

SPENCER OGDEN	HEALTH, SAFETY AND ENVIRONMENT MANAGEMENT SYSTEM		Doc No:	SO-HSE-GDN-001-A
			Issue Date:	22 <sup>nd</sup> July 2019
			Revision Date	
GUIDANCE NOTE – GET IT RIGHT – PERSONAL PROTECTIVE EQUIPMENT (PPE)			Revision Number	A
PREPARATION: Geoff Stacey	AUTHORITY: Greg Morris	ISSUING DEPARTMENT: Health Safety & Environment (HSE)	Next Review Date	

## INTRODUCTION

Spencer Ogden regards the health, safety and security of its workers as an integral part of its business. Our aspirations are no accidents and no harm to people. We believe all incidents can be prevented and that safety must never be compromised. We provide safe workplaces for all, and everyone is expected to take responsibility for health and safety. Two overriding principles provide the foundation of our approach to HSE, they are:

- 1. NOTHING WE DO IS SO IMPORTANT THAT WE CANNOT TAKE THE TIME TO DO IT SAFELY**
- 2. EVERYONE HAS THE RIGHT TO SAFELY HALT WORK AT ANY TIME IF THEY FEEL HEALTH AND SAFETY IS BEING COMPROMISED.**

This guidance note has been developed in line with the above, taking on board learnings from incidents over recent years to Spencer Ogden personnel who have been working on worksites and not using correctly Personal Protective Equipment (PPE) provided to them for use. Spencer Ogden has developed numerous policies and procedures as part of their Health, Safety and Environmental Management System (HSEMS). However, it is the Clients HSEMS that will be followed and complied with by all SO employees and Contract personnel working under the Clients control and supervision on their sites and facilities. It is expected that Client HSE Inductions will be carried out for all SO personnel before they commence any site / facility activities and these inductions shall include the importance, maintenance and proper use of PPE.

The US Department of Occupational Safety and Health Administration (OSHA) has a role to promote the safety and health of America's working men and women by setting and enforcing standards; providing training, outreach and education; establishing partnerships; and encouraging continual improvement in workplace safety and health. In principle, Spencer Ogden follows and aligns itself with the OSHA requirements globally for its organisation.

## WHY IS PPE IMPORTANT?

Using PPE in the correct manner and ensuring it is properly maintained is key in ensuring that PPE related incidents are kept to a minimum. Injuries related to the use of incorrect or poorly maintained PPE could have serious implications for the employer and the person who has been injured.

## WHAT DO I HAVE TO DO?

To help prevent PPE related injuries in the workplace, you must always ensure you are using the correct and properly maintained PPE for the job, remain aware of the risks and follow sensible health and safety measures to prevent and avoid injury. In particular, ensure that you follow these guidance notes to PPE related incidents on site. Your commitment to following the guidance outlined herein is a precondition of Spencer Ogden offering employment and your failure to follow the important advice set out below will in, the event of any injury, very likely mean you will as a result be fully at fault or contributory negligent in causing that injury.

This guideline provides a general overview of PPE and assistance to workers on understanding the types of PPE, selecting appropriate PPE for a variety of circumstances, knowing the basics of conducting a "hazard assessment" of the workplace and understanding what kind of training is needed in the proper use and care of PPE.

## YOUR RESPONSIBILITIES

You are responsible for:

- Complying with the correct use and care of PPE.
- Reporting changes in exposure to hazardous conditions that might require a follow-up assessment of the task for PPE.
- Reporting and replacing defective or damaged PPE, which shall not be used.
- Wearing of required PPE in the correct manner is a condition of employment.
- Ensuring your PPE is adequate, clean and properly maintained
- Attend training sessions on PPE

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Furthermore, everyone on site is collectively responsible for ensuring and achieving the greatest possible levels of protection for workers in the workplace. The cooperative efforts of all, employers, Clients, contractors and employees, will help in establishing and maintaining a safe and healthy work environment.

## UNDERSTAND THE TYPES OF PPE

### SELECTING PPE

All PPE clothing and equipment should be of safe design and construction, and should be maintained in a clean and reliable fashion. Employers should take the fit and comfort of PPE into consideration when selecting appropriate items for their workplace. PPE that fits well and is comfortable to wear will encourage employee use of PPE. Most protective devices are available in multiple sizes and care should be taken to select the proper size for each employee. If several different types of PPE are worn together, make sure they are compatible. If PPE does not fit properly, it can make the difference between being safely covered or dangerously exposed. It may not provide the level of protection desired and may discourage employee use. Employers and Clients need to provide PPE in the categories listed below and must make certain that any new equipment procured meets the appropriate ANSI standard where appropriate.

