Manual Section 7	Issue Date 11/25/09	Revision Date 01/01/24	Policy Number LLCP-098
	Personal Protective Equipment		

Purpose
This written program documents steps our Company has taken to minimize injury resulting from various occupational hazards present at our construction sites by protecting workers through the use of PPE when the hazards cannot be eliminated.

Scope
All LLC Companies including, Blanchard Industrial, LLC, GIS Engineering, LLC, Grand Isle Shipyard, Inc., and GWIS, Mack Steel, NuWave, Sun Industries, Valvemax, Discovery Industries, Inc.; hereafter identified as "Company".

General
The Corporate HSE Director is the program coordinator and has designated the Company's Industrial Training Education Center, ITEC in training of employees. This written plan is maintained by the Corporate HSE Department, reviewed and update as necessary. Copies of this program may be obtained from Corporate HSE Department or by visiting our Safety Portal at GISY.COM.

We believe it is our obligation to provide a hazard free environment to our employees. Any employee encountering hazardous conditions must be protected against the potential hazards. The purpose of protective clothing and equipment (PPE) is to shield or isolate individuals from chemical, physical, biological, or other hazards that may be present in the workplace. (See separate documents for respirator protection and hearing conservation programs.)

Establishing an overall written PPE program detailing how employees use PPE makes it easier to ensure that they use PPE properly in the workplace and document our PPE efforts in the event of an OSHA inspection. Our PPE program covers:

- Purpose
- Hazard assessment
- PPE selection
- Employee training
- Cleaning and maintenance of PPE
- PPE specific information

If after reading this program, you find that improvements can be made, please contact the Corporate HSE Director. We encourage all suggestions because we are committed to the success of our Personal Protective Equipment Program. We strive for clear understanding, safe behavior, and involvement in the program from every level of the Company.

Purpose of Program
The basic element of any PPE program is an in depth evaluation of the equipment needed to protect against the hazards at the workplace. This is the initial hazard assessment for which written documentation is required. Two basic objectives of any PPE program should be to protect the wearer from incorrect use and/or malfunctioning of PPE. The purpose of this Personal Protective Equipment (PPE) Program is to document the hazard assessment and protective measures in place.

PPE devices are not to be relied on as the only means to provide protection against hazards, but are to be used in conjunction with guards, engineering controls, and sound manufacturing practices. If possible, hazards will be abated first through engineering controls then with PPE to provide protection against hazards, which cannot reasonably be abated otherwise.

Hazard Assessment

As a Company, we shall 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 such hazards are present, or likely to be present, we will select, and have each affected company employee use, the types of PPE that will protect them from the hazards identified in the hazard assessment. Additionally, we will communicate selection decisions to each affected employee; and, select PPE that properly fits each affected employee. We will verify that the required workplace hazard assessment has been performed through a written certification that identifies the workplace evaluated; the person certifying that the evaluation has been performed; the date(s) of the hazard assessment; and, which identifies the document as a certification of hazard assessment.

In order to assess the need for PPE, the following steps are taken:

1. The Corporate HSE Director and staff, identifies job classifications where exposures occur or could occur. The HSE Director or designee examines the following records to identify and rank jobs according to exposure hazards:
    - Injury/illness records
    - First aid logs
2. The Operations Quality department conducts a walk through survey of workplace areas, where hazards exist or may exist, to identify sources of hazards to employees. They consider these basic hazard categories:
    - Impact
    - Heat
    - Penetration
    - Harmful dust
    - Compression (roll over)
    - Light (optical) radiation
    - Chemical
3. During the walk through survey, Operations Quality observes and records the following hazards along with PPE currently in use (type and purpose):
    - 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; Shop area, parking lots and pipeline right-way.
    - Sources of high temperatures that could result in burns, eye injury or ignition of protective equipment, i.e., welding and cutting.
    - Types of chemical exposures are, i.e., mechanic shops and wash racks.
    - Sources of harmful dust, i.e., sand blasting and pipeline coating.
    - Sources of light radiation area, i.e., cutting and welding.
    - Sources of falling objects or potential for dropping objects, i.e., excavations, directional drilling and moving of overhead objects.
    - Sources of sharp objects, which might pierce the feet or cut the hands, i.e., steel cable, stringing skids and nails.

- Sources of rolling or pinching objects, which could crush the feet, i.e., mechanic shops, pipeline right-way and directional drilling.
- Certain electrical hazards, i.e., overhead power lines.

4. Following the walk through survey, the Operations Quality organizes the data and information for use in the assessment of hazards to analyze the hazards and enable proper selection of protective equipment.

