




Sterling Chemical Malta Ltd

SAFETY INSTRUCTION: PROTECTIVE EQUIPMENT MANAGEMENT

REVISION HISTORY

Revision Date	Revision Number	Section Affected	Description of the change
28.02.2014	00		First issue

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1. PURPOSE

This procedure establishes the measures to be taken in order to manage the personal protective equipment. Management refers to the set of all procedures intended to identify, purchase, store, distribute, keep and maintain PPE.

2. FIELD OF APPLICATION

Regulations provided in this procedure apply to all Sterling Chemical Malta Ltd staff involved in the management and/or use of protective equipment.

Personal and collective protective equipment (PPE) are identified by the Safety office as a result of the risk assessment carried out for the various activities performed within the Company.

3. REFERENCE DOCUMENTS

This procedure was drafted after consulting the following documents:

- BS OHSAS 18001 par. 4.3.1
- Legislative Decree 81/2008 and subsequent amendments. Title III section II “Personal protective equipment usage”
- Legislative Decree 81/2008 and subsequent amendments. Annex VIII “Personal protective equipment”
- European Directive 89/686/EEC on personal protective equipment, integrated with all changes provided by the Directive 93/95/EEC and 93/68/EEC.
- Legislative Decree dated 4th of December 1992, n. 475 "Implementation of the European Directive 89/686/EEC"

4. PROCEDURES

The risk assessment identify the situations which can reduce all those risks that can not be avoided but possibly reduced by the effective implementation of technical measures by using Personal Protective Equipment.

4.1 PPE definition and selection

PPE refers to any equipment intended to be worn and kept by the worker which protect him against one or more risks that could endanger his safety or health at work. In addition, PPE refers to any accessory designed for this purpose.

PPE does not refer to:

- a) usual working clothes and uniforms not specifically designed for the protection of workers safety and health;
- b) emergency and rescue services equipment;
- c) personal protective equipment used for means of road transport;
- d) portable devices intended to detect and signal risks and harmful factors.

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According to the prevention and protection measures program provided in the individual risk assessment documents, the Employer, in collaboration with the Safety office and the RSPP consult the Doctor in charge and choose such equipment:

- by identifying the types of PPE to be used;
- by taking into account all features of the PPE available on the market then choosing those that meet both protective requirements and ergonomic and acceptability requirements;
- by establishing the conditions under which PPE have to be used, in particular their usage duration.

PPE have to be used when the risks can not be avoided or sufficiently reduced through preventive technical measures, collective prevention measures or work reorganization measures, methods and procedures.

Usually, PPE is intended for a personal use; except for those devices that are not designed for the contact with the skin, which cannot be washed, disinfected or sterilized as long as they are of an adequate size for the user.

In case PPE are used for multiple different activities, make sure they do not cause hygienical problems:

- by ensuring that after their usage, PPE are treated with disinfectant or sterilized as indicated by the manufacturer;
- by ensuring that the user wear disposable latex gloves under the PPE gloves.

In addition, as a result of a new revision of the Risk Assessment Document (or of a part of it) the Safety office has to check if there are any change in the regulation of PPE listed in the new revision. Sometimes it is possible that after changes or improvements provided in the new revision, the use of certain PPE to reduce the residual risk is no longer necessary.

4.2 Personal and collective protective equipment purchase

For the purchase of new protective equipment, once selected the equipment as described in the previous paragraph, RSGS in collaboration with the Safety office make sure that the appointed supplier is able to provide PPE:

- which meet the "essential health and safety requirements" provided in the annex II of Legislative Decree no. 475/92 in accordance with the European Directive 89/686/EEC. PPE warranty has to be supplied by the manufacturer that has the duty to carry out the "certification" depending on the category to which each PPE pertains. He also has to put the EC mark on the PPE or on its packaging. The EC mark indicates that the PPE was made in compliance with the "essential health and safety requirements";
- equipped with an information notice (usually in the PPE package) which reports the following information:
 - instructions for the storage, use, cleaning, maintenance, disinfection of PPE;
 - list of performance recorded during technical tests to check PPE protection levels or classes;
 - list of all accessories that can be used with the PPE as well as the characteristics of appropriate spare parts;
 - protection classes adequate to the different levels of risk and the corresponding limits of use;
 - the expiry date of the PPE or its components;

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- type of packaging suitable to transport PPE;
- name, address and identification number of the organization involved in the PPE certification process.

At the time of purchase, the information sheet will be analysed by the RSGS and the Safety office in order to draw up the operative instruction **MIOS_4.4.6-L1 "PPE usage and maintenance"** which will be given to all workers who use PPE during the training course.

The minimum quantities of personal protective equipment of which a company has to be provided are listed in the PPE inventory registry file and managed by RSGS who periodically update the stock in the individual storage areas in accordance with the minimum requirements.

After purchasing PPE, the RSGS performs the following checks:

RSGA checks the PPE complies with what is specified in the purchase order (in terms of characteristics and regulations);

RSGA makes sure that what is specified in the purchase order complies with what is provided in the risk assessment documents;

RSGA makes sure that PPE are not damaged and totally safe

RSGA makes sure that each PPE is provided with the relevant components required by the informative

RSGA makes sure all PPE is equipped with the EC mark

If the results of the checks carried out are positive, the RSGS records the compliance by signing the transport document and authorizing the entry and delivery of protective equipment to workers. Otherwise, RSGA will contact the supplier and deny any permission to use the PPE.

