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<b>PERSONAL PROTECTIVE EQUIPMENT (PPE)</b>		

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**SUBPART A - PURPOSE**

Berry Bros. will provide as required by the final rule that took effect on 2-13-08 to all Employees required PPE as stated to suit the task and known hazards. This policy covers the requirements for Personal Protective Equipment with the exception of PPE used for respiratory protection or PPE required for hazardous



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material response to spills or releases. Applicable OSHA Standards are 1910 Subpart 1 App B and 1910.120 App B, 132, 133, 136, and 138.

As stated by the final rule, all PPE will be provided by the employer with the exception of non-specialty safety-toe protective footwear and non-specialty prescription eyewear. In addition, the final rule states that employers do not have to pay for everyday clothing.

As required by law, the company will provide replacement PPE to the employee free of charge unless the employee has lost or intentionally damaged the PPE that was issued to him or her. In which case, the employee may be required to pay for such replacement.

The final rule goes on to state that employees who use their own PPE must meet current standards and the employer is not obligated to replace their PPE if it is damaged or lost.

PPE devices are not to be relied on as the only means to provide protection against hazards, but are used in conjunction with guards, engineering controls, and sound manufacturing practices.

If possible, hazards will be abated first through engineering controls, with PPE to provide protection against hazards that cannot reasonably be abated otherwise.

## **SUBPART B - GENERAL RULES**

All personal protective equipment shall be of safe design and construction for the work to be performed. All employees shall be required by reasons of hazards of processes or environment to protect body parts from inhalation, absorption or physical contact. All PPE provided shall be used and maintained in a sanitary and reliable condition.

## **SUBPART C - HAZARD ASSESSMENT AND EQUIPMENT SELECTION**

Hazard analysis procedures (JSEA – Job Safety Environmental Analysis) shall be used to assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE). If



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such hazards are present, or likely to be present, the following actions will be taken:

- Select, and have each affected Employee use the proper PPE
- Communicate selection decisions to each affected Employee
- Select PPE that properly fits each affected employee.
- Defective or damaged personal protective equipment shall not be used.
- Proper selection and/or assignment of proper PPE must be documented on the JSEA document.

**NOTE:** In the event that an employee might use his or her own personal equipment, Berry Bros. shall be responsible for the assurances of its adequacy, maintenance and sanitation.

## **SUBPART D - TRAINING**

Employees who are required to wear basic PPE (Safety glasses, hard hat, safety toe shoes, PFD) will be required at the time of hire to demonstrate how to properly don, doff, maintain, and know the limitations of their PPE.

Each affected employee shall demonstrate an understanding of the training specified above, and the ability to use the PPE properly before being allowed to perform work requiring the use of PPE.

When there is reason to believe that any affected employee does not have the required understanding and skill to use the PPE properly, BBGCI shall retrain that employee. Circumstances where retraining is required include, but are not limited to, situations where:

- Changes in the workplace render previous training obsolete.
- Changes in the types of PPE to be used render previous training obsolete.
- Inadequacies in an employee's knowledge or use of assigned PPE indicate that the employee has not retained the requisite understanding or skill.

The training shall include the following: when PPE is necessary; what PPE is necessary; how to wear assigned PPE; the limitations of PPE, and the proper care, maintenance, useful life, and disposal of assigned PPE.



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Employees whose job assignments require the use of specialized PPE shall be trained in the selection and use of PPE, and shall use it as prescribed in their training and by the provisions of this policy and the host employer policy. This training may or may not be conducted by an outside third-party training provider.

### **SUBPART E - ENFORCEMENT**

Employees shall comply with federal, state, local, and Company established safety rules, standards, and procedures as a term and condition of employment. Failure to comply will result in disciplinary action up to and including termination.

### **SUBPART F - PPE SELECTION**

Controlling hazards PPE devices alone should not be relied on to provide protection against hazards, but should be used in conjunction with guards, engineering controls, and sound manufacturing practices.