### STANDARD PPE

The standard basic PPE requirements for any construction / operating facility is: Head Protection (Safety Helmet); Eye Protection (Safety Glasses); Hearing Protection (Ear plugs); Body Protection (Coveralls); Hand Protection (Gloves); Foot Protection (Safety Shoes).

### HEAD PROTECTION

Employees must wear protective helmets when working in areas where there is a potential for injury to the head from employee-initiated impact or impact from falling or other moving objects. Helmets must comply with **ANSI / ISEA Standard Z89.1-2014 Class E**, American National Standard for Industrial Head Protection for Type II head protection or be equally effective.

- Employees must wear protective helmets when working in areas where there is a potential for injury to the head from falling objects.
- Hardhats are to be worn at all field, shop and warehouse locations, or where deemed necessary as per each location's PPE Hazard Assessment.
- Hardhats will not be altered in any way.
- Do not paint or apply unauthorized stickers, name plates, etc.
- Do not drill, cut, bend, or apply heat.
- Do not alter the suspension system.
- Hardhats will be inspected by the employee regularly for cracks, chips, scratches, signs of heat exposure (sun cracks), etc.
- Defective hardhats will be replaced immediately.
- Hardhats shall not be placed in rear windows of vehicles where they will be exposed to the sun or become projectiles during an accident.
- A supply of hardhats must be made available to visitors.
- Employees will be trained in the use, care and maintenance of head protection equipment.

### CLOTHING - COVERALLS

- Work clothing should be selected which provides protection from incidental exposure to cuts, abrasions, hot surfaces, hydrocarbons, chemicals etc. In general, long-sleeve button up shirts and long pants or coveralls are considered the best protection from incidental exposures. Clothing of cotton natural fibres is preferable. One hundred percent (100%) synthetic

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garments such as polyester, nylon, or rayon are not allowed. Clothing must be carefully selected and worn to minimize the risk of snagging in plant and equipment, e.g. rotating equipment, valve stems, scaffolding clamps, small bore piping supports etc., which could lead to serious injury.

- Fire-resistant clothing worn by emergency fire team members shall be certified as complying with NFPA Standard 1971 -2018, or an international equivalent, by a marking permanently affixed to the items by the manufacturer. All coveralls will have sleeves, and the pants portion must extend past the ankles and be in a condition that provides protection to the wearer (i.e. no large holes). Coveralls should be kept reasonably clean and not saturated with grease, oil or hydrocarbons.

#### EYE AND FACE PROTECTION

- Employees can be exposed to a large number of hazards that pose danger to their eyes and face. OSHA requires employers to ensure that employees have appropriate eye or face protection if they are exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapours, potentially infected material or potentially harmful light radiation.
- Many occupational eye injuries occur because employees are not wearing any eye protection while others result from wearing improper or poorly fitting eye protection. Employers must be sure that their employees wear appropriate eye and face protection and that the selected form of protection is appropriate to the work being performed and properly fits each employee exposed to the hazard.
- Employees must use appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids or chemical gases or vapours. Eye and Face PPE must comply with ANSI Standard Z87.1-2003 (Z87+), Occupational and Educational Personal Eye and Face Protective Devices.
- Each type of protective eyewear is designed to protect against specific hazards. Employers can identify the specific workplace hazards that threaten employees' eyes and faces by completing a hazard assessment as outlined in the earlier section.

*Examples of potential eye or face injuries include:*

- Dust, dirt, metal or wood chips entering the eye from activities such as chipping, grinding, sawing, hammering, the use of power tools or even strong wind forces.
- Chemical splashes from corrosive substances, hot liquids, solvents or other hazardous solutions.
- Objects swinging into the eye or face, such as tree limbs, chains, tools or ropes.
- Radiant energy from welding, harmful rays from the use of (as well as heat, glare,

#### *Types of Eye Protection*

- Selecting the most suitable eye and face protection for employees should take into consideration the following elements:
  - Ability to protect against specific workplace hazards.
  - Should fit properly and be reasonably comfortable to wear.
  - Should provide unrestricted vision and movement.
  - Should be durable and cleanable.
  - Should allow unrestricted functioning of any other required PPE.

