

**D & M Painting**  
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**D & M Painting**  
**1759 North Batavia Street**  
**Orange, CA 92865**

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### **D & M PAINTING PAINTING OPERATIONS SAFETY PLAN**

#### **1. PAINTING OPERATIONS SAFETY PLAN**

1. D & M Painting knows painting and paint removal present hazards and requires effective controls.
2. Hazards include exposure to toxic materials and flammable or explosive mists, particulates, and vapors.
3. Inhalation of mists and vapors from nearly all paints, solvents, thinners, cleaning chemicals, strippers, and epoxies can be injurious depending upon the agent's toxic characteristics and the amount and method of exposure.
4. Further, many can physically injure the skin and eyes, or be absorbed through the skin.
5. D & M Painting knows that appropriate work procedures, controls, facility design, protective clothing, and equipment can control potential physical and health hazards.

#### **2. PAINTING OPERATIONS SAFETY PLAN PROCEDURES**

##### **Pressure Equipment:**

1. Pressure equipment used in painting operations is hazardous because of the compressed air component; therefore, D & M Painting's Safety and Health Manager will assure that spray-painting equipment is in serviceable condition.
2. On all air-type spraying equipment a pressure regulator valve will be installed in the airline between the compressor and painting equipment.
3. A pressure relief valve and a pressure gauge will be installed between the pressure regulator and pressurized paint containers and/or spray guns.

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4. Pressure relief valves will be set to open at pressures not more than 10 pounds above the required working pressure.

### **Other Equipment:**

D & M Painting's painter's ladders, scaffolds, and other equipment will be inspected prior to use to be certain they are in safe condition.

### **Paint Mixing:**

1. D & M Painting states that paint mixing will be done in designated, adequately ventilated rooms constructed of fire-resistant materials.
2. All sources of ignition will be prohibited in mixing areas.
3. All electrical fixtures or equipment in or within 20 feet of designated paint preparation areas will meet the requirements of the National Electrical Code (NFPA #70) for Class I Division 2 locations.

### **Housekeeping:**

1. D & M Painting knows that good housekeeping is essential to safe operations in paint shops.
2. Paint rooms, booths, etc., will be kept clean with equipment stored in a proper and orderly manner.
3. All solvent or paint-soiled rags will be placed in approved self-closing metal containers plainly marked to indicate the contents.
4. At the end of each day, these containers will be emptied or removed to an approved location for pickup and disposal.

### **3. EMPLOYEE HEALTH EXPOSURES**

1. There is a wide application of organic solvents in painting. All organic solvents have some effect on the central nervous system and the skin.

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2. The principal modes of personnel exposure are inhalation of vapors and skin contact and absorption.
3. Personnel engaged in painting operations will review Material Safety Data Sheets (MSDS) in order to acquaint themselves with the properties and hazards of the solvents that are used.
4. Skin contact with solvents may cause dermatitis, ranging in severity from a simple irritation to actual damage to the skin.

#### **4. PAINTING OPERATIONS PROTECTIVE EQUIPMENT**

1. Personnel engaged in painting and paint removal will wear protective clothing, respiratory devices if required and appropriate face, eye, and hand protection.
2. Eye or face protection is required during scraping or paint preparation (abrasive techniques). Clothing will be changed, as needed, to minimize body contamination.
3. The Safety and Health Manager will be consulted for specific advice on respiratory protection required for specific painting activities.

#### **5. PERSONAL HYGIENE FOR PAINTING OPERATIONS**

1. The hands and face will be kept clean, clothes will be changed when contaminated and hands and soiled objects will be kept out of the mouth.
2. No food or drink will be brought into, or consumed, in paint shops.
3. Personnel will wash their hands prior to smoking or consuming food.

#### **6. POLLUTION AND SPILL PREVENTION FOR PAINTING OPERATIONS**

1. Painting and paint removal operations can cause air and water pollution problems that can impact the local community.

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2. Liquid, solid, and gaseous waste products from painting and paint removal operations will be disposed of in accordance with federal and state air, water, and solid waste pollution control laws and as specified by the Safety and Health Manager.
3. All spills of flammable or combustible liquids will be cleaned up promptly.
4. With major spills, remove ignition sources, evacuate, and ventilate the area, and provide appropriate protective equipment to cleanup personnel.
5. These liquids will not be allowed to enter a confined space, such as a sewer, because of the possibility of an explosion.

