

## SECTION 16: LEAD AWARENESS PROGRAM (ARKANSAS REQUIREMENTS)

Regulatory Basis: 29 CFR 1926.62 (Lead in Construction); 40 CFR Part 745 (EPA RRP Rule); ADH Lead-Based Paint Program (Ark. Code Ann. Sec. 20-27); 29 CFR 1910.1200 (HazCom)

### Scope

HVAC/plumbing workers may encounter lead in:

- Older buildings with lead-based paint on pipe and equipment (pre-1978)
- Lead solder in older copper pipe systems (pre-1986 plumbing)
- Lead gaskets and lead-caulked pipe joints (older cast iron systems)
- Lead-lined tanks and components

### Exposure Limits

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### Arkansas Lead Overlay

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### Renovation, Repair, and Painting (RRP)

EPA has not delegated the RRP Rule (40 CFR Part 745 Subpart E) to Arkansas - it is federally administered in Arkansas by EPA. Contractors performing renovation, repair, or painting activities that disturb more than 6 sq ft (interior) or 20 sq ft (exterior) of lead-based paint in pre-1978 target housing or child-occupied facilities must hold:

- EPA firm certification from EPA
- At least one EPA-certified renovator on-site during the regulated work

OSHA lead in construction (29 CFR 1926.62) applies independently of the EPA RRP Rule for worker exposure.

### Lead Safe Work Practices

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## Stop Work Policy

If lead paint or lead-containing materials are suspected/found in quantities beyond minor surface disturbance, Sarah Martinez assesses whether a full lead compliance program (air monitoring, biological monitoring, regulated areas) is required before proceeding.

## SECTION 17: SILICA EXPOSURE CONTROL PLAN

This section constitutes the Written Exposure Control Plan (WECP) required by 29 CFR 1926.1153(g).

Regulatory Basis: 29 CFR 1926.1153 (Respirable Crystalline Silica in Construction); no AR state delta

### Scope

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### Engineering Controls - Table 1 Compliance (29 CFR 1926.1153, Table 1)

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Do not dry-sweep silica-containing dust - use wet sweeping, wet mopping, or HEPA vacuum. Do not use compressed air to remove silica dust from surfaces.

### Designated Person

Sarah Martinez is the Designated Person responsible for implementing and maintaining this exposure control plan.

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### Active NEPs Affecting Silica Enforcement in Arkansas

OSHA Silica NEP (CPL 03-00-007) authorizes programmed inspections at construction sites where silica-generating work is being performed. Sarah Martinez monitors OSHA's active NEP list and communicates changes to field supervisors during toolbox talks.

## SECTION 18: HEARING CONSERVATION / NOISE EXPOSURE CONTROL

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Regulatory Basis: 29 CFR 1926.52 (Occupational Noise Exposure); 29 CFR 1910.95

If monitoring or objective data indicate employee exposure at or above an 8-hour TWA of 85 dBA, Demo Company LLC implements a hearing conservation process for affected employees including audiometric testing (per 29 CFR 1910.95), hearing protector selection/fitting, and retraining. If exposures exceed the permissible levels in 29 CFR 1926.52 Table D-2, engineering/administrative controls and mandatory hearing protection are implemented immediately.

Use quieter tools and equipment where feasible; maintain bits, blades, bearings, and mufflers to reduce noise output; limit time near high-noise equipment through task rotation; keep unnecessary employees out of high-noise areas.

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## SECTION 19: BRAZING & SOLDERING SAFETY

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Regulatory Basis: 29 CFR 1910.252; 29 CFR 1926.350; 29 CFR 1926.352; 29 CFR 1910.1200

### Pre-Work Checks

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### Ventilation

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### Nitrogen Purge During Brazing

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### Fire Watch

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### PPE for Brazing/Soldering

- Brazing goggles (shade 4-5) or face shield
- Leather welding gloves
- Long sleeves - heat-resistant clothing
- Leather apron for heavy brazing work
- Ventilate work area or use respiratory protection appropriate for fumes (Section 20)

## SECTION 20: RESPIRATORY PROTECTION PROGRAM

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Regulatory Basis: 29 CFR 1910.134

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### Respirator Selection Guide

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No beards, stubble, or other facial hair that interferes with the sealing surface of a tight-fitting respirator facepiece.