#### *Eye Protection for Exposed Employees*

- Each individual shall be provided with one pair of protective eyewear. If this is done, the employee must make sure that the protective eyewear is kept hygienically clean and disinfect protective eyewear on a regular basis.
- OSHA suggests that eye protection be routinely considered for use by carpenters, electricians, machinists, mechanics, millwrights, plumbers and pipefitters, sheet metal employees and tinsmiths, assemblers, sanders, grinding machine operators, sawyers, welders, labourer's, chemical process operators and handlers, and timber cutting and logging workers. Employers of employees in other job categories should decide whether there is a need for eye and face PPE through a hazard assessment.

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#### *Safety Glasses*

Safety glasses, with side shields, that meet ANSI Z-87.1-2003 standards with “high Impact lenses” are required to be worn by all employees, subcontractors, and visitors while on COMPANY property, at all times, as described below:

- At field locations, in shops and warehouses, except in approved, designated, striped safety zones.
- In all yard work zones or by everyone when in the vicinity of loading or unloading equipment, performing mechanic or maintenance work, test stand operations, operating equipment such as forklifts, welding, or any type of work which has the potential to inflict an eye injury.
- In any office, restroom, or any other building while performing any type of work where a potential eye injury may be present.
- Visitors will be provided with visitor glasses. In the absence of approved prescription safety glasses, “Over the glass” type safety glasses or goggles, must be worn over the non safety glasses until approved prescription safety glasses are obtained.
- Workers assisting welders must wear absorbent safety glasses that protect the wearer from ultra-violet (UV) and/or infrared rays (IR).
- Dark shaded lens (sunglasses) darker than a # 1 shade are prohibited to be worn indoors unless welding or assisting a welder.
- A doctor must support “exceptions for medical reasons” in writing to exempt safety eyewear requirements.
- Safety glasses are not required: inside offices or in parking lots when traveling from vehicles to and from office buildings by way of main doors that do not pass through shops.

#### *Goggles*

- These are tight-fitting eye protection that completely cover the eyes, eye sockets and the facial area immediately surrounding the eyes and provide protection from impact, dust and splashes. Some goggles will fit over corrective lenses.
- Chemical splash proof goggles shall be worn when handling or mixing liquid chemicals, solvents, paints, etc., and/or as recommended on the Material Safety Data Sheet of the material being handled.
- Dust proof goggles shall be worn when blowing equipment down with air or while performing other jobs where safety glasses are not adequate to prevent airborne particles from entering the openings around the lenses and side shields.

#### *Laser safety goggles.*

These specialty goggles protect against intense concentrations of light produced by lasers. The type of laser safety goggles an employer chooses will depend upon the equipment and operating conditions in the workplace.

#### *Prescription Lenses*

- Everyday use of prescription corrective lenses will not provide adequate protection against most occupational eye and face hazards, so employers must make sure that employees with corrective lenses either wear eye protection that incorporates the prescription into the design or wear additional eye protection over their prescription lenses. It is important to ensure that the protective eyewear does not disturb the proper positioning of the prescription lenses so that the employee’s vision will not be inhibited or limited. Side shields are available on some models and these are the preferred. If no side shields then over-glasses must be used.
- Also, employees who wear contact lenses must wear eye or face PPE when working in hazardous conditions.

#### *Welding Operations*

The intense light associated with welding operations can cause serious and sometimes permanent eye damage if operators do not wear proper eye protection. The intensity of light or radiant energy produced by welding, cutting or brazing operations varies according to a number of factors including the task producing the light, the electrode size and the arc current. Welding shields, constructed of vulcanized fibre or fiberglass and fitted with a filtered lens, welding shields protect eyes from burns caused by infrared or intense radiant light; they also protect both the eyes and face from flying sparks, metal spatter and slag chips produced during welding, brazing, soldering and cutting operations. OSHA requires filter lenses to have a shade number appropriate to protect against the specific hazards of the work being performed in order to protect against harmful light radiation.

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#### *Face shields.*

- These transparent sheets of plastic extend from the eyebrows to below the chin and across the entire width of the employee's head. Some are polarized for glare protection. Face shields protect against nuisance dusts and potential splashes or sprays of hazardous liquids but will not provide adequate protection against impact hazards. Face shields used in combination with goggles or safety spectacles will provide additional protection against impact hazards.
- Full face shields shall be worn over safety glasses when operating hand held or stationery grinders with abrasive or wire wheels, while chipping paint or concrete or, performing jobs where there is the potential for flying objects striking the face and safety glasses or goggles would not provide adequate protection.

