



-PERFICUT SITE MANAGEMENT-

Respirable Crystalline Silica Program

1/20/2025

PURPOSE

This Respirable Crystalline Silica Program was developed to prevent employee exposure to hazardous levels of Respirable Crystalline Silica that could result through construction activities or nearby construction activities occurring on worksites. Respirable Crystalline Silica exposure at hazardous levels can lead to lung cancer, silicosis, chronic obstructive pulmonary disease, and kidney disease. It is intended to meet the requirements of the Respirable Crystalline Silica Construction Standard (29 CFR 1926.1153) established by the Occupational Safety and Health Administration (OSHA).

All work involving chipping, cutting, drilling, grinding, or similar activities on materials containing Crystalline Silica can lead to the release of respirable-sized particles of Crystalline Silica (i.e. Respirable Crystalline Silica). Crystalline Silica is a basic component of soil, sand, granite and many other minerals. Quartz is the most common form of Crystalline Silica. Many materials found on construction sites include Crystalline Silica; including but not limited to – cement, concrete, asphalt, pre-formed structures (inlets, pipe, etc.) and others. Consequently, this program has been developed to address and control these potential exposures to prevent our employees from experiencing the effects of occupational illnesses related to Respirable Crystalline Silica exposure.

SCOPE

This Respirable Crystalline Silica Program applies to all employees who have the potential to be exposed to Respirable Crystalline Silica when covered by the OSHA Standard. The OSHA Respirable Crystalline Silica Construction Standard applies to all occupational exposures to Respirable Crystalline Silica in construction work, except where employee exposure will remain below 25 micrograms of Respirable Crystalline Silica per cubic meter of air ($25 \mu\text{g}/\text{m}^3$) as an 8-hour time-weighted average (TWA) under any foreseeable conditions.

RESPONSIBILITIES

Perficut firmly believes protecting the health and safety of our employees is everyone's responsibility. This responsibility begins with upper management providing the necessary support to properly implement this program. However, all levels of the organization assume some level of responsibility for this program including the following positions.

SAFETY COMMITTEE:

- Conduct job site assessments for Silica containing materials and perform employee Respirable Crystalline Silica hazard assessments to determine if an employee's exposure will be above $25 \mu\text{g}/\text{m}^3$ as an 8-hour TWA under any foreseeable conditions.
- Select and implement into the project's ECP the appropriate control measures in accordance with the Construction Tasks identified in OSHA's Construction Standard Table 1; and potentially including (but not limited to) - a written Exposure Control Plan (ECP), exposure monitoring, Hazard Communication training, medical surveillance, housekeeping, and others.

NOTE: OSHA's Construction Standard Table 1 is a list of 18 common construction tasks along with acceptable exposure control methods and work practices that limit exposure for those tasks.

- Ensure that the materials, tools, equipment, personal protective equipment (PPE), and other resources (such as worker training) required to fully implement and maintain this Respirable Crystalline Silica Program are in place and readily available if needed.

- Ensure that Production Managers, Site Managers, Competent Persons, and employees are educated in the hazards of Silica exposure and trained to work safely with Silica in accordance with OSHA's Respirable Crystalline Silica Construction Standard and OSHA's Hazard Communication Standard. Managers and Competent Persons may receive more advanced training than other employees.
- Maintain written records of training (for example, proper use of respirators), ECPs, inspections (for equipment, PPE, and work methods/practices), medical surveillance (under lock and key), respirator medical clearances (under lock and key) and fit-test results.
- Conduct an annual review (or more often if conditions change) of the effectiveness of this program and any active project ECP's that extends beyond a year. This includes a review of available dust control technologies to ensure these are selected and used when practical.
- Coordinate work with other employers and contractors to ensure a safe work environment relative to Silica exposure.

PRODUCTION MANAGER:

- Ensure all applicable elements of this Respirable Crystalline Silica Program are implemented on the project including the selection of a Competent Person.
- Assist the Safety Committee in conducting job site assessments for Silica containing materials and perform employee Respirable Crystalline Silica hazard assessments to determine if an ECP, exposure monitoring, and medical surveillance is necessary.
- Assist in the selection and implementation of the appropriate control measures in accordance with the Construction Tasks identified in OSHA's Construction Standard Table 1; and potentially including (but not limited to) - a written Exposure Control Plan (ECP), exposure monitoring, Hazard Communication training, medical surveillance, housekeeping, and others.
- Ensure that employees using respirators have been properly trained, medically cleared, and fit-tested in accordance with the company's Respiratory Protection Program. This process will be documented.
- Ensure that work is conducted in a manner that minimizes and adequately controls the risk to workers and others. This includes ensuring that workers use appropriate engineering controls, work practices, and wear the necessary PPE.
- Where there is risk of exposure to Silica dust, verify employees are properly trained on the applicable contents of this program, the project specific ECP, and the applicable OSHA Standards (such as Hazard Communication). Ensure employees are provided appropriate PPE when conducting such work.