**7. FIRE PREVENTION AND PROTECTION FOR PAINTING OPERATIONS**

1. Painting operations of particular concern are those having a fire potential; i.e., paint removal, solvent wipe and paint application by means of spray apparatus.
2. Certain paints, lacquers, varnishes, shellacs, solvents, and thinners are very flammable. These, for the purpose of control, are classified as being flammable.
3. Solvent materials selected to do the residual clean up, after the initial removal, will have a flash point of 140 degrees F or above. D & M Painting near all paint spraying areas will install portable fire extinguishers.
4. The Safety and Health Manager will determine the type of extinguisher that is appropriate.
5. Fire suppression sprinklers installed in spray finishing areas will conform to NFPA 13, provisions for extra hazardous occupancy.
6. Dry chemical, carbon dioxide, or homogenates extinguisher systems may be installed where automatic sprinkler protection is not available.

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**8. SPRAY PAINTING OPERATIONS**

1. Spray painting presents varying degrees of fire hazards, depending on the materials used.
2. Material having a flash point below 140 degrees will be handled very carefully, and precautions are in order even for those having a flash point higher than this.

**9. VENTILATION SYSTEMS FOR PAINTING OPERATIONS**

1. Ventilation and exhaust systems will be in accordance with the standard for Blower and Exhaust Systems for Vapor Removal, NFPA 91.
2. Mechanical ventilation will be in operation while spraying operations are being conducted and for a sufficient time thereafter to assure vapors are completely exhausted.
3. Adequate conditioned make-up air will be provided.
4. The fan-rotating element and its casing will be non-sparking. Ample clearances will be provided to prevent friction-caused fire hazards.
5. Fan blades will be mounted on a shaft rigid enough to maintain alignment when the fan is operating under full load.
6. Exhaust ducts will be protected against mechanical damage, properly supported, and will normally have a separation of at least 18 inches from combustible materials.
7. Air exhaust from spray operations will be directed so that it will not contaminate make-up air being introduced into the spraying area or other ventilation intakes.

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8. Ducts will be periodically inspected for accumulation of paint deposits and will be cleaned as needed
9. Unless the spray booth exhaust duct terminal is from a water-wash spray booth, the terminal discharge point will be at least 6 feet from any combustible exterior wall or roof.
10. Electric motors driving exhaust fans will not be placed inside booths or ducts.
11. Drive belts will not enter the duct or booth unless the belt and pulley within the duct or booth are enclosed or guarded.

**10. STORAGE AND HANDLING FOR PAINTING OPERATIONS**

1. The quantity of paints, lacquers, thinners, solvents and other flammable and combustible liquids kept near spraying operations will be the minimum required for operations but will not exceed 1 day's supply.
2. Bulk storage of these liquids will be in a separate building detached from other buildings or in rooms specifically designed and constructed to meet flammable storage room requirements.
3. No storage of open containers of solvents is permitted.
4. Open containers may only be used for cleaning of painting materials after which the solvent will be transferred back to a closed container for retention or disposal.
5. Supplies of flammable and combustible liquids will be stored in approved fire-resistant safety containers equipped with flash screens and self-closing lids.
6. Operations involving water base latex paints are exempt from the above requirements.



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### **Containers:**

Original closed containers, approved portable tanks, and approved safety cans must be used for bringing flammable or combustible liquids into spray finishing rooms. Open or glass containers will not be used.

### **Liquid Transfer:**

The withdrawal of liquids from containers and the filling of containers, including portable mixing tanks, will be done only in a mixing room or in a spraying area when the ventilating system is in operation. Precautions will be taken to protect against liquid spillage.

### **Grounding:**

Whenever flammable or combustible liquids are transferred from one container to another, both containers will be effectively bonded and grounded. This practice prevents electrical discharge from the accumulation of static charge because of the transfer process.

