

Title: PPE Policy
Document No: PPE 031419

PERSONAL PROTECTIVE EQUIPMENT (PPE)

1. PURPOSE

To protect personnel from recognized and potential hazards through the appropriate application of various PPE, only after implementing engineering and administrative controls.

2. SCOPE

This policy applies to all facilities and ALL persons who work in or visit areas requiring PPE on the property.

3. RESPONSIBILITY

The EHS Director is responsible for maintaining this document. The EHS Department will assist terminals with:

- a. The periodic review of existing Job Safety Analysis, (JSA's);
- **b.** The development of additional JSA's for new processes;
- **c.** Revising PPE requirements;
- d. Worksite Hazard Assessments (WHA's); and
- e. Periodic training.

Terminal Managers are responsible for maintaining, updating and training their teams on site specific JSA's and WHA's

Each person performing work requiring PPE is responsible for following policies and procedures contained in this and related documents.

Individual responsibility for safety must be accepted! No Policy, Rule, Law or organization can keep you safe.

4. **DEFINITIONS**

4.1 <u>"Acid"</u> – Any material having a pH of less than 7. An acid may be solid, liquid or gas. Acids are usually found in a liquid state in our facilities. Check SDS for specifics on a particular material.

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- **4.2** <u>"Administrative Controls"</u> Written procedures outlining safe work practices for particular job tasks. Intended to minimize known or potential risks associated with the task when followed as written.
- **4.3** <u>"Alkaline" or "Caustic":</u> Any material having a pH of more than 7. An alkaline or caustic may be solid, liquid or gas. Check the SDS for specifics for a particular material.
- **4.4** <u>"ANSI"</u> American National Standards Institute, a private organization that oversees the development of <u>voluntary</u> standards for safety related products and systems. Many of these standards are adopted by reference in a particular OSHA Standard. When this occurs, these standards are enforceable and no longer voluntary.
- **4.5** <u>"Corrosive"</u> A caustic or acid having hazardous characteristics nominally a pH of greater than 12.5 or less than 2.0.
- **4.6** <u>"Engineering Controls"</u> Physical or mechanical solutions aimed at reducing or eliminating job hazards or lowering the risk of exposure to those hazards. (i. e. forced ventilation, sound deadening material, machine guards, remote controls, etc.)
- **4.7** <u>"Five Points of Safety"</u> A standard for personal protective equipment that addresses five areas of protection; eye, head, hand, foot and total body clothing.
- **4.8** <u>"Heavy Duty Work Boot"</u> An all leather boot, 6" minimum height, with oil & slip resistant sole, equipped with an ANSI approved impact resistant toe, which may be either composite or steel. The uppers must be made of all leather.
- **4.9** <u>"JSA"</u> Job Safety Analysis. Upon <u>observation</u> of the entire job, a formal outline (i. e. loading trucks), is created. Each step of the job is listed, identifying all recognized and potential <u>hazards</u> that may be encountered. The hazards are addressed listing potential injuries and preventive measures. Environmental impacts are often included in the analysis.
- **4.10** <u>"OSHA"</u> Occupational Safety & Health Administration, the government agency charged with overseeing employee and workplace health & safety, by setting and enforcing standards through inspections. These are <u>minimum</u> standards.
- **4.11** <u>"PPE"</u> Personal Protective Equipment, such as safety glasses, gloves, hearing protection, etc., when fitted and worn properly, provides a protective barrier between a specific hazard and a specific body part. PPE <u>DOES NOT</u> eliminate the hazard!
- **4.12** "PPE Free Zones" Areas within the terminal where PPE is not required, unless there is an active construction area, or overhead work within the zone that requires PPE or a Safe Work Permit. (See 5.2 below)
- **4.13** <u>"Terminal PPE Map"</u> The map/diagram will be developed from the WHA to indicate areas that are PPE Free Zones and where PPE is required. Graphic symbols will be used in the defined areas to indicate type of PPE required.
- **4.14** "Worksite Hazard Assessment (WHA)" Is a tool to aid in selecting appropriate PPE for known and potential hazards identified through the use of a JSA.

