

**Modern Protective Coatings, Inc.**  
**Environmental Monitoring Plan Narrative**  
**Dated February 16, 2015**

**Project Name:** Waterbury  
**Project Number:** Vermont Agency of Transportation Project # VT IM 089-2 (43)  
**Project Description:** Cleaning and Painting Bridge Ends and Pier Diaphragms  
**Competent Person:** Joe Kenney  
**Back-up Competent Person:** Scott Roystan and/or Chris Roystan

**Contact Information:**

<b>Office:</b>	<b>(603) 594-3722</b>	
<b>Joe Kenney</b>	<b>Cell (603) 455-6393</b>	<b>Home (603) 648-2942</b>
<b>Scott Roystan</b>	<b>Cell (603) 620-0261</b>	<b>Home (603) 881-3018</b>
<b>Chris Roystan</b>	<b>Cell (603) 620-0262</b>	<b>Home (603) 595-1609</b>
<b>Resident Engineer, Tom Mancini</b>	<b>Cell (802) 279-0558</b>	<b>Trailer (802) 241-1451</b>
<b>Agency Hazardous Waste Coordinator, Andy Shively</b>	<b>(802) 282-2797</b>	
<b>Beck and Bellucci Superintendent, Louie Menard</b>	<b>(603) 455-0754</b>	<b>Trailer (802) 241-1451</b>

**Environmental Monitoring Plan**

To satisfy the requirements of this section, we have included Modern Protective Coatings' site specific Environmental Compliance and Waste Management Plan. Joe Kenney, the Quality Control Supervisor for Modern Protective Coatings, will perform employee exposure monitoring, regulated area monitoring, visible emissions monitoring, and soil sampling. Included is the AIHA accreditation certificate for Schneider Laboratories, as this is the laboratory that we currently utilize.

The site specific program details monitoring activities undertaken by Modern Protective Coatings including: Employee Exposure Monitoring, Regulated Area Monitoring, Visible Emissions Monitoring, and Soil Sampling, along with remediation measures and site clearance evaluations.

We will run TSP (Total Suspended Particulate) monitors for the first containment, with the acceptance criteria of 1.5 micrograms of lead, per cubic meter of air, expressed as a 90 day time weighted average. If the results meet this acceptance criteria then we will discontinue TSP monitoring. We will continue with the regulated area monitoring.

## ENVIRONMENTAL COMPLIANCE AND WASTE MANAGEMENT PLAN

This Environmental Compliance & Waste Management Plan has been developed to invoke project specific environmental compliance and waste handling requirements. It is approved for use by Modern Protective Coatings, Inc. It is reviewed and revised at least every six months. The Modern Protective Coatings, Inc. competent person assigned to the project has the complete authority to implement this program. Additional information is found in the Modern Protective Coatings, Inc. Corporate Environmental Compliance and Waste Handling Programs.

### 1.0 General Information

1.1 Project: # IM 089-2 (43), Bridges 46 North and South on I-89 in Waterbury, Vermont

Brief description of job: Total Removal of lead coatings on bridge ends and at pier diaphragm  
locations using a lumber work platform installed by the General Contractor, a SSPC Class 1A  
containment, steel grit equipment and dust collection, and application of a 3 coat  
zinc/epoxy/urethane NEPCOAT approved coatings system compatible with the fabricator's system.

1.2 Competent Person

Joseph Kenney and/or Scott Roystan and/or Chris Roystan (Name), will be on-site and will act as the competent person for environmental compliance and waste handling issues.

### 2.0 Environmental Compliance Plan

All monitoring will be witnessed by, and documentation initialed by, the Department's Representative. In addition, locations will be documented on a site map and with photos.

2.1 Air Monitoring Measures

The air monitoring methods invoked for this project are (check all that are invoked):

<u>  X  </u> Regulated Areas (Section 5.1)	Performed	Number of Samples	Acceptance Criteria
Initially:	<u>  X  </u>	<u>  2  </u>	<u>&lt;30ug/m3</u>
Bi-Weekly:	_____	_____	_____
As Specified:	<u>  X  </u>	_____	_____
In accordance with Section 5.1:	_____	_____	_____
Performed by Contractor:	<u>  X  </u>	_____	_____
Performed by Owner or Third Party:	_____	_____	_____

*Monitoring will be done at the closest points of public access and will also be in a position to monitor the equipment and containment and therefore, adequately establish the safe zone for the public.*

