

## Proof of Training

Print name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

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

#### Purpose

The purpose of the Personal Protective Equipment (PPE) Program is to develop and implement the procedures for the identification, use, care and maintenance of PPE required to be used by employees for the prevention of illness and injury. Personal Protective Equipment should always be used along with, but never instead of, engineering controls and safe work practices.

#### Scope

This policy will apply to all work performed by employees and subcontractors including, but not limited to the following activities: construction, installation, demolition, remodeling, relocation, refurbishment, testing, and servicing or maintenance of equipment or machines and at other times when personal protective equipment is required. This program is limited to eye, face, head, foot and hand protection. Respiratory protection and hearing protection are covered in separate programs.

### **Responsibilities**

#### Management (Board of Directors and Project Managers)

Management is responsible for ensuring that the materials (e.g., tools, equipment, personal protective equipment) and other resources (i.e., worker training materials) required to fully implement and maintain this program are readily available where and when they are required. Additionally, management will monitor the effectiveness of the program, provide technical assistance as needed, and review the program bi-annually.

#### Program Manager

Dave Simpson is responsible for the development, documentation, training and administration of the program. This position carries the responsibility of insuring this program is adhered to and that proper reporting is executed.

#### Supervisors (Superintendents and Foreman)

Supervisors are responsible for ensuring that a task specific job hazard analysis (JHA), also known as a safe work plan, is developed. The JHA will select, implement and document the appropriate site-specific control measures as defined within this policy. Supervisors will direct the work in a manner that ensures the risk to workers is minimized, adequately controlled and that practices defined by this policy will be followed. Supervisors are responsible for ensuring: Unger Construction employees and subcontractors are following expectations, that employees are trained on the proper use, care, storage and cleaning of PPE, that PPE training certification and evaluation forms are signed and in the employee's, that employees properly use and maintain their PPE, that defective or damaged PPE is immediately disposed

of and replaced. Additionally, supervisors are responsible for providing appropriate PPE and making it available to employees as well as notifying the Program Administrator when new hazards are introduced or when processes are added or changed. Supervisors will be held accountable for enforcing the requirements of this program. Undesirable behavior will not resolve itself, therefore supervisors must be directly involved with modifying behaviors inconsistent with program expectations. Supervisors will be held accountable for enforcing Unger Construction's disciplinary program.

#### Workers (Employees and Subcontractors)

Unger Construction has high expectations and requires safety excellence for each employee, crew, project and for our entire company. Workers are required to follow the minimum procedures outlined in this program. Workers are responsible for knowing the hazards and the control measures established in the JHA. Workers are responsible for using the assigned PPE in an effective and safe manner. Workers are responsible for stopping unsafe acts and correcting unsafe conditions on the spot as soon as they are discovered. Any deviations from this program must be immediately brought to the attention of your supervisor. Workers that choose to conduct themselves in a manner that is inconsistent with these expectations will be held accountable for those decisions and may incur disciplinary actions.

#### Hazardous Material Survey

Unger Construction requires hazardous materials surveys before demolition or renovation work begins. The survey shall include all of the following: A visual inspection of a facility or a portion thereof for suspect materials, sampling and laboratory analysis of any suspect materials found for the presence of asbestos. The hazardous materials survey will also furnish a written report that includes: a description of the area(s) visually inspected, a detailed description of any suspect material sampled, the results of any laboratory analysis of suspect materials, the method of analysis, and the total amount of asbestos containing material. Typically a floor or roof plan is included with the report to reference the written information visually.

The person conducting the survey must be certified pursuant to OSHA and/or EPA regulations. The survey may be performed by a certified Site Surveillance Technician (SST) under the supervision of a licensed consultant. Note: The survey may be performed by a certified Site Surveillance Technician (SST) under the supervision of a licensed consultant. Note: The survey needs to be kept in a project file so that it can be accessed when working on future projects.

If lead or asbestos have been confirmed to be present employees and subcontractors must follow Unger Construction's Lead and/or Asbestos program. If hazards such as asbestos or lead will be disturbed during remediation, a properly licensed professional must perform the work and follow appropriate regulations.