#### **Selection Guidelines**

The general procedure for selection of protective equipment is to:

- Become familiar with the potential hazards and the type of protective equipment that is available, and what it can do; i.e., splash protection, impact protection, etc.;
- Compare the hazards associated with the environment; i.e., impact velocities, masses, projectile shape, radiation intensities, with the capabilities of the available protective equipment;
- Select the protective equipment, which ensures a level of protection greater than the minimum required protecting employees from the hazards
- Fit the user with the protective device and give instructions on care and use of the PPE. It is very important that end users be made aware of all warning labels for and limitations of their PPE.

### **SUBPART G - FITTING THE DEVICE**

Careful consideration must be given to comfort and fit. PPE that fits poorly will not afford the necessary protection. Continued wearing of the device is more likely if

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it fits the wearer comfortably. Protective devices are generally available in a variety of sizes. Care should be taken to ensure that the right size is selected. Certification of training for PPE is required by OSHA and shall be accomplished by using the Job Safety Checklist to verify that each affected Employee has received and understood the required PPE training including fitting, proper donning, doffing, cleaning and maintenance.

### **SUBPART H - DEVICES WITH ADJUSTABLE FEATURES**

Adjustments should be made on an individual basis for a comfortable fit that will maintain the protective device in the proper position. Particular care should be taken in fitting devices for eye protection against dust and chemical splash to ensure that the devices are sealed to the face. In addition, proper fitting of helmets is important to ensure that it will not fall off during work operations. In some cases a chinstrap may be necessary to keep the helmet on an employee's head. (Chinstraps should break at a reasonably low force, however, so as to prevent a strangulation hazard). Where manufacturer's instructions are available, they should be followed carefully.

**NOTE:** Any defective and/or damaged PPE shall not be used under any conditions.

### **SUBPART I - RESPIRATORY PROTECTION EQUIPMENT**

For more information, refer to the *Respiratory Protection Policy (29 CFR 1910.134.)*

### **SUBPART J - HEARING PROTECTION EQUIPMENT**

For more information, refer to the *Hearing Conservation Policy (29 CFR 1910.95.)*

### **SUBPART K - EYE AND FACE PROTECTION**

- Rules for eye protection are found in 29 CFR 1926.102. These regulations require employees to use eye protection to guard against injury in situations where reasonable probability of injury exists. The protection equipment must meet the requirements specified in American National Standard Institute (ANSI) Z87.1-1968.



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- Each affected employee shall use appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation.
- Each affected employee shall use eye protection that provides side protection when there is a hazard from flying objects. Detachable side protectors are acceptable if approved.
- Each affected employee who wears prescription lenses while engaged in operations that involve eye hazards shall wear eye protection that incorporates the prescription in its design, or shall wear eye protection that can be worn over the prescription lenses without disturbing the proper position of the prescription lenses or the protective lenses.
- Eye and face PPE shall be distinctly marked to facilitate identification of the manufacturer.
- Each affected employee shall use equipment with filter lenses that have a shade number appropriate for the work being performed for protection from injurious light radiation.

**SUBPART L - HEAD PROTECTION**

- Head protection regulations for the construction industry are found in 29 CFR 1926.100. The standards recognized by OSHA for protective hats are in the ANSI Z89.1-1969. Helmets for employees exposed to high voltage electrical shock and burn hazards must meet the requirements found in ANSI Z89.2-1971.
- All head protection is designed to provide protection from impact and penetration hazards caused by falling objects. Head protection is also available which provides protection from electric shock and burn. When selecting head protection, knowledge of potential electrical hazards is important.
  - Class A helmets, in addition to impact and penetration resistance, provide electrical protection from low-voltage conductors (they are proof tested to 2,200 volts).
  - Class B helmets, in addition to impact and penetration resistance, must provide electrical protection from high-voltage conductors (they are proof tested to 20,000 volts).
  - Class C helmets provide impact and penetration resistance (they are usually made of aluminum which conducts electricity), and should not be used around electrical hazards.