_____ PM-10 (Section 5.2)	Performed	Number of Samples	Acceptance Criteria
Initially:	_____	_____	_____
Daily:	_____	_____	_____
As Specified:	_____	_____	_____
In accordance with Section 5.2:	_____	_____	_____
Performed by Contractor:	_____	_____	_____
Performed by Owner or Third Party:	_____	_____	_____

*None Required*

	Performed	Number of Samples	Acceptance Criteria
<u>  X  </u> TSP-Lead (Section 5.2) Initially (Background Levels):	<u>  X  </u>	<u>  2  </u>	<u>  N/A  </u>
Daily:	<u>  X  </u>	<u>  2  </u>	<u>  &lt;1.5ug/m3 daily as 90 day T.W.A.  </u>
As Specified:	<u>  X  </u>	_____	_____
In accordance with Section 5.2:	_____	_____	_____
Performed by Contractor:	<u>  X  </u>	_____	_____
Performed by Owner or Third Party:	_____	_____	_____

*Site location will be verified by the Department's third party consultant. Monitoring will be done during the first containment and provided results meet the acceptance criteria, will be discontinued.*

2.2 Visible Emission Evaluations (check all that are invoked):

	Performed	Acceptance Criteria
<u>  X  </u> Method 22 (Total) (Section 5.3) Daily:	<u>  X  </u>	<u>  SSPC level 1  </u>
Weekly:	_____	_____
As Specified:	_____	_____
In accordance with Section 5.3:	_____	_____
Performed by Contractor:	<u>  X  </u>	_____
Performed by Owner or Third Party:	_____	_____

*As per Project Specifications which sets acceptance criteria at 36 seconds per hour, or 5 minutes per 8-hour day. Operations will be shut down and leaks addressed if emissions exceed level 1.*

	Performed	Acceptance Criteria
_____ Method 9 (Opacity) (Section 5.3) Daily:	_____	_____
Weekly:	_____	_____
As Specified:	_____	_____
In accordance with Section 5.3:	_____	_____
Performed by Contractor:	_____	_____
Performed by Owner or Third Party:	_____	_____

*Not Required*

2.3 Other Sampling (check all that are invoked):

	Performed	Number of Samples	Acceptance Criteria
<u>  X  </u> Water Sampling (Decon Water) (Section 5.4) Pre-project:	_____	_____	_____
Post-project:	<u>  X  </u>	_____	<u>  &lt;5` mg/L (lead)  </u>
As Specified:	_____	_____	_____
In accordance with Section 5.4:	_____	_____	_____
Performed by Contractor:	<u>  X  </u>	_____	_____
Performed by Owner or Third Party:	_____	_____	_____

*Water testing non-hazardous will be disposed of by the portable toilet company servicing the project*

	Performed	Number of Samples	Acceptance Criteria
_____ Sediment Sampling (Section 5.4) Pre-project:	_____	_____	_____
Post-project:	_____	_____	_____
As Specified:	_____	_____	_____
In accordance with Section 5.4:	_____	_____	_____
Performed by Contractor:	_____	_____	_____
Performed by Owner or Third Party:	_____	_____	_____

*Not Required*

<u>  X  </u> Soil Sampling (Section 5.5)		Performed	Number of Samples	Acceptance Criteria
	Pre-project:	<u>  X  </u>	<u>  6 (min)  </u>	_____
	Post-project:	<u>  X  </u>	<u>  6 (min)  </u>	_____
	As Specified:	_____	_____	_____
	In accordance with Section 5.5:	_____	_____	_____
	Performed by Contractor:	<u>  X  </u>	_____	_____
	Performed by Owner or Third Party:	_____	_____	_____

*Samples (at a minimum) will be taken under each corner of the bridges, at the waste storage area, and the equipment area. Sample locations will be documented on a site sketch with offsets from fixed reference points.*

2.4 Evaluation of Mechanical Systems (check all that are invoked):

<u>  X  </u> Visual Verification (Section 5.6)		Performed	Acceptance Criteria
	Pre-Project:	_____	_____
	Post-Project:	_____	_____
	As Specified:	_____	_____
	In accordance with Section 5.6:	<u>  X  </u>	_____
	Performed by Contractor:	<u>  X  </u>	_____
	Performed by Owner or Third Party:	_____	_____

