

APPENDIX B

Hazard Assessment and Personal Protective Equipment

Introduction

The purpose of the Personal Protective Equipment Program is to protect the employees of this site from exposure to work place hazards and the risk of injury by the use of personal protective equipment (PPE). PPE is not a substitute for more effective control methods and its use will be considered only when other means of protection against hazards are not adequate or feasible. It will be used in conjunction with other controls unless no other means of hazard control exist.

Personal protective equipment will be provided, used, and maintained when it has been determined that its use is required to ensure the safety and health of our employees and that such use will lessen the likelihood of occupational injury and/or illness.

This section addresses general PPE requirements, including eye and face, head, foot and leg, hand and arm and body (torso) protection.

This site's Personal Protective Equipment Program includes:

- Responsibilities of the safety program manager, supervisors and employees
- Hazard assessment and PPE selection
- Employee training
- Cleaning and maintenance of PPE

1. Responsibilities

Safety Program Manager:

The Safety Program Manager is responsible for the development, implementation and administration of the PPE program and requirements. This involves:

- Conducting workplace hazard assessments to determine the presence of hazards that necessitate the use of PPE.
- Selecting and purchasing PPE.
- Reviewing, updating, and conducting PPE hazard assessments whenever:
 - A job changes
 - New equipment is used
 - There has been an accident
 - A supervisor or employee requests it, or
 - At least every year
- Maintaining records on hazard assessments, PPE assignments and training.
- Providing training, guidance, and assistance to supervisors and employees on the proper use, care, and cleaning of approved PPE.
- Periodically re-evaluating the suitability of previously selected PPE.
- Reviewing, updating and evaluating the overall effectiveness of PPE use, training, and policies.

Employees:

- The PPE user is responsible for following the requirements of the PPE program. This involves:
 - Properly wearing PPE as required and caring for, cleaning, maintaining and inspecting the PPE.
 - Attending required training sessions.
 - Informing the supervisor of the need to repair or replace PPE.

2. Hazard Assessment for PPE Selection

The Safety Program Manager, in conjunction with Supervisors, will conduct a walk-through survey of each work area to identify sources of work hazards. Each survey will be documented using the Hazard Assessment Certification Form, which identifies the work area surveyed, the person conducting the survey, findings of potential hazards, and date of the survey. The Hazard Assessment Certification Form is included with this appendix.

The Safety Program Manager will conduct, review, and update the hazard assessment for PPE whenever:

- A job changes
- New equipment or process is installed
- There has been an accident
- Whenever a supervisor or employee requests it, or
- At least every year

Selection of PPE

Once the hazards of a workplace have been identified, the Safety Program Manager will determine if the hazards can first be eliminated or reduced by methods other than PPE, i.e., methods that do not rely on employee behavior, such as engineering controls.

If such methods are not adequate or feasible, the Safety Program Manager will determine the suitability of the PPE presently available, and as necessary, will select new or additional equipment that ensures a level of protection greater than the minimum required to protect our employees from the hazards. Care will be taken to recognize the possibility of multiple and simultaneous exposure to a variety of hazards. Adequate protection against the highest level of each of the hazards will be recommended for purchase.

All personal protective clothing and equipment will be of safe design and construction for the work to be performed and will be maintained in a sanitary and reliable condition. Only those items of protective clothing and equipment that meet NIOSH or ANSI (American National Standards Institute) standards will be procured or accepted for use. Newly purchased PPE must conform to the updated ANSI standards that have been incorporated into the PPE regulations as follows:

- Eye and Face Protection ANSI Z87.1-1989
- Head Protection ANSI Z89.1-1986
- Foot Protection ANSI Z41.1-1991
- Hand Protection (There are no ANSI standards for gloves; however, selection must be based on the performance characteristics of the glove in relation to the tasks to be performed.)

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Affected employees whose jobs require the use of PPE will be informed of the PPE selection and will be provided PPE by Parish at no charge. Careful consideration will be given to the comfort and proper fit of PPE in order to ensure that the right size is selected and that it will be used.

3. Employee Training

Any worker required to wear PPE will receive training in the proper use and care of PPE before being allowed to perform work requiring the use of PPE. Periodic retraining will be offered to PPE users as needed. The training will include, but not necessarily be limited to, the following subjects:

- When is it necessary to wear PPE
- What PPE is necessary
- How to properly don, doff, adjust, and wear PPE
- The limitations of the PPE
- The proper care, maintenance, useful life, and disposal of the PPE

After the training, the employees will demonstrate that they understand how to use PPE properly, or they will be retrained.

Training of each employee will be documented and kept on file. The document certifies that the employee has received and understands the required training on the specific PPE he/she will be using. The PPE Training Quiz will be used to evaluate employees' understanding and will be kept in the employee training records. The training quiz is recommended, not required.

Retraining:

The need for retraining will be indicated when:

- An employee's work habits or knowledge indicates a lack of the necessary understanding, motivation, and skills required to use the PPE (i.e., uses PPE improperly)
- New equipment is installed
- Changes in the work place make previous training out-of-date
- Changes in the types of PPE to be used make previous training out-of-date

4. Cleaning and Maintenance of PPE

It is important that all PPE be kept clean and properly maintained. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision. Employees must inspect, clean and maintain their personal PPE according to the manufacturers' instructions before and after each use. Supervisors are responsible for ensuring that users properly maintain their PPE in good condition.

Personal protective equipment must not be shared between employees until it has been properly cleaned and sanitized. PPE will be distributed for individual use whenever possible.

If employees provide their own PPE, make sure that it is adequate for the work place hazards, and that it is maintained in a clean and reliable condition.

Defective or damaged PPE will not be used and will be immediately discarded and replaced.

NOTE: *Defective equipment can be worse than no PPE at all. Employees would avoid a hazardous situation if they knew they were not protected; but they would get closer to the hazard if they erroneously believed they were protected, and therefore would be at greater risk. It is also important to ensure that contaminated PPE that cannot be decontaminated is disposed of in a manner that protects employees from exposure to hazards.*