PERSONAL PROTECTION AND RELATED EQUIPMENT

Hazard Assessment, Selection, Proper Fit and Use

POLICY STANDARD	Pheifer Brothers will select, provide and require properly fitting PPE appropriate for the actual task, traffic exposure, weather and site conditions. PPE is the final layer of protection and does not replace higher-level controls.

PHEIFER BROTHERS CONSTRUCTION CO., INC.

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USE OF THIS POLICY	This policy states minimum company expectations and is not all-inclusive. The hazard assessment, law, manufacturer instructions, traffic-control plan, owner, WisDOT or project requirements may require additional PPE or more protective controls.

Primary Regulatory References

- 29 CFR 1926 Subpart E, including 1926.95 through 1926.103
- 29 CFR 1926 Subpart M and task-specific fall-protection requirements
- 29 CFR 1926.106 for work over or near water
- Wisconsin MUTCD Part 6 and ANSI/ISEA 107 for high-visibility apparel
- ANSI/ISEA Z89.1, Z87.1, ASTM F2413 and NIOSH approvals as applicable

Official standards: www.osha.gov/laws-regs/regulations/standardnumber/1926 and wisconsindot.gov/Pages/doing-bus/local-gov/traffic-ops/manuals-and-standards/wmutcd.aspx

1. Purpose, Scope and Responsibilities

Purpose and Scope

This policy applies at company facilities, shops, yards and heavy-highway or bridge projects. It covers employees, temporary workers and visitors entering areas where PPE is required. PPE supplements - and never replaces - engineering controls, traffic control, guardrails, ventilation, equipment guarding, isolation or safe work practices.

Management / Project Management

- Provide required PPE at no cost except where OSHA permits an exception, and verify employee-owned PPE is adequate.
- Select PPE from documented task and site hazard assessments and provide sizes and designs that properly fit each affected employee.
- Provide training, qualified support, replacement equipment and enforcement resources.
- Review regulatory, owner, WisDOT and manufacturer requirements before work begins.

Foremen and Supervisors

- Evaluate PPE during project planning and each daily pre-task plan.
- Communicate the required PPE before exposure and verify it is available, compatible, serviceable and properly fitted.
- Reassess PPE when work, traffic, weather, lighting, equipment, products or exposures change.
- Stop work when PPE is absent, defective, unsuitable or cannot be worn correctly.

Employees

- Wear, adjust and use required PPE as trained; inspect it before each use.
- Keep PPE clean and serviceable and promptly report damage, contamination, poor fit or incompatibility.
- Do not modify, substitute or remove required PPE without authorization.
- Use stop-work authority when protection is inadequate or conditions differ from the plan.

STOP-WORK AUTHORITY	Any employee may stop work when required PPE is missing, defective, improperly fitted or no longer adequate. Work resumes only after correction and reassessment.

2. Minimum PPE, Selection and Proper Fit

Minimum Active-Construction PPE

- Company-approved protective helmet with compatible chin strap buckled and snugly adjusted.
- Safety glasses with side protection.
- High-visibility safety apparel appropriate to the traffic and equipment exposure.
- Sturdy construction work boots suitable for the surface, weather and task.
- Work clothing covering the torso and legs; task-appropriate gloves when hand hazards are present.

Hearing, respiratory, fall, flotation, chemical, welding, electrical and other specialized protection is required when identified by the task or conditions. Visitors follow the same minimum rules unless they remain in a designated PPE-exempt area. Office employees must put on required PPE before entering an active shop, yard or jobsite area.

Selection and Proper Fit

- Select PPE for the specific hazard, exposure level and employee; one size or style does not fit everyone.
- PPE must remain in place, cover the intended body area, permit safe movement and not create gaps, snag hazards or loss of vision/hearing.
- Required items must be compatible when worn together - including helmets, eyewear, hearing protection, respirators, harnesses, PFDs and high-visibility apparel.
- Use PPE according to its markings and manufacturer instructions. Do not drill, cut, paint or alter protective components.
- Employees must report poor fit. The foreman will arrange another size, model or approved solution before exposure.

Hazard Assessment Factors

- Task, materials, tools and exposure duration.
- Public traffic and internal equipment speed, distance, direction and blind spots.
- Daylight, darkness, glare, rain, snow, fog, smoke, wind, heat and cold.
- Falling/flying objects, chemicals, electricity, noise, respiratory contaminants, falls and drowning.
- Owner, WisDOT, SDS, manufacturer and project-specific requirements.

