Policy Name: Personal Protective Equipment (PPE) Policy

Policy Applies to: All Associates, contractors, temporary associates and vendors

Prepared by	**Effective Date**
Safety Department	December 2, 2024

Purpose

The purpose of the personal protective equipment policy (PPE) is to protect PODS associates from exposure to workplace hazards and the risk of injury by using PPE. PPE is not a substitute for more effective control methods and its use will be considered only when other means of protection against hazards are not adequate or feasible. It will be used in conjunction with other controls unless no other means of hazard control exists.

Personal protective equipment will be provided, used, and maintained when it has been determined that its use is required to ensure the safety and health of our associates and that such use will lessen the likelihood of occupational injury and/or illness.

Scope

This policy applies to all handling or usage of PPE by associates working at PODS storage centers and Maintenance HUBS. The PPE policy establishes the minimum requirements for PPE to ensure that associates are aware of and utilize the appropriate PPE during performance of tasks to prevent injury.

Responsibilities

Managers are responsible for:

- Conducting workplace hazard assessments to determine the presence of hazards which requires the use of PPE.
    - This includes assessing the hazards posed by new equipment, tools or chemicals brought in for use.
- Providing appropriate PPE and making it available to associates and visitors.
- Periodically re-evaluating the suitability of previously selected PPE.
- Ensuring Associates are trained on the proper wear, cleaning, inspecting and maintenance of PPE.
- Document associate PPE training and maintain in Learning Management System (LMS).
- Ensuring associates use and maintain their PPE and follow PODS' PPE policies and rules.
- Notifying PODS management and the safety department when new hazards are introduced or when processes are added or changed.
- Ensuring defective or damaged PPE is immediately disposed of and replaced.

Associates are responsible for:

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

Safety is responsible for:

- Providing guidance, and assistance to Managers and Associates on the proper use, care, and cleaning of approved PPE.
- Periodically reviewing this policy to ensure the policy is aligned with current regulatory requirements and operational risks and hazards.
- Monitoring trends in PPE and evaluating PPE options that will afford associates the highest level of protection while meeting operational needs.

Procurement is responsible for:

- Working with vendors to make PPE outlined in this policy available to all PODS locations via P&S Portal or designated vendor website.
- Coordinating any changes in PPE selection with Safety team to ensure meets policy requirements and risk reduction needs.

Contractors are responsible for:

- Wearing hi vis vest and closed toe shoes when in the warehouse or yard.
- Contractors required to wear task specific PPE as outlined in their safety policies.

Requirements

PPE, including 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 whenever it is necessary by reason of hazards of processes or environment, chemical 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.

Types of PPE and Ordering

- Foot Protection: Safety Toe Footwear
  - US operations must be ASTM F2413-2018 and ASTM F3445-21 compliant.
    - PODS safety footwear vendor in the US is Red Wing
  - Canada operations must meet CSA Standard Z195-16 (Green triangle).
  - Foot protection required for all drivers, storage center workers (SCW), Equipment Maintenance Technicians (EMTs), Container A&R Techs during performance of normal duties and all other PODS associates when in the warehouse, yard or on a ride along.
    - US associates shall only wear safety footwear sourced from Red Wing utilizing PODS Red Wing voucher program, which currently provides an allowance of $175.
      - Any exceptions to use of Red Wing footwear shall be discussed with HRBP.
    - Red Wing provides warranty and support services as well as only making available safety footwear that meets PODS criteria.
    - Workers sourced from a temporary labor agency shall be responsible for reporting with safety footwear that meets the above referenced ASTM standards.
    - Any issues with Red Wing should be directed to PODS Procurement Department.
- Eye and Face Protection: ANSI/ISEA Z87.1-2020
  - Safety glasses must conform to ANSI/ISEA Z87.1 standards for US operations and CSA Standard Z94.3.1-16 for Canada operations.
  - Safety Glasses – Required in container assembly and repair areas and when eyes are exposed to airborne particles or chemicals.
  - Detachable side protectors (e.g. clip-on or slide on side shields) that meet OSHA 29 CFR Part 1910.133 and ANSI/ISEA Z87.1 specifications are also acceptable to wear with prescription glasses. Prescription glasses used with detachable side shields must conform to ANSI/ISEA

