Woodland Pulp LLC

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Personal Protective Equipment Policy & Procedure

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1. Purpose

To reduce employee exposure to hazards when engineering and administrative controls are not feasible or effective by requiring the correct use of personal protective equipment (PPE) in accordance with the OSHA standards 1910.132 – 1910.137 (excluding 1910.134 (Respiratory) and 1910.137 (Electrical) which are under separate procedures.

Information regarding Bloodborne Pathogens PPE requirements according to OSHA standard 1910.1030 can be found in the Bloodborne Pathogens Exposure Control Plan.

2. Scope

This policy and procedure applies to all Woodland Pulp and St. Croix Chipping personnel, contractors and service suppliers while on mill property.

Visitors and non-mill employees are required to meet the minimum employee dress code and PPE requirements.

3. Policy

Woodland Pulp and St. Croix Chipping employees, contractors and service suppliers must follow the PPE requirements as set out in this document. PPE is considered the last line of defense behind engineering and administrative controls.

Visitors must, at a minimum:

- wear PPE in the mill area including hearing and eye protection, and ANSI-approved high-visibility vest or clothing;
- wear safety boots or shoes unless escorted by a mill employee and remain on designated walkways;
- be escorted by a mill employee unless approved in advance;
- must report all incidents, injuries, near misses, unsafe condition or damaged/unsafe equipment to a mill employee.

4. Definitions

- PPE: Personal Protective Equipment
- Metatarsal guards: special foot protection that covers the top arch of your foot.
- Safety footwear: Can be either a safety shoe or boot. The toe can be either steel or made from approved composite materials.
- Line breaking / Equipment Opening: initially opening a process line or piece of equipment.

5. Responsibilities

a. The Safety Manager is responsible for:

- Identification and evaluation of hazards in the workplace.
- Determining if the use of PPE is an appropriate control measure; determines if PPE is to be used, how it is selected, maintained and its use evaluated.
- Establishing and arranging training for employees in the use of PPE.
- Determining PPE effectiveness in preventing employee injury or illness.
- Ensuring the relevant OSHA standards are followed.

b. The Supervisors are responsible for:

- Communicating changes in safety policies and procedure to their team members.
- Scheduling employees to attend training.
- Ensuring the correct PPE for the task is used and worn correctly.

c. Employees, Contractors and Service Suppliers are responsible for:

- Using/wearing PPE, where required, as directed by safety procedures and the associated Job Safety Analysis for specific tasks.
- Using/wearing the appropriate type of PPE correctly.
- Properly inspecting and maintaining all PPE according to manufacturer's standards.
- Removing from service any defective PPE.
- Complying with the minimum employee dress code and PPE.

6. Hazard Assessment for PPE

The Safety Department, in conjunction with Supervisors and hourly employees, will conduct a walk-through survey of each work area to identify sources of work hazards. Each survey will be documented using the Hazard Assessment for PPE Form, which identifies the work area surveyed, the person conducting the survey, findings of potential hazards, and the date of the survey. The Safety Department will email copies to all employees, keep hard copies in a file in the Safety Department, and keep electronic copies in Dropbox.

The Safety Department will conduct, review, and update the hazard assessment for PPE whenever

- A job changes
- New equipment or process is installed
- There has been an accident
- Whenever a supervisor or employee requests it
- Or at least every year (annually)

7. Procedure

7.1 General Requirements

1. Once the hazards of a workplace have been identified, the Safety Department and Management will determine if the hazards can first be eliminated or reduced by methods other than PPE (i.e methods that do not rely on employee behavior, such as engineering controls.)

2. If such methods are note adequate or feasible, then the Safety Department and Management will determine the suitability of the PPE presently available;

and as necessary, will select new or additional equipment which ensures a level of protection greater than the minimum required to protect our employees from the hazards.

a. Care will be taken to recognize the possibility of multiple and simultaneous exposure to a variety of hazards. Adequate protection against the highest level of each of the hazards will be recommended.

3. Protective equipment, including personal protective equipment for eyes, face, head and extremities, protective clothing, respiratory devices, and protective shields and barriers, shall be provided, used and maintained in a sanitary and reliable condition.

4. Only those items of protective clothing and equipment that meet NIOSH, or ANSI standards will be procured or accepted for use.
5. PPE shall be used wherever it is necessary by reason of hazards of processes or environment, chemical hazards, radiological hazards, biological hazards or mechanical irritants encountered in a manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact.

2. In addition to the PPE mentioned above, barriers may be used for further protection against caustics and acids.
3. In addition to the requirements of this procedure, Electricians will be responsible for following the Mill Electrical Work Safe Procedures.
4. Employees will only use Mill approved or provided PPE.