#### **FOOT PROTECTION**

- All safety footwear must meet ANSI Z41-1999 / ASTM F2413-11 standards.
- All employees shall wear safety footwear with regularly assigned duties at field locations, in shops and warehouses.
- Office workers and visitors who enter these areas on an infrequent basis may not be required to wear foot protection provided they stay clear of the work being performed and with the permission of the appropriate HSE Manager.
- Shops, Field Locations, Warehouses and Parts Departments: Leather or equivalent boots, either lace up or pull up, shall be worn.
- The boot must provide ankle protection and have soles designed to protect from punctures with defined heels for climbing ladders.
- Metatarsal guards will be worn when duties present a hazard of equipment or material crushing the foot.
- Client locations may require safety footwear to be worn by everyone; check with the local supervisor for client requirements before visiting field locations.

#### **HAND PROTECTION**

For hand protection, there is no ANSI standard for gloves but OSHA recommends that selection be based upon the tasks to be performed and the performance and construction characteristics of the glove material.

#### *Gloves*

- Gloves are required to be worn when performing work, which may expose the hands to extreme temperatures, cuts and abrasions, or exposure to chemicals.
- Welding: Welding gloves made of leather or other heat resistant materials shall be worn when performing arc welding or oxy/gas cutting.
- Chemical: For protection against chemicals, glove selection must be based on the chemicals encountered, the chemical resistance and the physical properties of the glove material.
- Refer to the specific chemical's Material Safety Data Sheet for the correct glove type.
- Persons assigned to working with chemicals, i.e., solvent vats, shall be issued their own individual gloves for hygiene purposes.
- Leather: Leather gloves should be worn when working with sharp materials or when handling rigging equipment.
- Cloth: Cloth gloves should be worn when handling objects or materials, which could cause blisters, splinters, cuts, etc.
- Heat Resistant: Heat resistant gloves shall be worn when handling hot bearings, races, or other materials or objects that have been heated beyond ambient temperatures.
- Insulated: Insulated gloves shall be worn to prevent frostbite in extreme cold climates.

#### *Glove Inspections*

- Gloves shall be inspected before each use for holes, tears, and worn areas.

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- Chemical gloves shall be periodically air tested for pinholes by twisting the cuff tightly, apply low air pressure to expand the glove, and then submersing in water to check for bubbles.
- Defective gloves shall be discarded immediately. Exception: machinists are exempted from wearing gloves while working with rotating machinery.

## HEARING PROTECTION

Hearing protection is required to be worn by all employees, subcontractors, and visitors while in posted “High Noise” areas. Refer to the Spencer Ogden Hearing Conservation Program for more information. Warning signs will be posted in areas known or suspected to have noise levels exceeding 85 dBA either constantly or intermittently. When signs are not posted, employees shall wear hearing protection when noise caused by machinery, tools, etc., prevents normal conversations to be heard clearly. Rule of thumb: If you have to yell to be heard, hearing protection is required

### *Fit*

- Due to individual differences, not everyone can wear the same type of hearing protection. A variety of styles may have to be tried before one is found to be comfortable and provide adequate protection.
- Employees shall be instructed how to obtain the proper fit.

### *Types of Hearing Protection*

- Moulded Inserts (ear plugs)
- Canal Caps (head band type)
- Muff, either headband or hardhat mounted Earmuffs and earplugs shall be provided to the employee in sizes and configurations that will be comfortable to the employee.

### *Care and Maintenance*

- Inspect hearing protection prior to each use.
- Hearing protection must be kept clean to prevent ear infections.
- Most earplugs used today are disposable and must be discarded when they become dirty, greasy, or cracked.
- Earmuffs that have deteriorated foam inserts, cracked seals or are defective must be replaced.

## FALL PROTECTION

Personal fall protection is required when performing certain elevated jobs in excess of six feet. Consult the Spencer Ogden HSE Manager if you have concerns.

## ELECTRICAL PROTECTION

Consult the Spencer Ogden HSE Manager if you have concerns.

# HAZARDS AND THE REQUIREMENT FOR HAZARD ASSESSMENTS

## HAZARDS

Hazards exist in every workplace in many different forms: sharp edges, falling objects, flying sparks, chemicals, noise and a myriad of other potentially dangerous situations. It is imperative that employers and Clients protect their employees and contractors from workplace hazards that can cause injury. Controlling a hazard at its source is the best way to protect employees. Depending on the hazard or workplace conditions, the use of engineering or work practice controls is the best way to manage or eliminate hazards to the greatest extent possible. For example, building a barrier between the hazard and the employees is an engineering control; changing the way in which employees perform their work is a work practice control.