## **11. ELECTRICAL EQUIPMENT FOR PAINTING OPERATIONS**

1. Electrical wiring and equipment will conform to the provisions of the National Electrical Code (NFPA 70).
2. Electrical wiring located in spray areas will be rigid metal conduit, Type MI cable, or in metal boxes or fitting containing no taps, splices or terminal connections.
3. There is alternative electrical wiring in options when the location is adjacent to (rather than inside) a spray area (NFPA 33).
4. Electrical equipment outside of, but within 20 feet horizontally and 10 feet vertically, of any spraying area and not separated from it by partitions extending at least to the boundary of the location will be of non-spark producing design.

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5. If spraying operations are confined to an enclosed spray booth or room, the space adjacent to the booth or room will be considered non-hazardous except for the space within three feet in all directions from any opening in the booth or room.
6. All metal parts of spray booths and exhaust ducts conveying flammable or combustible liquids or aerated combustible solids will be electrically grounded.

#### **12. LOCATION OF PAINT SHOPS AND SPRAY FINISHING OPERATIONS**

##### **Paint Shops:**

1. Paint shops may be located in specially constructed rooms if they are separated from other operations by fire resistant walls.
2. Paint shops will be provided with automatic sprinkler protection.
3. Avoid locating these shops near ignition sources.

##### **Spray Booths:**

When possible, paint spray booths will be located in the paint shop. All spray booths will be installed to conform to NFPA 33.

##### **Prohibited Locations:**

D & M Painting in a building classified as administrative or public assembly unless a room is specifically designed for that purpose, is protected with an automatic sprinkler system, and is separated vertically and horizontally from such occupancies by not less than two-hour fire resistance construction will not conduct spray finishing operations.

##### **Airless Paint Spraying:**

1. Never point an airless spray gun at any part of the body. Paint can be hypodermically injected into the body by the high operating pressures

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2. Do not disconnect the gun from the fluid hose or the hose from the pump until the pressure has been released from the hose.
3. This is accomplished by first closing off the main line air pressure to the pump and then bleeding off the pressure in the fluid hose by triggering the gun before disconnecting it.
4. When handling the gun but not actually spraying (such as while changing parts or work position), hold the gun by the grip and remove the fingers from the trigger.
5. This will prevent the gun from being activated if the operator will inadvertently tighten his hold due to slipping or stumbling. Guns will be equipped with trigger guards and a safety lock.
6. The lock will be in the non-operating position except when the gun is actually in use.
7. Check all hose connections and fittings to make sure they are tight and not leaking.
8. The fluid hose will be designed to withstand the high pressure to which it is subjected.
9. The hose, gun, and pressure vessel will be equipped with special fittings that are not interchangeable with low-pressure fittings.
10. Check the fluid hose to be sure that there are no weak or worn spots.
11. Make certain the hose does not contact moving parts of machinery, lie over or around sharp edges and corners, or come near objects that would damage it.
12. Check for deterioration caused by exposure to chemicals or ordinary wear and tear. High-pressure leaks from the hose or connections can also cause hypodermic injection

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13. Never pass the finger over the gun orifice to clean it, as this will result in hypodermic injection of paint into the finger.
14. Consult the manufacturer's operating manual for cleaning procedures.
15. The object being sprayed as well as the spray gun will be grounded to prevent static electricity from being created.
16. Periodic continuity checks will be performed to ensure the hose ground wire is intact.
17. The operator will wear eye protection and gloves to guard against accidental contact with the spray.
18. Respiratory protective equipment will be worn if exhaust ventilation is not available.
19. D & M Painting's Health and Safety Manager will be contacted to determine appropriate protective equipment needed for the operation.

### **13. PAINT SPRAY BOOTHS OPERATIONS**

#### **Extinguishers:**

Provide portable fire extinguishers adequate to handle the most flammable of the coating materials being used. D & M Painting's Safety and Health Manager will be consulted for appropriate extinguishers needed.

#### **Floor Covering:**

It is desirable that the floor of paint spray booths be covered with a non-combustible mat, removable for cleaning or disposal.