#### Training

Before any employee is allowed to perform work in areas requiring PPE, they must first receive training. The training will include the following subjects: When it is necessary to wear PPE, What PPE is necessary, How to properly put on, take off, adjust and wear PPE, The limitations of the PPE, The proper care, maintenance, useful life and disposal of the PPE.

Proof of training is available on the “S” drive. The training data base can be sorted by employee name or by subject. This ensures supervisors and employees are able to confirm they have the necessary training and if they don’t which employees do. Employees that need training should contact their project manager or superintendent to make arrangements for them to be trained. Each employee must demonstrate an understanding of the required training, and the ability to use PPE properly, before being allowed to perform work requiring the use of PPE.

### Retraining

The need for retraining will be indicated when: An employee’s work habits or knowledge indicate a lack of necessary understanding, motivation or skills required to properly use the PPE, New equipment is installed that requires new or different PPE, Changes in the workplace make previous training obsolete, Changes in the types of PPE to be used make previous training obsolete or Upon a supervisor request.

### Discussion

PPE is not a substitute for good work practices, elimination of hazards, engineering controls or administrative controls. PPE should only be used when engineering or administrative controls are not feasible or when they are not 100% effective in eliminating hazards. Workers must understand that PPE does not eliminate the hazard; if the PPE fails exposure to the hazard will occur. To reduce the possibility of failure PPE must be in good condition, properly; fitted maintained and stored. Selection of PPE is important it must be matched correctly to the potential hazard. Workers must understand the purpose and limitations of the PPE. PPE cannot be altered or modified for any reason, no exceptions.

### Job Hazard Assessment (Safe Work Plan)

Unger Construction utilizes JHA’s as our means of hazard assessment and establishing a safe work plan. JHA’s are performed by supervisors and/or workers. Our library of hazard assessments is maintained on the “S” drive. Before beginning a new task refer to the JHA library, generally speaking all scopes of our work are covered. For situations that have not yet been covered select one that is substantially similar and use it as a baseline. JHA’s on the “S” drive are organized by work area and job description. JHA’s include strategies for elimination, substitution, engineering and administrative controls. After applying all appropriate reduction and elimination technique, the remaining hazards will be analyzed and the proper PPE to reduce the hazards will be selected. PPE will be identified for hazards that are in the process of being reduced or eliminated and/or when hazard-reduction efforts are not 100% effective in eliminating the hazards.

For complex or moderate to high hazard tasks, tasks where an additional level of safety planning is needed, the safety director will perform the JHA with the supervisor and workers.

### Choosing Personal Protective Equipment

Unger Construction selects PPE that ensures a level of protection greater than the minimum required to protect employees from the hazards. If employees provide their own PPE for voluntary use or in lieu of company supplied PPE the PPE must be evaluated by the safety manager for compliance to Unger Constructions expectations. PPE that does not meet this standard will be rejected. Employee owned PPE shall be included in Unger Constructions maintenance, inspection and service program to ensure it performs no differently than company supplied PPE.

Personal protective equipment is generally available in many sizes. Care should be taken to ensure that the correct size is selected. At Unger construction careful consideration is given to comfort and fit. Personal protective equipment must fit properly to be effective. If the protective gear does not fit, it may not adequately protect the worker. If your PPE is uncomfortable or it fits poorly stop work, contact your supervisor for a replacement unit. Employees must be aware that the PPE does not eliminate the hazard. If the equipment fails, exposure will occur. To reduce the possibility of failure, equipment must be properly fitted and maintained in a clean and serviceable condition.

#### Inspection

PPE must be inspected by the user before each use for; damage, wear, deterioration and be removed from service if any damaged components are detected. Do not use PPE if it does not appear to be clean and in sanitary condition. Report any defective equipment to your supervisor. Damaged or defective PPE must be taken out of service immediately and red tagged.

#### Storage

PPE must be stored in a manner that is clean, sanitary and protects the unit from damage while it is not in use.