

Proof of Training

Print name: _____ Signature: _____ Date: _____

Pneumatic Tools

Purpose

To establish appropriate expectations and safe work practices when working with pneumatic tools such as nail guns, staple guns, jack hammers and chipping hammers.

Scope

This policy will apply to all work performed by employees and subcontractors including, but not limited to the following activities: construction, installation, demolition, remodeling, relocation, refurbishment, testing, and servicing or maintenance of equipment or machines and at other times when pneumatic tools are required.

Responsibilities

Management (Board of Directors and Project Managers)

Management is responsible for 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 program are readily available where and when they are required. Additionally, management will monitor the effectiveness of the program, provide technical assistance as needed, and review the program bi-annually.

Program Manager

Dave Simpson is responsible for the development, documentation, training and administration of the program. This position carries the responsibility of insuring this program is adhered to and that proper reporting is executed.

Supervisors (Superintendents and Foreman)

Supervisors are responsible for ensuring that a task specific job hazard analysis (JHA), also known as a safe work plan, is developed. The JHA will select, implement and document the appropriate site-specific control measures as defined within this policy. Supervisors will direct the work in a manner that ensures the risk to workers is minimized, adequately controlled and that practices defined by this policy will be followed. Supervisors are responsible for ensuring Unger Construction employees and subcontractors are following expectations. Supervisors will be held accountable for enforcing the requirements of this program. Undesirable behavior will not resolve itself, therefore supervisors must be directly involved with modifying behaviors inconsistent with program expectations. Supervisors will be held accountable for enforcing Unger Construction's disciplinary program.

Workers (Employees and Subcontractors)

Unger Construction has high expectations and requires safety excellence for each employee, crew, project and for our entire company. Workers are required to follow the minimum procedures outlined in this program. Workers are responsible for knowing the hazards and the control measures established in the JHA. Workers are responsible for using the assigned PPE in an effective and safe manner. Workers are responsible for stopping unsafe acts and correcting unsafe conditions on the spot as soon as they are discovered. Any deviations from this program must be immediately brought to the attention of your supervisor. Workers that choose to conduct themselves in a manner that is inconsistent with these expectations will be held accountable for those decisions and may incur disciplinary actions.

Hazardous Material Survey

Unger Construction requires hazardous materials surveys before demolition or renovation work begins. The survey shall include all of the following: A visual inspection of a facility or a portion thereof for suspect materials, sampling and laboratory analysis of any suspect materials found for the presence of asbestos. The hazardous materials survey will also furnish a written report that includes: a description of the area(s) visually inspected, a detailed description of any suspect material sampled, the results of any laboratory analysis of suspect materials, the method of analysis, and the total amount of asbestos containing material. Typically a floor or roof plan is included with the report to reference the written information visually.

The person conducting the survey must be certified pursuant to OSHA and/or EPA regulations. The survey may be performed by a certified Site Surveillance Technician (SST) under the supervision of a licensed consultant. Note: The survey may be performed by a certified Site Surveillance Technician (SST) under the supervision of a licensed consultant. Note: The survey needs to be kept in a project file so that it can be accessed when working on future projects.

If lead or asbestos have been confirmed to be present employees and subcontractors must follow Unger Construction's Lead and/or Asbestos program. If hazards such as asbestos or lead will be disturbed during remediation, a properly licensed professional must perform the work and follow appropriate regulations.

Job Hazard Assessment (Safe Work Plan)

Unger Construction utilizes JHA's as our means of hazard assessment and establishing a safe work plan. JHA's are performed by supervisors and/or workers. Our library of hazard assessments is maintained on the "S" drive. Before beginning a new task refer to the JHA library, generally speaking all scopes of our work are covered. For situations that have not yet been covered select one that is substantially similar and use it as a baseline. JHA's on the "S" drive are organized by work area and job description. JHA's include strategies for elimination, substitution, engineering and administrative controls. After applying all appropriate reduction and elimination technique, the remaining hazards will be analyzed and the proper PPE to reduce the hazards will be selected. PPE will be identified for hazards that are in the process of being reduced or eliminated and/or when hazard-reduction efforts are not 100% effective in eliminating the hazards.

For complex or moderate to high hazard tasks, tasks where an additional level of safety planning is needed, the safety director will perform the JHA with the supervisor and workers.

Training

Before any employee is allowed to perform work in areas requiring pneumatic tools, they must first receive training. Each employee must demonstrate an understanding of the required training, and the ability to use pneumatic tools properly, before being allowed to perform work.

Proof of training is available on the "S" drive. The training data base can be sorted by employee name or by subject. This ensures supervisors and employees are able to confirm they have the necessary training and if they don't which employees do. Employees that need training should contact their project manager or superintendent to make arrangements for them to be trained.