An estimate of the potential for injuries is now made. Each of the basic hazards is reviewed and a determination made as to the frequency, type, level of risk, and seriousness of potential injury from each of the hazards found. The existences of any situations where multiple exposures occur or could occur are considered.

The Operations Quality documents the hazard assessment via a written certification that identifies the workplace evaluated, the person certifying that the evaluation has been performed, the date(s) of the hazard assessment, and that the document is a certification of hazard assessment.

Selection Guidelines

Once all hazards have been identified and evaluated through hazard assessment, the general procedure for selecting protective equipment is to:

- Become familiar with the potential hazards and the type of protective equipment (PPE) that are available, and what they can do.
- Compare types of equipment to the hazards associated with the environment.
- Select the PPE, which ensures a level of protection greater than the minimum required to protect employees from the hazards.
- Fit the user with proper, comfortable, well fitting protection and instruct employees on care and use of the PPE. It is very important that the users are aware of all warning labels for and limitations of their PPE. (See the Employee Training guidelines outlined in the next section of this program for a more detailed description of training procedures.)

It is the responsibility of the Corporate HSE Director or designee to reassess the workplace hazard situation as necessary, to identify and evaluate new equipment and processes, to review accident records, and reevaluate the suitability of previously selected PPE. This reassessment will take place as needed, but at least annually. Employee-owned PPE is permitted in certain situations but the Company is responsible for the assurances of its adequacy, maintenance & sanitation. Approval must be obtained by Management.

Elements, which should be considered in the reassessment, include:

- Adequacy of PPE program
- Accidents and illness experience
- Levels of exposure (this implies appropriate exposure monitoring)
- Adequacy of equipment selection
- Number of person hours that workers wear various ensembles
- Adequacy of training/fitting of PPE
- Program costs
- The adequacy of program records
- Recommendation for program improvement and modification
- Coordination with overall safety and health program

Employee Training
ITEC provides training for each employee who is required to use personal protective equipment. Training includes:

- When PPE is necessary
- What PPE is necessary
- How to utilize and wear assigned PPE
- Limitations of PPE
- The proper care, maintenance, useful life, and disposal of assigned PPE
- An explanation of the complete hazard assessment
- A review of the PPE standard

Employees must demonstrate an understanding of the training and the ability to use the PPE properly before they are allowed to perform work requiring the use of the equipment. This is accomplished by having the employee demonstrate proper donning and usage of the PPE to his supervisor.

Employees are prohibited from performing work without donning appropriate PPE to protect themselves from the hazards they will encounter in the course of their work.

Employee Retraining
Retraining shall be performed when changes render previous training as obsolete, the types of PPE are changed, or when behaviors of employees indicate a lack of understanding of established requirements. If a Supervisor has reason to believe an employee does not have the understanding or skill required, then the employer must retrain the employee. Since an employee's supervisor is in the best position to observe any problems with PPE used by individual employees, the Supervisor will seek this person's input when making this determination. Circumstances where retraining may be required include changes in the workplace or changes in the types of PPE to be used which would render previous training obsolete, or inadequacies in an affected employee's knowledge or use of the assigned PPE, which indicates that the employee has not retained the necessary understanding or skills.

ITEC certifies in writing that the employee has received and understands the PPE training which will include employee’s name, dates of training and certification subject.

Because failure to comply with company policy concerning PPE can result in employee injury, OSHA citations and fines, an employee who does not comply with this program will be disciplined for noncompliance according to the Company’s Disciplinary Program:

- Verbal warning for the first offense accompanied by retraining
- Written reprimand for the second offense which goes in the employee's permanent record
- Suspension without pay for a third offense and documentation in the employees permanent record
- Dismissal as a last resort

Cleaning and Maintenance
It is important that all PPE be kept clean and properly maintained by the employee to whom it is assigned/issued. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision. PPE 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 by employees at regular intervals as part of their normal job duties so that the PPE provides the requisite

protection. Supervisors are responsible for ensuring compliance with cleaning responsibilities by employees. If a piece of PPE is in need of repair or replacement, it is the responsibility of the employee to bring it to the immediate attention of his /her supervisor or the HSE department. It is against work rules to use PPE that is in disrepair or not able to perform its intended function. Contaminated PPE, which cannot be decontaminated, is disposed of in a manner that protects employees from exposure to hazards.

