

**Commonwealth Scaffold, LLC**  
**Personal Protective  
Equipment Program and  
Training Materials**

Effective Date: 01/14/2014  
Revision #:



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# Personal Protective Equipment Program

Effective Date: 12/14/2012

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## Reference Standard

Occupational Safety and Health Administration PPE Subpart I, including:

- 29 CFR 1910.132 - General Requirements
- 29 CFR 1910.133 - Eye and Face Protection
- 29 CFR 1910.135 - Head Protection
- 29 CFR 1910.136 - Foot Protection
- 29 CFR 1910.137 - Electrical Protective Equipment
- 29 CFR 1910.138 - Hand Protection & Body Protection

Note: 29 CFR 1910.139 – Respiratory Protection and Hearing Protection are under separate cover

## Purpose

This procedure establishes minimum personal protective equipment (PPE) requirements to be followed when performing tasks in which hazards are present or are likely to be present.

## Scope

This procedure applies to all company employees, contractors and vendors performing work on company property, and all other individuals who are visiting or have business with our company.

## Responsibilities

- Management is responsible for identifying hazards or potential hazards and establishing requirements for PPE. Management will review this procedure at least annually and when equipment or facility additions or modifications cause changes in PPE requirements.
- Management will ensure that required training is conducted as outlined below.
- Management and supervisors are responsible for enforcement of this program.
- Employees, Contractors and vendors are required to comply with all procedures outlined in this policy.

## Definitions

**Administrative Controls:** Rules, procedures or standards that prevent or limit exposure to a hazard.

**Contractor:** A non-company employee being paid to perform work in our facility.

**Engineering Controls:** Are equipment or process modifications, usually hardware in nature that provides passive protection to personnel.

**Personal Protective Equipment or PPE:** PPE is equipment that an individual wears to protect against a hazard. PPE is the last line of defense after engineering control and administrative control.

**Vendor:** A non-company employee being paid to perform a service in our facility.

## Procedure

### **Hazard Assessment (29 CFR 1910.132)**

A hazard assessment has been conducted in order to determine what hazards are present or are likely to be present that would necessitate the use of PPE. The hazard assessment consisted of a walk-through survey of all work areas and duties to determine sources of hazards to employees that could not be controlled by means of engineering or administrative approaches. A sample form can be found in Appendix A. A summary of the assessment results can be obtained from the program administrator.

It will be the responsibility of the program administrator to revise or update the assessment, as necessary, by identifying and evaluating new equipment and processes, reviewing accident records and reviewing the suitability of previously selected PPE. Additionally, the program administrator will review the hazard assessment annually. Any changes will be entered into the permanent copy of the hazard assessment.

If changes in PPE are required, the program administrator will take appropriate action.

The written hazard assessment will be certified in writing and contain the following:

- The workplace identified;
- The person certifying that the evaluation has been performed;
- The person certifying that the evaluation has been performed; and
- The date(s) of the assessment.

### **PPE Selection (29 CFR 1910.132)**

All identified hazards or potential hazards will be controlled by engineering or administrative methods. If engineering or administrative controls cannot eliminate a hazard, the program administrator will select appropriate types of PPE to guard against it.

All PPE selections will be communicated to employees through employee training programs.

Affected employees will wear all PPE specified by the company at the appropriate time in order to guard against the identified hazard. Our company will ensure that all selected PPE properly fits affected employees.

### **Employee Owned Equipment (29 CFR 1910.132)**

Any employee who wishes to provide his/her own PPE must have the PPE approved by the program administrator prior to use. No employee shall wear their own PPE if it does not meet requirements identified in the appropriate OSHA standards.

Where employees provide their own protective equipment, the employer will be responsible to assure its adequacy, including proper maintenance and sanitation of such equipment.

### **Defective or Damaged Equipment (29 CFR 1910.132)**

At no time will employees wear PPE that is defective, damaged or unsanitary. PPE will be cleaned and sanitized prior to use by another worker.