*Acceptance criteria are listed on the MPC Mechanical Ventilation Evaluation Form: Visual Inspection.*

<u>  X  </u> Instrument Verification (Section 5.6)		Performed	Acceptance Criteria
	Pre-Project:	_____	_____
	Post-Project:	_____	_____
	As Specified:	_____	_____
	In accordance with Section 5.6:	_____	<u>  100 CFM cross draft  </u>
	Performed by Contractor:	<u>  X  </u>	_____
	Performed by Owner or Third Party:	_____	_____

*Acceptance Criteria are listed on the MPC Mechanical Ventilation Evaluation Form: Instrument Evaluation. These evaluations will be performed initially and bi-weekly using a velometer to measure cross draft air-flow.*

2.5 CERCLA Releases (check all that are invoked):

  X   CERCLA Releases  
(Section 5.7)  
\_\_\_\_\_ Phone # for release reporting:   1-800-424-8802  

2.6 Clearance Testing (check all that are invoked):

  X   Clearance Evaluations  
(Section 5.8)  
*All visible debris is to be picked up at the end of the project.*



3.4 Restricted Waste Handling & Storage (check all that are invoked):

Restricted Waste Handling & Storage  
(Section 6.4)

Project Specific Requirements: \_\_\_\_\_  
\_\_\_\_\_

3.5 Non-Hazardous Waste Handling & Storage (check all that are invoked):

Non-Hazardous Waste Handling & Storage  
(Section 6.5)

Project Specific Requirements: \_\_\_\_\_  
\_\_\_\_\_

3.6 Transportation and Disposal (check all that are invoked):

Transportation and Disposal  
(Section 6.6)

Waste will be disposed

Name, address, and ID of licensed Waste Transporter: EQ Northeast,  
185 Industrial Road, Wrentham, Massachusetts. 02093

Name, address, and ID of licensed Disposal Facility Michigan Disposal Waste Treatment  
Plant, 49350 North I-94 Service Drive, Belleville Michigan 48111, ID#MID 000724831

Performed by Owner or Third Party: \_\_\_\_\_

Waste will be scrapped or recycled:

Name, address of foundry or mill:

Name, address of recycler

Waste transfer of ownership

Contingency Plan and Training (check all that are invoked):

*The hazardous waste manifest shall properly identify the project location with the project number, bridge number and town.*

3.7 Contingency Plan and Training  
(Section 6.7)

PCCP Plan

Training

Spill Documentation

3.8 Other (Requirements required by the specification, that are not part of the Environmental Compliance Plan):

\_\_\_\_\_ Other:

Describe: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_ Other:

Describe: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Pre-Job Hazard Analysis for Project # IM 089-2 (43)**  
**Repainting the Diaphragm Areas on Bridges 46N and 46S in Waterbury, Vermont**

*Description of Activity/Operation:* Clean and paint small areas in preparation for new diaphragms.

*Equipment needed for Activity:* Suspended work platforms, blast machine/recycler, dust collector.

<b>Hazard</b>	<b>Controls or Proper Work Procedures</b>	<b>Implementation Plan</b>
Working over Water	If water is more than waist deep, floatation vests and a life saving skiff will be available, along with life rings and ropes	Fall Protection Program, Section E, Part 3 of the Corporate Worker Safety and Health Program (CWSHP)
Traffic	Fluorescent work vests will be worn at all times when working in and around traffic	Traffic Safety Program, Section A, Part 18.0 of the CWSHP
Lead Dust and Paint Mists	Protective clothing and respiratory protection will be used as well as required training, hygiene, and medical surveillance	Respiratory Protection Program and Protective Equipment Program, Section B of the CWSHP and all sections of the Corporate De-leading Program
Falls	Fall protection equipment consisting of full body harnesses and shock arresting lanyards with double locking snap hooks will be used	Fall Protection Program, Section E of the CWSHP
“Struck By” Injuries	Protective Equipment including but not limited to hard hats and fluorescent traffic vests	Protective Equipment Program, Section B of the CWSHP
Noise	Ear protection will be worn	Hearing Conservation Program, Section G, Part 2 of the CWSHP
Fire, Combustible Liquids	Fire extinguishers located in all company trucks and in the office trailer	Fire Protection and Prevention Program, Section C of the CWSHP
Electrical Shock	Ground fault circuit interrupters and double insulated power tools will be used	Electrical Safety Program, Section H of the CWSHP
Injection (Spray, and Abrasive Blast Equip.)	Employees are trained to use the equipment safely and are aware of the dangers of the improper use of such equipment	Painting and Paint Removal Equipment safety program, Section I of the CWSHP
Power Tools	Proper work practices for this equipment will be followed	Hand, Power, and Pneumatic Tools Program, Section H of the CWSHP
Compressors and Compressed Air	Proper work practices for this equipment will be followed	Compressors and Compressed Air Program, Section I of the CWSHP
Working on Staging Trucks, Work Platforms and Ladders	Employees are trained in proper staging setup and proper work procedures for this equipment	Scaffolding and Ladder safety program, Section D of the CWSHP



