Purpose

The purpose of this program is to inform interested persons, including employees, that Trinity Medical Management (“Trinity”) is complying with all OSHA rules as needed to ensure that no employee is exposed to inhalation, ingestion, skin absorption, or contact with any material or substance at a concentration above those specified in the "Threshold Limit Values of Airborne Contaminants for 1970" of the American Conference of Governmental Industrial Hygienists found in the OSHA regulations..

To achieve compliance we must first implement all feasible administrative and engineering controls. However, when such controls are not feasible, we will use protective equipment or other protective measures to keep the exposure of employees to air contaminants within the limits. All equipment and technical measures used to achieve compliance will first be approved for each particular use by a competent industrial hygienist or other technically qualified person.

Administrative Duties

The Training and Compliance Manager is the program coordinator/manager and is responsible for its implementation. Copies of the written program may be obtained at the Operations Office.

Exposure Assessment & Monitoring

We conduct personal or area sampling for gases to measure worker exposures. Air sampling is needed to measure worker exposures and select appropriate engineering controls and respiratory protection. Where data is collected it must be retained to support negative exposure assessments.

We will perform air monitoring as needed to measure the effectiveness of controls.

Gas Monitors

Each employee will use a portable gas detector as required in all high gas hazard areas. The gas monitor must be calibrated per manufacturer's recommendations and contain a current calibration sticker on the monitor providing the date of calibration.

Bump tests are required to be completed at the beginning of each day the monitor is in use per the requesting owner client and manufacturer's guidelines to insure the monitor is functioning correctly.

Recordkeeping

We know recordkeeping is critical for our operations involving gases. Our recordkeeping tasks, at a minimum, include:

- Employee exposure measurements according to chemical-specific regulations;

- Medical surveillance records measurements according to chemical-specific regulations;
- Training records;
- Required notification records according to chemical-specific regulations.

Training

Trinity assures that our employees are trained in Gas Hazards before initial assignment and annually thereafter. We will provide our workers with Gas Hazard Awareness training that includes at a minimum:

- Locations of alarm stations
- Gas Monitoring Equipment- Portable and Fixed Detection
- Gas Alarms
- Gas Hazards- Characteristics of gases, to include oxygen deficiency, oxygen or nitrogen enrichment, carbon monoxide and hydrogen sulfide at a minimum. Hazard training must also include any plant or department specific gases of concern. Training must include signs and symptoms of overexposure
- Personnel Rescue Procedures
- Use and care of Self-Contained Breathing Apparatus (SCBA)- includes donning and emergency procedures (if applicable)
- Evacuation Procedures
- Staging Areas – Primary and Secondary

Gas Hazard Awareness training is documented and available for review.

Methods of Compliance

This section contains our description of the specific means that we will employ to achieve compliance with the requirements of all applicable OSHA regulations.

<u>Administrative procedures, engineering controls, and good work practices</u>

Exposures to gases can be controlled through the use of engineering controls and work practices. Engineering controls are hazard controls designed into equipment and workplaces. Work practices are procedures followed by employers and workers to control hazards. Some of the engineering controls and work practices we may use during work that generate gases are:

- Recognize when gases may be generated and plan ahead to eliminate or control the gas at the source. Awareness and planning are keys to prevention of silicosis.
- When available, use local exhaust ventilation systems to prevent gases from being released into the air.
- Use engineering controls and containment methods to control the hazard and protect adjacent workers from exposures.

Respiratory Protection

We know the OSHA regulation requires us to implement a respirator program when engineering, administrative, and good work practices are not enough to keep gases below their permissible exposure limit (PEL). We will not use respirators as the primary means of preventing or minimizing exposures to airborne contaminants. Instead, we will use effective source controls such as:

- Substitution,
- Automation,
- Enclosed systems,
- Local exhaust ventilation,
- Good work practices.

Such measures will be the primary means of protecting our workers. However, when source controls cannot keep exposures below the PEL, controls will be supplemented with the use of respirators. A respiratory protection program will be established in accordance with 29CFR 1910.134.

Contingency & Emergency Plans

Trinity ensures all employees are aware of our customer's (Owner's) contingency plan provisions including evacuation routes and alarms. Employees participate in emergency evacuation drills and practice rescue procedures.

Communication of Hazards

We will post warning signs to mark the boundaries of work areas contaminated with gases at or above their PELs. Our Communication of Hazards program is supplemented by the requirements of OSHA's Hazard Communication Standard. See this program for further instructions.