Defective or damaged equipment will be taken out of service. Employees will notify their immediate supervisor of all defective or damaged PPE and will not perform tasks requiring the use of PPE until such equipment has been replaced/repared.

For replacement PPE employees can contact the program administrator or their immediate supervisor.

### **Training Requirements (29 CFR 1910.132)**

Training will be provided to each employee who is required to use PPE upon hire. No employee will use or wear PPE or perform job functions requiring the use of PPE until properly trained.

Training for PPE will consist of the following:

- When PPE is required for a job responsibility or task;
- How to properly don (put on), doff (remove), adjust, and wear required PPE;
- Limitations of selected PPE; and
- Proper care, maintenance and useful life of selected PPE.

All employees must demonstrate an understanding of the training outlined in this section. This will be accomplished through a hands-on demonstration of acquired skills.

Additional training will be required in the following circumstances:

- There are changes in job assignments or work practices that render previous training obsolete
- There are changes in the types of PPE used that renders previous training obsolete
- Whenever deficiencies are noted in an employee's understanding or skill in the use of selected PPE

All employees' attendance to training classes will be documented. Documentation will include:

- The name of each employee trained;
- The date(s) of training;
- Specific PPE training received; and
- Verification of the employee's acquired skill level as a result of training.

### **Payment for PPE**

The protective equipment, including personal protective equipment (PPE), used to comply with this part, shall be provided by the employer at no cost to employees.

The employer is not required to pay for non-specialty safety-toe protective footwear (including steel-toe shoes or steel-toe boots) and non-specialty prescription safety eyewear, provided that the employer permits such items to be worn off the job-site.

The employer is not required to pay for:

- Logging boots;
- Everyday clothing, such as long-sleeve shirts, long pants, street shoes, and normal work boots; or
- 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.

The employer must pay for replacement PPE, except when the employee has lost or intentionally damaged the PPE.

### **Enforcement**

Management will require that specified PPE is used as appropriate in the Hazard Assessment. Failure to conform to this program will result in discipline up to and including discharge.

### **PPE Elements**

#### **Eye and Face Protection (29 CFR 1910.133)**

All employees, contractors and visitors will wear appropriate eye and/or face protection when inside designated areas.

Safety glasses will be provided to employees required to wear them. All safety glasses will be issued with side shields. When prescription safety glasses are required, our company will either provide safety eyewear that is capable of being worn over personal glasses or will contribute to the cost of frames and

lenses. (See Safety Glasses Reimbursement Policy) When required, supplemental or specialized eye and face protection will be provided by the Company.

Employees who wear contact lenses are required to wear non-prescription safety glasses (Plano) over their contact lenses. It should be recognized that contact lenses may present additional hazards to employees in dusty and/or chemical environments. These situations will require the use of additional eye protection such as dust or liquid tight goggles.

Safety glasses purchased before July 5, 1994 will meet ANSI Z87.1-1969 standards. Safety glasses purchased after July 5, 1994 will meet ANSI Z87.1-1989 standards.

**The following charts will be used to assist with specification of eye and face protection.**

<b>Selection Chart - Guidelines for Eye and Face Protection</b>		
The following chart provides general guidance for the proper selection of eye and face protection to protect against hazards associated with the listed hazard "source" operations.		
<b>Source</b>	<b>Hazard</b>	<b>Protection</b>
<b>IMPACT</b> - Chipping, grinding machining, masonry work, woodworking, sawing, drilling, chiseling, powered fastening, riveting, and sanding	Flying fragments, objects, large chips, particles, sand, dirt, etc.	Spectacles with side protection, goggles, face shield  For severe exposure, use face shield
<b>HEAT</b> -Furnace operation and arc welding	Hot sparks	Face shields, spectacles with side shields.
<b>CHEMICALS</b> -Acid and chemical handling, degreasing, plating	Splash	Goggles, eyecup and cover types. For severe exposure, use face shield with goggles.
<b>DUST</b> - Woodworking, buffing, general, buffing, general dusty conditions.	Nuisance dust	Goggles, eye cup and cover type