**MODERN PROTECTIVE COATINGS, INC.**  
**SITE-SPECIFIC RESPIRATORY PROTECTION PROGRAM**

This Site-Specific Respiratory Protection Program has been developed by the Modern Protective Coatings, Inc. Respirator Administrator to comply with the OSHA Respiratory Protection Standard (29 CFR 1926.103). It is approved for use by Modern Protective Coatings, Inc. The Modern Protective Coatings, Inc. competent person assigned to the project has the complete authority to implement this program. Additional information for implementing the site-specific respiratory protection program is found in the Modern Protective Coatings, Inc. Safety and Health Program (see Section B – Part 2.0).

Name of Project:           #IM 089-2 (43) : Waterbury, Vermont          

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Location of Project:           Bridge 46 North and 46 South on I-89          

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Respirator Program Administrator:           Scott Roystan          

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Competent Person Assigned to Project:           Joe Kenney and/or Scott Roystan          

          And/or Chris Roystan

## 1.0 Respiratory Hazard Evaluation

The activities listed below have been determined by the Respirator Program Administrator to present a respiratory hazard to **Modern Protective Coatings, Inc.** employees. Based on the best available information, the respiratory hazard for each activity has been estimated. Identification and evaluation of respiratory hazards has been performed in accordance with the guidelines in the Modern Protective Coatings, Inc. Respiratory Protection Program (see Attachment 2 – Section B – Part 2.0).

**Data used to estimate levels of respiratory hazards has been attached to this program as an addendum. Where a reasonable estimate could not be performed for a specific activity, the Respirator Program Administrator has determined that an IDLH condition exists.**

<u>Activity</u>	<u>Anticipated Hazard</u> (e.g. oxygen deficiency, specific toxic gases, dusts, mists, etc.)
<u>Erecting/Dismantling Containment</u>	<u>Lead Dust</u>
<u>Blasting/Vacuuming in Containment</u>	<u>Lead Dust</u>
<u>Tending Equipment</u>	<u>Lead Dust</u>
<u>Handling Hazardous Waste</u>	<u>Lead Dust</u>
<u>Painting</u>	<u>Organic Vapors and Isocyanates</u>
<u>Vacuum-Assisted Power Tool Prep</u>	<u>Lead Dust</u>
<u>Estimated Level of Exposure</u>	<u>OSHA Permissible Exposure Limit (PEL)</u>
<u>Erecting/Dismantling Containment</u>	<u>50 ug/m3</u>
<u>Blasting/Vacuuming in Containment</u>	<u>50 ug/m3</u>
<u>Handling Waste/Tending Equipment</u>	<u>50 ug/m3</u>
<u>Isocyanates: unknown</u>	<u></u>
<u>Organic Vapors: unknown</u>	<u></u>

**NOTE: For activities where substance specific OSHA standards are applicable, the exposure assessment requirements of the appropriate standard shall be followed.**

## 2.0 Respirator Selection

Based on the hazard evaluation in Section 1.0, the Respirator Program Administrator has selected respiratory protection as indicated below (guidelines used for selecting respiratory protection can be found in the Modern Protective Coatings, Inc. Respiratory Protection Program in Attachment 3).