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### **Hoses and Couplings:**

Pressure hoses and couplings will be regularly inspected for condition and will be replaced as needed. When positive displacement pumps are used, a relief valve will be installed in the discharge line to prevent overpressure.

### **14. PORTABLE PAINT SPRAY EQUIPMENT**

1. Such equipment consists of an air compressor, paint spray gun and hose.
2. The paint reservoir on most portable spray guns holds one quart of fluid or less.
3. When a considerable amount of paint is to be applied, a 2-½ or 5 gallon pressure tank is usually employed.

### **Compressor:**

1. The air compressor will be equipped with an ASME rated air tank, a visible pressure gauge on the tank, a pressure reducer with its own gauge, a guard fully enclosing the drive belt and pulleys, and a pressure limiting switch to shut down the compressor when the system's working pressure has been reached. \
2. The equipment will be securely mounted on a wheeled carriage for portability. For interior painting only electric motor-driven equipment will be used.

### **Overpressure Protection:**

1. When separate paint pressure tanks are used, they will be equipped with a gauge and a relief valve to prevent overpressure.
2. Hoses will be rated for the maximum working pressure of the system.

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### **Maintenance**

1. A preventive maintenance program will be implemented to cover periodic inspection and testing of all components.
2. Storage of compressors, hoses, and paint pressure tanks and spray guns will be in areas designated and approved by the supervisor in conjunction with the Office of Health and Safety.

### **15. AEROSOL SPRAY PAINT CANS**

The same general safety and health precautions apply to spray painting from pressurized cans as to spray painting by other means. The following specific items are noted:

#### **Storage:**

1. Pressurized cans of spray paint are to be considered flammable materials and stored in appropriate locations.
2. Office desks are not to be used for the storage of pressurized cans of spray paint.
3. Office storerooms are not to be used for the storage of pressurized cans of spray paint unless the storage area has been designated safe for the storage of flammable materials by the Safety and Health Manager.

#### **Disposal:**

1. Disposal of malfunctioning paint spray cans still containing paint under pressure will be in accordance with the Safety and Health Manager hazardous waste disposal procedures.
2. Office waste cans must not be used for the disposal of cans of spray paint or for the disposal of wiping rags and other waste material.
3. Disposal of wiping rags and other waste materials will be in self-closing metal containers labeled to indicate the contents.

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### **Protective Equipment:**

The same general rules governing the use of personal protective equipment apply to painting with pressurized cans.

### **16. PROCEDURES FOR THE IDENTIFICATION, SAFE REMOVAL, AND DISPOSAL OF LEAD-BASED PAINTS**

Due to the potential exposure of personnel to lead released during abatement of lead-based paint, proposed EPA regulatory authority over lead abatement activities in federal buildings, and existing regulatory mandates governing the disposal of hazardous wastes, the following procedures will be adopted in order to reduce the possibility of human exposure and contamination of the environment.

#### **Identification of Lead-Based Paints:**

Lead-based paints may have been used in the past in buildings. The presence of lead on existing painted surfaces will be determined by sequential use of the following methods:

1. First, knowledge by painters, maintenance personnel, or contractors of a specific paint that has been applied where the manufacturer's Material Safety Data Sheet documents there is greater than 1% lead in the paint.
2. Second, all "red or rust-colored", and gray primer coats are assumed to contain lead.
3. Third, presence of lead as determined by "lead swabs" or any other direct reading procedure or instrument.
4. Fourth, analysis by a contracted analytical laboratory by the AIHA Environmental Lead Laboratory Accreditation Program.

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### **Training of D & M Painting Employees:**

The Federal EPA is proposing the establishment of specific disciplines and training for lead-based paint activities. The disciplines to be established are: Inspector Technicians, Inspector/Risk Assessors, Employees, and Supervisors. Additionally, numerous OSHA requirements govern the activities associated with lead exposure.

Prior to involvement in lead removal activities, successful completion of the following training will be documented:

1. OSHA hazard communication training specific to lead and any hazardous materials used during the paint removal process.
2. Respiratory protection training and fit testing.
3. Maintenance supervisors responsible for causing the removal of lead-based paints will attend an accredited lead abatement course for supervisors.

