



Personal Protective Equipment Policy

Date of Introduction: March 2022

Purpose

The purpose of the Personal Protective Equipment (PPE) Policy is to develop and implement the procedures for the identification, use, care, and maintenance of PPE required to be used by team members for the prevention of illness and injury.

All team members are required to follow the minimum procedures outlined in this policy. Any deviations from this policy will be immediately addressed with Mammoth Holdings Progressive Discipline Policy. Wearing task specific PPE are required of all Mammoth Holdings team members, contractors, and vendors.

Scope

This policy applies to the use of PPE at Mammoth Holdings and related facilities and operations. This policy is integrated into our organization's written safety and compliance program and is a collaborative effort that includes all team members. The Safety & Compliance Manager is responsible for the program's implementation, management, training, and recordkeeping requirements.

Program Responsibilities

Management. The management of Mammoth Holdings is committed to the safety and health of its team members. Management supports the efforts of the Safety & Compliance Manager by pledging financial and leadership support for the identification of hazards and implementation of appropriate PPE for those hazards. Management will regularly communicate with team members about this program.

Program Administrator. The Program Administrator (Safety & Compliance Manager) reports directly to senior management and is responsible for the hazard assessments, implementation, training, and administration of the PPE program. The Program Administrator will monitor the results of the program to determine additional areas of focus as needed. The Program Administrator will also

- Conduct workplace hazard assessments to determine the presence of hazards that require the use of PPE (*PPE hazard assessment instructions are included in **Appendix A***)
- Select appropriate PPE
- Review, update and conduct PPE hazard assessments whenever:
 - A job or process changes
 - New equipment is used or added
 - There has been an accident
 - A supervisor or employee requests it
- Maintain records on hazard assessments
- Maintain records on PPE assignments and training
- Provide training, guidance, and assistance to supervisors and team members on the proper use, care, and cleaning of approved PPE
- Periodically re-evaluate the suitability of previously selected PPE
- Review, update, and evaluate the overall effectiveness of PPE use, training, policies and program

DM's and Site Managers. DM's and Site Managers have the primary responsibility for implementing and enforcing PPE use in their work area, including, but not limited to:

- Providing appropriate PPE and making it available to team members
- Ensuring that team members are trained on the proper use, care, storage, and cleaning of PPE
- Ensuring that PPE training certification and evaluation forms are signed
- Ensuring that team members properly use and maintain their PPE
- Notifying the Program Administrator when new hazards are introduced or when processes are added or changed
- Ensuring that defective or damaged PPE is immediately disposed of and replaced

Team Members. The PPE user is responsible for following the requirements of the PPE program, including, but not limited to:

- Properly wearing PPE as required
- Attending required training sessions
- Properly caring for, cleaning, storing, maintaining, and inspecting PPE as required
- Following program policies and rules
- Informing the supervisor of the need to repair or replace PPE

Team Members who repeatedly disregard and do not follow PPE procedures and rules will face disciplinary action up to and including termination.

General Requirements

Appropriate PPE is required to be worn at all times when team members are exposed to hazards that cannot be eliminated through the use of preferred elimination, substitution, engineering or administrative controls.

The workplace will be evaluated, and all uncontrolled hazards will be identified at least once a year based on changes to the workforce and workplace operations. Assessments will include, but are not limited to, the following items:

- Torso and abdominal protection
- Eye and face protection
- Head protection
- Foot protection
- Leg protection
- Hand protection
- Hearing protection (Separate written program)
- Fall protection (Separate written program)

PPE appropriate for the identified hazards will be identified, purchased, and provided to all team members exposed to those hazards. All PPE will be properly fit to each team member before relying on it as a protective measure.

Team members will be continually trained, formally and informally, on the types of PPE necessary for the workplace hazards and its limitations. Training will also include the proper way to wear, use, and maintain the PPE.

PPE Program Implementation

The following implementation steps will be used for this program:

- Conduct and document PPE assessment for each work task, assignment, or location (see form in **Appendix B**)
- Select appropriate PPE based on hazard assessment
- Communicate PPE selection decisions to team members
- Provide PPE free of charge to all affected team members
- Train each affected team members
- Test team member understanding*
- Document training and team member testing results
- Retrain as necessary
- Enforce PPE requirements

*Essential functions for all tasks/assignments where PPE is required.

