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# PERSONAL PROTECTIVE EQUIPMENT (PPE) PROGRAM

## Dowdy Corporation

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# TAB 1: PERSONAL PROTECTIVE EQUIPMENT (PPE) PROGRAM

## Dowdy Corporation

### 1.1 INTRODUCTION

This written Personal Protective Equipment (PPE) program has been developed by Dowdy in order to minimize employee injury and hazard exposure when other work practice controls are neither feasible nor effective. The program will be maintained in Warehouse, Jobsite Trailers, Project Supervisor's Company Vehicle and is available for review upon request.

### 1.2 RESPONSIBILITY

#### PROGRAM ADMINISTRATOR - THE GENERAL MANAGER

- Administer and implement this PPE program.
- Perform and sign the hazard assessment.
- Select and fit PPE to affected employees.
- Assure the adequacy, proper maintenance, and sanitation of all PPE.
- Provide signage in areas that necessitate PPE
- Retain training records

#### MANAGEMENT

- Perform an assessment of the operation to identify workplace hazards.
- Use engineering and administrative controls to limit employee exposure.
- Provide adequate PPE for employees.
- Post signs and warnings in all high noise areas.
- Conduct personal protective equipment training for all new employees.
- Conduct annual PPE training for all employees.

#### EMPLOYEES

- Use company-issued and approved PPE.
- Request PPE when needed.
- Exercise proper care of issued PPE.

### **1.3 HAZARD IDENTIFICATION**

In order to identify current and potential hazards in the workplace, a baseline hazard assessment has been conducted. Consideration has been given to the following categories

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

Additional hazard identification tools that may be used in the hazard identification process include job hazard analyses, workplace inspections, accident and incident investigation data, and injury/illness analysis.

The hazard identification process will be used for routine and non-routine activities, new processes, as well as changes in operation, services, or products. Workplace hazard will be reassessed as necessary by identifying and evaluating new equipment and processes, reviewing accident records, and reevaluating the suitability of previously selected PPE.

Employees are trained in the hazard identification process and are encouraged to report hazards and to take an active role in the hazard determination process. The Hazard Assessment is reviewed with employees annually, at minimum.

A copy of the most recent hazard assessment along with previous assessments can be found in Attachment B.

### **1.4 CONTROLS**

Once the hazard identification process has been completed and the hazards have been prioritized, engineering and administrative controls are addressed. The following actions may be taken to eliminate or mitigate each hazard:

- Find a new method of doing the job (i.e., analyze various ways of reaching the safest possible method. Consider work-saving tools and equipment.)
- Change or modify the physical conditions that create the hazards.
- Eliminate hazards still present by changing work procedures.
- Reduce the necessity of doing a job or the frequency with which it must be performed. (Reducing job frequency contributes to safety only in that it limits exposure. Make every effort to eliminate hazards and to prevent potential accidents through changing physical or environmental conditions.)
- Provide adequate and effective PPE. This should be the last line of defense after all other methods of controlling the hazard have been exhausted.

All corrective actions taken to mitigate a hazard will be reviewed periodically to ensure that new hazards have not been created. Corrective actions will be documented and retained for future analysis.

## **1.5 SELECTION**

If engineering and administrative controls cannot eliminate the hazard, PPE will be necessary to protect the employee. The General Manager will select the types of PPE to be used to protect each affected employee from identified hazards. The PPE selection will be communicated to each affected employee and PPE will be fitted to each employee to ensure its proper performance.

The General Manager is responsible to assure the adequacy, proper maintenance, and sanitation of all PPE, whether it has been provided by Dowdy or is employee-owned. All PPE must be used and maintained in sanitary and reliable condition; defective or damaged PPE shall not be used. This equipment is to be properly disposed of and replaced with new equipment.

Attachment C provides a list of PPE used by Dowdy.

## **1.6 TYPES OF PPE**

### **EYE & FACE PROTECTION**

Each affected employee must use appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation. Side protection will be provided whenever there is a hazard from flying objects.

Dowdy recognizes that regular prescription lenses are not appropriate eye protection. When eye protection is necessary, affected employees who wear prescription lenses must wear eye protection that incorporates the prescription in its design or eye protection that can be worn over prescription lenses without disturbing the proper position of the safety eyewear.