### **Work Practices for Interior building surfaces:**

1. All work areas where paint removal or scraping is to be conducted will be sealed off from other work areas. This step includes placing barrier tape across all access areas to the work site and taping 6-mil plastic over all vents, doorways, windows, and other openings into the work site.
2. Personnel will be instructed not to grind or sand painted areas known to contain lead. Hand scraping is permitted.
3. The work area will be cleaned periodically during the day by using a combination of a HEPA-filtered vacuum and wiping down the area using damp cloths.

### **Work Practices for Exterior building surfaces:**

When removing lead-containing paint from the exterior of D & M Painting buildings, the following occupational health and environmental guidelines will be followed:



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1. Special precautions will be taken when working near air intakes, doors, and windows.
2. Air intakes will be protected by construction of a wood frame and plastic sheeting barrier and will be of such a size to ensure that air is pulled from uncontaminated areas.
3. Door and windows will remain closed and will be sealed with duct tape and/or plastic sheeting.
4. Physical barriers will be set up around the work area to prevent pedestrian traffic through the work site.

When removing lead-containing paint from the exterior of D & M Painting buildings, the following occupational health/ environmental guidelines will be followed:

1. Loose and flaking paint will be removed by manually scraping the surfaces of the building. Sanding or grinding will not be permitted.
2. A drop cloth will be placed directly and completely under the work area. Paint chips will be collected periodically throughout the day and at the end of the workday and will be placed in a container with a tight fitting lid or sealed in a plastic bag (6-mil).

### **17. ABRASIVE BLASTING UNITS**

1. Removal of paints containing lead or other heavy metals will be conducted in a sealed abrasive blasting unit equipped with a high efficiency particulate air (HEPA) filter.
2. The abrasive blasting media will be used to its fullest extent prior to disposal.
3. Institute the protective measures listed below when cleaning out an abrasive blasting unit.

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### **General Practices:**

1. Personnel will remove contaminated clothing prior to leaving the work site for breaks, lunch, and at the end of the workday.
2. All surfaces will be maintained as free as practicable of accumulation of lead-based paint debris.
3. All waste materials, including used disposable clothing, respirator cartridges, plastic, etc. will be placed in a plastic bag or other container as appropriate and sealed.
4. All tools and equipment used on the project will be wet-wiped prior to removal from the work site.
5. After the waste containers are sealed, the outside of the container will be wiped off for any residual dust that may be present prior to being taken off-site for disposal.

### **Protective Measures:**

1. All personnel will wear respiratory protection (half-mask, dual cartridge with HEPA filters, as a minimum) and full-body disposable clothing. Personnel will have a current (<6 months) medical clearance to wear a respirator and have been fit-tested with their respirator.
2. Personnel will also be provided and instructed to wear face shield or vented goggles, gloves, head coverings, and disposable shoe coverlets.
3. Personnel are not permitted to eat, drink, or smoke in or near the work area.
4. Personnel will be instructed to wash their face and hands before eating, drinking or smoking and before leaving the work area for breaks or lunch.
5. All personnel involved in lead-based paint removal will shower at the end of the shift before going home to prevent contamination of their vehicle and exposure of family members and others to lead-containing dust.

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6. The Safety and Health Manager requires that paint removal personnel participate in the personal air monitoring program in order to determine their potential exposures to lead dust.
7. The results of this monitoring will also be used to determine if personnel need to be enrolled in a medical surveillance program for lead.
8. Contact will be made with Safety and Health Manager prior to the start of the project to coordinate the sampling effort.
9. Host Contractors are responsible for meeting OSHA personnel air monitoring, personal protective equipment, and medical surveillance requirements for lead exposures.

#### **Hazardous Waste Disposal:**

1. D & M Painting's Safety and Health Manager will be contacted prior to the initiation of a lead-based paint removal project.
2. The Safety and Health Manager will dispose of hazardous wastes generated by in-house maintenance personnel only.
3. Contractors are responsible for disposing of all waste materials that they generate in the course of their work/contract obligations.
4. Specific wastes generated during lead-based paint removal can include, but is not limited to paint chips/dusts, and solvents used to remove paints.
5. All hazardous wastes will be disposed in accordance with hazardous waste regulations and arrangements will be made to with the appropriate company to haul these wastes away to the designated dump site.