PROPER FIT REQUIRED	PPE must be selected to properly fit each affected employee. Work may not proceed with equipment that slips, gaps, interferes with another item or cannot be adjusted to protect the wearer.

3. High-Visibility Safety Apparel

Employees exposed to public traffic or construction vehicles/equipment must wear ANSI/ISEA 107-compliant apparel. Roadway workers within a temporary traffic-control zone must wear Performance Class 2 or 3 apparel as required by the Wisconsin MUTCD. Pheifer Brothers applies the following minimums; a traffic-control plan, owner, contract or hazard assessment may require more protection.

WORK CONDITION	COMPANY MINIMUM
PPE-exempt office/shop area with no moving-equipment exposure	Not required unless posted or directed
Closed road; fully separated from public traffic and moving equipment	Class 2 outside designated PPE-exempt areas
Closed road with construction vehicles, deliveries or authorized traffic	Type R, Performance Class 2
Active traffic at 25 mph or less in daylight	Type R, Performance Class 2
Active traffic 26-50 mph in daylight	Type R, Performance Class 3
Active traffic above 50 mph	Type R, Performance Class 3
Night, dusk/dawn, fog, smoke, snow, heavy rain or limited visibility	Type R, Performance Class 3
Flagging/directing traffic or short-duration uncontrolled-traffic exposure	Type R, Performance Class 3
Work over water with a drowning hazard	Required visibility plus required PFD

Use and Condition

- Wear garments fastened and visible from all sides; do not cover retroreflective material with coats, harnesses, tools or equipment.
- Outer rainwear and winter layers must meet the required class, or a compliant garment must remain fully visible over them.
- Replace faded, torn, painted, heavily soiled or damaged apparel that no longer provides effective visibility.
- A road-closed sign does not eliminate exposure to construction vehicles, deliveries, emergency vehicles, local traffic or unexpected intrusions.
- Speed alone does not determine risk. Upgrade protection for complex traffic, short sight distance, high volume, lane crossings, blind spots and poor weather.

NIGHT WORK	Performance Class 3 apparel is required by company policy. Inspect retroreflective material before the shift and provide illumination without creating glare for workers or motorists.

4. Protective Helmets and Chin Straps

Company Requirement

Protective helmets must be worn on company jobsites and in designated hard-hat areas. Every helmet must have a manufacturer-approved or compatible chin strap. The strap must be buckled and snugly adjusted under the chin whenever the helmet is required. It may not hang loose, remain unbuckled or be tucked inside the helmet.

Protective helmets are optional only when operating equipment inside the cab with the overhead closed. The protective helmet must be inside or within reach of the cab and must be worn once leaving the equipment's cab.

Selection

- Use head protection meeting an OSHA-recognized ANSI/ISEA Z89.1 edition or demonstrated equivalent protection.
- Type I primarily protects from top impact. Type II provides top and lateral-impact protection and is the company preference for bridge work, pile driving, demolition, rigging, climbing and other lateral-impact exposure unless the assessment supports another selection.
- Select electrical class for the exposure: Class G provides limited electrical protection; Class E provides higher electrical protection; Class C provides no electrical protection.
- Wear the manufacturer-designated front forward unless the manufacturer specifically permits another orientation.
- Use only approved helmet accessories and welding-shield combinations; they may not interfere with the suspension, chin strap or other PPE.

Inspection and Care

- Inspect the shell, suspension, adjustment system, chin strap, buckle and attachment points before use.
- Remove a helmet from service after an impact or when cracked, dented, cut, punctured, heat/chemical/UV damaged or beyond manufacturer replacement criteria.
- Do not use unauthorized paint, holes, stickers or modifications.
- Store away from chemicals, direct sunlight and extreme heat, including vehicle rear windows.
- After welding, return to the standard helmet configuration with the chin strap buckled whenever head protection remains required.

WHY CHIN STRAPS	Wind, climbing, elevated bridge work, looking upward and sudden movement can dislodge a helmet. A secured chin strap keeps protection in place and prevents the helmet from becoming a falling-object hazard.