COMPETENT PERSON AND/OR SITE MANAGER (SUPERINTENDENT, FOREMAN, ETC.)

- Make frequent and regular inspections of job sites, materials, and equipment to implement the written ECP.
- Identify existing and foreseeable Respirable Crystalline Silica hazards in the workplace and take prompt corrective measures to eliminate or minimize them.
- Notify the Production Manager of any deficiencies identified during inspections to coordinate and facilitate prompt corrective action.
- Assist the Production Manager and Safety Department in conducting job site assessments for Silica containing materials and perform employee Respirable Crystalline Silica hazard assessments to determine if an ECP, exposure monitoring, and medical surveillance is necessary.

EMPLOYEES:

- Follow recognized work procedures (such as the Construction Tasks identified in OSHA's Construction Standard Table 1) as established in the project's ECP and this program.
- Use the assigned PPE in an effective and safe manner.
- Participate in Respirable Crystalline Silica exposure monitoring and the medical surveillance program.
- Report any unsafe conditions or acts to the Site Manager and/or Competent Person.
- Report any exposure incidents or any signs or symptoms of Silica illness.

DEFINITIONS

If a definition is not listed in this section, please contact your supervisor. If your supervisor is unaware of what the term means, please contact the Competent Person or your Safety Department.

- Action Level means a concentration of airborne Respirable Crystalline Silica of $25 \mu\text{g}/\text{m}^3$, calculated as an 8-hour TWA.
- Competent Person means an individual who can identify existing and foreseeable Respirable Crystalline Silica hazards in the workplace and who has authorization to take prompt corrective measures to eliminate or minimize them.
- Employee Exposure means the exposure to airborne Respirable Crystalline Silica that would occur if the employee were not using a respirator.
- High-Efficiency Particulate Air (HEPA) Filter means a filter that is at least 99.97 percent efficient in removing monodispersed particles of 0.3 micrometers in diameter.
- Objective Data means information, such as air monitoring data from industry-wide surveys or calculations based on the composition of a substance, demonstrating employee exposure to Respirable Crystalline Silica associated with a particular product or material or a specific process, task, or activity. The data must reflect workplace conditions closely resembling or with a higher exposure potential than the processes, types of material, control methods, work practices, and environmental conditions in the employer's current operations.
- Permissible Exposure Limit (PEL) means the employer shall ensure that no employee is exposed to an airborne concentration of Respirable Crystalline Silica in excess of $50 \mu\text{g}/\text{m}^3$, calculated as an 8-hour TWA.
- Physician or Other Licensed Health Care Professional (PLHCP) means an individual whose legally permitted scope of practice (i.e., license, registration, or certification) allows him or her to independently provide or be delegated the responsibility to provide some or all the particular health care services required by the Medical Surveillance Section of the OSHA Respirable Crystalline Silica Standard.
- Respirable Crystalline Silica means Quartz, Cristobalite, and/or Tridymite contained in airborne particles that are determined to be respirable by a sampling device designed to meet the characteristics for respirable-particle size- selective samplers specified in the International Organization for Standardization (ISO) 7708:1995: Air Quality-Particle Size Fraction Definitions for Health-Related Sampling.
- Specialist means an American Board-Certified Specialist in Pulmonary Disease or an American Board Certified Specialist in Occupational Medicine.

REQUIREMENTS

SPECIFIED EXPOSURE CONTROL METHODS

When possible and applicable, Perficut will conduct activities with potential Silica exposure to be consistent with OSHA's Construction Standard Table 1 (next page). Supervisors will ensure each employee under their supervision and engaged in a task identified on OSHA's Construction Standard Table 1 have fully and properly implemented the engineering controls, work practices, and respiratory protection specified for the task on Table 1 (unless Perficut has assessed and limited the exposure of the employee to Respirable Crystalline Silica in accordance with the Alternative Exposure Control Methods Section of this program).