Protective eyewear used by Dowdy will comply with ANSI/ISEA Z87.1-2010, ANSI Z87.1-2003, or ANSI Z87.1-1989 (R-1998).

### **HEAD PROTECTION**

Whenever employees are working in areas where there is a potential for injury to the head from falling objects, protective helmets will be provided. A protective helmet designed to reduce electrical shock hazard must be worn when an affected employee is working near exposed electrical conductors which could contact the head.

Head protection will comply with ANSI Z89.1-2009, ANSI Z89.1-2003, or ANSI Z89.1-1997.

### **HEARING PROTECTION**

When employees are subjected to sound levels which exceed those listed in 29 CFR 1910.95, Table G-16 (see below), feasible administrative or engineering controls shall be utilized. If such controls fail to reduce

sound levels within the levels of Table G-16, hearing protection shall be provided and used to reduce sound levels within the levels of the table.

<b>TABLE G-16 - PERMISSIBLE NOISE EXPOSURES (1)</b>	
<u>Duration per day, hours</u>	<u>Sound level dBA slow response</u>
8	90
6	92
4	95
3	97
2	100
1-½	102
1	105
½	110
¼ or Less	115

Footnote(1) When the daily noise exposure is composed of two or more periods of noise exposure of different levels, their combined effect should be considered, rather than the individual effect of each. If the sum of the following fractions:  $C(1)/T(1) + C(2)/T(2) + \dots + C(n)/T(n)$  exceeds unity, then, the mixed exposure should be considered to exceed the limit value.  $C_n$  indicates the total time of exposure at a specified noise level, and  $T_n$  indicates the total time of exposure permitted at that level. Exposure to impulsive or impact noise should not exceed 140 dB peak sound pressure level.

Hearing protection devices such as earplugs or ear muffs are utilized whenever noise control measures are infeasible, or until effective engineering and administrative controls are implemented. Employees will have the opportunity to choose from at least two different types of hearing protection devices representative of at least two different types such as earplugs and earmuffs. Personal stereo headsets are not approved for hearing protection and are not permitted in any operating area.

If monitoring data indicates that employees are exposed to equal or exceed an 8-hour time-weighted average sound level (TWA) of 85, Dowdy will implement a Hearing Conservation Program which complies with OSHA's Occupational Noise Exposure standard.

## HAND PROTECTION

Appropriate hand protection is required to be used when employees' hands are exposed to hazards such as those from skin absorption of harmful substances; severe cuts or lacerations; severe abrasions; punctures; chemical burns; thermal burns; and harmful temperature extremes.

The selection of hand protection will be based on /an evaluation of the performance characteristics of the hand protection relative to the task(s) to be performed, conditions present, duration of use, and the hazards and potential hazards identified.

## FOOT PROTECTION

When there is a danger of foot injuries from falling objects, rolling objects, objects piercing the sole, or where the employee's feet are exposed to electrical hazards, proper footwear will be required.

Foot protection will comply with ASTM F-2412-2005 and ASTM F-2413-2005, ANSI Z41-1999, or ANSI Z41-1991.

## RESPIRATORY PROTECTION

Respiratory protection will be provided whenever airborne hazards cannot be eliminated through accepted engineering control methods or whenever such controls are being instituted.

Please refer to the Dowdy written Respiratory Protection Program.

Although employees of Dowdy are not exposed to airborne contaminants above OSHA's exposure limits, the voluntary use of dust masks is permitted. Appendix D to 29 CFR 1910.134 (Mandatory) Information for Employees Using Respirators will be reviewed with affected employees.

## 1.7 PAYMENT

Dowdy will provide protective equipment and PPE at no cost to the employee. The following types of PPE may not be provided by the company, as specified in 29 CFR 1910.132(h) or 29 CFR 1926.95(d):

- Non-specialty safety-toe protective footwear (including steel-toe shoes or steel-toe boots)
- Non-specialty prescription safety eyewear
- Shoes or boots with built-in metatarsal guards when metatarsal guards are provided
- Logging boots
- Everyday clothing such as long-sleeve shirts, long pants, street shoes, and normal work boots
- Ordinary clothing, skin creams, or other items, used solely for protection from weather, such as winter coats, jackets, gloves, parkas, rubber boots, hats, raincoats, ordinary sunglasses, and sunscreen

Replacement PPE will be provided by Dowdy at no cost to the employee unless the employee has lost or intentionally damaged the PPE.