<b>Filter Lenses for Protection Against Radiant Energy</b>			
<b>Operations</b>	<b>Electrode Size 1/32 in</b>	<b>Arc Current</b>	<b>Protective Shade</b>
Shielded metal arc welding	Less than 3	Less than 60	7
	3-5	60-160	8

	5-8	160-250	10
	More than 8	250-550	11
Torch brazing			3
Torch soldering			2
<p><b>Note:</b> As a rule of thumb, start with a shade that is too dark to see the weld zone. Then go to a lighter shade, which gives sufficient view of the weld zone without going below the minimum. In oxy-fuel gas welding or cutting where the torch produces a high yellow light, it is desirable to use a filter lens that absorbs the yellow or sodium line in the visible light of the (spectrum) operation.</p>			

### Head Protection (29 CFR 1910.135)

All affected employees will use appropriate head protection when exposed to hazards such as falling objects or energized electrical equipment. Employees who are working near exposed electrical conductors will wear protective helmets designed to reduce electrical shock.

Head protection is designed to provide protection from impact and penetration hazards caused by falling objects. Head protection is also available which provides protection from electric shock and burn. When selecting head protection, knowledge of potential electrical hazards is important.

Class A helmets, in addition to impact and penetration resistance, provide electrical protection from low-voltage conductors (they are proof tested to 2,200 volts). Class B helmets, in addition to impact and penetration resistance, provide electrical protection from high-voltage conductors (they are proof tested to 20,000 volts). Class C helmets provide impact and penetration resistance (they are usually made of aluminum which conducts electricity), and should not be used around electrical hazards. Bump caps are not designed to provide impact protection but protect against scalp lacerations from working in congested areas or areas with low equipment clearances.

Our company will select, purchase, and provide employees with required head protection if the use of head protection is required by this policy. Protective helmets purchased before July 5, 1994 will meet ANSI Z89.1-1969 standards. Protective helmets purchased after July 5, 1994 will meet ANSI Z89.1-1986 standards.

### Foot Protection (29 CFR 1910.136)

All employees, contractors, and visitors will use appropriate foot protection as required by the Company when inside areas identified areas. The employer must ensure that each affected employee uses protective footwear when working in areas where there is a danger of foot injuries due to falling or rolling objects, or objects piercing the sole, and where such employee's feet are exposed to electrical hazards.

Our company will identify acceptable types of foot protection and will contribute towards the cost of foot protection, for personnel required to wear it. (See Foot protection Reimbursement Policy)

Protective footwear purchased before July 5, 1994 will meet ANSI Z41.1-1967 standards. Protective footwear purchased after July 5, 1994 will meet ANSI Z41-1991 standards.

## **Electrical Protective Equipment (29 CFR 1910.137)**

All electrical protective devices purchased by our company will meet the requirements outlined in the Occupational Safety and Health Administration (OSHA) standard Electrical Protective Equipment. All equipment will be appropriately marked with its Class and Type.

Electrical PPE will be required where contact with energized electrical conductors and or flash/arc hazards exist. The Company will provide PPE, insulating blankets and devices and insulated tools as needed. All electrical protective equipment will be inspected by the user prior to use and immediately after any incident involving possible damage. Electrical protective equipment will be stored to protect against visible light, temperature, humidity, ozone chemicals and other damage. The Company will also maintain a testing program for electrical protective equipment that ensures performance. Testing will occur according to the following schedule:

### **Electrical PPE Testing Schedule**

<b>Type of Equipment</b>	<b>When to Test</b>
Rubber insulating line hose	Upon indication that insulating value is suspect
Rubber insulating covers	Upon indication that insulating value is suspect
Rubber insulating blankets	Before first issue and every 12 months
Rubber insulating gloves	Before first issue and every 6 months
Rubber insulating sleeves	Before first issue and every 12 months

If the electrical equipment has been in storage, it must have been tested within the previous 12 months prior to issue

## **Hand Protection (29 CFR 1910.138)**

Hand and finger protection with a minimum Level 3 cut resistance rating in accordance with ANSI/ISEA 105-2005 is mandatory at all times on this project. It is employers responsibility to determine and enforce the appropriate type and level of protection required for its employees based on 29 CFR 1910.138 and 1926.95(a) for the work and task being performed.

