

PERSONAL PROTECTIVE EQUIPMENT (PPE) PLAN

General Requirements 1910.132



Eye and Face Protection 1910.133



Head Protection 1910.135



Foot Protection 1910.136



Hand Protection 1910.138



Hearing Protection 1910.95



PERSONAL PROTECTIVE EQUIPMENT (PPE) PLAN

PURPOSE:

- 1) Personal Protective Equipment (PPE) is designed to protect workers from Health and Safety Hazards that cannot be practically removed from the work environment with engineering or other controls.
- 2) It is intent of this policy to educate employees on values and importance of using proper PPE.
- 3) The purpose of this policy is to establish and maintain a safe and meaningful workplace to all Uchiyama Manufacturing America LLC (UMA) employees.

SCOPE:

This program covers Personal Protective Equipment (PPE) for the following parts of the body"

Body Part	OSHA Std 29 CFR
<i>General Requirements</i>	1910.132
<i>Eye and Face Protection</i>	1910.133
<i>Head Protection</i>	1910.135
<i>Occupational Foot Protection</i>	1910.136
<i>Hand Protection</i>	1910.138
<i>Hearing Protection</i>	1910.95

UMA REQUIREMENTS:

- 1) PPE rules for ALL employees - Plantwide:
 - a) Safety Glasses
 - b) Safety Toed Shoes
 - c) Hair Nets/Hats
 - d) Hard hats per Head Protection Section below
 - e) No Jewelry on plant floor (No watches / bracelets, earrings must be studs, and necklaces must be tucked into the shirt.)
- 2) UMA shall provide all PPE to employees except prescription glasses and steel/safety toed shoes.
- 3) All equipment provided by company and employee must meet all applicable rules, standards, codes and regulations
- 4) Defective, damaged equipment, and/or improper PPE will NOT be used at any time.
- 5) PPE issued to employees that becomes unservicable can be replaced on a one for one basis through the parts room.

NOTE:

- The Hazard Assessment conducted at UMA evaluates each job position at 494 Arrington Bridge Road, Goldsboro, North Carolina.
- The hazard assessment recommends minimum requirements of PPE for each job position.
- The Job Hazard Analysis (JHA) for UMA are written in a task orientated concept and may require additional PPE depending on the task being performed.
- Please refer to JHA when suggested by hazard assessment.

NOTE:

- Hearing Protection and Respiratory Protection shall be covered under separate Safety Procedures
- Electrical Protection Devices will be included in Electrical Safe Work Practices procedure.

- 6) Prescription safety glasses must meet the requirement of the American National Standards Institute (ANSI) Standard Z87.1: Eye-and-Face Protection.
 - a) The frames or bows of the glasses must be marked Z87 or better.
 - b) Side shields are required on prescription safety glasses at all times.
 - 1 The side shields may be detachable, providing they meet the ANSI requirements.
 - 2 The side shields must be marked Z87 or better.
 - c) UMA provides safety glasses to fit over top of regular prescription eyeglasses.

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RESPONSIBILITIES:

- 1) To ensure the greatest possible protection for employees in the workplace, the cooperative efforts of both employers and employees will help in establishing and maintaining a safe and healthful work environment.
- 2) Projects, Environmental & Safety Manager (PESM) Responsibilities:
 - a) Update the program as often as needed and must be reviewed annually.
 - b) Training
 - c) Selection of equipment used in conjunction with associates who use the PPE.
 - d) Hazard Assessment in conjunction with the Safety/JHA Team.
- 3) Employers Responsibilities:
 - a) Performing a "hazard assessment" of the workplace to identify and control physical and health hazards.
 - b) Identifying and providing appropriate PPE for employees.
 - c) Training employees in the use and care of the PPE.
 - d) Maintaining PPE, including replacing worn or damaged PPE.
 - e) Periodically reviewing, updating and evaluating the effectiveness of the PPE program.
- 4) Employees Responsibilities:
 - a) Properly wear PPE as required
 - b) Attend training sessions on PPE
 - c) Care for, clean and maintain PPE, and
 - d) Inform a supervisor of the need to repair or replace PPE.