## 1.8 EMPLOYEE TRAINING

Employees are required to attend training concerning the proper usage of PPE in their work area. Each affected employee shall demonstrate an understanding of the training and the ability to use PPE properly, before being allowed to perform work requiring the use of PPE. The training will be conducted by a qualified representative designated by Dowdy.

Training shall consist of the following components, at minimum:

- A. When PPE is necessary
- B. What PPE is necessary
- C. How to properly don, doff, adjust, and wear PPE
- D. Limitations of the PPE
- E. Proper care, maintenance, useful life and disposal of the PPE

When there is reason to believe that any affected employee who has already been trained does not have an understanding of the training specified above and the ability to use PPE properly, the employee will be retrained. Retraining is additionally required in the following situations:

- A. Changes in the workplace render previous training obsolete
- B. Changes made in the types of PPE to be used render previous training obsolete
- C. Inadequacies in an affected employee's knowledge or use of assigned PPE indicate that the employee has not retained the requisite understanding or skill

Dowdy's training records will be maintained in a safe location. Training documentation includes the training subject, employees' names, the trainer, and the date of training. Attachment D contains copies of training records.

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# ATTACHMENT A: OSHA STANDARD FOR PERSONAL PROTECTIVE EQUIPMENT, INCLUDING OSHA'S VOLUNTARY DUST MASK USE FORM (APPENDIX D)

## **Personal Protective Equipment – 29 CFR 1910 Subpart I**

General Requirements	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.132">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.132</a>
Eye and Face Protection	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.133">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.133</a>
Respiratory Protection	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134</a>
Head Protection	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.135">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.135</a>
Foot Protection	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.136">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.136</a>
Electrical Protective Equipment	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.137">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.137</a>
Hand Protection	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.138">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.138</a>
Personal Fall Protection Systems	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.140">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.140</a>
App A – References for Further Information (Non-Mandatory)	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910SubpartIAppA">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910SubpartIAppA</a>
App B – Nonmandatory Compliance Guidelines for Hazard Assessment and Personal Protective Equipment Selection	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910SubpartIAppB">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910SubpartIAppB</a>
App C – Personal Fall Protection Systems Non-Mandatory Guidelines	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910SubpartIAppC">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910SubpartIAppC</a>
App D – Test Methods and Procedures for Personal Fall Protection Systems Non-Mandatory Guidelines	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910SubpartIAppD">https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910SubpartIAppD</a>



## **Personal Protective Equipment – 29 CFR 1926 Subpart E**

Criteria for Personal Protective Equipment	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.95">https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.95</a>
Occupational Foot Protection	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.96">https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.96</a>
Electrical Protective Equipment	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.97">https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.97</a>
Head Protection	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.100">https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.100</a>
Hearing Protection	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.101">https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.101</a>
Eye and Face Protection	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.102">https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.102</a>
Respiratory Protection	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.103">https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.103</a>
Safety Belts, Lifelines, and Lanyards	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.104">https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.104</a>
Safety Nets	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.105">https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.105</a>
Working Over or Near Water	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.106">https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.106</a>
Definitions Applicable to This Subpart	<a href="https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.107">https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.107</a>

## Voluntary Dust Mask Use Acknowledgement

### Regulations (Standards - 29 CFR) (Mandatory) Information for Employees Using Respirators When not Required Under Standard. - 1910.134 App D

- **Part Number:** 1910
- **Part Title:** Occupational Safety and Health Standards
- **Subpart:** I
- **Subpart Title:** Personal Protective Equipment
- **Standard Number:** 1910.134 App D

### Appendix D to Sec. 1910.134 (Mandatory) Information for Employees Using Respirators When Not Required Under the Standard

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirator's limitations.
2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.
4. Keep track of your respirator so that you do not mistakenly use someone else's respirator.

[63 FR 1152, Jan. 8, 1998; 63 FR 20098, April 23, 1998]

I have read and understand the above information regarding Appendix D of 1910.134.

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Print Name

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Signature

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Date

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# ATTACHMENT B: HAZARD ASSESSMENT

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# ATTACHMENT B: HAZARD ASSESSMENT

The following pages contain Dowdy's most current version of the hazard assessment along with any previous versions.