All hand protection used at our company will be selected by the program administrator to ensure the greatest degree of protection is provided for the specific hazard identified. Glove manufacturers and suppliers will be consulted to select gloves that will provide the desired protection against mechanical, thermal and/or chemical hazards. Special care will be exercised when evaluating the need for hand protection in areas with moving machine parts, especially rotating and revolving equipment.

## **Body Protection**

Body protection in the form of aprons or other protective clothing will be required when employees are exposed to the following hazards: chemical splash or contact, contact with sharp or jagged objects, heat, sparks or flame. Equipment manufacturers and suppliers will be consulted to select equipment that will provide the desired protection against mechanical, thermal and/or chemical hazards.

## **Hearing Protection**

Hearing conservation procedures shall be outlined in a separate "Hearing Conservation Program."

## **Respiratory Protection (29 CFR 1910.139)**

Procedures regarding respiratory protection are contained in the Respiratory Protection Program.

Revision History Record:

Revision Number	Section	Revised By	Description
0	NA	NA	Original document.

# Appendix A

## Hazard Assessment Form

# PPE – HAZARD ASSESSMENT FORM

Job Classification: \_\_\_\_\_

<b>HEAD HAZARD</b> Tasks that can cause head hazards include: Working below other workers who are using tools and materials, which could fall, working on energized electrical equipment, working with chemicals and working under machinery or processes which might cause materials to fall.				
<b>CIRCLE ALL HAZARDS THAT ARE OBSERVED:</b>				
Chemical Splash	Burn	Electric Shock	Impact	Heat
Particulate				NO HAZARD

Description of hazards: \_\_\_\_\_  
 \_\_\_\_\_

<b>EYE HAZARD</b> Tasks that can cause eye hazards include: Working with acids and chemicals, chipping, grinding, furnace operations, sanding, welding, and woodworking.				
<b>CIRCLE ALL HAZARDS THAT ARE OBSERVED:</b>				
Chemical Splash	Burn	Electric Shock	Impact	Heat
Dust	Light Radiation	Flying Fragments	Furnace	Welding
Brazing	Mists	Fumes		NO HAZARD

Description of hazards: \_\_\_\_\_  
 \_\_\_\_\_

<b>HAND HAZARD</b> Tasks that can cause hand hazards include: Cutting materials, working with chemicals and hot objects.				
<b>CIRCLE ALL HAZARDS THAT ARE OBSERVED:</b>				
Chemical Splash	Burn	Electric Shock	Impact	Sharp Objects
				NO HAZARD

Description of hazards: \_\_\_\_\_  
 \_\_\_\_\_

<b>BODY HAZARD</b> Tasks that can cause hand hazards include: Cutting materials, working with chemicals and hot objects.				
<b>CIRCLE ALL HAZARDS THAT ARE OBSERVED:</b>				
Chemical Splash	Burn	Electric Shock	Impact	Sharp Objects
				NO HAZARD

Description of hazards: \_\_\_\_\_  
 \_\_\_\_\_

<b>FOOT HAZARD</b> Tasks that can cause foot hazards include: Carrying or handling materials that could be dropped, performing manual material handling and working with chemicals.				
<b>CIRCLE ALL HAZARDS THAT ARE OBSERVED:</b>				
Chemical Splash	Burn	Electric Shock	Impact	Sharp Objects
Rolling Objects	Compression			NO HAZARD

Description of hazards: \_\_\_\_\_  
 \_\_\_\_\_

<b>RESPIRATORY HAZARD</b> Tasks that can cause respiratory hazards include: Spraying, dipping, welding, cutting and working with chemicals.				
<b>CIRCLE ALL HAZARDS THAT ARE OBSERVED:</b>				
Chemical Splash	Burn	Welding	Dipping	Cutting
				NO HAZARD

