 1904.7, 29 CFR 1926.20(b)(3)

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19.2 Definitions

- Near-miss: An event that did not result in injury or property damage but had the potential to do so (e.g., a tool dropped from the roof that narrowly missed a worker)
- First-aid incident: Injury requiring only first aid treatment (not medical care beyond first aid)
- Recordable incident: OSHA-recordable injury or illness (medical treatment beyond first aid, lost work time, restricted duty, loss of consciousness, etc.)
- Serious incident: Hospitalization, amputation, loss of an eye, or fatality
- Property damage: Any unintended damage to equipment, tools, or customer property

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1. Ensure the safety of all workers - address any ongoing hazard first
2. Call 911 for serious injuries
3. Notify Maria Gonzalez within 2 hours of any recordable incident, or within 1 hour of a serious incident
4. Preserve the scene - do not move equipment or clean up until the supervisor has documented the scene (photos, measurements, witness statements)
5. Secure witness statements from all workers who were present as soon as possible

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Step 1: Scene Documentation

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- Identify the immediate cause (what directly caused the injury/incident)

- Identify the contributing causes (conditions that allowed the immediate cause to occur)
- Identify the root cause (why did those contributing conditions exist?)
- Common root causes in roofing: inadequate training, pressure to work fast, missing or bypassed PPE, failure to inspect equipment, unclear procedures

Step 4: Corrective Actions

- Identify specific corrective actions for each root cause
- Assign responsibility and deadlines for each corrective action
- Verify implementation of corrective actions

Step 5: Documentation & Communication

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Texas OSHCON (OSHA Consultation): In Texas, the OSHA On-Site Consultation Program is operated by TDI-DWC under a 21(d) cooperative agreement and branded as OSHCON. Free, confidential on-site consultation - no citations, no penalties. SHARP recognition available. Contact: 1-800-252-7031 or https://www.tdi.texas.gov/oshcon/.

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Texas rule: Texas private employers are generally allowed to choose whether to carry workers' compensation insurance, but construction-project work can trigger special coverage requirements under Texas Labor Code Sec. 406.096 and contract requirements from owners/GCs. Employers that carry coverage are subscribers; employers that do not are non-subscribers under the Texas Workers' Compensation Act. Before this program is issued, Demo Company LLC must identify its current status, verify whether Sec. 406.096 or project contracts require coverage, and keep the matching notices/forms in the safety file.

Demo Company LLC is a workers' compensation subscriber and shall:

- Maintain active workers' compensation coverage through the current carrier, certified self-insurance, or approved self-insurance group
- Post the applicable Texas DWC employee notice in the workplace: Notice 6 (commercial policy), Notice 7 (certified self-insurer), or Notice 10 (self-insurance group), as applicable
- Give the Texas DWC new-employee coverage notice at hire and notify employees within required timeframes if coverage changes or ends