5. The Safety Manager and Supervisor(s) shall verify that the required workplace hazard assessment has been performed through a written certification (JSA).
6. Defective and damaged personal protective equipment shall not be used. **NOTE**: Defective equipment can be worse than no PPE at all. Employees would avoid a hazardous situation if they knew they were not protected; but they would get closer to the hazard if they erroneously believed they were protected, and therefore would be at greater risk.

7.2 Eye and Face Protection

1. Safety glasses must meet the latest ANSI Z87 standard and be labeled accordingly.
2. Eye protection is required on Woodland Pulp and SCT property once you have entered the gates. Slip-on side shields are not allowed.

3. Electricians are not allowed to wear metal framed safety glasses.
4. The following areas are exempt from wearing eye protection:
   - All offices
   - Control rooms and completely enclosed booths
   - Enclosed lunchrooms
   - Inside enclosed cabs of company vehicles (windows closed)
   - Locker rooms
   - Restrooms
5. Safety glasses with photo chromatic lens will be allowed with medical approval for employees working inside the mill. Tinted and/or colored lenses are only permissible for exterior areas unless medically required or task warrants special lens protection, such as welding.
6. Before starting a job the proper eye and face protection must be assessed for the task. Specific eye protection may be required for working in a specific area and must be worn.
   - Chemicals – splash goggles and face shield must be worn.
   - Grinding or cutting on metals – safety glasses with foam back or goggles must be worn with a face shield.
   - Welding – welding goggles must be worn.
   - Cutting wires – safety glasses and face shield must be worn.
   - Dusty areas – goggles must be worn.
7. Safety glasses can be removed for temporary relief when environmental conditions cause them to fog but are to be returned to one's eyes after fog conditions subsides and/or employee is no longer in the area causing the fogging condition.
8. Employees who don't wear prescription glasses may obtain a pair of plain safety glasses through the Stores Department. Employees and visitors may wear approved safety glasses over their prescription glasses.
9. Employees are responsible to inspect and replace worn, damaged or lost equipment that no longer provides adequate protection or causes distortion in one's vision.
10. Employees need to use care after handling chemicals or working in dusty environments. Hands should be washed any time an employee works with or near chemicals to prevent possible eye contamination and use caution to not wipe one's face and wipe material into one's eye.

11. After doing production or maintenance work, clothing and facial area should be cleaned of all residual material to prevent possible eye contamination such as dust, material, debris, etc.
12. Employees who experience eye irritation or sense material enter one's eye are required to immediately report and obtain medical attention, even if the employee feels he/she has completed a self-administered eye washing and no longer feels the material.
13. Employees who are in areas or perform work that constitutes the need/use for goggles should be appropriately equipped.
14. Goggles or tight-fitting safety glasses are to be worn in windy and dusty conditions or when there is the possibility of dirt and material falling from overhead, etc.
15. In those locations where hard hats are required, if an employee needs a face shield then he / she must use the type of face shield that attaches to the hard hat.

7.3 Respiratory Protection

See Respiratory Protection Program

7.4 Bloodborne Pathogens

See Bloodborne Pathogens Exposure Control Plan

7.5 Head Protection

1. Head protection shall comply with ANSI Z89.1-1986
2. Employees will wear hard hats in all areas in which danger of overhead hazards exist.
3. Employees will wear hard hats in all areas that have been designated as permanent hardhat areas, which include any area deemed a construction site.
4. Employees are required to wear hard hats when reporting to or leaving their work location during shutdowns (gate to gate policy).
5. Employees will wear hard hats in areas, in which work is being done at different levels, in areas of low staging or confined spaces, in areas where articles may drop and during area outages.
6. During the annual outage, all employees will wear a hard hat while in the mill complex. This will be a gate-to-gate policy with the exceptions of:
   - All offices

- Control rooms and completely enclosed booths
- Enclosed lunchrooms
- Inside enclosed cabs of company vehicles
- Locker rooms
- Restrooms

7. Hardhats shall be worn according to the manufacturer's recommendations.
8. Employees are responsible to follow manufacturer's suggested use and replacement. Worn or damaged hard hats that no longer provide adequate protection must be replaced.
9. Employees will wear hard hats in all areas that have been designated as permanent hardhat areas, which include:

1. Kraft mill – except 4th floor of the bleach plant (for bleach plant operators only)
2. Lime kiln
3. Steam and Power operations – except while working on the spout deck

7.6 Hearing Protection

See Hearing Protection and Testing Procedure

7.7 Foot Protection

1. Employees are required to wear safety footwear, which meets the specifications of ANSI Z41 -1991.
2. Employees are required to wear safety footwear when reporting to or leaving their work location at the beginning and end of their shift.
3. Safety footwear is exempt in office areas. Upon leaving an office area, safety footwear is required when entering or passing through an operational area.
4. Fully enclosed footwear is required beyond the gate.
5. Safety footwear is required in all out-lying areas such as the lagoon, Grand Falls, landfill, power lines and dams.
6. Employees are responsible for promptly replacing worn or damaged safety footwear that no longer provides adequate protection. Chemical saturated footwear is to be discarded immediately.
7. Metatarsal guards shall be worn in addition to safety toed footwear when the possibility exists that conditions or tasks would allow objects to fall on the feet or that equipment might impact the instep of the foot. For example: employees shall wear metatarsal guards when using a jackhammer.