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- Hard hats must be worn where falling object hazards are present. Some examples include: working below other workers who are using tools and materials, which could fall; working around or under crane or cherry picker which are carrying parts or materials; working below machinery or processes which might cause material or objects to fall; and working on exposed energized conductors.

### **SUBPART M - FOOT PROTECTION**

- The OSHA regulations for Construction Industry are found in 29 CFR 1926.96. OSHA requires that safety toe shoes meet the requirements of ANSI Z41.1-1991.
- Each affected employee shall wear protective footwear when working in areas where there is a danger of foot injuries due to falling or rolling objects, or objects piercing the sole, and where employee's feet are exposed to electrical hazards.

#### **Selection guidelines for foot protection**

- Safety shoes and boots provide both impact and compression protection. Where necessary, safety shoes can be obtained which provide puncture protection. In some work situations, metatarsal protection should be provided, and in other special situations electrical conductive or insulating safety shoes would be appropriate. Safety shoes or boots with impact protection would be required for carrying or handling materials such as packages, objects, parts or heavy tools, which could be dropped; and, for other activities where objects might fall onto the feet. Safety shoes or boots with compression protection would be required for work activities involving skid trucks (manual material handling carts) around bulk rolls (such as paper rolls) and around heavy pipes, all of which could potentially roll over an employee's feet. Safety shoes or boots with puncture protection would be required where sharp objects such as nails, wire, tacks, screws, large staples, scrap metal etc., could be stepped on by employees causing a foot injury.

### **SUBPART N - HAND PROTECTION**

- OSHA does not regulate hand protection for the construction industry. However, OSHA does regulate the use of hand protection under General Industry at 29 CFR 1910.138. There are no ANSI requirements for hand protection at this time.



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- Hand protection is required when employees' hands are exposed to hazards such as those from skin absorption of harmful substances; severe cuts or lacerations; severe abrasions; punctures; chemical burns; thermal burns; and harmful temperatures.

### **Selection Guidelines for Hand Protection**

Selection of hand PPE shall be based on an evaluation of the performance characteristics of the hand protection relative to the task(s) to be performed, conditions present, duration of use, and the hazards and potential hazards identified. Gloves are often relied upon to prevent cuts, abrasions, burns, and skin contact with chemicals that are capable of causing local or systemic effects following dermal exposure. There is no glove that provides protection against all potential hand hazards, and commonly available glove materials provide only limited protection against many chemicals. Therefore, it is important to select the most appropriate glove for a particular application and to determine how long it can be worn, and whether it can be reused. It is also important to know the performance characteristics of gloves relative to the specific hazard anticipated; e.g., chemical hazards, cut hazards, flame hazards, etc. Before purchasing gloves, request documentation from the manufacturer that the gloves meet the appropriate test standard(s) for the hazard(s) anticipated. Other factors to be considered for glove selection in general include:

- As long as the performance characteristics are acceptable, in certain circumstances, it may be more cost effective to regularly change cheaper gloves than to reuse more expensive types.
- The work activities of the employee should be studied to determine the degree of dexterity required, the duration, frequency, and degree of exposure of the hazard, and the physical stresses that will be applied.
- In certain circumstances where wearing gloves may pose a greater hazard than not wearing gloves, an assessment should be made with the affected employee and his or her supervisor. This will be handled on a case-by-case basis. No one shall put any part of his or her body near a moving part that subjects him or her to an obviously hazardous or potentially hazardous area.

### **Selection of Gloves for Protection against Chemical Hazards:**



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- The toxic properties of the chemical(s) must be determined; in particular, the ability of the chemical to cause local effects on the skin and/or to pass through the skin and cause systemic effects.
- Generally, any "chemical resistant" glove can be used for dry powders.
- For mixtures and formulated products (unless specific test data are available), a glove should be selected on the basis of the chemical component with the shortest breakthrough time, since it is possible for solvents to carry active ingredients through polymeric materials.