Team Member Training

General Training

Before any team members is allowed to perform work in areas requiring PPE, they must first receive training in the proper use and care of the PPE they will be using. Periodic retraining will be offered to PPE users as identified by the lack of knowledge or the improper use of PPE, after changes in work tasks, or at the supervisor's request. The training will include, at a minimum, the following subjects:

- Mammoth Holdings requirement that PPE be worn at all times during identified tasks or in areas requiring PPE
- 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

Check Your Understanding. Training can be completed in many ways, but a combination of several different types of media (such as PowerPoint, videos, pamphlets and lecture) is usually the most effective approach. Whichever approach is taken, it is important that the material is understandable to the audience. Training materials should consider the participants' educational levels, reading abilities and language skills. This may mean providing materials and instruction in languages other than English.

Training attendees should be reminded that the purpose is to provide them with the information necessary to properly wear and maintain their assigned PPE and follow safe work practices, thus reducing the chance of an injury or illness. Training sessions should be designed for interaction between trainers and trainees.

Eye and Face Protection

Each affected employee will:

- Use appropriate eye and face protection equipment when exposed to hazards from flying objects or particles, hot metal, fumes, chemical liquids, gases, vapors, dusts, acids, caustics, and other potentially injurious chemical or physical hazards.
- Use appropriate eye protection equipment with filter lenses that have a shade number appropriate for the work being performed when exposed to an eye hazard from potentially injurious light radiation (i.e., welding).

- When wearing prescription lenses while engaged in operations that involve eye hazards, wear eye protection that incorporates the prescription in its design, or wear eye protection that can be worn over the prescription lenses without disturbing the prescription lenses or the protective lenses.

Foot Protection

Each affected team member will wear protective footwear when working in areas where there is danger of objects falling on or rolling across the foot, piercing the sole, and where the feet are exposed to electrical or chemical hazards. Foot protection will comply with appropriate ANSI standards. In addition, rubber boots are supplied for team member use when working in the tunnel or anytime they are exposed to wet conditions.

Hand and Body Protection

The Program Administrator will select and require team members to use appropriate hand protection when team member's hands are exposed to hazards from cuts, abrasions, punctures, chemical or thermal burns, harmful temperature extremes, vibration and skin absorption of harmful substances including waste, mild cleaning agents, etc.

Hearing Protection

The Program Administrator will select and require team members to wear appropriate hearing protection in environments where noise levels equal or exceed the OSHA Occupational Noise Exposure Standard (OSHA 29 CFR 1910.95) 8-hour time weighted average (TWA) of 85 dBA. See Hearing Protection Program for details. Over the ear and in the ear hearing protection devices are supplied to team members.

Respiratory Protection

Each affected employee will wear dust masks only where indicated in the hazard assessment. At no time shall any Mammoth Holdings team member wear a "respirator" device. There are no tasks that are carried out at any Mammoth Holdings location that this type of PPE is required. No "respirator" devices shall be located on any Mammoth Holdings sites.

After training, team members will demonstrate that they understand how to use PPE properly. If they cannot demonstrate a sufficient understanding, they will be retrained.

Training of each team members will be documented using the Employee Training Record (**Appendix D**) and kept on file. The PPE Training Quiz (**Appendix E**) will be used to evaluate team member's understanding and will be kept for documentation. Team members are responsible for learning the information held within this policy as well as other Mammoth Holdings safety policies and procedures.

Retraining

The need for retraining will be indicated when:

- A team member'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
- Upon supervisor requests

Periodic Program Review

At least annually, the Program Administrator will conduct a program review to assess the progress and success of the program. The review will consider the following:

- Evaluation of all training programs and records
- The need for retraining of managers, supervisors, and team members
- The jobs, processes or areas that have produced a high incidence rate of injuries or illnesses
- The Program's success will be determined and reported to senior management based upon comparison to previous years, using the following criteria:
 - Cost and frequency of workers' compensation cases
 - Employee and supervisor feedback through direct interviews and questionnaires

Annual reviews will be documented with the form shown in **Appendix C**.

Outside Contractors

Whenever outside personnel are contracted to work on-site, the Program Administrator or location management will communicate all necessary PPE safety requirements to the contractor before any work commences. Outside Contractors are held to the same standards as team members.

Record Retention

Written records will be kept which include trainee names, the type of training provided and the dates when training occurred. The Program Administrator will maintain these training records for 3 years after the team member is no longer employed by Mammoth Holdings.

Appendix A – PPE Hazard Assessments

Survey

The Safety & Compliance Manager will conduct a walk-through survey of the workplace at least one time a year. The survey is to identify sources of hazards to team members. The following hazard categories will be examined in each area and for each person and their tasks:

- Impact
- Penetration
- Compression
- Chemical/Gasses
- Heat/Cold
- Harmful dust
- Light (Optical) radiation
- Noise
- Falling objects
- Vibration
- Electrical shock

Hazard Sources

During the walk-through survey, the Program Administrator will observe:

- Sources of motion; i.e., machinery or processes where any movement of tools, machine elements or particles could exist, or movement of personnel that could result in collision with stationary objects
- Sources of high temperatures that could result in burns, eye injury, ignition of protective equipment, etc.
- Types of chemical exposures
- Sources of harmful dust
- Sources of light radiation, i.e., welding, brazing, cutting, furnaces, heat treating, high-intensity lights, etc.
- Sources of falling objects or potential for dropping objects
- Sources of sharp objects which might pierce the feet or cut the hands
- Sources of rolling or pinching objects which could crush the feet
- Layout of workplace and location of coworkers
- Any electrical hazards

Injury and accident data will also be reviewed to help identify problem areas.