Z87.1. Information on whether the prescription glasses meet the ANSI/ISEA Z87.1 standard must be determined by the supplier or optometrist.
    - In some cases, safety goggles or face shields provide superior protection when using grinding wheels, buffing wheels or other cutting tools.
    - When using safety goggles, choose impact goggles for protection from flying objects and chemical goggles for protection from chemical splash.
    - To determine the eye and/or face protection required when using a chemical, reference the PODS Chemical Inventory PPE Hazard Assessment document or Safety Data Sheet (SDS).
        - If the chemical to be used is not listed in the PPE Hazard Assessment, contact your Region Safety Manager or the Director-Enterprise Safety for assistance in conducting the PPE Hazard Assessment and adding to the document for future reference.
    - Hot work
        - Goggles with appropriate shade required for oxygen acetylene torch work.
        - Welding helmet with appropriate shade required for all welding work.
        - Minimum protective shade required for various types of hot work can be found in OSHA 1910.133.
    - Face shield
        - Associates changing LP gas cylinders shall wear full face shields to protect from potential LP gas leaks during connecting and disconnecting cylinders.
        - Face shield shall be worn during any task where face protection from airborne particles or chemical splash is warranted.
        - Face shield must conform to ANSI/ISEA Z87.1 standards.
- Bump Cap – EN 812 compliant protective cap required in container assembly and repair areas of maintenance HUBS.
- Gloves
    - Level 2 cut resistant glove when handling product, tools or materials that pose a cut hazard.
        - Do not wear gloves when operating a manual drill press.
    - Driver gloves
        - Drivers shall wear gloves during load securement activities.
        - Driver gloves are to provide grip on winch bar and provide general abrasion and pinch protection.
    - Chemical gloves
        - Associates shall wear the proper type of glove as specified on the chemical Safety Data Sheet (SDS) for chemical being handled.
          For the type of glove required, refer to PODS Chemical Inventory PPE Hazard Assessment. If the chemical to be used is not listed in the PPE Hazard Assessment, contact your Regional Safety Manager or Director-Enterprise Safety for assistance conducting the PPE Hazard Assessment and adding to the document for future reference.
        - Associates changing LP gas cylinders on forklift must wear insulated chemical gloves to protect hands from potential LP gas leaks during connecting and disconnecting cylinders.
- Hearing Protection – required in areas where noise levels exceed 85 decibels at maintenance and repair HUBS.
- High Visibility Clothing –
    - Drivers must wear a “tear away” high visibility vest or ANSI Class 2 Uniform garment when outside the truck during deliveries/pick-ups and at the storage center.
    - Storage Center Associates (SCW) are required to wear a “tear away” high visibility vest at all times while working in the warehouse and storage yard.
    - High visibility vests shall be a minimum Class 2 per the ANSI/ISEA 107-2020.
    - All associates shall wear a high visibility vest when in the storage center warehouse or yard, or during ride alongs.

- Raincoat – required when using cleaners that require chemical resistant clothing for prevention of skin contact.
- Respiratory Protection – PODS does not currently have any tasks or chemicals that require the use of respiratory protection. However, PODS recognizes that associates may choose to voluntarily use a respirator in the workplace. PODS will allow this practice and associate must acknowledge Appendix D to 1910.134 – Information for Employees Using Respirators When Not Required Under the Standard in PODS LMS. The Appendix D assignment will be made by the manager before an associate wears a respirator in the workpalce.
    - Only filtering facepieces shall be used by associates voluntarily and not cartridge respirators.
    - ***Filtering facepiece*** (dust mask) means a negative pressure particulate respirator with a filter as an integral part of the facepiece or with the entire facepiece composed of the filtering medium.
- Task specific PPE requirements can be found in the following documents:
    - Podzilla Safety, Maintenance, Inspection and Repair User's Manual
    - Container Repair instructions found on the Corporate Operations intranet page under the EMT Resources and Tools.
- PPE should be ordered through the Parts and Service site on PODS intranet page.