4.3 PPE storing and conservation

Once personal and collective protective equipment are accepted, RSGS ensures that they are stored in the appropriate area of the plant, in accordance with the terms prescribed by the manufacturer in the informative note. The Departmental head and the Safety supervisor are responsible for the proper storage of personal and collective protective equipment in the appropriate area of the plant.

4.4 Maintenance and checks

PPE efficiency and effectiveness are result from their proper preservation and maintenance.

In order to appropriately preserve PPE it is necessary to:

- store such devices in certain places (e.g. lockers) within their package, check and clean them after the use;
- comply with the rules for the conservation of the filters; in particular it is necessary to verify the expiration date and the storage temperature.

Maintenance refers to all operations necessary to maintain the PPE efficiency. There are two types of maintenance: ordinary and extraordinary maintenance.

Ordinary maintenance has to be carried out directly by the user following the directions provided in the instruction **MIOS_4.4.6-L1 "PPE use and maintenance"** which focuses mainly on a visual inspection to check the device is in good conditions, as well as the cleaning and disinfection to ensure the PPE hygiene. These operations do not have to be registered by the worker.

Furthermore, if some PPE require more complex maintenance operations (e.g. the replacement of spare parts, some mandatory periodic inspections), the departmental head reports the maintenance

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to RSGS who makes sure that such activities are carried out by qualified internal staff or by external appointed companies. The result of such maintenance activities is reported in the document issued by the company that carries out the maintenance.

By following the frequency established in procedure **MPA_4.5.5 "audit"**, the RSGS performs several sample operational audits to check that operator correctly use PPE. The result of such audits is registered by the RSGS on the Form Operational Internal audit form on environment and safety

4.5 PPE request and delivery

When the employee is hired or when the collaboration with the employee starts, RSGS has to delivery all necessary PPE to the worker, depending on his task, by making sure to record them in the form **"PPE delivery receipt" MS_4.4.6-L1**.

When the employee is at work he is required to use all PPE provided and shown in the Instruction **MIOS_4.4.6-L1 "PPE use and maintenance"**, which is delivered during the initial training.

When the employee is at work he can ask the Departmental head for PPE to be replaced or delivered again through a verbal request. The department head or a supervisor in charge of the area in which the employee works, evaluates the request and delivers the PPE by recording the delivery in the form **"PPE delivery receipt" MS_4.4.6-L1**. All PPE is delivered to workers in an official way through the use of the PPE Delivery Form which is countersigned for acceptance by the employee (except for the delivery of latex gloves, and disposable materials).

Collective protective devices are assigned by the RSGS to the departmental head in charge using the form **"PPE delivery receipt" MS_4.4.6-L1**.

5. RESPONSIBILITIES

Employer:

- He keeps all PPE in working conditions and ensures their hygienic conditions, through the maintenance, repair and replacement operations necessary in accordance with any instructions provided by the manufacturer;
- He makes sure that PPE is used only for the purposes intended, unless specific and exceptional cases, according to the manufacturer instructions;
- He provides clear instructions to workers;
- He makes sure each worker uses his own PPE. In case a single PPE has to be used by two or more workers, the employer take appropriate measures to ensure that such use does not endanger the health and hygiene for each user;
- He notifies the worker of the risks against which the PPE protects him;
- He makes available all appropriate information on each PPE within the plant (that is to say a productive unit);
- After the use, he establishes all business procedures to be followed for the PPE delivery and storage;
- He provides an appropriate training and, if necessary, organizes a specific training about the correct and practical use of PPE.

Managers

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- They provide workers with the necessary and appropriate personal protective equipment, after consulting the safety office and the appointed doctor;
- They ask all workers to observe the rules in force, as well as the company regulations on safety and hygiene and the use of collective and personal protective equipment available to them;
- They fulfill their duty to provide information, instructions and training as established in articles 36 and 37.

Safety office and RSGS

- They make sure this procedure is correctly implemented
- They perform internal operational audits to assess the status of implementation of this procedure
- They provide training and ensure PPE are correctly delivered when the employee is hired or when the collaboration with the employee starts.

Supervisors

- They make sure that workers comply with the law requirements as well as the company regulations regarding health and safety at work and the use of collective and personal protective equipment at their disposal. In case these regulations are not observed, they have to notify their superiors.
- They immediately notify the employer or the manager of the lack of work equipment and individual protective equipment, as well as any other dangerous condition occurring during working hours, of which they become aware thanks to the training received;

Workers

- They take part in training programs organized by the employer in all cases considered necessary in accordance with article 77 paragraphs 4 letter h), and article 5 of Legislative Decree no. 81/08.
- They use PPE made available to them in accordance with the information and training course received.
- They provide for the care of PPE at their disposal.
- They do not make changes on PPE on their own initiative.
- They immediately notify the employer, the manager or the supervisor of any flaw or fault they found in PPE at their disposal.
- Each worker has to take care of his own health and safety and of other people safety within the workplace, on which fall the effects of his actions or omissions, in accordance with his training, instructions and equipment provided by the employer.