PPE Specific Information

General Requirements

Employees shall wear appropriate PPE when required by procedure or whenever there is a reasonable possibility of injury or illness that can be prevented by wearing such equipment. PPE worn shall be in good condition, fully functional, and shall:

- Properly fit the employee
- Be free from defect or damage
- Be clean
- Be capable of being decontaminated or else must be discarded after contamination
- Meet applicable standards for protection and function.

Defective or damaged personal protective equipment shall not be used. It must be marked defective and turned into the tool room or to your supervisor for repair or disposal.

Eye and face protection (29 CFR 1910.133) (ANSI Z87.1-1989) -- Goggles and face shields

It is Company policy that, as a condition of employment, all regular full time, part time, and temporary employees working on job assignments are required to wear ANSI approved Safety Glasses with side shields to help prevent eye injuries, and face shields when performing grinding or anything that could fly into face area. This includes those resulting from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or light radiation, as examples. Employees in the specifically designated work areas, where eye hazards are prevalent, are required to wear goggles/ face shields.

Work Area

Eye protection is a requirement of all employees to wear at all times in areas, typically outside of office areas, in which they are required.

Employees from temporary work agencies and contractors are required to wear ANSI approved side shield safety glasses/face shields if assigned to work in the designated work areas.

All supervisors and managers are responsible for ensuring employees under their charge are in compliance with this policy.

All employees who work in designated work areas and/or job assignments are responsible for wearing company provided side shield safety glasses/face shields to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

All employees required to wear side shield safety glasses/face shields must routinely inspect and properly care for their side shield safety glasses/face shields.

Impact-resistant eye wear (safety glasses) with plastic or glass lenses shall conform to ANSI Z87.1-1989 - Spectacles meeting this ANSI standard can be identified by a number/icon stamped on the lens and "Z 87" stamped on the frame. Side shields are required.

- Regular prescription eye wear with side shields added does not qualify as occupational safety glasses. Approved safety over-glasses or goggles can be worn over regular prescription eye ware.

Impact-resistant chemical splash goggles:

- Activities requiring chemical splash goggles shall include, but not be limited to:
  - when handling acids, caustics, and other corrosive materials;
  - in the likelihood of a hydrocarbon splash
  - for protection from dusts from catalysts, refractory coke, coke chipping, sulfur, breaking concrete, etc.
- Spectacles should not be worn under chemical splash goggles if the goggle is needed for splash protection, unless the goggle is designed to accommodate the spectacles and temple-pieces. If prescription lenses are required, the goggle shall be so fitted with a set of lenses. Contact lenses can be worn under goggles.
- Impact resistant-only goggles should not be worn for splash protection, as the ventilation holes will not prevent liquid from entering the goggle. To avoid misapplication, the facility/location should determine the need to have both chemical splash goggles and impact-resistant goggles, as opposed to an all-purpose goggle.
- Goggles may be attached to the hard hat using an adapter specifically designed for this purpose. The goggles should be regularly checked for distortion and cleanliness and the strap checked for elasticity and cracking.

For outdoor use, ultraviolet (UV) protection (attenuation) at greater than 90% for UV-A and UV-B is recommended to prevent chronic eye damage (such as pterygium).

- UV protection should be provided by the company and not be an employee option for reimbursement.
- UV protection is available for both clear and tinted lenses.

Tinted lenses are allowed for outside work. They should not be permitted to be worn indoors, in dark areas, or in artificially-lighted confined spaces (except if required for welding, burning, cutting, or brazing).

Lens inserts (spectacle kits) shall be provided for a full-facepiece respirator if prescription lenses are required for visual acuity.

Contact lenses may be worn under goggles and with respirators unless specifically prohibited by the facility/location.

Welding: the eyes must be protected from the intense visible light, ultraviolet, and infrared radiation, as well as from sparks and molten metal.

- Welding helmet/hood shall be worn by the welder for arc welding and air arcing.
- Welding helpers must wear, as a minimum, green tint glasses with #2 or #3 shade lenses when assisting welders during fit-up and tacking.
- Tinted lenses #2 or #3 will still allow enough rays to penetrate to burn the surface of the eye if they are exposed enough and that the proper technique is to turn your head while the welder is tacking and close your eyes or block the light with your free hand.

- Welders should not tack until the fitter or helper verbally asks for a "Tack".
- Shading shall meet the ANSI requirements for transmission of radiant energy.

Face shields provide protection to the entire face; the ears and neck are also protected to a limited degree. Face shields shall be used for but not limited to, the following:

- When an unexpected release of pressure may occur
- When taking samples from pressurized systems
- In the lab to protect against the potential for glassware breakage
- For hose connections for acid/caustic truck or rail car loading/unloading
- For protection from flying particles such as during welding, grinding, machining, drilling, using air to blow down, etc.