8. Specific safety footwear may be required for working in a specific area and must be worn.
   - Electricians must wear electrical hazard rated safety footwear.
   - When working in areas where risk of chemical exposure is present rubber boots should be worn.
   - Flooded areas require rubber boots.
   - Normal dry conditions, leather footwear can be worn.

9. It is the employee's responsibility that for footwear conditions regardless of type or age, that contain rips, holes, seam failures, saturated with acidic/caustic chemicals, etc.; the employee must discard and replace one's footwear.

7.8 Hand Protection

1. Employees whose tasks warrant hand protection are to have convenient access to appropriate type gloves for the task.
2. All employees are required to wear gloves if the task involves a hazard to their hands. Example: handling wood, handling objects with sharp edges, chemicals, use of knife, etc.
3. The appropriate gloves must be worn for the specific task
   - Cut resistant gloves - on both hands when adjusting or changing slitters, doctor blades, using utility knives, or working around/with sharp objects.
   - Welding gloves - when welding or handling hot materials
   - Rubber or chemical resistant gloves - when handling or working around chemicals
   - Insulated gloves - when working around hot and high temperature items
4 Care of protective gloves:
   - Employees need to check their gloves before each use to ensure that they are not torn, punctured or made ineffective in any way.
   - A visual inspection will help detect cuts or tears.
   - Gloves that are discolored or stiff may also indicate deficiencies caused by excessive use or degradation from chemical exposure.

Note: Any gloves with impaired protective ability should be discarded and replaced.

7.9 Clothing Requirements

1. For non-specific tasks when entering SCT, Woodland Pulp, and all outlying areas such as the Lagoon, Grand Falls, Landfill, Power Lines, and Dams employees, visitors, and non-employees must wear the following:

   a. Long or short sleeved shirts will be worn (tank tops and sleeveless shirts are not permitted).
   b. Long pants are required.

2. For specific positions identified such as electricians, specified flame-resistant clothing is required to be worn during job hours.

3. For specific tasks, such as using wire cleaning, exposure to high temperature and steam areas, additional clothing is required such as rubber rain suits, insulated jackets, enclosed head gear, etc.

7.10 Jewelry Requirements

Note: E&I Technicians are not allowed to wear rings or conductive watches.

1. The term “jewelry” refers to finger rings, earrings, studs, facial attachments such as chains and rings, bracelets (including medical alert bracelets), necklaces and watches.

2. Necklaces must be worn inside the shirt at all times and must not be permitted, or be able to, fall out.

3. Bracelets must not be won except for “Medic Alert” type. These bracelets must be completely covered by clothing cuffs.

4. Metal rings must not be worn in all manufacturing, operational, warehouse, maintenance, and construction areas. A single, plain silicone band can be worn.

5. Earrings must be small, stud or sleeper type and are not to extend below the ear lobes.

6. Any exposed piercings that are not closely attached to the body are not permitted within 10 feet of the tissue machines or winder operating areas, or in areas where tissue broke is processed or moved.

7. Any dangling accessories, such as key chains, are not permitted within 10 feet of the tissue machine or winder operating areas. Personal locks may be worn on the person provided they have a secure point of attachment.

8. Watches must be fitted with a quick release or not worn. Watches cannot have bands that continue underneath the watch face. Pedometers and smart watches with continuous latching bands are not allowed in manufacturing, operational, warehouse, maintenance, and / or construction areas.

7.11 Extreme Temperature Protection

See Heat and Cold Procedure

8. Knife Use

The type of knife used and how it handled and maintained are very important in achieving the desired results. All of these factors are also essential for worker safety and preventing injuries. The type of injuries that occur from the unsafe use of knives range from small nicks to serious disabling cuts.

Other injuries related to the repeated and long-term use of knives can include wrist strains and sprains.

a. Using Knives Safely

The basics of safely using a knife include:

- Making sure the area around is clear.
- Grasping the knife handle with your whole hand.
- Cutting away from your hand and body. **Never cut toward your hand or your body. Do not try to cut while distracted.**

1.1 Choose the right knife for the job:

1.1.1 No single utility knife is right for the job.
1.1.2 Too large a blade is unwieldy.
1.1.3 Too small a blade makes the job more difficult than necessary.
1.1.4 Different blade types are designed for different functions.

