



## Proof of Training

Print name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

### Emergency Spill Procedures

#### Purpose

The purpose of this program is to ensure the protection of employees and subcontractors from the hazards associated with chemical spills.

#### 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 chemicals could be spilled.

### 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 with chemicals or participate on the emergency response team (ERT) they must first receive training. Each employee must demonstrate an understanding of the required training, and the ability to use spill equipment and PPE properly, before being allowed to perform spill cleanup. The training will include the following subjects: Reviewing SDS's, Spill response procedures, general first aid and categories of spills; simple or complex.

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 handle spills, New chemicals are introduced that requires new or different PPE, Changes in the workplace make previous training obsolete, Changes in the types of PPE to be used make previous training obsolete or Upon a supervisor request.

## Periodic Program Review

At least annually, the Program Administrator will conduct a program review to assess the progress and success of the program.

## Background

The potential for spills can be minimized by proper storage, handling techniques and housekeeping practices. Refer to Unger Construction's material handling, storage and housekeeping policies.

Generally speaking the individual(s) who caused the spill is responsible for prompt and proper clean-up. Minor or simple spills do not necessarily need the assistance of projects emergency response team (ERT). Workers who have had the proper training and possess the appropriate equipment can safely and effectively handle the majority of the spills that occur.

## Spill Response Plan

Each project and subcontractor within the project should evaluate the potential for spills and develop a spill response plan. Supervisors and foreman are responsible for developing Spill Response plans. Spill response plans shall be approved by the Unger Construction Project Manager, Superintendent or Safety Director. Spill plans shall be developed and spill response kits before the first chemical arrives on a project site. The chemicals and materials commonly used on Unger Construction projects are separated into three categories: Powders, Non-flammable liquids and Flammable liquids.

If a spill occurs, a quick appropriate response can prevent serious consequences. However, the wrong response can make things worse. Knowing the potential hazards and preparing for them in advance will have a dramatic influence during an actual spill event. The first source of information to consult is the

Safety Data Sheets (SDS). The spill response plan will, of course depend upon the physical characteristics and volume of materials being handled, their potential toxicity, and the potential for releases to the environment.

Spills can be either “Simple Spills” or “Complex Spills”. Cleanup procedures shall be developed to give guidance to knowledgeable personnel on the safe and effective way to clean up small spills. If you have any questions or concerns about the spill cleanup process, contact your supervisor, or Unger Construction's superintendent.

#### Spill Response Kits

Spill response kits shall be placed in areas where the potential for a spill exists. The spill kits shall have absorbent pads, flexible berms and other materials. Spill kits shall be highly visible and are located in the emergency response area. Spill response kits should be staged well away from the material in question to prevent it from becoming captured by the spill and rendered inaccessible. However, the spill kit should be in relative proximity such that timely response is ensured.

#### Sample Spill Plan

The following is a generic spill response plan based on the three common form of chemical or materials used on a construction site. Follow the procedures provided below based on the class and type of material.

#### Nonflammable Liquids

Control the spread of the spill with a dike or adsorbent spill materials. Adsorb the spill with dry sand, kitty litter, inert clay or vermiculite, diatomaceous earth (adsorbent spill materials). Spread the adsorbent over the spill starting with the edges first working from the outside, this will help to confine the spill to a smaller area, circling to the inside or center of the spill. This reduces the chance of splash or spread of the spilled chemical.

Spread enough adsorbent over the spill to completely cover the liquid. Adsorbent should be distributed over the entire spill area there should be no free liquid. Do not walk through the spilled material. When spilled materials have been absorbed, use the plastic scoop to pick up the adsorbent and place it in a polyethylene bag. Seal the bag with tape and attach a sticker or label on the bag identifying the material and the date of the incident. Dispose wastes by following the instructions in the SDS.

#### Flammable Liquid Spills

Immediately alert other workers in the area extinguish all flames, and turn off any spark-producing equipment. Remove all potential sources of ignition (motors, pumps,) it may be necessary to shut off power from a remote circuit breaker.

Determine if supplemental ventilation would improve the situation by diluting or assisting in the evaporation of the liquid. This determination needs to be considered carefully fans could greatly extend the area in which fumes could spread causing other areas outside of the spill to be evacuated. Provide supplemental ventilation using pedestal, carpet or breeze box fans to dilute the gas concentration and provide fresh air to the space.

Control the spread of the spill with a dike or adsorbent spill materials. Adsorb the spill with dry sand, kitty litter, inert clay or vermiculite, diatomaceous earth (adsorbent spill materials). Spread the adsorbent over the spill starting with the edges first working from the outside, this will help to confine the spill to a smaller area, circling to the inside or center of the spill. This reduces the chance of splash or spread of the spilled chemical.

