



### **Personal Protective Equipment (PPE) Program**

This written program documents steps EMA has taken to minimize injury resulting from various occupational hazards present at our construction sites by protecting workers through the use of PPE when the hazards cannot be eliminated.

The Project Manager, is the program coordinator, acting as the representative of EMA, who has overall responsibility for the program and will monitor employee use of PPE. This written plan is kept in EMA's written safety and Health Manual and at the corporate office. Project Manager will review and update the program as necessary. Copies of this program may be obtained from the EMA Project Manager.

We at EMA believe it is our obligation to provide a hazard free environment to our employees. Any employee encountering hazardous conditions must be protected against the potential hazards. The purpose of protective clothing and equipment (PPE) is to shield or isolate individuals from chemical, physical, biological, or other hazards that may be present in the workplace.

Establishing an overall written PPE program detailing how employees use PPE makes it easier to ensure that they use PPE properly in the workplace and document our PPE efforts in the event of an OSHA inspection. EMA PPE program covers:

- Purpose
- Hazard assessment
- PPE selection
- Employee training
- Cleaning and maintenance of PPE
- PPE specific information

If after reading this program, you find that improvements can be made, please contact the Project Manager. We encourage all suggestions because we are committed to the success of our Personal Protective Equipment Program. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

#### **Purpose of Program**

The basic element of any PPE program is an in depth evaluation of the equipment needed to protect against the hazards at the workplace; this is the initial hazard assessment for which written documentation is required. Two basic objectives of any PPE program should be to protect the wearer from incorrect use and/or malfunction of PPE. The purpose of this Personal Protective Equipment (PPE) Program is to document the hazard assessment, protective measures in place, and PPE in use at this company. PPE devices are not to be relied on as the only means to provide protection against hazards, but are used in conjunction with guards, engineering controls, and sound manufacturing practices. If possible, hazards will be abated first through engineering controls, with PPE to provide protection against hazards which cannot reasonably be abated

otherwise.

## **Hazard Assessment**

In order to assess the need for PPE the following steps are taken:

1. Project Manager, with other appropriate employees identifies job classifications where exposures occur or could occur. The Project Manager or designee examines the following records to identify and rank jobs according to exposure hazards:

- Injury/illness records
- First aid logs

2. The Project Manager conducts a walk through survey of workplace areas where hazards exist or may exist to identify sources of hazards to employees. They consider these basic hazard categories:

- Impact
- Heat
- Penetration
- Harmful dust
- Compression (roll over)
- Light (optical) radiation
- Chemical

During the walk through survey the Project Manager observes and records the following hazards along with PPE currently in use.

- Sources of motion; i.e., machinery or processes where any movement of tools, machine elements or particles could exist, or movement of personnel that could result in collision with stationary objects.
- Sources of high temperatures that could result in burns, eye injury or ignition of protective equipment, etc.
- Chemical exposures
- Sources of harmful dust.
- Sources of light radiation, i.e., welding, brazing, cutting, furnaces, heat treating, high intensity lights, etc.
- Sources of falling objects or potential for dropping objects.
- Sources of sharp objects which might pierce the feet or cut the hands.
- Sources of rolling or pinching objects which could crush the feet.

- Layout of workplace and location of co workers.
- Electrical hazards.

1. Following the walk through survey, the Project Manager organizes the data and information for use in the assessment of hazards to analyze the hazards and enable proper selection of protective equipment.

2. An estimate of the potential for injuries is now made. Each of the basic hazards is reviewed and a determination made as to the frequency, type, level of risk, and seriousness of potential injury from each of the hazards found. The existence of any situations where multiple exposures occur or could occur are considered.

3. The Project Manager documents the hazard assessment via a written certification that identifies the workplace evaluated, the person certifying that the evaluation has been performed, the date(s) of the hazard assessment, and that the document is a certification of hazard assessment.

### **Selection Guidelines**

Once any hazards have been identified and evaluated through hazard assessment, the general procedure for selecting protective equipment is to:

1. Become familiar with the potential hazards and the type of protective equipment (PPE) that are available, and what they can do.
2. Compare types of equipment to the hazards associated with the environment.
3. Select the PPE which ensures a level of protection greater than the minimum required to protect employees from the hazards.
4. Fit the user with proper, comfortable, well fitting protection and instruct employees on care and use of the PPE. It is very important that the users are aware of all warning labels for and limitations of their PPE. (See the Employee Training guidelines outlined in the next section of this program for a more detailed description of training procedures.)

It is the responsibility of the Project Manager to reassess the workplace hazard situation as necessary, to identify and evaluate new equipment and processes, to review accident records, and reevaluate the suitability of previously selected PPE. This reassessment will take place as needed.

Elements which should be considered in the reassessment include:

- Adequacy of PPE program
- Accidents and illness experience
- Levels of exposure (this implies appropriate exposure monitoring)
- Adequacy of equipment selection
- Number of person hours that workers wear various protective ensembles
- Adequacy of training/fitting of PPE

- Program costs
- The adequacy of program records
- Recommendation for program improvement and modification
- Coordination with overall safety and health program

### **Employee Training**

The Project Manager or designee provides training for each employee who is required to use personal protective equipment. Training includes:

- When PPE is necessary
- What PPE is necessary
- How to wear assigned PPE
- Limitations of PPE
- The proper care, maintenance, useful life, and disposal of assigned PPE

Employees must demonstrate an understanding of the training and the ability to use the PPE properly before they are allowed to perform work requiring the use of the equipment.