<u>Activity</u>	<u>Type of Respirator</u>	<u>Type of Cartridge</u>	<u>Manufacturer</u>	<u>Model</u>
<u>Blast/Vacuum</u>	<u>Supplied Air</u>	<u>None</u>	<u>Bullard</u>	<u>88</u>
<u>Vacuum</u>	<u>PAPR</u>	<u>HEPA</u>	<u>3M</u>	
<u>Tending Equip.</u>	<u>Half-Mask</u>	<u>HEPA</u>	<u>North or 3M</u>	<u>7700 or 6000</u>
<u>Handling Waste</u>	<u>Half-Mask</u>	<u>HEPA</u>	<u>North or 3M</u>	<u>7700 or 6000</u>
<u>Painting and Power Tool</u>	<u>Full-face Mask</u>	<u>Organic Vapors</u>	<u>North</u>	<u>7600 or 5400</u>

<u>Type of Respirator</u>	<u>Assigned Protection Factor</u>	<u>Maximum Concentration Gas/Vapor Cartridge</u>
<u>Half-Mask</u>	<u>10</u>	
<u>Full-face Mask</u>	<u>25</u>	
<u>3M PAPR</u>	<u>1000</u>	
<u>Bullard Air-Supplied</u>	<u>2000</u>	

The competent person shall ensure that only respirators listed in this section are used by Modern Protective Coatings, Inc. employees.

**NOTE: For activities where substance specific OSHA standards are applicable, selection guidance in the appropriate standard shall be followed.**

### 3.0 Employee Qualifications

Prior to the start of site activities, the competent person shall ensure that each Modern Protective Coatings, Inc. employee has met the following qualifications:

- Medical Approval Form (Exhibit 7 – Appendix A)
- Training Acknowledgment Form (Exhibit 8 – Appendix A)
- Fit Test Documentation Sheet (Exhibit 9 – Appendix A)

NOTE: See Modern Protective Coatings, Inc. Safety and Health Program Section B for additional information on these requirements.

### 4.0 Cartridge Change Schedules

This schedule was developed in accordance with the guidelines in Attachment 5 of the Modern Protective Coatings, Inc. Respiratory Protection Program.

**Data used by the Respirator Program Administrator to develop this changeout schedule has been attached to this Site Specific Respiratory Protection Program.**

If gas/vapor cartridges are used, the competent person will implement the following change schedule determined by the Respirator Program Administrator:

Organic Vapor cartridges will be changed out every during every 4 hours of use.

## 5.0 Immediately Dangerous to Life and Health (IDLH) Atmospheres

IDLH atmospheres (are/are not) anticipated.

If IDLH atmospheres are anticipated, the following equipment/procedures will be used:

- Number of stand-by personnel to be located outside the IDLH atmosphere at all times:

\_\_\_\_\_ N/A \_\_\_\_\_

- Respiratory protection (list specific equipment below):

\_\_\_\_\_ N/A \_\_\_\_\_

- Rescue equipment (list specific equipment below, unless the use of rescue equipment is not feasible):

\_\_\_\_\_ N/A \_\_\_\_\_

- Communication methods used between workers and stand-by personnel:

\_\_\_\_\_ N/A \_\_\_\_\_

## 6.0 Respirator Storage

The competent person shall ensure that respirators are cleaned prior to overnight storage and stored in the following area, which should be clean, dry, and secured:

Respirators are to be stored in sealed bags, labeled with the employee's name, and kept on the clean side of the Decontamination trailer, when not in use.

All compressors, tanks, regulators, filters, and air lines are shut down and depressurized after each use. Hose connections shall be protected from contamination. Air lines, filters, and regulators shall be stored in the following area, which shall be clean, dry, and secure:

\_\_\_\_\_ In storage trailer \_\_\_\_\_

Respirator maintenance and repair parts, such as respirator wipes, cartridges, storage bags, replacement valves, straps, etc. are stored in the following area, which is clean, dry, and secure:

Maintenance and repair parts are stored in the cabinet located in the project office/storage trailer. The Respirator Program Administrator is responsible for maintaining adequate supplies of these materials. Personnel are to address all such needs to the Respirator Program Administrator, to be issued the required equipment.

**MODERN PROTECTIVE COATINGS, INC.  
SITE-SPECIFIC LEAD COMPLIANCE PROGRAM**

The attached forms are completed on a project basis to develop a site-specific worker lead protection compliance program.

**MODERN PROTECTIVE COATINGS, INC.**  
**WORKER LEAD PROTECTION COMPLIANCE PROGRAM**

This Lead Protection Compliance Program has been developed to comply with OSHA Construction Industry Lead Standard 29 CFR 1926.62. It is approved for use by Modern Protective Coatings, Inc. It is reviewed and revised at least every six months. The Modern Protective Coatings, Inc. competent person assigned to the project has the complete authority to implement this program. Additional information is found in the Modern Protective Coatings, Inc. Corporate Worker Lead Protection Program.