Description of hazards: \_\_\_\_\_  
 \_\_\_\_\_

<b>NOISE HAZARD</b> Tasks that cause employees to be exposed to noise levels exceeding 85 decibels, over an 8 hour shift.				
<b>CIRCLE ALL HAZARDS THAT ARE OBSERVED:</b>				
Noise 85-90 db	Noise 90 db & higher			NO HAZARD

Description of hazards: \_\_\_\_\_  
 \_\_\_\_\_

PPE Required: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Completion Date: \_\_\_\_\_

Completed By: \_\_\_\_\_

<b>ELECTRICAL HAZARD</b>		Tasks that cause employees to be exposed to exposed high voltage electrical conductors or electrical flash/arc including.		
<b>CIRCLE ALL HAZARDS THAT ARE OBSERVED:</b>				
High voltage contact	Flash-arc			NO HAZARD

Description of hazards: \_\_\_\_\_  
 \_\_\_\_\_

PPE Required: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Completion Date: \_\_\_\_\_

Completed By: \_\_\_\_\_

# PLAYING IT SAFE

Be safe and healthy on the job at Commonwealth Scaffold, LLC with these helpful tips provided by Allied Insurance Brokers, Inc..



## Personal Protective Equipment

### *Staying safe on the job*

No matter what your job is, engineering controls are the first line of defense against occupational injury and fatalities. However, these methods do not always offer the maximum protection for workers, so personal protective equipment (PPE) is crucial.

While Commonwealth Scaffold, LLC follows all government regulations regarding PPE and maintains American National Standards where required, it is also important that employees do their part. Become familiar with the types of PPE you may be required to use and why it is essential to your health and safety.

Often times, workers don't wear their safety equipment because it's a nuisance to put on or because it's bulky and uncomfortable. It can be tempting not to put PPE on at all unless the safety supervisor is looking, but ultimately, it is up to you to be a professional and recognize the life-saving benefits of PPE.

A poorly fitted piece of protective equipment can cause headache or pain, and if it does, see your supervisor immediately to have it adjusted or re-fitted. But most of the time, it's just a matter of getting used to wearing these items.

**Foot protection**, also known as steel-toe boots, safety-toe boots, steel-capped boots or safety shoes, is a must for all workers exposed to falling objects and puncture wounds from below. Most shoes will have symbols on the outside to illustrate the type of protection the footwear offers. Select shoes with the proper type of sole to prevent slips, trips and falls.

**Hand and arm protection** protects against amputation hazards and harmful materials. Depending on the work you do, you may need leather, canvas, metal mesh, fabric, coated fabric, chemical-resistant or liquid-resistant gloves.

**Head protection** is required in areas with the danger of impact, falling or flying objects and electrical shock or burn. Be sure to select the proper size, and take good care of the equipment so it doesn't fail in the event of an accident.

In some cases, **full-body protection** may be necessary to fully protect against all harmful agents in the workplace. When full-body protection is required, it should not be taken lightly. It must be worn whenever you are in designated areas.

Though it is often overlooked, **hearing protection** is crucial in preventing permanent damage. Remember that plain cotton is not an acceptable form of ear protection.

When there is a chance of physical, chemical or radiation damage to the **eyes or face**, you must wear appropriate PPE. Everyday glasses do not qualify and are no excuse for lack of proper protection – request eye and face PPE that fits over spectacles.

**Respiratory protection** is essential because without it, toxins may enter straight into the body. It is important for you to understand how to use this PPE properly and what its limitations are.



### It's All In The Fit

No matter what kind of PPE you are using, proper fit is essential for maximum protection. Take time to make sure all of your PPE is in good working order and fits properly before beginning a task.

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## PERSONAL PROTECTIVE EQUIPMENT INSTRUCTOR NOTES

The following provides a useful preparation outline for use by trainers presenting the Personal Protective Equipment presentation to employees. The presentation is available from Allied Insurance Brokers, Inc..