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5. POLICY

5.1 Basic PPE Requirements - The basic terminal PPE requirements are provided below. Associated Asphalt's basic PPE requirements incorporate the Five Points of Safety. The following provides a visual representation of these five points:











Hard Hat

Eye Protection

Gloves

Boots (Ankle High)

Long Sleeve Shirts and Pants

Reflective (During Low Visibility Period)

The above requirements provides a minimum standard for operating areas. There will be times when the task and or environment demands additional PPE. Each terminal will conduct a Worksite Hazard Assessment (WHA) for every task performed and every area in the terminal. The WHA will clearly identify situations when/where additional PPE is required. These results will be graphically depicted on a Terminal Diagram (Terminal Permit and PPE Map). Examples of completed PPE Hazard Assessment Certifications are included in Appendix B. An example of a Terminal PPE Map is included in Appendix C.

The requirement to wear PPE may increase hazardous associated with heat exposure. Make sure to drink plenty of fluids, take breaks, and cool down when necessary.

5.2 Applicable PPE Standards

- **5.2.1** Safety Glasses must meet ANSI Z87+ for non-prescription and ANSI Z87.2+ for prescription.
- **5.2.2** Safety Shoes must be all leather heavy duty work boot, minimum 6" high, with oil & slip resistant sole & impact resistant toes. Uppers must be all leather. Canvas & nylon materials are not suitable for our work environment.
- **5.2.3 Hard Hats** must meet ANSI Z87.1-1986 and be equipped with a shell and suspension system.
- **5.2.4** Gloves must be made leather or a similar cut-resistant material and suitable for the task performed. See additional discussion in **Section 5.4.3.**

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- **5.2.5** <u>Uniforms</u> will be supplied to Associated Asphalt terminal employees and must be worn at all times. Standard uniforms consist of all cotton long sleeve shirts with Hi-Visibility reflective stripes and all cotton cuff-less long pants.
- **5.2.6 Fall Protection** See Associated Asphalt fall protection policy.
- **5.3 PPE Free Zones** The classification of PPE and Permit Free Zones is required; however, the classification of such zones requires the permanent elimination of hazards PPE and Permitting is designed to mitigate. The classification of "Free Zones" must be reviewed and approved by the EHS Department and the Terminal's Regional Manager. Once approved the "Free Zones" must be declared on the Terminal's Permit and PPE Map.

PPE Free Zones must be marked with signs or painted boundaries.

The inside of a vehicle is considered a PPE free Zone.

- **5.4 Situations in Which PPE Requirements May Be Modified** A situation may develop that will require PPE that is different from the 5 Points of PPE minimum. Below are guidelines to assist in the development of WHAs and PPE requirements.
 - 5.4.1 <u>Face Shields w/Safety Glasses or One-Piece Face Shield /Goggle</u>

 <u>Combination and Nomex Hoods</u> are required to be worn by all personnel (Associated Asphalt employees, contractor personnel, chemical truck drivers, inspectors, etc.) when there is a reasonable chance that product or matter may impact ones face or eyes. This includes, but is not limited to:
 - **a.** When within 10 feet of a pump to be started
 - **b.** When within 10 feet of a temporary liquid material, product, steam, condensate hose connection.
 - **c.** While disconnecting, breaking, loosening, opening a flange, cap, plug including hooking up or disconnecting product hoses to rail cars.
 - **d.** While standing over open container of liquid (examples: tank truck, tank car, drip pan, barge, drum, and pail)
 - e. While gauging any container
 - **f.** When a procedure calls for goggles
 - **g.** Where goggles are not specifically exempted in lieu of other approved eye protection
 - **h.** While collecting material with the vacuum truck

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5.4.2 <u>Hard Hats Versus Bump Caps</u>

5.4.2.1 <u>Hard Hats</u> must be worn in Associated Asphalt terminals unless otherwise specified (refer to terminal-specific PPE Maps).