The task(s) being performed by Perfcut identified on OSHA's Construction Standard Table 1 is/are:

Table 1: Specified Exposure Control Methods When Working with Materials Containing Crystalline Silica

Construction Task or Equipment Operation		Engineering and Work Practice Control Methods	Required Respiratory Protection	
			≤ 4 hours/shift	>4 hours/shift
1a	Handheld power saws (any blade diameter) when used outdoors	<ul style="list-style-type: none"> Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. 	None	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
1b	Handheld power saws (any blade diameter) when used indoors or in an enclosed area	<ul style="list-style-type: none"> Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. 	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
2	Handheld and stand-mounted drills (including impact and rotary hammer drills)	<ul style="list-style-type: none"> Use drill equipped with commercially available shroud or cowl with dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. Use a HEPA-filtered vacuum when cleaning holes. 	None	None
3a	Heavy equipment and utility vehicles for tasks such as grading and excavating but not including demolishing, abrading, or fracturing silica-containing materials	<ul style="list-style-type: none"> Apply water and/or dust suppressants as necessary to minimize dust emissions. 	None	None
3b	Heavy equipment and utility vehicles for tasks such as grading and excavating but not including demolishing, abrading, or fracturing silica-containing materials	<ul style="list-style-type: none"> When the equipment operator is the only employee engaged in the task, operate equipment from within an enclosed cab. 	None	None

When implementing the control measures specified in Table 1, Perfcut shall:

- For tasks performed indoors or in enclosed areas, provide a means of exhaust as needed to minimize the accumulation of visible airborne dust.
- For tasks performed using wet methods, apply water at flow rates sufficient to minimize release of visible dust.

- Where an employee performs more than one task included on OSHA's Construction Standard Table 1 during the course of a shift, and the total duration of all tasks combined is more than four hours, the required respiratory protection for each task is the respiratory protection specified for more than four hours per shift. If the total duration of all tasks on Table 1 combined is less than four hours, the required respiratory protection for each task is the respiratory protection specified for less than four hours per shift.

Alternate Control Methods

- Perfcut will provide control methods that are either consistent with Table 1 or otherwise minimize worker exposures to Silica. These exposure control methods can include engineering controls, work practices, and respiratory protection. Listed below are control methods to be used when Table 1 is not followed:
 - Move any indoor or enclosed work outdoors when possible.

RESPIRATORY PROTECTION

Where respiratory protection is required by this program, Perfcut will provide each employee an appropriate respirator that complies with the requirements of the company's Respiratory Protection Program and the OSHA Respiratory Protection Standard (29 CFR 1910.134).

Respiratory protection is required where specified by the OSHA Construction Standard Table 1, for tasks not listed in Table 1, or where the company has not fully and properly implemented the engineering controls, work practices, and respiratory protection described in Table 1. Situations requiring respiratory protection include:

- Where exposures exceed the PEL during periods necessary to install or implement feasible engineering and work practice controls.
- Where exposures exceed the PEL during tasks, such as certain maintenance and repair tasks, for which engineering, and work practice controls are not feasible; and
- During tasks for which an employer has implemented all feasible engineering and work practice controls and such controls are not sufficient to reduce exposures to or below the PEL.

HOUSEKEEPING

Perfcut does not allow dry sweeping or dry brushing where such activity could contribute to employee exposure to Respirable Crystalline Silica unless wet sweeping, HEPA-filtered vacuuming, or other methods that minimize the likelihood of exposure are not feasible.

Perfcut does not allow compressed air to be used to clean clothing or surfaces where such activity could contribute to employee exposure to Respirable Crystalline Silica unless:

- The compressed air is used in conjunction with a ventilation system that effectively captures the dust cloud created by the compressed air; or
- No alternative method is feasible.

WRITTEN EXPOSURE CONTROL PLAN

When employee exposure on a construction project is expected to be at or above the Action Level, a Written Exposure Control Plan (ECP) will be established and implemented. This ECP will contain at least the following elements:

- A description of the tasks in the workplace that involve exposure to Respirable Crystalline Silica.
- A description of the engineering controls, work practices, and respiratory protection used to limit employee exposure to Respirable Crystalline Silica for each task.
- A description of the housekeeping measures used to limit employee exposure to Respirable Crystalline Silica;
- A description of the procedures used to restrict access to work areas, when necessary, to minimize the number of employees exposed to Respirable Crystalline Silica and their level of exposure, including exposures generated by other employers or sole proprietors.