Although Berry Bros. encourages the use of hand protection while conducting work, some job tasks may be performed without the individual wearing gloves. This justification is two fold. First, the task being performed is considered low risk with respect to hand/finger injury while performing the task without gloves is not significantly higher than with gloves. Second, the task being performed requires micro/precise movement of the fingers and the use of gloves cause significant loss of dexterity.

### **SUBPART O - FLAME RESISTANT CLOTHING (FRC's)**

While the oil and gas industry has worked to reduce the risk of flash fire incidents, these efforts have not eliminated the occurrence of flash fires, nor the resulting burn injuries and fatalities. The use of FRC's greatly improves the chance of a worker surviving and regaining quality of life after a flash fire. FRC's can significantly reduce both the extent and severity of burn injuries to the body.

Ignition sources are present in drilling, well servicing, and production-related operations in several forms, including but not limited to: electrical systems, handheld electrical tools, motors, generators, hot work activities, and static electricity. Exposure to flash fires can result in devastating burns and death -- 16% of fatalities in the oilfields result from fire and explosions.

To ensure the safety of our employees, sub-contractors, and visitors will be required to wear Fire Resistant Clothing (FRC's) when working client properties and/or when working around all client production locations, drilling operations, or on any jobsite that may contain hydrocarbons or processing facilities that may contain hydrocarbons. The specific FRC requirement distance when working near hydrocarbons may vary from client to client, please be sure to check with your supervisor and/or Safety dpt. for the appropriate distance requirement. This



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information will be noted in the Site Specific Safe Work Plan (SSSWP) that is issued per job site and/or in the Client Specific HSSE Plan.

Sub-contractors will be responsible for providing FRC's to their employees when required and visitors will be provided a pair of FRC's if they do not have their own pair when necessary.

The potential for flash fire is greater in areas of production-related operations that fall outside of drilling and well servicing. FRC's must be worn during production-related operations, such as:

- Equipment openings (e.g., line breaking or valve changes)
- Gauging
- Transfer of hydrocarbons
- Maintenance operations on production equipment
- Hot work operations
- Tank heating
- Using open flame
- Start-up operation

**Selection Guidelines for FRC's:**

- FRC's will meet NFPA 2112 guidelines.
- In addition, the temperature and particular season will also come into play as to whether lightweight or heavyweight and color of clothing are chosen.

**SUBPART P - PERSONAL FLOTATION DEVICES (PFD)**

Where required, employees who work over or near water shall wear a fully-secured work vest, except when working on immovable installations where guard rails are provided or in enclosed areas.

Buoyant work vests shall meet U.S. Coast Guard requirements for such devices found in 46 CFR 160, *Coast Guard Lifesaving Equipment Specifications*.

All persons shall wear work vests/life jackets while working on or near docks and aboard decks of cargo vessels, tugs, and barges.



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Inflatable life jackets are provided and shall be worn when traveling by helicopter over water. It is mandatory to wear work vests/life jackets while riding in an outboard boat. While riding in a crew boat it is not mandatory to wear work vests/life jackets unless the client requires. However, when outside the cabin, employees shall wear work vests/life jackets.

Each person is responsible for the care and maintenance of the work vest/life jacket assigned to them. A work vest/life jacket that is no longer an effective flotation device shall be taken out of service and reported to the supervisor for replacement.

**SUBPART Q - FALL PROTECTION DEVICES**

Fall protection devices include, but are not limited to, full body harnesses, safety belts, lifelines, lanyards, safety nets, or similar equipment.

Full body harnesses, safety belts, lifelines, and lanyards shall meet the requirements of OSHA 29 CFR 1926.104, *Safety Belts, Lifelines and Lanyards*.

Any full body harness, safety belt, lifeline, or lanyard subjected to in-service loading, as distinguished from static load testing, shall be immediately removed from service and shall not be used again for employee fall protection.