Name of Project: # IM 089-2 (43): Waterbury, Vermont

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Location of Project: Bridge 46 North and 46 South on I-89

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Anticipated Project Dates: Spring of 2015 until Phased Completion at G.C.'s Schedule

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Competent Person Assigned to Project: Joe Kenney and/or Scott Roystan and/or Chris Roystan

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**Prepared by:**

Signature: \_\_\_\_\_

Name: Scott D. Roystan

Title: Vice President

Date: February 16, 2015

**Approved by:**

Signature: \_\_\_\_\_

Name: Scott D. Roystan

Title: Vice President

Date: February 16, 2015

## WORKER LEAD PROTECTION COMPLIANCE PROGRAM

This Lead Protection Compliance Program has been developed to comply with OSHA Construction Industry Lead Standard 29 CFR 1926.62. It is approved for use by Modern Protective Coatings, Inc. It is reviewed and revised at least every six months. The Modern Protective Coatings, Inc. competent person assigned to the project has the complete authority to implement this program. Additional information is found in the Modern Protective Coatings, Inc. Corporate Worker Lead Protection Program.

1. Project

Brief description of job: Erect containment and perform total removal of lead coatings in selective areas in accordance with Project Specifications and application of a three coat zinc/epoxy/urethane coatings system.

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2. Competent Person

Joe Kenney and/or Scott Roystan and/or Chris Roystan will be on-site and will act as the competent person for occupational health and safety issues. The Competent Person will conduct inspections of the work areas on a daily basis to ensure that control measures, work practices, personal protective equipment, and hygiene facilities are used as prescribed in this document.

3. Schedule

The project is expected to start on April of 2015 and end on at Project Completion according to GC's schedule. This compliance plan will take effect immediately upon project start-up. Work is scheduled to proceed according to the following schedule:

**A Schedule is Provided Separately and is Not Included in this Document**

Week \_\_\_ through \_\_\_: Initial set-up or site mobilization and (description of tasks):

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Week \_\_\_ through \_\_\_ (description of tasks):

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Week \_\_\_ through \_\_\_ (description of tasks):

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Week \_\_\_ through \_\_\_ (description of tasks):

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4. Lead Exposure Activities

Activities which may result in lead exposures:

- Erecting containment
- Abrasive blasting surface preparation
- Vacuuming grit
- Tending equipment
- Handling hazardous waste
- Dismantling containment

Signs are posted around work areas where exposures exceed the Action Level.

5. Equipment

A list of equipment and materials (paint removal, containment, personal protective, etc.) to be used during this project includes:

Steel Grit Recycling Blast Equipment, Dust Collector, Containment Tarps, Work Platform, Respirators, Coveralls, Gloves, Work Boots, Decontamination Trailer, Hand-Wash Station

6. Crew

The work will be completed by a crew of approximately 14 (insert number) workers. Crew leaders and likely assignments are as follows:

Crew 1 Chris Roystan (leader) Task: Surface Prep and Painting

Crew 2 Joe Kenney (leader) Task: Quality Control

Additional workers and job classifications which may be assigned to this project include:

Name: John Finn Job: Blaster/Painter

Name: Mark Kenney Job: Blaster/Painter

Name: Errol Cady Job: Blaster/Painter

Name: John Styles Job: Blaster/Painter

Name: Ron Treddin Job: Blaster/Painter

Name: Ryan Larocque Job: Blaster/Painter

Name: Joshua St. Cyr Job: Laborer

Name: Corey Vien Job: Laborer

Name: Lance Roberge Job: Laborer

Name: Scott Roystan Job: Quality Control/Safety

7. Engineering Control Measures

The primary engineering control methods for this project are (check all that apply):

- Containment
- General Ventilation (abrasive blast cleaning)
- Wet Methods (high pressure water, wet abrasive blast cleaning)
- Local Exhaust Ventilation (needle guns, rotary peening, vacuum blasting)
- HEPA Vacuums
- Other, describe: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Description

A brief description of the engineering controls established are outlined below (i.e. type and size of dust collector, SSPC classification of containment, description of containment and ventilation components). Reference engineering drawings if any and SSPC Guide 6(CON).

We will use an Ipec 30,000 cfm dust collector and an Industrial Vacuum steel grit recycler. We will construct a class 1A containment using a wooden platform installed by the General Contractor and canvas or reinforced plastic containment tarps.