5. Eye, Face, Foot, Hand and Arm Protection

Eye and Face Protection

TASK / HAZARD	MINIMUM PROTECTION
General construction/shop work	Safety glasses with side protection
Grinding, chipping, drilling, concrete breaking	Safety glasses plus face shield
Concrete sawing/cutting	Safety glasses or goggles plus face shield as conditions require
Chemical splash	Chemical-splash goggles plus face shield
Welding	Correct-shade welding helmet plus safety glasses
Torch cutting/brazing	Correct shaded goggles/face protection plus safety glasses
Flying dust/high wind	Sealed or indirectly vented goggles as appropriate

A face shield normally supplements - and does not replace - safety glasses or goggles. Prescription users must wear approved prescription safety eyewear with side protection or properly fitting over-the-glass protection.

Foot Protection

- Wear sturdy work boots; athletic shoes, open-toed shoes and casual footwear are prohibited in construction areas.
- Use ASTM F2413 safety-toe footwear or equivalent when exposed to crushing, rolling, falling-object or equipment hazards.
- Select slip, puncture, metatarsal, electrical, chemical, waterproof and insulation features as the task requires.
- Clean or control boots contaminated with concrete, lead, chemicals or other hazardous substances under the applicable program.

Hand and Arm Protection

- Select gloves for the actual hazard: cut/abrasion, rigging/wire rope, alkali-resistant wet-concrete, SDS-specified chemical, welding/heat, high-cut steel handling or voltage-rated electrical protection.
- Do not wear loose gloves around rotating equipment when entanglement is possible.
- Gloves must preserve grip, dexterity and tool control. Replace punctured, saturated or degraded gloves.
- Wash promptly after contact with wet concrete, epoxy, fuel, solvents or other hazardous substances.

6. Hearing and Respiratory Protection

Hearing Protection

- Wear hearing protection in posted areas, when required by the Hearing Conservation Program or monitoring, and when directed for high-noise work.
- Common exposures include pile driving, concrete breaking, grinding, cutting, drilling, blasting, compressed air and heavy equipment.
- Select and fit plugs or muffs for the measured/anticipated noise and compatibility with the helmet and other PPE.
- Use dual protection when required by the exposure assessment. Inspect and replace damaged or contaminated devices.
- Hearing protection does not replace feasible noise controls, equipment maintenance or exposure-duration controls.

Respiratory Protection

- Respirators may be used only under the written Respiratory Protection Program.
- Before required use, employees must receive medical clearance, training, fit testing for tight-fitting respirators, and the correct NIOSH-approved respirator/filter/cartridge for the hazard.
- Facial hair or another condition may not interfere with a tight-fitting facepiece seal.
- Do not substitute a filtering facepiece or dust mask for a respirator required by silica, lead, asbestos, chromium, welding, blasting, coating or solvent controls.
- Follow cartridge change schedules, cleaning, storage, inspection and emergency-use limitations in the respiratory program.
- Leave the area immediately for alarm, breakthrough, damaged equipment, breathing difficulty, dizziness or suspected respirator failure.

Compatibility Check

Before exposure, the foreman and employee must confirm the helmet, eye protection, hearing protection and respirator can be worn together without breaking the face seal, lifting the helmet, blocking vision or preventing communication.

NO UNAUTHORIZED RESPIRATOR USE	An employee may not perform work requiring a respirator until the written program's medical, training, fit-testing and equipment-selection requirements have been completed.

7. Fall Protection, Water and Specialized Work

Fall Protection

- Use guardrails, covers, restraint, personal fall arrest, nets or another approved system under the Fall Protection Program and task-specific standard.
- Personal systems use compatible full-body harnesses, connectors, anchorage and rescue arrangements selected for the work. Body belts are prohibited for fall arrest.
- Inspect before each use; remove from service equipment involved in a fall or showing damage, contamination or unauthorized alteration.
- Plan protection for bridge decks, pier caps, formwork, rebar, scaffolds, aerial lifts, steel erection and unprotected edges.

Work Over or Near Water

- Wear a properly fitted, fastened U.S. Coast Guard-approved life jacket or buoyant work vest whenever drowning exposure exists.
- Inspect PFDs before use and verify compatibility when both flotation and fall protection are required.
- High-visibility requirements remain in effect unless the PFD provides the required visibility or approved apparel remains visible.
- PFDs do not replace guardrails or fall protection. Required ring buoys, skiffs, access and rescue capability must be in place.