Fall protection shall be used in certain situations. These shall include, but are not limited to:

- Open-sided floors, floor openings, catwalks, or platforms elevated six feet or higher where handrails or barricades are not provided.
- Working above potential hazards.
- Working over water when personal flotation devices (PFD's) are not used.
- Safety belts, lifelines, and lanyards shall be used only for personnel protection.
- Lifelines shall be secured above the point of operation to an anchorage capable of supporting a minimum dead weight of 5,400 pounds.

**Safety Belt, Lifeline, and Lanyard Specifications:**



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Lifelines shall be a minimum of 3/4-inch manila rope or equivalent, with a minimum breaking strength of 5,400 pounds. Two lifelines shall be utilized at all times and firmly secured to fixed structures to prevent equipment failure.

Safety belt lanyards shall be a minimum of 1/2-inch nylon or equivalent, with a maximum length to provide for a fall of no greater than 6 feet. The rope shall have a nominal breaking strength of 5,400 pounds.

All safety belt and lanyard hardware shall be drop forged or pressed steel, cadmium plated in accordance with Type 1, Class B plating, specified in federal specification QQ-P-416. Surface edges shall be smooth and free of sharp edges.

All safety belt and lanyard hardware, except rivets, shall be capable of withstanding a tensile loading of 4,000 pounds without cracking, breaking, or taking a permanent deformation.

**Safety Nets**

Safety nets shall meet the requirements of OSHA 29 CFR 1926.105, *Safety Nets*.

Safety nets shall be provided when workplaces are more than 25 feet above the ground, water, or other surface where the use of platforms with handrails, ladders, scaffolds, temporary floors, safety belts, or lifelines is not possible.

Safety nets shall extend 8 feet beyond the edge of the work surface where the employee is exposed and shall be installed as close under the work surface as practical, but no more than 25 feet below the work surface.

Safety nets shall be hung with sufficient clearance to prevent the user's contact with surfaces or structures below.

Forged steel safety hooks or shackles shall be used to fasten the net to its supports.

Connections between net panels shall be the same full strength as the net.

**Safety Net Specifications**

The mesh size of nets shall not exceed 6 inches by 6 inches.



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Safety nets shall meet accepted performance standards of 17,500 foot-pounds minimum impact resistance as determined and certified by the manufacturer, and shall bear the label of proof of test.

Edge ropes shall provide a minimum breaking strength of 5,000 pounds.

## **SUBPART R - ENGINEERING CONTROLS**

### **Types of Engineering Controls**

Engineering controls shall be used, where practical, to eliminate or reduce potential hazards. Engineering controls involve the use of engineering measures such as equipment design, selection and arrangement, process method selection, and raw materials substitutions.

### **Engineering Controls and PPE**

PPE shall be used during the period while engineering controls are being installed. PPE shall be used where engineering controls are unable to provide complete protection.

### **Administrative Controls**

Where applicable; administrative controls may be used to supplement engineering controls. They may also be used in combination with the use of PPE to reduce reliance on PPE as a means of protection. Very close supervision must be provided to assure that the controls are carried out as designed.

Examples of administrative controls are as follows:

- Arranging work schedules and the related duration of exposures so that personnel are minimally exposed to potential hazards.
- Transferring personnel who have reached their upper permissible exposure limits to an environment where no further exposure will be experienced.



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**SUBPART S - MEDICAL SURVEILLANCE**

**Medical Evaluation for Respirator Use**

Refer to the *Respiratory Protection Policy* for information on required medical evaluation of employees prior to their use of respiratory protection equipment.

**Audiometric Testing for Hearing Protection Use**

Refer to the Hearing Conservation Program for information on required medical evaluation of employees.

**SUBPART T - RECORDKEEPING**

Training shall be documented and records retained as required by the specific policy under which the training was required. Equipment inspections that require special documentation shall be documented and records retained as required.

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