HAZARD ASSESSMENT:

- 1) The workplace shall be assessed to determine if hazards are present requiring the use of PPE.
- 2) The PESH and Area supervision will assess the workplace for the existence of potential hazards, which necessitate the use of PPE.
- 3) If such hazards exist, the appropriate PPE must be selected for and used by the affected employee(s).
- 4) The PPE must be kept sanitary and must properly fit at all times.
- 5) Methods of Hazard Assessment :
 - a) Review of Injury and Illness Data:
 1. Hazard Assessment shall include a review of injuries and illnesses that have occurred in the area and determine if PPE was a factor.
 2. If the PPE was not worn or if the type of PPE was inappropriate, countermeasures will be taken to change the PPE and prevent re-occurrence of a similar injury.
 3. The PPE Hazard Assessment Form may be used as a tool for conducting the assessments.
 - b) Area Procedures
 1. Based on the area, the Job Safety Analysis (JSA), and Safe Reliable Methods are also ways PPE may be appropriately assessed and selected.
 2. Periodically these are reviewed and revised (e.g. Accident Investigation)
 - c) Area Surveys:
 1. A Hazard Assessment of all work areas will be conducted to evaluate and identify sources of hazards to employees.
 2. Consideration will be given to the basic hazard categories:

i) Impact	v) Heat
ii) Penetration	vi) Harmful dust
iii) Compression (roll over)	vii) Light (Optical radiation)
iv) Chemical	

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- 6) Sources to consider during Hazard Assessment:
 - a) Sources of motion: (examples)
 1. Machinery or processes that have the movement of tools.
 2. Machine elements or particles that could exist
 3. Movement of personnel that could result in collision with stationary objects.
 - b) Sources of high temperatures that could result in burns, eye injury or ignition of protective equipment, etc.
 - c) Types of chemical exposures
 - d) Sources of harmful dust
 - e) Sources of light radiation (i.e. welding, brazing, cutting, furnaces, high intensity lights, etc.
 - f) Sources of falling objects or potential for dropping objects.
 - g) Sources of sharp objects which might pierce the feet or cut the hands
 - h) Sources of rolling or pinching objects which could crush the feet.
 - i) Lay-out of workplace and location of co-workers.
 - j) Electrical Hazards.
- 7) Evaluation:
 - a) The PESM will evaluate the information in this policy annually or more frequently if there are facility or process changes that may initiate an evaluation.
 - b) When updates occur, all employees will receive updated training as needed.
 - c) The evaluation will determine the types of hazards that may exist and the level of risk or seriousness of potential injury to the employee.
 - d) If the potential for injury exists, then the appropriate PPE should be selected and included in the area requirements.

TRAINING

- 1) Employees will be trained in the use of PPE including the following:
 - a) When PPE is necessary.
 - b) What PPE is necessary.
 - c) How to properly put on, take off, adjust, and wear the PPE.
 - d) The limitations of the PPE.
 - e) The proper care, maintenance, useful life and disposal of the PPE.
- 2) Employees shall demonstrate an understanding and have the ability to use the PPE properly before being allowed to perform work requiring the use of PPE.
- 3) Retraining shall be conducted when changes in the workplace occur making the previous training obsolete, when different PPE is selected, or when the employee's knowledge or use of the PPE indicate that the employee has not retained the appropriate understanding or skill.

GENERAL REQUIREMENTS

- 1) **Appropriate body clothing shall be worn when the body is exposed to such hazards as:**
 - a) Exposure to hazardous chemicals or other harmful substances.
 - b) Exposure to thermal burns.

NOTE: No one will be permitted to work in shorts or work without a shirt.

Shirts must cover the shoulders (No Tank tops).

UMA Employees must always be in uniform.