\_\_\_\_\_

Job Responsibilities

Employee job responsibilities with regard to maintaining the controls include (i.e. ventilation inspections, air velocity measurements, work practices, etc.) Forms 4 and 5 or equivalent are used when assessing mechanical ventilation performance.

All relevant inspections mentioned above will be performed by the Competent Person, Joe Kenney or Scott Roystan or Chris Roystan, and will be documented.

\_\_\_\_\_

\_\_\_\_\_

8. Technology Considered in Meeting the Permissible Exposure Limit

The OSHA standards, other publications (e.g. SSPC 93-02 Industrial Lead Paint Removal Handbook) and past project experience have been used to determine the appropriate engineering controls to be used on this project. Alternative methods were considered (Refer to the Modern Protective Coatings Corporate Worker Safety and Health Program, Section G, page G1-1), but determined to be inappropriate for the project for the reasons stated below (e.g. reference project specification):

Project Specifications dictate technology to be used. Work practice programs such as job rotation was considered but not used due to the difference in the level of training and experience required to perform surface preparation relative to the level required for performing laboring activities such as grit recovery (vacuuming), and/or equipment operation.

9. Respirators

Respirators are provided in the context of a complete respiratory protection program. The written respiratory program is found in Attachment 2 of the Corporate Worker Lead Protection Program.

The types of respirators to be used on this project include:

Air Purifying with HEPA Cartridges Acceptable for Use While:

<u>  X  </u>	Half Mask	<u>  Erecting  </u>	<u>  containment,</u>
		<u>  tending equipment,</u>	<u>  handling waste  </u>
<u>  X  </u>	Full Facepiece	<u>  Same as above  </u>	
<u>  X  </u>	Powered Air-Purifying (half or full facepiece)	<u>  Vacuuming  </u>	

Air Supplying Acceptable for Use While:

<u>  X  </u>	Type CE Abrasive Blast Helmet	<u>  Blasting/Vacuuming  </u>
<u>      </u>	Type C Full Facepiece Pressure	<u>      Demand      </u>
<u>      </u>	Other, describe:	<u>      _____      </u>

10. Protective Clothing

Protective clothing provided to employees who may be exposed to lead in excess of the PEL includes:

  Nylon/Canvas Coveralls,    
  Gloves

11. Laundry

Reusable coveralls will be laundered as follows:

Outside Laundry

Name: Uni-First

Address: Industrial Park Drive, Nashua, N.H.

Phone #: 603-888-1323

They have been approved for accepting lead contaminated clothing.

Laundering will be accomplished on-site. See item 14 for additional details.

Other: Nylon/Canvas coveralls will be vacuumed clean and will be disposed of as waste when they become torn and unusable.

12. Disposable coveralls will:

not be used on this project.

allowed for inspection personnel only.

other

13. Hygiene Facilities

Hygiene facilities are provided by:

Modern Protective Coatings, Inc.

Facility Owner

General Contractor

Others (identify) \_\_\_\_\_

The following wash and/or shower facilities will be used to decontaminate workers and will consist of:

On-site decontamination trailer and a portable hand-wash station with running water which shall be located adjacent to the containment at the edge of the regulated area, between the work area and the water cooler.

The wash and/or shower facilities will be located at:

On-site, as close to the operation as is feasible.

Running cold and hot water, soap, and towels will be provided. Hands and face will be washed before all breaks and at the end of the day.

The general decontamination sequence will be:

<u>  X  </u>	Beginning of Shift: <u>Change out street clothes and into work clothes</u>
<u>  X  </u>	Breaks: <u>Wash hands, arms, face</u>
<u>  X  </u>	Lunch: <u>Wash hands, arms, face</u>
<u>  X  </u>	End of Shift: <u>Shower</u>

14. Wastewater

Wastewater (wash and/or laundry water if laundry is accomplished on-site) will be (check which ones apply):

<u>  X  </u>	Collected and filtered on site using (describe system) <u>Three stage lead filtration system</u>
<u>  X  </u>	Disposed of in accordance with prior arrangements made with (name of local water and sewage authority) <u>Portable toilet company</u> <u>servicing the project</u>
<u>      </u>	Containerized for testing and disposal without filtration.
<u>      </u>	Controlled by the Owner or General Contractor.