### Training Objectives

The employee will learn:

- What PPE is and how to use it
- What types of PPE Commonwealth Scaffold, LLC requires in the facility
- How to use, care for and replace required PPE

### Training Tips

- Read the OSHA standards covering your facility's required PPE and the model PPE program.
- Use a hands-on approach to PPE instruction – allow employees to practice using the required PPE even if their work does not require them to use that specific piece of protection.
- Illustrate proper PPE fit by giving a demonstration as well as showing examples of correct and incorrect use.
- Explain the steps required for putting on, removing, caring for and storing the PPE.
- Stress the importance of following PPE rules and all safety rules. Review the facility policy on discipline for safety rule violations.

### Introduction for Training

Begin by stressing the overall importance of safety in your facility.

- Review incidents where PPE was successful in preventing an accident; however, always protect individual confidentiality as necessary and never discuss discipline issues relating to an individual.
- Introduce the topic of PPE by stating that it is equipment worn by workers to protect body parts (eyes) or body systems (respiratory system).
- As an ice breaker, you can ask employees what PPE they have worn in past jobs or while doing work as a hobby.

### General Guidelines

- Stress the importance of the bullet points on these slides.
- Discuss PPE as being the last line of defense after engineering controls and administrative controls.
- Stress the importance of the individual employee being committed to his/her own safety. Success of PPE is dependent upon the employee following procedure at all times.
- If desired, remove slides describing PPE not used within your facility.
- Spend extra time on slides describing PPE used in your facility.
- Be sure to be open to questions or comments at the end of the presentation.

### Eye and Face Protection

- Mention that dress glasses, even with plastic lenses, are not safety glasses. They do not provide protection for industrial hazards
- All safety lenses will have a scribe mark on the upper edge of the lens identifying the safety lens manufacturer, and safety frames will have ANSI Z87.1 imprinted.

- You may decide to review the policy for visitor eye protection so that new employees are familiar with the requirement.

### **Electrical PPE**

Use of electrical PPE requires that NFPA (National Fire Protection Association) 70E be consulted for proper selection. Only competent and qualified personnel who are authorized to interpret that standard may provide training on it.

### **PPE Requirements for Our Company**

- Review all specific information that the employee needs to be aware of in order to use PPE to prevent injuries in your facility.
- Stress the overall importance of safety and the place that PPE occupies in the overall safety program of your facility.

### **Conclusion**

- Review the important points listed on the "Conclusion" slide.

### **Student Exercise**

At the conclusion of the training, the following activities will demonstrate the employees' understanding of the topic:

- Ask the employee to demonstrate proper procedures for wearing and removing PPE
- Ask the employee to describe how s/he will inspect their assigned PPE.
- Ask the employee to describe or show you how and where the PPE will be stored between use.
- Ask the employee to describe how to obtain replacement PPE.
- Administer the PPE Quiz.

## PERSONAL PROTECTIVE EQUIPMENT QUIZ

Name: \_\_\_\_\_ Date: \_\_\_\_\_ Score: \_\_\_\_\_

**Place a check mark on the line with the best answer for each of these 10 questions:**

1. PPE is designed to protect:  
a.  Body parts or body systems  
b.  The Company Vault
2. PPE is considered the last line of defense against injury:  
a.  Yes  
b.  No
3. Questions regarding PPE should be directed to your supervisor:  
a.  Yes  
b.  No
4. You must be trained and authorized to wear each piece of PPE:  
a.  Yes  
b.  No
5. Failure to use PPE as required can result in serious injury and discipline:  
a.  Yes  
b.  No
6. PPE must be inspected:  
a.  Annually  
b.  Before each use
7. If PPE is damaged or defective you should:  
a.  Replace it after you have completed your assigned job  
b.  Replace immediately, your safety and health could depend on PPE
8. To use PPE properly you should:  
a.  Be sure you select the proper model and size  
b.  Inspect before use and wear the PPE where and when required  
c.  Both of the above
9. PPE must be kept clean and stored properly to prevent damage:  
a.  Yes  
b.  No
10. The person most responsible for using PPE properly is:  
a.  My supervisor  
b.  Me