5.4.2.2 <u>Bump Caps</u> may be approved for use:

- **a.** when unloading rail cars provided that there is at least one car spacing between any person working at the top and bottom of the car and
- **b.** when working in industrial locations under roof, such as within some of the emulsion manufacturing facilities within Associated Asphalt terminals.
- 5.4.3 Hand Protection when Working with Chemicals or Performing High Dexterity Work Chemical resistant gloves must be worn at all times when performing work in the Terminal having the potential for exposure to a chemical or petroleum product other than hot asphalt. For routine work where short duration and non-immersion product exposure is typical (such as when handling hoses during product transfer) use of PVC coated gloves will be adequate for most products managed at the Terminal. Tasks that require fine mechanical dexterity or writing may be performed without work gloves.
- 5.4.4 Requirements for Employees, Contractors, and Visitors Who Are Not Issued Uniforms All field employees, visitors, contractors, managers and suppliers working in an Associated Asphalt terminal, when outside a PPE Free Zone, will be required to wear a long sleeve shirt with reflective Hi Vis striping (or a reflective vest) and long cuff-less pants and appropriate all leather foot wear. Reflective vests are NOT required when wearing uniforms with reflective stripes permanently affixed. For visitors and employees who are not issued uniforms, a short sleeve shirt may be worn with separate cotton sleeves covering all exposed skin on the lower arm and overlapping the short sleeves.
- **5.5** Additional PPE is Optional At any time, an employee may wear additional PPE for a task. For example, face shields and chemicals goggles provide a higher level of protection and may be used in lieu of safety glasses.

5.6 Hazards Requiring Additional PPE

5.6.1 Corrosive Products - Chemical or acid resistant suits and face shields or a respirator (as appropriate) are required when handling corrosive products or when within 10 feet of open lines or vessels where corrosive materials are

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being transferred and exposure to these materials is possible. This excludes transfer in permanent and closed systems where no exposure is expected Laboratory testing is also excluded from the chemical suit requirement.

- **5.6.2** Heated Products When handling products having temperatures above 130 °F, a face shield, chemical goggles, chemical resistant gloves and work clothing that prevents skin exposure are required.
- **5.6.3** Steam When working on equipment where potential for exposure to escaping steam is present, a face shield, safety glasses or chemical goggles protective gloves and work clothing that prevents skin exposure are required.
- **5.6.4** Elevated Work Locations (Fall Protection) Employees are required to stay within the boundaries of guardrails when gauging tanks. When working at elevated locations higher than 4 feet that are not equipped with guardrails, personal fall protection systems must be used. Consult the Associated Asphalt fall protection policy.
- 5.7 PPE at No Cost to Employee PPE required for specific tasks will be issued to employees at no cost to the employee. Each employee is responsible for the use, care, and maintenance of all PPE issued to them. Any defect or other condition that prevents PPE from functioning as designed will be reported to the Terminal Manager or immediate supervisor for replacement upon discovery. Contract personnel may be given the required PPE if what they have is not appropriate or if specialized PPE is needed.
 - **5.7.1** Use of defective/broken equipment is dangerous and *prohibited*. Discontinue use and replace immediately
 - 5.7.2 Employees shall be trained to use and maintain PPE upon initial issue. Retraining will not be necessary unless PPE is replaced by that which is substantially different.
 - **5.7.3** Associated Asphalt reserves the right to charge for PPE in cases of abuse or neglect.

6. REFERENCES

- **6.1** 29 CFR 1910.95, .132, .133, .135, .136, .138 & .140
- **6.2** 29 CFR 1910.251 -.255

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7. APPENDICES

Appendix A – Work Hazard Assessments – Blank Form



Appendix B – Work Hazard Assessments – Examples



Appendix C – Example Terminal PPE Map



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