Retraining

The need for retraining will be indicated when: An employee's work habits or knowledge indicate a lack of necessary understanding, motivation or skills required to properly use pneumatic tools or equipment, New equipment is installed/purchased, Changes in the workplace make previous training obsolete, or Upon a supervisor request.

Discussion

Pneumatically powered tools present the same hazards as their electrically powered counter-parts, plus some additional hazards. Electrically powered tools have a constant and well-regulated power source this is not the case with pneumatically powered tools. The air pressure source can vary. Too much pressure can cause the tool to perform at speeds above what it was designed for resulting in damage to the tool or the tools accessories. Too low a pressure could cause the user to apply excessive force possibly cause damage to the tool or injury to the user. Make certain the air pressure is adjusted to the manufacturers' recommendations.

Shock Potential: pneumatic tools are not grounded or double insulated. If you contact an energized conductor you could be shocked. Make certain all electric power in the immediate work area is de-energized and properly locked out.

Whipping hose: a severed air hose can whip violently can direct injuries from contact or indirect injuries from reflexes as you remove yourself from the danger area. Protect the hose from physical danger.

Compressed air can be dangerous. Do not use compressed air for cleaning unless the nozzle pressure is less than 30 psi.

Operation, Alteration, Modification, Servicing, Repairing

All pneumatic tools shall be used in accordance to the manufacturers intended design and function and per their written instructions. Safety devices, covers, shields, interlocks and alarms shall be fully functional as the manufacturer intended for them. Pneumatic tools cannot be modified or altered in any way without written approval from the manufacturer or formal approval from a Professional Engineer registered in the State of California. Additionally, approval shall be received from Unger Constructions Director of Safety, Director of Risk Management and the Vice President of Operations. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, warnings and limitations. Pneumatic tools shall be only operated, serviced and repaired by qualified personnel. The

operator is primarily responsible for the safe operation of equipment. They must have knowledge of the safety regulations applicable to the equipment and its operation.

Keep tools clean, lubricated and maintained according to manufactures instructions. Only use attachments and accessories recommended by the manufacturer. Transport and store the tool per the manufactures recommendations.

Pre-task plan

Pre-task plans must be developed for each pneumatic tool. Operators and supporting cast members shall read and sign the Pre-task plan before beginning work. The pre-task plan shall list corresponding potential hazards for each task and the methods to eliminate or control hazards. Tasks should be listed sequentially, in the order in which they will be performed. Personnel protective equipment (PPE) requirements for pneumatic tools are task specific; however, typical PPE includes (vibration gloves, glasses, face shield, respirator, hearing protection and/or metatarsal covers.)

Hoses and Connections

Hoses shall be inspected before each use. The inspection shall look for defects or damage to the mechanical restraints, caps, connectors, kinks, or frays. Suspect hoses shall be taken out of service (red tagged) or immediately repaired by a qualified individual. Hoses must be of the correct inside diameter and not kinked or crushed. Quick disconnects shall be self-venting. The male fitting shall be installed on the tool itself. Make sure the connections fit properly and are equipped with a mechanical means of securing the connection (chain, wire, positive locking device). Do not carry a pneumatic tool by its hose. Avoid creating a tripping hazard by carefully placing the hoses in walking areas. Excess hose shall be coiled away from foot traffic. If an air hose is more than ½ inch in diameter, a safety excess flow valve must be installed at the source of the air supply to automatically shut off the air flow if the line should break. Shut off the air source and release the pressure before disconnecting a hose.

Set up

The work location must be properly set up. To include proper body positions, work space, footing, clamping, visibility, lighting and clearance. Ensure proper ventilation. Protect air hoses from damage.

Inspection

All pneumatic tools must be inspected prior to use to confirm they are in good, safe working condition. Safety guards, shields and protective devices must be properly positioned and functional. Bits blades and other consumable accessories shall be in near new condition before starting the task. Worn or defective consumable accessories must be removed from service immediately. Inspect air hoses for cuts, bulges and abrasions. Ensure the air supplied to the tool is clean and dry.

Performing tasks with pneumatic tools

Check clearances 360 degrees around the point of work. Place high visibility flags on nearby lines or items of concern so workers can clearly distinguish items in the proximity, which should be avoided. Select the size of the blade or bit to reduce over-penetration or excessive blade exposure. Have 3-dimensional awareness of the point of work. Determine what is behind, within, or on the opposite side, of what you are about to drill or cut. Eliminate potential interference's prior to cutting or drilling.

Coordinate your activities with others working around you. Be aware of others working around you; don't let others work below you. When not in use, pneumatic tools must be disconnected from their air source, and properly stowed.