The written ECP will designate a Competent Person to make frequent and regular inspections of job sites, materials, and equipment to ensure the ECP is implemented.

The written ECP will be reviewed at least annually to evaluate the effectiveness of it and update it as necessary. Having said this, ECP's are project specific, and most project durations do not exceed a year. The written ECP will be readily available for examination and copying, upon request, to each employee covered by this program and/or ECP, their designated representatives, and OSHA.

MEDICAL SURVEILLANCE

Medical surveillance will be made available for each employee who will be required to use a respirator for 30 or more days per year due to their Respirable Crystalline Silica exposure. Medical surveillance (i.e. medical examinations and procedures) will be performed by a PLHCP and provided at no cost to the employee at a reasonable time and place.

Perficut will make available an initial (baseline) medical examination within 30 days after initial assignment, unless the employee has received a medical examination that meets the requirements of the OSHA Respirable Crystalline Silica Construction Standard within the last three years. The examination shall consist of:

- A medical and work history, with emphasis on past, present, and anticipated exposure to Respirable Crystalline Silica, dust, and other agents affecting the respiratory system in addition to any history of respiratory system dysfunction, including signs and symptoms of respiratory disease (e.g., shortness of breath, cough, wheezing), history of tuberculosis, and smoking status and history.
- A physical examination with special emphasis on the respiratory system.
- A chest X-ray (a single postero-anterior radiographic projection or radiograph of the chest at full inspiration recorded on either film [no less than 14 x 17 inches and no more than 16 x 17 inches] or digital radiography systems) interpreted and classified according to the International Labour Office (ILO) International Classification of Radiographs of Pneumoconiosis by a NIOSH-certified B Reader.
- A pulmonary function test to include forced vital capacity (FVC) and forced expiratory volume in one second (FEV1) and FEV1/FVC ratio, administered by a spirometry technician with a current certificate from a NIOSH-approved spirometry course.
- Testing for latent tuberculosis infection; and
- Any other tests deemed appropriate by the PLHCP.

Perficut will make available medical examinations that include the aforementioned procedures (except testing for latent tuberculosis infection) at least every three years. If recommended by the PLHCP, periodic examinations can be more frequent than every three years.

Perficut will ensure that the examining PLHCP has a copy of the OSHA Respirable Crystalline Silica Construction Standard, this program, and the following information:

- A description of the employee's former, current, and anticipated duties as they relate to the employee's occupational exposure to Respirable Crystalline Silica.
- The employee's former, current, and anticipated levels of occupational exposure to Respirable Crystalline Silica.
- A description of any personal protective equipment (PPE) used or to be used by the employee, including when and for how long the employee has used or will use that equipment; and
- Information from records of employment-related medical examinations previously provided to the employee and currently within the control of Perficut.

Perficut will ensure that the PLHCP explains to the employee the results of the medical examination and provides each employee with a written medical report within 30 days of each medical examination performed. The written report shall contain:

- A statement indicating the results of the medical examination, including any medical condition(s) that would place the employee at increased risk of material impairment to health from exposure to Respirable Crystalline Silica and any medical conditions that require further evaluation or treatment.
- Any recommended limitations on the employee's use of respirators.
- Any recommended limitations on the employee's exposure to Respirable Crystalline Silica.

- A statement that the employee should be examined by a Specialist if the chest X-ray is classified as 1/0 or higher by the B Reader, or if referral to a Specialist is otherwise deemed appropriate by the PLHCP.

Perficut will also obtain a written medical opinion from the PLHCP within 30 days of the medical examination. The written opinion shall contain only the following in order to protect the employee's privacy:

- The date of the examination.
- A statement that the examination has met the requirements of the OSHA Respirable Crystalline Silica Construction Standard; and
- Any recommended limitations on the employee's use of respirators.

If the employee provides written authorization, the written opinion shall also contain either or both of the following:

- Any recommended limitations on the employee's exposure to Respirable Crystalline Silica; and/or
- A statement that the employee should be examined by a Specialist if the chest X-ray is classified as 1/0 or higher by the B Reader, or if referral to a Specialist is otherwise deemed appropriate by the PLHCP.

If the PLHCP's written medical opinion indicates that an employee should be examined by a Specialist, Perficut will make available a medical examination by a Specialist within 30 days after receiving the PLHCP's written opinion. Perficut will ensure that the examining Specialist is provided with all the information that the employer is obligated to provide to the PLHCP.