- 2) **Eye and Face Protection**
 - a) Eye protection is required plant wide. (Effective October 1st 2016)
 - b) Protective eye and face equipment is provided and required where there is a reasonable probability of injury that can be prevented by such equipment.
 - c) Eye and face protection used must meet the requirements of ANSI Standard Z87 Eye-and-Face Protection.

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- d) All employees are required to wear the prescribed eye and face protection to protect from injury.
- e) Every eye-and-face protector must be distinctly marked to facilitate the identification.
 - 1. The frames or bows of the glasses must be marked Z87.
 - 2. If detachable side shields are used, they must be marked Z87.
 - i) Side shields are required on prescription safety glasses at all times.
- f) Protection for people who wear corrective lenses must wear over safety glasses over spectacles without disturbing the adjustment of prescription.
- g) If a face shield or welding helmet is worn, safety glasses/goggles are also required underneath the face shield or helmet.

3) Head Protection

OSHA 29CFR 1910.135

- a) UMA shall ensure that all affected employee wear a protective helmet when working in areas where there is a potential for injury to the head from falling objects.
- b) Bump caps are worn in Rubber Mfg for certain job tasks.
- c) UMA shall issue protective head gear to affected personnel as needed to fulfill their job requirements.
- d) Head gear can be turned into the parts room for replacement of headbands or completed replacement if the head gear becomes unservicable.
- e) Per requirement from UMC, affected employees shall wear hard hats in the following situations:
 - 1. When ascending/descending any ladder on the manufacturing floor.
 - 2. When performing any work on an elevated level above any machine; to include fixed ladders with fall protection attached to a piece of equipment.
 - 3. While performing any work in any personnel lifting device to include the Aerial Lift.
 - 4. While performing any work outside on any ladder or lifting device above ground level.
 - 5. After getting onto the roof through the interior roof access.
 - 6. Hard hats are not required when using stepstools with a height under 4' or in an office area or the parts room.
 - i) This exemption does not override any requirement outlined in any other information in this section.
- f) Hats and/or hair nets are required plant wide for quality and safety reasons.

4) Occupational Foot Protection

OSHA 29CFR 1910.136

- a) Foot protection is required plant wide. (Effective January 1st 2017)
- b) Safety shoes shall be worn when working in areas where there is a danger of foot injuries due to falling or rolling objects, objects piercing the sole, and exposure to electrical hazards.
 - 1. Rubber boots shall be worn where there is danger of exposure to hazardous chemicals.
- c) All employees and contractors shall wear ANSI approved safety shoes when working on the plant site when there is a danger of foot injury.
 - 1. The only exception is a visitor / vendor that is touring the plant and when the tour will not be in the process work areas.
- d) Lace type shoes that extend above the ankle afford the best support and are recommended for employees working in the maintenance and operating departments.
- e) ESD safety shoes are provided by a voucher for up to \$75.00 through Sutton Shoes for associates that work in the NL-24 Glue Application, Maintenance and the Chemical Mixing Room; Once per year.

5) Hand Protection

OSHA 29CFR 1910.138

- a) Appropriate hand protection shall be used when hands are exposed to hazards such as those from:
 - 1. Skin absorption of harmful substances
 - 2. Severe cuts or laceration
 - 3. Severe abrasions or punctures
 - 4. Chemical or thermal burns
 - 5. Harmful temperature extremes.

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b) Cut protection:

1. Hand-held sharp and cutting tools are frequently used in our workplace.
2. The tools range from scissors, razors, utility knives and saws to pruners, chisels, and snips just to name a few.
3. Sharp and cutting tools can cause cuts and puncture wounds if they are not handled properly.
4. To prevent team members from cuts and hazards from sharp tools, use the hierarchy of controls:
 - i) Eliminate the hazard (when possible)
 - ii) Substitute the hazard
 - Use self-retracting utility knives provided by the company.
 - Use wire stripper to strip wires, not knives
 - Knives for cutting rubber shall be stored in leather or hard sheathes while not in use.
 - Use the proper tool for the job.
 - iii) Engineering Controls (when possible)
 - iv) Administrative Controls
 - Inspect all tools before using them
 - If a tool is broken, dull or damaged, it should be tagged as such and taken out of service, repaired or replaced
 - Follow manufacturer's instructions for using tools
 - Train team members to maintain a sharp edge on tools, as sharp tools are less hazardous than dull tools.
 - Never carry any sharp tools in pockets.
 - Brass rods shall be carried in a protective pouch in the pocket to prevent the possibility of puncture wounds.
 - Always cut away from the body. (knives, chisels, Wire cutters etc.)
 - When replaceable blades (ie. razor blades, utility blades) or other sharp tools become unusable, place them in the sharp containers near the parts room. DO NOT THROW IN THE TRASH.

c) Each department has been assessed for the correct hand protection for their specific tasks.

d) Gloves can be exchanged one for one in the parts room.

1. **Chemical Gloves:**

- i) Before each use, gloves must be inspected for signs of chemical degradation such as swelling, cracking, shrinking, or discoloration of the material.
- ii) If detected, it means the gloves material has undergone a physical change due to chemical contact and will no longer provide chemical protection.
- iii) Also during inspection, look for signs of hole and punctures and remove the gloves from service if any are found.
- iv) Another way to identify holes is through the use of air;
 - Fill the glove with air and hold the glove near your cheek to feel for escaping air,
 - If any air is felt, then the glove shall be discarded and replaced with new gloves.
- v) For a more thorough inspection, OSHA recommends filling the gloves with water and tightly rolling the cuff towards the fingers - this will reveal any pinhole leaks.
- vi) If leaks are exposed again discard and replace with new gloves.
- vii) For complete care and maintenance instructions for each specific type of glove, refer to the specific manufacturers information.

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2. Electrical Gloves and other Electrical PPE:

- i) All electrical gloves and PPE shall be inspected in accordance with the 23CFR 1910.137 and they must meet the minimum standards set within.
- ii) Before anyone shall be issued any glove for electrical purposes, they shall be trained to the standard.

6) Hearing Protection

OSHA 29 CFR 1910.95

- a) UMA shall administer a continuing, effective hearing conservation program whenever employee noise exposures equal or exceed an 8-hour time-weighted average sound level (TWA) of 85 decibels measured on the A scale (slow response) or, equivalently, a dose of 50%.
- b) For purposes of the hearing conservation program, employee noise exposures shall be computed and without regard to any attenuation provided by the use of PPE.

UMA shall establish and maintain an audiometric testing program.

- 1. The important elements of the program include the baseline audiograms, annual audiograms, training, and follow-up procedures.
- 2. UMA must make audiometric testing available at no cost to all employees who are exposed to an action level of 85 dB or above, measures as an 8-hour TWA. (UMA complies with this) After performing noise sampling in different areas of the plant-Metal Press dept is the only area that exceeds 85dba. Other areas are limited to specific tasks.
For additional information: The Hearing Conservation Plan is entailed with more detail and is located on each floor computer under the safety procedures.

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Hazard Assessment / Certification Form

Facility Name: Uchiyama MFG America LLC

Date: _____

Position / Job / Task: - _____

Type of PPE (provide detail on selection as appropriate):

(A = Available O = Optional X = Required)

☐ **Eye/Face Protection**
(Safety Glasses/Goggles/FaceShield)

☐ **Hand Protection**
(Gloves - cotton/leather/other)

☐ **Foot Protection**
(Safety-toed Boots)

☐ **Hearing Protection**
(Ear plugs / Ear muffs)

☐ **Head Protection**
(Hard Hat)

☐ **Respiratory Protection**
(Dust Mask / Air Helmet)

☐ **Body Protection**
(Welding Apron/Fire Suit)

☐ **High Visibility**
Orange hard hat/vest

☐ **Other:** _____

Hazards:

Selection Criteria:

Equipment Selected:

Reviewed by: _____

Revised: _____