15. Worker Exposure Air Monitoring Data

Modern Protective Coatings performs its own exposure monitoring, with samples being analyzed by Schneider Laboratories of Richmond, Virginia. Results are communicated to the crew and posted in the job trailer.

Monitoring is done for each job classification using personal sampling pumps at project start-up for a minimum 7-hour shift and are repeated any time there is a change in equipment, containment size/design, or number of blasters. Results are to be communicated to the Department within 4 days.

16. Medical Surveillance Program

A medical surveillance program is in place for all employees assigned to this project who are exposed to lead above the Action Level. The doctor or firm conducting blood lead and ZPP testing is Concentra Medical Center, 156 Harvey Road  
Londonderry, New Hampshire 03053, (603) 644-3330

Worker blood lead levels are measured initially before the onset of work. Blood lead testing is repeated at the following frequency: Entry and Exit levels for project and at least bi-monthly when working with lead

Results are reported to employees on Form 6 or equivalent.

17. Medical Removal Protection

Employees assigned to this project are removed from exposures above the Action Level, if blood lead levels greater than 50 µg/dl occur, or upon recommendation by the examining physician. Their seniority and benefits are protected during the removal period. They are returned to exposures above the Action Level only after 2 consecutive blood lead results are 40 µg/dl or lower, or when the physician indicates that the risk due to exposure no longer exists (in the case of removal for reasons other than blood lead).

18. Administrative Job Rotation Plans

Job rotation may be used on this project to reduce worker exposures to lead on a given day. The job rotation schedule will be as follows (complete if applicable):

Not Applicable (See section 8, Technology Considered in Meeting the PEL)

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19. Multi-Contractor Site Arrangements

The following arrangements will be made with other contractors on-site to inform them of the potential lead exposures and their respective responsibilities (e.g., the General Contractor may provide shower facilities for all contractors on-site):

Modern Protective Coatings will inform other contractors on site of the risks and dangers associated with the project. Other contractors are excluded from the regulated area unless they have their own lead program with training and medical surveillance, established and monitored by their management to protect their employees.

20. Training

All workers who will be exposed to lead above the Action Level have been trained in accordance with all the requirements found in paragraph (l) of 29 CFR 1926.62. The names of the employees trained, the training provider, and the training dates are recorded on Form 7 or equivalent.

Documentation of this training will be submitted to the Department prior to project start-up.

21. Housekeeping

The project site will be kept as clean and lead-free as possible by following procedures listed in the Modern Protective Coatings Worker Safety and Health Program (Section A, Page A13-1) and the Modern Protective Coatings Corporate Deleading Compliance Program (Section 2.8, pages 9 and 10).





## AIHA Laboratory Accreditation Programs, LLC

*acknowledges that*

### **Schneider Laboratories Global, Inc.**

2512 West Cary Street, Richmond, VA 23220-5117

Laboratory ID: 100527

along with all premises from which key activities are performed, as listed above, has fulfilled the requirements of the AIHA Laboratory Accreditation Programs (AIHA-LAP), LLC accreditation to the ISO/IEC 17025:2005 international standard, *General Requirements for the Competence of Testing and Calibration Laboratories* in the following:

#### **LABORATORY ACCREDITATION PROGRAMS**

- ✓ INDUSTRIAL HYGIENE      Accreditation Expires: 05/01/2015
- ✓ ENVIRONMENTAL LEAD      Accreditation Expires: 05/01/2015
- ✓ ENVIRONMENTAL MICROBIOLOGY      Accreditation Expires: 05/01/2015
- FOOD      Accreditation Expires:
- UNIQUE SCOPES      Accreditation Expires:

Specific Field(s) of Testing (FoT)/Method(s) within each Accreditation Program for which the above named laboratory maintains accreditation is outlined on the attached **Scope of Accreditation**. Continued accreditation is contingent upon successful on-going compliance with ISO/IEC 17025:2005 and AIHA-LAP, LLC requirements. This certificate is not valid without the attached **Scope of Accreditation**. Please review the AIHA-LAP, LLC website ([www.aihaaccreditedlabs.org](http://www.aihaaccreditedlabs.org)) for the most current Scope.

  
Larry S. Pierce  
Chairperson, Analytical Accreditation Board

Revision 13: 03/12/2013



Cheryl O. Morton  
Managing Director, AIHA Laboratory Accreditation Programs, LLC

Date Issued: 08/30/2013