If employee owned equipment is permitted, the Project Manager is responsible for the assurance of ppe adequacy, maintenance, and sanitation.

Employees are prohibited from performing work without donning appropriate PPE to protect them from the hazards they will encounter in the course of that work.

If the Project Manager has reason to believe an employee does not have the understanding or skill required, the employer must retrain. Since an employee's supervisor is in the best position to observe any problems with PPE use by individual employees, the Project Manager will seek this person's input when making this determination. Circumstances where retraining may be required include changes in the workplace or changes in the types of PPE to be used which would render previous training obsolete. Also, inadequacies in an affected employee's knowledge or use of the assigned PPE which indicates that the employee has not retained the necessary understanding or skills.

The Project Manager certifies in writing that the employee has received and understands the PPE training.

Because failure to comply with company policy concerning PPE can result in OSHA citations and fines as well as employee injury, an employee who does not comply with this program will be disciplined for noncompliance according to the following schedule:

- Verbal warning for the first offense accompanied by retraining
- Written reprimand for the second offense which goes in the employee's permanent record
- Suspension without pay for a third offense and documentation in the permanent record

- Dismissal as a last resort.

### **Cleaning and Maintenance**

It is important that all PPE be kept clean and properly maintained by the employee to whom it is assigned. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision. PPE is to be inspected, cleaned, and maintained by employees at regular intervals as part of their normal job duties so that the PPE provides the requisite protection. Supervisors are responsible for ensuring compliance with cleaning responsibilities by employees. If PPE is for general use, the Project Manager has responsibility for cleaning and maintenance. If a piece of PPE is in need of repair or replacement it is the responsibility of the employee to bring it to the immediate attention of his or her supervisor or the Project Manager. It is against work rules to use PPE that is in disrepair or not able to perform its intended function. Contaminated PPE which cannot be decontaminated is disposed of in a manner that protects employees from exposure to hazards.

### **PPE Specific Information**

#### *Eye and face protection -- Goggles and face shields*

It is the policy of the company that as a condition of employment, all regular full time, part time, subcontractors, and temporary employees working in designated work areas and/or job assignments are required to wear ANSI approved goggles/face shields to help prevent eye and face injuries, including those resulting from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or light radiation, for example.

Employees from temporary work agencies and contractors/subcontractors are required to wear goggles/face shields if assigned to work in the designated work areas requiring ppe.

All supervisors and managers are responsible for ensuring employees under their charge are in compliance with this policy.

All employees who work in designated work areas and/or job assignments are responsible for wearing company provided goggles/face shields to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

All employees required to wear goggles/face shields must routinely inspect and properly care for their goggles/face shields.

#### *Foot Protection-Safety Shoes*

It is the policy of the company that as a condition of employment all regular full time, part time, subcontractors, and temporary employees working in designated work areas and/or job assignments are required to wear safety shoes to help prevent foot injuries, ankle injuries, slips, and falls.

Employees from temporary work agencies and contractors/subcontractors are required to wear safety shoes if assigned to work in the designated work areas. It is the responsibility of the agency and/or contractor to ensure the employee reports to his/her temporary assignment at this company wearing approved safety shoes.

Those employees who work in non designated areas of the company and vendors and visitors will be allowed to walk through the designated work areas without safety shoes as long as they remain in outlined aisles or walkways.

Members of the Emergency Response Team are required to wear safety footwear when responding to fire emergency situations. Safety footwear is provided by the company for those associates who do not work in the designated work areas within the company. All supervisors and managers are responsible for ensuring their associates are in compliance with this policy.

All employees who work in designated work areas and/or job assignments are responsible for purchasing and wearing safety shoes to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

Personnel is responsible for informing new employees who are assigned to the designated work areas of the safety shoe policy and the procedures for obtaining them. The new employee is responsible for reporting to his/her first day of work wearing approved safety shoes.

#### *Hand Protection -- Gloves*

It is the policy of the company that as a condition of employment, all regular full time, part time, subcontractors, and temporary employees working in designated work areas and/or job assignments are required to wear gloves to help prevent hand injuries, including cuts, burns, chemical exposure, for example.

Employees from temporary work agencies and contractors are required to wear protective gloves if assigned to work in the designated work areas.

All supervisors and managers are responsible for ensuring employees under their charge are in compliance with this policy.

All employees who work in designated work areas and/or job assignments are responsible for wearing company provided gloves to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

All employees required to wear protective gloves must routinely inspect and properly care for their assigned gloves (if the gloves are not disposable).

#### *Head protection -- Hard hats*

It is the policy of the company that as a condition of employment, all regular full time, part time, subcontractors, and temporary employees working in designated work areas and/or job assignments are required to wear ANSI approved hard hats to help prevent head injuries, including those resulting from falling objects, bumping the head against a fixed object, or electrical shock.

Employees from temporary work agencies and contractors are required to wear hard hats if assigned to work in the designated work areas.

All supervisors and managers are responsible for ensuring employees under their charge are in compliance with this policy.

All employees who work in designated work areas and/or job assignments are responsible for

wearing company provided hard hats to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

All employees required to wear hard hats must routinely inspect and properly care for their hard hats.