Perficut will ensure that the Specialist explains to the employee the results of the medical examination and provides each employee with a written medical report within 30 days of the examination. The written report will contain:

- A statement indicating the results of the medical examination, including any medical condition(s) that would place the employee at increased risk of material impairment to health from exposure to Respirable Crystalline Silica and any medical conditions that require further evaluation or treatment.
- Any recommended limitations on the employee's use of respirators; and
- Any recommended limitations on the employee's exposure to respirable crystalline silica.

In addition, Perficut will obtain a written opinion from the Specialist within 30 days of the medical examination. The written opinion shall contain the following:

- The date of the examination.
- Any recommended limitations on the employee's use of respirators; and
- If the employee provides written authorization, the written opinion shall also contain any recommended limitations on the employee's exposure to Respirable Crystalline Silica.

HAZARD COMMUNICATION

Perficut will include Respirable Crystalline Silica in the company's Hazard Communication Program established to comply with the OSHA Hazard Communication Standard (29 CFR 1910.1200).

Perficut will make available Safety Data Sheets (SDS's) for Crystalline Silica.

All employees will be trained in accordance with the provisions of the OSHA Hazard Communication Standard and the Training Section of this program. This training will cover concerns relating to cancer, lung effects, immune system effects, and kidney effects.

Perficut will ensure that each employee with the potential to be exposed at or above the Action Level for Respirable Crystalline Silica can demonstrate knowledge and understanding of at least the following:

- The health hazards associated with exposure to Respirable Crystalline Silica.
- Specific tasks in the workplace that could result in exposure to Respirable Crystalline Silica.
- Specific measures Perficut has implemented to protect employees from exposure to Respirable Crystalline Silica, including engineering controls, work practices, and respirators to be used.
- The contents of the OSHA Respirable Crystalline Silica Construction Standard.
- The identity of the Competent Person designated by Perficut; and
- The purpose and a description of the company's Medical Surveillance Program.

Perficut will make a copy of the OSHA Respirable Crystalline Silica Construction Standard readily available without cost to any employee who requests it.

RECORDKEEPING

Perficut will make and maintain an accurate record of all exposure measurements taken to assess employee exposure to Respirable Crystalline Silica. This record will include at least the following information:

- The date of measurement for each sample taken.
- The task monitored.
- Sampling and analytical methods used.
- Number, duration, and results of samples taken.
- Identity of the laboratory that performed the analysis.
- Type of personal protective equipment (PPE), such as respirators, worn by the employees monitored.
- Name, social security number, and job classification of all employees represented by the monitoring, indicating which employees were monitored.

Perficut will ensure that exposure records are maintained and made available in accordance with 29 CFR 1910.1020. Exposure records will be kept for at least 30 years.

The employer shall make and maintain an accurate record of all objective data relied upon to comply with the requirements of the OSHA Respirable Crystalline Silica Construction Standard. This record shall include at least the following information:

- The Crystalline Silica-containing material in question.
- The source of the objective data.
- The testing protocol and results of testing.
- A description of the process, task, or activity on which the objective data were based; and
- Other data relevant to the process, task, activity, material, or exposures on which the objective data were based.

Perficut will ensure that objective data are maintained and made available in accordance with 29 CFR 1910.1020. Objective data records will be kept for at least 30 years.

Perficut will make and maintain an accurate record for each employee enrolled in the Medical Surveillance portion of this program. The record shall include the following information about the employee:

- Name and social security number.
- A copy of the PLHCPs' and/or Specialists' written medical opinions; and
- A copy of the information provided to the PLHCPs and Specialists.

Perficut will ensure that medical records are maintained and made available in accordance with 29 CFR 1910.1020. Medical records will be kept under lock and key for at least the duration of employment plus 30 years. It is necessary to keep these records for extended periods because Silica-related diseases such as cancer often cannot be detected until several decades after exposure. However, if an employee works for an employer for less than one year, the employer does not have to keep the medical records after employment ends, if the employer gives those records to the employee.

PROGRAM EVALUATION

This program will be reviewed and evaluated on an annual basis by the Safety Committee unless changes to operations, the OSHA Respirable Crystalline Silica Construction Standard (29 CFR 1926.1153), or another applicable OSHA Standard require an immediate re-validation of this program.