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When engineering, work practice and administrative controls are not feasible or do not provide sufficient protection, employers must provide personal protective equipment (PPE) to their employees and contractors and ensure its correct use. Personal protective equipment, commonly referred to as “PPE”, is equipment worn to minimize exposure to a variety of hazards. Examples of PPE include such items as gloves, foot and eye protection, protective hearing devices (earplugs, muffs) hard hats, respirators and full body suits.

## THE HAZARD ASSESSMENT

A first critical step in developing a comprehensive safety and health program is to identify physical and health hazards in the workplace. This process is known as a “hazard assessment.” Potential hazards may be physical or health-related and a comprehensive hazard assessment should identify hazards in both categories. Examples of physical hazards include moving objects, fluctuating temperatures, high intensity lighting, rolling or pinching objects, electrical connections and sharp edges. Examples of health hazards include overexposure to harmful dusts, chemicals or radiation.

The hazard assessment should begin with a walkthrough survey of the facility to develop a list of potential hazards in the following basic hazard categories:

- Penetration,
- Compression (roll-over),
- Chemical,
- Heat/cold,
- Harmful dust,
- Light (optical) radiation, and Biologic.

In addition to noting the basic layout of the facility and reviewing any history of occupational illnesses or injuries, things to look for during the walkthrough survey include:

- Sources of electricity.
- Sources of motion such as machines or processes where movement may exist that could result in an impact between personnel and equipment.
- Sources of high temperatures that could result in burns, eye injuries or fire.
- Types of chemicals used in the workplace. Sources of harmful dusts.
- Sources of light radiation, such as welding, brazing, cutting, furnaces, heat treating, high intensity lights, etc.
- The potential for falling or dropping objects.
- Sharp objects that could poke, cut, stab or puncture.
- Biologic hazards such as blood or other potentially infected material.

When the walkthrough is complete, the employer / client should organize and analyze the data so that it may be efficiently used in determining the proper types of PPE required at the worksite. The employer / client should become aware of the different types of PPE available and the levels of protection offered. It is definitely a good idea to select PPE that will provide a level of protection greater than the minimum required to protect employees from hazards. The workplace should be periodically reassessed for any changes in conditions, equipment or operating procedures that could affect occupational hazards. This periodic reassessment should also include a review of injury and illness records to spot any trends or areas of concern and taking appropriate corrective action. The suitability of existing PPE, including an evaluation of its condition and age, should be included in the reassessment.

Documentation of the hazard assessment is required through a written certification that includes the following information:

- Identification of the workplace evaluated;
- Name of the person conducting the assessment;
- Date of the assessment; and Identification of the document certifying completion of the hazard assessment.



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Each employee should ascertain that the above has been completed for any worksite on which they work.

## TRAINING EMPLOYEES IN THE PROPER USE OF PPE

Clients are required to train each employee who must use PPE. Employees must be trained to know at least the following:

- When PPE is necessary.
- What PPE is necessary?
- How to properly put on, take off, adjust and wear the PPE.
- The limitations of the PPE.
- Proper care, maintenance, useful life and disposal of PPE.

Clients should make sure that each employee demonstrates an understanding of the PPE training as well as the ability to properly wear and use PPE before they are allowed to perform work requiring the use of the PPE. If a Client believes that a previously trained employee is not demonstrating the proper understanding and skill level in the use of PPE, that employee should receive retraining. Other situations that require additional or retraining of employees include the following circumstances: changes in the workplace or in the type of required PPE that make prior training obsolete. The Client must document the training of each employee required to wear or use PPE by preparing a certification containing the name of each employee trained, the date of training and a clear identification of the subject of the certification. Each employee should ascertain to their own satisfaction that the above has been complied with for any worksite on which they work.

### TRAINING

Employees who require or may need to wear PPE shall be properly trained and PPE must be fitted to each affected employee. Training shall include:

- When PPE is necessary.
- What PPE is necessary.
- How to properly don, doff, adjust and wear PPE.
- The limitations of PPE.
- Useful life and disposal of PPE.
- How to clean and maintain PPE in a sanitary and reliable condition.
- Reporting and replacing defective or damaged PPE, which shall NOT be used.

### RETRAINING

Retraining is required when the workplace changes, making the previous training obsolete and / or the type of PPE changes.