Spread enough adsorbent over the spill to completely cover the liquid. Adsorbent should be distributed over the entire spill area there should be no free liquid. Do not walk through the spilled material. When spilled materials have been absorbed, use the plastic scoop to pick up the adsorbent and place it in a polyethylene bag. Seal the bag with tape and attach a sticker or label on the bag identifying the material and the date of the incident. Dispose wastes by following the instructions in the SDS.

### Powders

Spills of powders should be swept up carefully to avoid contaminating the air and creating an inhalation hazard. Do not add water, use blowers or pressurized airlines this will simply make a bigger mess and contaminate a larger area. Do not walk through the spilled material. Use the plastic scoop to place the spilled material into the polyethylene bag. Care should be taken so as not to create excessive dust or to cause the powder to become airborne. Dispose wastes by following the instructions in the SDS.

### Spill Response Procedures

When a spill occurs communicate with workers in the immediate and surrounding area(s). Inform them of the nature of the spill; suspect materials, relative extent of the spill, complexity of the spill and the initial safe zones that need to be established. Activate the emergency response team providing the same information to them.

Spill response and recovery protocol will be based on the nature of the material (non-flammable liquid, flammable liquid, or powder) and the potential hazards associated with each. Before taking any action, be sure you are not endangering yourself.

Determine if the spill is "Simple" or "Complex". A spill is "Simple" if; no one is injured, the material(s) involved has been identified, the material is not toxic or reactive, the appropriate clean up materials or PPE are available and the spill is not spreading.

A spill is "Complex" if; anyone is injured, the material has not been identified, the material is toxic or reactive, appropriate clean up materials or PPE are not available (note: If an air purifying respirator or self-contained breathing apparatus are needed workers must be; properly trained, fit tested and authorized to respond), the spill is spreading, or a fire or explosion is involved with the spill.

If anyone is injured or contaminated immediately activate the ERT. If you are trained in the hazards and protective equipment of the chemical you can begin to contain the spill and decontaminate the worker. If additional resources are needed or if no one knowledgeable about spill clean-up is available contact your supervisor, Unger Construction's Superintendent or Unger Construction's Safety Director.

Evacuate the affected area, alert others near the area of the spill and have them evacuate too. Secure the area with warning tape, or post staff outside of the affected area so personnel cannot enter the area. Follow the spill response plan. If you are not aware of the spill response plan take the time to develop one before you proceed. Reviewing the Safety Data Sheets (SDS) for spilled materials and follow the

recommended spill cleanup methods, materials and personal protective equipment (PPE). Acquire sufficient quantities and types to contain and clean the spill.

### Cleanup Procedures

In the event of a spill review the spill response plan or develop a spill response plan by reviewing the Safety Data Sheets (SDS) for the recommended spill cleanup methods, materials and personal protective equipment (PPE).

Before you proceed make certain you have all the appropriate are training, knowledgeable and equipped to handle the incident. Never proceed to clean up a spill if you do not know the hazards associated with the material or if you are unsure of how to clean up the spill.

Don the personal protective equipment from the spill kit; splash goggles and gloves.

### Issuing the All Clear

Conduct a thorough inspection with the leadership of the work area before releasing the area. Make certain the spill area has been brought back to pre-spill conditions with respect to health and safety. Conduct air sampling; wipe sampling and other means of independent confirmation that the hazards have been eliminated. The all clear should be issued by the leader of the emergency response team and the senior manager of the affected area. After the all clear is issued the emergency response leader and the area manager shall respond to questions for the affected workers. Once all the questions have been answered the workers can return to the area.

### Post Spill Procedures

Conduct a lessons learned exercise to evaluate the pluses and the deltas. Summarize the lessons learned in a written report and distribute it within 5 business days. Order and restock all of the spill response materials that were used or consumed during the event.

## **General First Aid**

### Hazardous material on skin

Remove contaminated clothing, shoes, jewelry, etc. Flood exposed area with running water from faucet or safety shower for at least 15 minutes. Review SDS's for hazards. Obtain medical attention.

### Hazardous material splashed in eye

Immediately rinse eye and inner surface of eyelid with water continuously for 15 minutes. Forcibly hold eyes and eye lids open and away from the eyeball itself. Rotate the eye slowly to ensure flushing of the entire area around the eye. It is critically important that the flushing occur for the full 15 minutes. Review SDS's for hazards. Obtain medical attention.