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#### **Compressed Air Receivers Self-Audit Safety Questions**

- YES - NO** Are compressors equipped with pressure relief valves and pressure gauges?
- YES - NO** Are air filters installed on the compressor intake?
- YES - NO** Are compressors operated and lubricated in accordance with the manufacturer's recommendations?
- YES - NO** Are safety devices on compressed air systems checked frequently?
- YES - NO** Before any repair work is done on the pressure system of a compressor, is the pressure bled off and the system locked out?
- YES - NO** Are signs posted to warn of the automatic starting feature of the compressors?
- YES - NO** Is the belt drive system totally enclosed to provide protection for the front, back, top and sides?
- YES - NO** Is it strictly prohibited to direct compressed air towards a person?
- YES - NO** Are employees prohibited from using highly compressed air for cleaning purposes?
- YES - NO** If compressed air is used for cleaning off clothing, is the pressure reduced to less than 10 psi?
- YES - NO** When using compressed air for cleaning, do employees use personal protective equipment?
- YES - NO** Are safety chains or other suitable locking devices used at couplings of high-pressure hose lines where a connection failure would create a hazard?
- YES - NO** Before compressed air is used to empty containers of liquid, is the safe working pressure of the container checked?
- YES - NO** When compressed air is used with abrasive blast cleaning equipment, is the operating valve a type that must be held open manually?
- YES - NO** When compressed air is used to inflate auto tires, is a clip-on chuck and an in line regulator preset to 40 psi required?
- YES - NO** Is it prohibited to use compressed air to clean up or move combustible dust if such action could cause the dust to be suspended in the air and cause a fire or explosion hazard?

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- YES - NO** Is every receiver equipped with a pressure gauge and with one or more automatic, spring-loaded safety valves?
- YES - NO** Is the total relieving capacity of the safety valve capable of preventing pressure in the receiver from exceeding the maximum allowable working pressure of the receiver by more than 10 percent?
- YES - NO** Is every air receiver provided with a drainpipe and valve at the lowest point for the removal of accumulated oil and water?
- YES - NO** Are compressed air receivers periodically drained of moisture and oil?
- YES - NO** Are all safety valves tested frequently and at regular intervals to determine whether they are in good operating condition?
- YES - NO** Is there a current operating permit issued by the Division of Occupational Safety and Health?
- YES - NO** Is the inlet of air receivers and piping systems kept free of accumulated oil and carbonaceous materials?

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#### **Spraying Operations Self-Audit Safety Questions**

- YES - NO** Is adequate ventilation assured before spray operations are started?
- YES - NO** Is mechanical ventilation provided when spraying operation is done in enclosed areas?
- YES - NO** When mechanical ventilation is provided during spraying operation, is it arranged so that it will not circulate the contaminated air?
- YES - NO** Is the spray area free of hot surfaces?
- YES - NO** Is the spray area at least 20 feet from flames, sparks, operating electrical motors and other ignition sources?

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#### **Control of Harmful Substances by Ventilation Self-Audit Safety Questions**

- YES - NO** Is the volume and velocity of air in each exhaust system sufficient to gather the dusts, fumes, mists, vapors or gases to be controlled, and to convey them to a suitable point of disposal?
- YES - NO** Are exhaust inlets, ducts and plenums designed, constructed, and supported to prevent collapse or failure of any part of the system?

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**YES - NO** Are clean-out ports or doors provided at intervals not to exceed 12 feet in all horizontal runs of exhaust ducts?

**YES - NO** If two or more different types of operations are being controlled through the same exhaust system, will the combination of substances being controlled constitute a fire, explosion or chemical reaction hazard in the duct?

**YES - NO** Is adequate makeup air provided to areas where exhaust systems are operating?

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**Reviewer's Signature:** \_\_\_\_\_

**Date Conducted:** \_\_\_\_\_