Foot Protection (29 CFR 1910.0136) (ANSI Z41-1991) - Safety Shoes/Steel Toe Boots

It is Company polic that as a condition of employment, all regular full time, part time, and temporary employees, working in designated work areas and/or job assignments, are required to wear steel toe boots to help prevent foot injuries, ankle injuries, slips, and falls.

Employees in the following designated work areas are required to wear approved safety shoes in accordance with ASTM F2412/F2413 & OSHA 1910.136.

Steel toe footwear is required at all times while on Company property away from an office.
Employees from temporary work agencies and subcontractors are required to wear steel toe boots if assigned to work in the designated work areas. It is the responsibility of the agency and/or contractor to ensure the employee reports to his/her temporary assignment to our Company wearing approved steel toe boots.

Members of the Emergency Response Team are required to wear safety footwear when responding to fire emergency situations. All supervisors and managers are responsible for ensuring their associates are in compliance with this policy.

All employees who work in designated work areas and/or job assignments are responsible for purchasing and wearing steel toe boots to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

Hand Protection (29 CFR 1910.138) -- Gloves

It is Company policy, that as a condition of employment, all regular full time, part time, and temporary employees working in designated work areas and/or job assignments are required to wear gloves to help prevent hand injuries cuts, burns, chemical exposure.

Work Area

Hand protection is required any time employee is performing a function where there could be or the possibility of hand injury.

Hazard

Common hazards associated with hand protection are splinters, mashing, cutting, punctures, and scrapes or abrasions.

Type of Glove
Gloves compatible with the scope of work being performed are required.

- Insulated gloves are recommended for thermal (hot or cryogenic) protection.
- Insulated chemical gloves are available for hot process samples.
- Cut resistant gloves (Kevlar) shall be used for protection from sharp edges, wires, etc...
- Chemical-resistant gloves shall be used to protect against potential exposure to chemicals and hydrocarbons.
- Welders, to protect against sparks, molten metal, and UV/infrared radiation burns, will use Gauntlet-style welding gloves, covering the forearm as well as hands.

Employees from temporary work agencies and contractors are required to wear protective gloves if assigned to work in the designated work areas.

All supervisors and managers are responsible for ensuring employees under their charge are in compliance with this policy.

All employees who work in designated work areas and/or job assignments are responsible for wearing gloves to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

All employees required to wear protective gloves must routinely inspect and properly care for their assigned gloves (if the gloves are not disposable).

<u>Head protection</u> (29 CFR 1910.135) (ANSI Z89.1-1986) -- Hard hats
It is the policy of the company that, as a condition of employment, all regular full time, part time, and temporary employees working in designated work areas and/or job assignments are required to wear ANSI approved hard hats to help prevent head injuries, including those resulting from falling objects, bumping the head against a fixed object, or electrical shock.

Work Area
Company policy requires wearing hardhat at all times while more than 50 feet away from an office building. Hard hats shall be worn whenever there is the possibility of falling objects, electrical contact, and/or in the presence of overhead obstructions including, but not limited to overhead piping, structures, and confined spaces; Unless wearing the hard hat increases the chance of injury or if other PPE (such as a full-facepiece respirator) cannot accommodate the hard hat.

Hazard
Falling objects and struck by objects.

Type of Hardhat
Hardhats must have Class E or G rating.

Hard Hats with a short bill on the front must be worn with the brim of the hard hat facing forward. According to the Occupational Safety and Health Administration (OSHA), a standard interpretation and compliance letter dated July 22, 1992 states:

"Because ANSI only tests and certifies hard hats to be worn with the bill forward, hard hats worn with the bill to the rear would not be considered reliable protection and would not meet the requirement of 29 CFR 1926.100 (a) and (b) unless the hard hat manufacturer certifies that this practice meets the ANSI requirements."

All supervisors and managers are responsible for ensuring employees under their charge are in compliance with this policy.

Asset Managers, after proper hazard assessment, may determine that employees working in Company buildings (i.e. shop locations) are free of hazards associated with hard hats.

Leadership will leave it up to the discretion of the Asset Manager to declare a shop location "hard hat free". Asset Managers must stay in compliance with OSHA 1910.132 (d)(1) which states "The employer shall assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of PPE". Corporate HSE shall still retain ultimate authority when deemed necessary to make a decision to wear hard hats.

All employees who work in designated work areas and/or job assignments are responsible for wearing company provided hard hats to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge. Employees from temporary work agencies and subcontractors are required to wear hard hats if assigned to work in the designated work areas.