### Voluntary Use

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## SECTION 21: TOOL SAFETY PROGRAM

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Regulatory Basis: 29 CFR 1926 Subpart I; 29 CFR 1926.300; 29 CFR 1926.301; 29 CFR 1926.302

- Inspect all tools before each use; remove defective tools from service immediately; tag "DO NOT USE"
- Use the right tool for the job; never modify tools, remove guards, or disable safety features
- Pipe Threading Machines: Never wear gloves, loose clothing, or jewelry that can catch in the rotating chuck; stop machine completely before adjusting die or removing pipe
- Reciprocating Saws and Hole Saws: Secure workpiece; be aware of what's behind the cut surface (electrical wires, gas lines, water pipes)
- Propane/MAPP/Acetylene Torches: See Section 19; never leave a burning torch unattended; store fuel cylinders upright away from heat
- Power Drill and Rotary Hammer: Use HEPA LEV when drilling concrete (silica dust); check for buried utilities before drilling through walls or concrete
- Refrigerant Recovery Equipment: Use only equipment rated for the refrigerant; keep recovery cylinders on a scale - stop filling at 80% of water capacity
- Cordless and Electric Power Tools: GFCI protection required for all 120-volt, single-phase, 15- and 20-ampere receptacles on construction sites per 29 CFR 1926.404(b)(1)

## SECTION 22: EMERGENCY ACTION PLAN

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Regulatory Basis: 29 CFR 1926.35 (Emergency Action Plans)

### Emergency Contacts

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Evacuation Signal: Three short blasts of an air horn OR verbal "EVACUATE NOW"

Assembly Point: Designated by site supervisor before work begins at each new job site; minimum 100 feet from building.

### Refrigerant Emergency Procedures

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Large refrigerant leak:

1. Evacuate the affected area immediately
2. Call 911 if the leak is large and uncontrolled, or if anyone shows exposure symptoms
3. Ventilate the area from outside before re-entry
4. Treat exposure symptoms: fresh air, rest, call Poison Control (1-800-222-1222)
5. Cardiac arrest: CPR/AED - cardiac sensitization can cause ventricular fibrillation

### Confined Space Emergency

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1. Do not enter the space to rescue an incapacitated person without trained rescue personnel
2. Attendant calls 911 immediately
3. Maintain communication with victim if possible
4. Keep space entrance clear for rescuers
5. Have SDS and entry permit available for emergency responders

### Trench Collapse

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1. Do not enter an unstable or collapsed trench to rescue a victim - secondary collapse will kill rescuers
  2. Call 911 immediately
  3. Carefully remove surface soil from above the victim without further disturbing trench walls if safely possible
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## SECTION 23: FIRE PREVENTION PLAN

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Regulatory Basis: 29 CFR 1926.150 (Fire Protection), 29 CFR 1926.151 (Fire Prevention), 29 CFR 1926.152 (Flammable and Combustible Liquids)

### Fire Hazards in HVAC/Plumbing Work

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- Minimum one 10-lb ABC dry chemical fire extinguisher available at all job sites where torch work is performed
- Minimum 2A:10B:C extinguisher on every commercial job site; within 100 feet travel distance of all work areas
- Monthly inspection; annual service
- PASS Method: Pull, Aim, Squeeze, Sweep

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### Flammable Liquid Storage

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- PVC primer and cement stored in approved metal safety cans
- No more than one gallon of flammable liquid per 100 square feet in work areas
- Keep containers closed when not in use; no ignition sources within 10 feet of flammable liquid use or storage

### Fuel Gas Cylinder Safety

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- Acetylene cylinders: maximum working pressure 15 psi; never lay on their side
  - Propane/MAPP cylinders stored upright, away from heat; transport in ventilated vehicle cargo area
  - Cylinder caps secured when not in use; no fuel gas cylinders stored inside buildings overnight unless facility specifically approved
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