Results

Following the walk-through survey, the data and information will be organized by work area and job description. An estimate of the potential for injuries will be made. Each of the basic hazards will be reviewed and a determination made as to type, level of risk, and severity of potential injury from each of the hazards identified. The possibility of exposure to multiple hazards simultaneously will be considered.

Strategies for elimination, substitution, engineering, and administrative controls will be identified and implemented for all possible identified hazards. 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.

Appendix B – Hazard Assessment Results

Tasks	Hazard Type	Estimated Injury/ Illness Risk			Body Parts Exposed To Hazards	Prior Injury/ Complaints	PPE Required Yes/No	PPE Description	Other Controls Needed
		Low	Med	High					
Processing	C/CO/CP		X		Body/Hands	None	Yes	Safety Vest	Safety Barriers in Place
Guide On	C/CO/CP		X		Body/Feet	None	Yes	Safety Vest	Safety Markers/Barriers
Lot	C/CO/CP		X		Body/Hands	None	Yes	Safety Vest/Disposable Gloves	None
Tunnel Inspections	C/CO/CP /N		X		Body/Hands/ Hearing	None	Yes	Safety Vest/Disposable Gloves/Hearing Protection	None
Grounds (other than lot)	C/CO		X		Body/Hands	None	Yes	Safety Vest/Disposable Gloves	None
Tunnel Cleaning	C/CO/FB		X		Body/Hands/ Feet/Eyes	None	Yes	Disposable Gloves/Safety Glasses/Safety Face Shield/Rubber Boots	Equipment Guards
Vacuum Debris Cleaning	C/FB/IH		X		Body/Hands/ Eyes/Inhale	None	Yes	Safety Vest/Disposable Gloves/Safety Glasses/Dust Mask	None
General Cleaning	FB/C		X		Body/Hands/ Eyes	None	Yes	Disposable Gloves/Safety Glasses	None
Minor Equipment Repair	C/CO/FB /LOTO		X		Body/Hands/ Eyes	None	Yes	Disposable Gloves/Work Gloves/Safety Glasses/LOTO	Equipment Guards
Handling Chemicals	C/FB/CH	X			Body/Hands/ Feet/FB	None	Yes	Disposable Gloves/Chemical Gloves/Chemical Apron/Chemical Face Shield	Maintain Closed System
Wet Surfaces	FA		X		Body/Hands/ Feet	None	Yes	Non-slip Footwear	Housekeeping

Hazard Type Abbreviations:

C – Contact	FB – Foreign Body (eyes)	N – Noise	FA – Fall
CP – Compression	I – Impact	CH - Chemical Exposure	
CO – Collision	IH – Inhalation	LOTO – Lockout Tagout	

Personal Protective Equipment (PPE)

- Safety Equipment (PPE) is provided for YOUR protection
- If there is a safety equipment concern, you must notify management so the proper safety equipment can be provided for you
- Safety Equipment (PPE) for specific uses are located in one of three locations....see safety information poster listed below for required PPE for specific task(s)
- Safety Equipment (PPE) will be located in one of three areas:
 - * General Safety Equipment (PPE) - Safety Board
 - * Chemical Safety Equipment (PPE) - Chemical Room
 - * Electrical/MCC Safety Equipment (PPE) - Electrical Area/MCC

General Safety Equipment (PPE)

- * Disposable Gloves (multiple sizes)
- * Disposable Dust Masks (not respirators)
- * Face Shield
- * Safety Glasses
- * Prescription Eye Wear Safety Glasses
- * Safety Vest
- * First Aid Kit (fully stocked)
- * Blood Borne Pathogen Spill Kit
- * "In the Ear" Ear Plugs
- * "Over the Ear" Earmuffs
- * SDS QR Code or Hardcopy SDS
- * Safety Communication Guide QR Code

Chemical Safety Equipment (PPE)

- * Chemical Face Shield
- * Safety Glasses
- * Chemical Apron
- * Longer Rubber Chemical Gloves
- * Rubber Boots
- * SDS QR Code or Hardcopy SDS

Electrical Safety Equipment (PPE)