All employees required to wear hard hats must routinely inspect and properly care for their hard hats. Replace the hard hat immediately if it is broken, brittle, or damaged.

Flotation Devices - Work Vests/Life Jackets

Where required, employees who work on, over or near water shall wear a fully secured work vest, except when working on immovable installations where guardrails are provided or in enclosed areas. Employees on offshore platforms are required to wear work vests when working at the +10 level or below the lowest working level. The immediate supervisor shall decide if and when employees may deviate from this requirement.

Each person is responsible for the care and maintenance of the work vest/life jacket assigned to him/her. 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.

All persons shall wear work vests/life jackets when boarding or disembarking undocked vessels.

It is not mandatory to wear work vests/life jackets while riding in the cabin of a supply or crew boat (speedboat). However, when outside the cabin, employees shall wear work vests/life jackets.

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

Inflatable life jackets are provided and shall be worn when traveling by helicopter over water.

Life jackets (U.S.C.G. approved, Type I) shall be worn while conducting abandonment drills.

Fall Protection (ANSI Z359.1 & ANSI A10.32) – Harness/Lanyards

Fall protection devices include, but are not limited to, safety harnesses, lanyards, lifelines, ladder climbing devices, and safety nets.

Fall protection devices such as, but not limited to, safety harnesses, shall be examined before each use for excessive wear or damage. Worn or damaged equipment shall be immediately removed from service and destroyed.
When requisitioning and purchasing equipment and raw materials for use in fall protection systems, applicable ANSI & ASTM requirements should be met.

Full body harnesses and lanyards should be worn anytime employees are six (6) feet or more from the ground, floor, or walking/working level.

Employees must be careful always to place themselves in a safe and secure position. The care exercised by others must not be relied upon for protection.

Wear a full body harness when using a boatswain chair.

Hardware should be examined and worn parts replaced.

Each harness rivet should be examined to be certain that it is secure.

Full body harnesses subjected to the maximum impact in an accidental fall should not be reused because the fittings might have been overstressed and weakened.

Full body harnesses must be worn in unprotected elevated areas.

Full body harnesses must be worn when working in tanks, vessels, etc., where subject to being overcome by gas or where maneuverability is hampered.

Wear a full body harness when working on high-pitched roofs (1/4 pitch or greater).

All supports must withstand 5,000 pounds of force. NOTE: It is important that the safety harness is properly worn, and that the wearer allows no more slack in the secured safety line than is necessary.

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 four feet or higher where handrails or barricades are not provided;
- Working above potential hazards;
- Working over water when personal flotation devices (PFDs) are not used.
- Where cage protection is not provided on ladders over 20 feet in unbroken length, employees shall use appropriate fall protection devices.

Safety Monitoring Systems

When no other alternative fall protection has been implemented, the Company shall implement a safety monitoring system. A competent person will be appointed to monitor the safety of workers. This will require a Company MOC. The Company shall ensure that the safety monitor:

- Is competent in the recognition of fall hazards.
- Is capable of warning workers of fall hazard dangers and in detecting unsafe work practices.
- Is operating on the same walking/working surfaces of the workers and can see them.
- Is close enough to work operations to communicate orally with workers and has no other duties to distract from the monitoring function.

No worker shall be allowed in an area where an employee is being protected by a safety monitoring system. All workers in a controlled access zone shall be instructed to promptly comply with fall hazard warnings issued by safety monitors.

Protective Clothing

No polyester/nylon material shall be worn in a work environment where there is the potential for exposure to flame, high heat, or welding sparks. Reflective safety vests should be removed if they pose an immediate danger to the employee.

Chemical protective clothing shall be worn to prevent skin exposure and/or to prevent contamination of the employee clothing while working around toxic materials. The type of material shall be selected based on the material's ability to resist penetration and its ability to withstand the rigors of the job.

Fire Retardant Clothing (FRC)

Several of our Customers are now requiring the use of flame retardant clothing while working on their property. Employees are expected to find out if the Customer you will be working for requires this from your Coordinator.

FRC's must:

- Provide for electrical arc protection (when required by task)
- Cover the entire body from neck to wrist to ankle
- Have non-metallic fasteners of fasteners that are protected by a layer of the same material as that of the garment on both the top and underside.
- Be laundered and used in accordance with the manufacturer's requirements.

Prior to use, clothing is to be visually inspected for signs of damage, deterioration and areas where sections of the body may not be adequately covered.

The JSEAs developed for work in flame retardant clothing shall take into account the hazards and control measures associated with heat stress and perspiration.