Training

Any Associate required to wear PPE will receive training in the proper use and care of PPE before being allowed to perform work requiring the use of PPE. Periodic retraining will be provided to PPE users as needed. The training will include, but not necessarily limited to, the following subjects:

- When PPE is necessary to be worn
- What PPE is necessary
- How to properly don, doff, adjust, and wear PPE
- The limitations of the PPE
- The proper care, maintenance, useful life, and disposal of the PPE

After the training, the associates will demonstrate they understand how to use PPE properly, or they will be retrained.

Retraining

The need for retraining will be required when:

- An associate's work habits, or knowledge indicates a lack of the necessary understanding, motivation, and skills required to use the PPE (i.e., uses PPE improperly).
- New equipment, tools or chemicals are brought into the facility for use.
- Changes in the workplace make previous training out-of-date.
- Changes in the types of PPE to be used make previous training out-of-date.
- Changes in the policy or every 3 years.

Cleaning and maintenance of 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. Associates must inspect, clean, and maintain their PPE before and after each use. Managers are responsible for ensuring that users properly maintain their PPE in good condition.
    - Personal protective equipment must not be shared between associates until it has been thoroughly cleaned and sanitized. PPE will be distributed for individual use whenever possible.
    - No modifications to PPE allowed.
    - The only PPE associates may provide is driver gloves, which must meet PODS requirements and be maintained in a clean and reliable condition.
    - Defective or damaged PPE will not be used and will be immediately discarded and replaced.

- NOTE: Defective equipment can be worse than no PPE at all. Associates 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.
- It is also important to ensure that contaminated PPE which cannot be decontaminated is disposed of in a manner that protects associates from exposure to hazards.

Oversight and Monitoring

Requirements and performance under this procedure are closely monitored by the Human Resources Department, Business Unit Leaders, Safety Management and Risk Management. Additionally, the Internal Audit Department will perform policy compliance audits.

Non-compliance or abuse of this policy may be grounds for associate counseling action, up to and including termination of employment.

Contact Information

Any questions or comments concerning this policy should be directed to the attention of:

- Director – Enterprise Safety
- Director – Container Fleet Services
- VP - Procurement

Revision History

Date	Section	Change	Author
6/1/2020		Initial policy	Risk Management
12/2/2024		Major policy revision	Safety
5/27/2026		Periodic Review	Safety

PPE Training Certification Form

Associate's name/ID No: _____

Job title/Work area: _____

Trainer's name (person completing this form): _____

Date of training: _____

Types of PPE associate is being trained to use (List all PPE used):

1. _____
2. _____
3. _____
4. _____
5. _____

The following information and training on the personal protective equipment (PPE) listed above were covered in the training session:

____ The limitations of personal protective equipment: PPE alone cannot protect the associate from on-the-job hazards.

____ What workplace hazards the associate faces, the types of personal protective equipment that the associate must use to be protected from these hazards, and how the PPE will protect the associate while doing his/her tasks.

____ When the associate must wear or use the personal protective equipment (PPE).

____ How to use the personal protective equipment (PPE) properly on-the-job, including putting it on, taking it off, and wearing and adjusting it (if applicable) for a comfortable and effective fit.

____ How to properly care for and maintain the personal protective equipment (PPE): look for signs of wear, clean and disinfect, and dispose of PPE.

Note to associate: This form will be made a part of your personnel file. Please read and understand its contents before signing.

(Associate) I understand the training I have received, and I can use, maintain and inspect PPE properly.

Associate's signature: _____ Date: _____

(Trainer must check off)

____ Associate has shown an understanding of the training.

____ Associate has shown the ability to use the PPE properly.

Trainer's signature: _____ Date: _____

Appendix D to 1910.134 – Information for Employees Using Respirators When Not Requried Under the Standard

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.
2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.
4. Keep track of your respirator so that you do not mistakenly use someone else's respirator.