- * Double Electrical Voltage Insulated Gloves**
- * Electrical ARC Flash Protection Jacket**
- * Electrical Safety Face Shield**
- * Safety Glasses**
- * Electrical Insulated Tool Kit**
- * Lockout/Tagout Kit**
- * Hardcopy - MCC/Electrical Safety Policy**

When and What Safety Gear to Wear:

- Cleaning Vacuums – Safety Glasses, Disposable Gloves, Disposable Dust Mask**
- Nightly Tunnel Cleaning –Safety Glasses, Disposable Gloves, Rubber Boots**
- Deep Cleaning Walls and Floors – Safety Glasses, Face Shield, Disposable Gloves, Rubber Boots**
- Handling Chemical Reservoirs – Long Rubber Chemical Gloves, Chemical Apron, Safety Glasses, Face Shield, Rubber Boots**
- Window Cleaning – Safety Glasses, Disposable Gloves**
- Blowing Lot & Tunnel – Safety Glasses, Hearing Protection*, Safety Vest**
- Cleaning Rest Rooms – Disposable Gloves, Safety Glasses**
- Working Near Running Blowers – Safety Glasses, Hearing Protection***
- Walking/Working in the Lot – Safety Vest**
- See Electrical Policies for wearing PPE around electrical equipment**

(* Hearing Protection – for best results, use “in the ear” and “over the ear” together)

Appendix C – Annual Evaluation Report

Date of evaluation:	Evaluated by (list all present):
Written program reviewed: Yes No	
Detailed description of the procedures reviewed:	
Describe any procedure modifications:	
Have any new procedures been added?	
A review of the log of occupational injuries and illnesses (OSHA Form 300 or equivalent) and the associated accident reports and injury and illness reports was made: Yes No	
The following injuries resulted from failure to use the correct PPE:	
Any actions needed or taken to ensure PPE use:	
Comments:	

Appendix D – Employee Training Record

The following individuals received training on Mammoth Holdings Personal Protective Equipment Program.

Print Name	Sign Name	PPE

The undersigned conducted training in accordance with this Personal Protective Equipment Program.

Print Instructor's Name	
Instructor's Signature	
Instructor's Title	
Date of Training	

Appendix E – Training Outline

Hazard Identification/PPE Selection

- Familiarize team members 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, projectile shape of masses, radiation intensities, with the capabilities of the available protective equipment.
- Identify the selected protective equipment which is at a level of protection greater than the minimum required to protect the employee from the hazards.
- Fit the user with the protective device and give instructions on care and use of the PPE.
- Ensure that team members are made aware of all warning labels and limitations of their PPE.

Fitting the Device

Each team member will be fitted with appropriate PPE. PPE that fits poorly may not afford the necessary protection. Protective devices are generally available in a variety of sizes. Care should be taken to ensure that the right size is selected. Continued wearing of the device is more likely if it fits the wearer comfortably.

Hazard Changes

It is the responsibility of supervisors and team member to inform the Program Administrator if they identify a change in the workplace hazard situation.

Guidelines

Training will cover the company requirement of PPE usage. Each type of PPE provided will be reviewed as to its purpose and function in the work environment. As required, the following types of PPE must be covered:

- Eye and face protection
- Head protection
- Foot protection
- Hand protection
- Hearing protection
- Respiratory protection

Cleaning and Maintenance

It is important that all PPE be kept clean and properly maintained. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision. It is also important to ensure that contaminated PPE which cannot be decontaminated is disposed of in a manner that protects team members from exposure to hazards.

Personal Protective Equipment Training Quiz

The following quiz will be used to determine if a team member has understood the training and can demonstrate the proper use and care of personal protective equipment (PPE). This form will be kept in the team member's file along with any PPE Certification Forms.

1. What are the limitations of PPE?
2. List the types of personal protective equipment you must use when doing your work/tasks.
3. What are the hazards in your job that require PPE, and when must you use your PPE?
4. What are the procedures for the proper use, care, and maintenance of your PPE?
5. What should you look for to determine that your PPE is in good working condition?
6. What do you do when your PPE is no longer useable?

Trainer/Supervisor: Instruct the team member to demonstrate putting on, wearing, adjusting, and taking off each piece of PPE properly. Also, have team member demonstrate how to clean and disinfect each PPE.

Has team member demonstrated proper use and care of each PPE?

PPE #1: _____	Yes _____	No _____
PPE #2: _____	Yes _____	No _____
PPE #3: _____	Yes _____	No _____
PPE #4: _____	Yes _____	No _____

The team member has answered all the questions adequately and has demonstrated the ability to properly use and care for the PPE needed to do his/her job.

Trainer's/Supervisor's signature

Date

Team Member's signature

Date