The following hazard categories were considered when conducting the assessment:

- Sources of motion,
- Sources of high temperature,
- Types of chemical exposures,
- Sources of harmful dust or mist,
- Sources of light radiation,
- Sources of falling objects of potential for dropping objects,
- Sources of sharp objects which could cut or pierce the hands,
- Sources of rolling or pinching objects,
- Hazards related to the layout of the workplace and the location of co-workers,
- Electrical hazards, and
- Problem areas identified as a result of reviewing injury and accident data.

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ATTACHMENT C:      PERSONAL PROTECTIVE EQUIPMENT  
LIST

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# ATTACHMENT C: PERSONAL PROTECTIVE EQUIPMENT LIST

I, \_\_\_\_\_, have received the following PPE which has been determined to be necessary to protect against hazards while performing my job duties.

**Personal Protective Equipment Provided:**

**N/A for my job duties:**

- |  |                          |
|--|--------------------------|
| <input type="checkbox"/> Hard Hat            | <input type="checkbox"/> |
| <input type="checkbox"/> Safety Glasses      | <input type="checkbox"/> |
| <input type="checkbox"/> Hi-Vis Vest         | <input type="checkbox"/> |
| <input type="checkbox"/> Ear plugs           | <input type="checkbox"/> |
| <input type="checkbox"/> Dust Mask           | <input type="checkbox"/> |
| <input type="checkbox"/> Gloves              | <input type="checkbox"/> |
| <input type="checkbox"/> Face Shield         | <input type="checkbox"/> |
| <input type="checkbox"/> Welding Helmet      | <input type="checkbox"/> |
| <input type="checkbox"/> Aprons              | <input type="checkbox"/> |
| <input type="checkbox"/> Respirator          | <input type="checkbox"/> |
| <input type="checkbox"/> Latex Gloves        | <input type="checkbox"/> |
| <input type="checkbox"/> Fall Arrest Harness | <input type="checkbox"/> |
| <input type="checkbox"/> Rain Suit           | <input type="checkbox"/> |
| <input type="checkbox"/> Tyvek Suit          | <input type="checkbox"/> |
| <input type="checkbox"/> Back Braces         | <input type="checkbox"/> |

I have been trained on how to use the required PPE in the appropriate situations.

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Signature

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Date

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**ATTACHMENT D:      NEW HIRE TRAINING DOCUMENTATION**

## OSHA's Employee Responsibilities

- Read the OSHA Poster at the workplace.
- Comply with all applicable OSHA standards.
- Follow all lawful employer safety and health rules and regulations and wear or use prescribed protective equipment while working.
- Report hazardous conditions to the supervisor.
- Report any work-related injury or illness to the employer, and seek treatment promptly.
- Exercise rights under the Act in a responsible manner.



## New Hire Training Summary:

*The following information must be reviewed with employees, and they shall demonstrate an understanding of the training before being allowed to perform work requiring the use of PPE.*

- Review the most current version of the company's hazard assessment (Attachment B)
- Review the most current version of the Personal Protective Equipment (PPE) list. Explain the types of PPE that the employee will be using during specific tasks and operations.
- Explain the different company-specific tasks and operations where PPE is necessary to protect the employee from hazards
- Show the employee how to properly put on (don), take off (doff), adjust, and wear PPE.
- Explain the limitations of PPE and that PPE is the last line of defense against hazards. Proper measures must first be taken to eliminate any hazards through engineering or administrative controls before resorting to the use of PPE.
- Explain the proper care, maintenance, useful life, disposal, and replacement procedures of PPE.
- If respirator use is voluntary, the employee uses their own respirator, or paper dust masks are used, refer to 29 CFR 1910.134 Appendix D located in Attachment A.

*Upon completing the review of the above information, have new employees sign the new hire training log on the following page.*

# NEW HIRE TRAINING LOG: PERSONAL PROTECTIVE EQUIPMENT

*I have read the information contained in this document and understand the health and safety policies and procedures contained herein. I have been advised of my OSHA required employee responsibilities and hereby pledge to abide by them. I also understand that it is my responsibility to work safely and to notify my supervisor regarding any questions I have or unsafe working conditions that I observe.*

<u>Print Name</u>	<u>Signature</u>	<u>Date</u>