1.2 Knife features to choose from:

1.2.1 Utility knife blades are either fixed or retractable.

1.2.2 Fixed blades cannot collapse but can be hazardous to carry around.
1.2.3 Most retractable knives are reliable and not prone to collapse.
1.2.4 Straight blades are better for cutting clean edges.
1.2.5 Other features to look for are blade guards and secure grip handles.

1.3 Safe care and storage of utility knives:
1.3.1 Keep blades sharp – they are safer and require less force to use.
1.3.2 Blades should be replaced as often as necessary, using the correct cut-resistant gloves.
1.3.3 Keep knives sheathed.
1.3.4 Never leave knives laying loose. Store them in a drawer or toolbox.

1.4 Using utility knives safely:
1.4.1 Plan your task before you begin.
1.4.2 Work in a well-lighted area.
1.4.3 Select a sharp knife with a good grip and blade guard.
1.4.4 Always cut away from your body.
1.4.5 Always cut on a sturdy surface.

b. Personal Protective Equipment

2.1 Utility Knives with Steel Blades

Utility knives with steel blades are incredibly dangerous and can cause serious injuries. Due to the severity of the injury a person could sustain from using a utility knife with a steel blade, personal protective equipment (PPE) **must be worn**. There are also restrictions to what tasks a utility knife with a steel blade can be used for.

To prevent accidents and injuries from occurring when using utility knives, the following guidelines must be followed:

- Utility knives are **not** to be used for cutting and collecting samples from the reel or dressing the rolls, in any department.

- Cut-resistant gloves and cut-resistant sleeves are to be worn when using utility knives.

9. Visitors

9.1 Escorted Tour Group Visitors

- No dresses, shorts, or tank tops allowed.
- Hard hats will be required for entering the SCT/Woodland Pulp complex.
- Safety glasses with fixed side shields will be required. Safety glasses with side shields can be worn over prescription street glasses. Mirrored glasses are not permitted to be worn unless a medical waiver is provided.
- Hearing protection required in posted areas.
- Article of high visibility clothing required gate to gate. (shirt or vest)
- Boots or closed toed shoes. Sandals or high-heeled shoes are not allowed.

9.2 Deliveries to Stores or Tissue Office Area

- Typical delivery uniform required by company personnel such as UPS or Fed Ex.
- Boots or closed toed shoes. No sandals will be allowed.
- Safety glasses with fixed side shields will be required. Safety glasses with side shields can be worn over prescription street glasses. Mirrored glasses are not permitted to be worn unless a medical waiver is provided.
- Seat belts are required for vehicle traffic. All posted traffic signs will be observed.
- No cell phone use while operating mobile equipment.

9.3 Truckers

- ANSI rated hi-visibility safety vest when in or around the warehouse area
- Safety glasses with fixed side shields will be required. Safety glasses with side shields can be worn over prescription street glasses. Mirrored glasses are not permitted to be worn unless a medical waiver is provided.
- Boots or closed toed shoes. No sandals will be allowed
- Seat belts are required for vehicle traffic. All posted traffic signs will be observed.
- No cell phone use while operating mobile equipment.

9.4 Vendors

- Hard hats will be required for all non-employees entering the mill complex.
- ANSI rated hi-visibility safety vest to be worn at all times.
- Safety glasses with fixed side shields will be required.
- Hearing protection required in posted areas.
- Boots or closed toed shoes. No sandals will be allowed.

- Seat belts are required for vehicle traffic. All posted traffic signs will be observed
- No cell phone usage while operating mobile equipment

10. Cleaning and Maintaining PPE

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. Employees must inspect, clean, and maintain their PPE in accordance with manufacturers' instructions before and after each use.

Supervisors are responsible for ensuring that users properly maintain their PPE in good condition.

PPE must not be shared between employees until it has been properly cleaned and sanitized. PPE will be distributed for individual use whenever possible.

11. Training Requirements

1. Each employee who is required to use PPE shall be trained in the following:
   - When PPE is necessary
   - Type of PPE alternatives and appropriate application.
   - How to don, doff, adjust and wear PPE.
   - Limitations of the PPE.
   - Proper care, limitations, useful life and disposal of the PPE.
2. Each affected employee shall demonstrate an understanding of the training specified.
3. Retraining, performed by the Safety Manager or delegate, is required as follows:
   - When there has been a significant change in the workplace.
   - When there have been changes in the types of PPE.
   - When inadequacies in an affected employee's knowledge or use of assigned PPE indicate that the employee has not retained the requisite understanding or skill.
4. The employer shall verify that each affected employee has received and understood the required training. Employees must demonstrate competency in the subject matter.

12. Distribution

- SCT Intranet
- WP Intranet