Hot Work, Concrete/Chemicals and Electrical PPE

- Welding/cutting may require correct-shade protection, safety glasses, flame-resistant clothing, welding gloves, leathers, safety-toe boots, hearing and respiratory protection. Do not wear meltable synthetic clothing where exposed to sparks or slag.
- Wet concrete, cement, grout, curing compounds, form oil, epoxies, acids and coatings require SDS-based gloves, clothing, boots, eye/face and respiratory protection. Remove contamination and wash immediately.
- Only qualified employees perform work requiring electrical PPE. Select Class E helmets, voltage-rated gloves/protectors, arc-rated clothing, face/arc hoods, insulating tools and dielectric footwear as required.
- Inspect, test and store electrical PPE under the applicable standard and manufacturer instructions.

MULTIPLE HAZARDS	When fall, traffic, water, respiratory or electrical hazards overlap, select a compatible PPE system. One protective item must not defeat another.

8. Weather, Inspection, Training and Enforcement

Weather and Environmental Conditions

- Heat: use lightweight breathable clothing and cooling equipment where practical. PPE does not replace water, rest, shade and acclimatization.
- Cold: use layers, insulated gloves and weather-resistant footwear. Under-helmet liners must be compatible and manufacturer-approved.
- Rain, snow and mud: use weather-resistant outerwear, gloves and slip-resistant footwear; required high-visibility class must remain visible.
- Sun: use protective clothing, compatible neck protection, safety-rated tinted eyewear and sunscreen without interfering with helmet fit or chin strap.

Inspection, Cleaning and Replacement

- Inspect PPE before each use. Remove damaged, expired, contaminated or ineffective items from service.
- Clean, sanitize and store equipment according to manufacturer instructions and away from sunlight, chemicals and damaging temperatures.
- Do not share personal-use PPE unless it is designed for reuse and has been properly cleaned and sanitized.
- Control and dispose of lead-, asbestos-, silica-, chromium- or chemical-contaminated PPE under the applicable exposure-control program.

Training and Retraining

- Train employees when PPE is necessary; what is required; how to put on, adjust, wear and remove it; limitations; inspection, care, storage and replacement; and reporting poor fit or defects.
- Employees must demonstrate understanding and proper use before exposure.
- Retrain when tasks, hazards or PPE change, or when knowledge or use is inadequate. Document required training.
- Toolbox talks reinforce but do not replace respiratory, fall, electrical or other required formal training.

Stop-Work and Enforcement

- Stop for missing, damaged, contaminated, incompatible or poorly fitting PPE; lack of training; reduced visibility; changed traffic/work conditions; or inadequate protection.
- Intentional removal, bypass, misuse or unauthorized modification is a safety violation subject to corrective action under company policy.
- This includes failing to buckle and properly adjust the helmet chin strap whenever head protection is required.

9. Test Your Knowledge

Circle the best answer. Review missed questions with your foreman before performing the work.

1. What is PPE's role in hazard control? A. It replaces traffic control B. It is the final layer and supplements higher-level controls C. It eliminates the need for planning	2. What should happen when assigned PPE does not fit? A. Wear it loosely B. Modify it in the field C. Stop and obtain properly fitting PPE
3. What is the company minimum for night work in traffic exposure? A. Type R, Performance Class 3 B. Any bright-colored shirt C. Class 1 apparel	4. When must a helmet chin strap be buckled? A. Only while climbing B. Whenever the helmet is required C. Only in high wind
5. What normally must be worn with a face shield? A. Nothing else B. Earbuds C. Required safety glasses or goggles	6. Who may use a required tight-fitting respirator? A. An employee who completed medical clearance, training and fit testing B. Anyone with a dust mask C. Anyone without facial hair
7. What does a PFD replace? A. Fall protection B. High-visibility apparel C. Neither; other required protections remain in effect	8. What should happen to PPE involved in a fall or serious impact? A. Return it to storage B. Remove it from service for required evaluation/disposition C. Use it only for short tasks
9. May a Class 2 vest be hidden under a noncompliant raincoat? A. No; required visibility must remain fully visible B. Yes, if traffic is slow C. Yes, during daylight	10. When may work resume after a PPE stop-work condition? A. When the schedule requires it B. When another employee lends any PPE C. After correction and authorized reassessment

EMPLOYEE: _____ DATE: _____

ANSWER KEY: 1-B | 2-C | 3-A | 4-B | 5-C | 6-A | 7-C | 8-B | 9-A | 10-C