



# GoM Region Personal Protective Equipment (PPE) Safe Work Practice (SWP)

## 1 Purpose/Scope

The purpose of this Safe Work Practice (SWP) is to document steps taken to provide a hazard free workplace. GoM does not rely on PPE as the only means to provide protection from hazards, but are used in conjunction with engineering controls, guards, and sound operating practices.

Additionally, this SWP provides assurance that all personnel on BP GoM operated facilities fully comply with all legal requirements and meet the provisions of company policies and programs designed to shield or isolate personnel from chemical, physical, biological, or other hazards that may present in the workplace and demonstrate compliance with the following applicable OMS Elements.

- OMS Element 2.2 – People & Competence
- OMS Element 3.1 – Risk Assessment and Management
- OMS Element 3.2 – Personal Safety
- OMS Element 3.4 – Health & Industrial Hygiene
- OMS Element 6.6 – Procurement

This SWP specifically addresses eye, face, head, foot, hand protection and protective clothing. The following SWP's provide additional protective controls:

- Blood borne Pathogens Control Plan
- Working at Heights
- Respiratory Program
- Hearing Conservation
- Asbestos Management
- Chemical SDS System

The above mentioned SWPs are designed to meet OSHA compliance requirements outlined in specific applicable regulations, including:

- Personal Protection Equipment: 29 CFR 1910.132 through 1910.138,
- Occupational Noise Exposure: 29 CFR 1910.95,
- Fall Protection: 29 CFR 1926.502,
- Respiratory Protection 29 CFR 1910.134, and
- Hazard Communication Standard: 29 CFR 1910.1200.

## 2 Key Responsibilities

Supervisors are responsible for implementing and enforcing BP's PPE requirements. Personnel are responsible for using PPE appropriately.

The user is responsible for following the requirements of this SWP. This includes:

- Wearing PPE as required,
- Attending required PPE training, including classroom or CBT.
- Caring for, cleaning, inspection and maintaining PPE as required,
- Informing supervisor of needs to repair or replace PPE, and
- Ensuring that contaminated PPE is disposed of in a manner that protects other employees from exposure to the hazard in compliance with the GoM Waste Management Program.

## 3 Procedures

### 3.1 Program Requirements

Supervisors shall confirm that appropriate PPE is available and worn properly by all personnel on location.

**3.1.1 Program Basic Objectives** - The basic objectives of the SWP is to assign responsibilities, put effective protective procedures in place, furnish appropriate PPE as required, and document the JSEA accordingly.

**3.1.2 Hazard Assessment** –A JSEA may be conducted of a single employee, a single task, or a group of employees that perform an identical task(s). These JSEAs are communicated to affected employees. If new equipment, chemicals, or hazards are added to existing operations which change the type of PPE being used then the existing JSEA shall be updated. Reassessments may also be required as a result of an injury or illness.

**3.1.3 New Chemicals** – New chemicals are not to be brought into a GoM Facility until they have been reviewed and PPE needs are considered and approved via the Chemical Evaluation Procedure, found in the HazCom SWP.

**3.1.4 PPE Training** – Employees required to use PPE shall be initially trained to understand the following:

- When PPE is necessary.
- What type PPE is necessary and required. Training frequency is dictated by VTA and available by CBT testing for refreshing.
- How to obtain PPE.
- How to properly don, doff, adjust and wear the PPE.
- The limitations of the PPE.
- The proper care, maintenance, useful life, and disposal of the selected PPE.

Employee shall demonstrate an understanding of the training, by a test score of 80% or better, and the ability to use PPE properly before allowed to perform work requiring the use of PPE.

Retraining shall be performed when one of the following conditions exists:

- There are changes in the workplace which makes previous training obsolete.
- There are changes in the types of PPE to be used.
- There are inadequacies in the employee's knowledge of or use of the chosen PPE.
- The hazard assessment is changed.

BP Learning and Operational Development is responsible to ensure that GoM employee training is fit for purpose and associated training records are maintained that contain the name of the employee trained, the date(s) of training, and identification of the subject of training.

### **3.2 Facility Hazard Assessment**

A facility hazard assessment of the workplace shall be performed to determine if hazards are or may be present that necessitate the use of PPE (refer to 29 CFR 1910, Subpart I, Appendix B, to determine the proper method of conducting an assessment).

### **3.3 Certification of PPE Hazard Assessment**

A written certification containing the following information shall be prepared for each location or workplace:

- The location or workplace evaluated.
- The name of the person and job title of person certifying that the evaluation has been performed.
- The date(s) of the hazard assessment.
- A statement that identifies the document as a PPE hazard assessment.

### **3.4 Inspection and Use**

PPE shall be used in accordance with manufacturer's requirements. Visual inspection of PPE shall be conducted before each use.

### **3.5 Requirements**

The following requirements apply to work tasks performed in operational areas such as production facilities, drilling rigs, shore bases, construction sites, etc. Administrative and clerical tasks in office settings normally do not require PPE. Maintenance and construction work tasks in office settings require applicable PPE.

Minimum PPE required consists of safety-toed shoes with a distinctive heel and oil-resistant soles (ASTM F 2413), hard hats (ISEA Z89.1, Class E), and approved safety glasses with side shields (ANSI Z87.1).

Additional PPE will be required as directed by hazards associated with the work to be performed (e.g., hearing protection, face protection, fall protection, hand protection, etc.). See Personal Protective Equipment and site-specific PPE assessment for additional data.

#### **3.5.1 Foot Protection**

Safety-toed shoes/boots, shall meet the requirements of ASTM F 2412 and F 2413, and any additional standards or requirements associated with the employee's occupation. For example, personnel working on exposed energized electrical components or circuits of 50 volts or more shall wear footwear that is non-conductive, meeting NFPA, and CSA standards.

Shoes or boots shall have leather or rubber uppers, an oil-resistant sole, and a distinctive heel (defined as a raised section 3/8" - 1/2" across the entire heel).

#### **3.5.2 Eye Protection**

Employees should wear approved safety glasses with side shields or goggles meeting ANSI Z87.1 standards are mandatory in all operating areas. Prescription safety glasses will be purchased for BP employees when an employee wears corrective lens and performs tasks where eye protection is required. Contact lenses are permitted but require the additional use of appropriate eye and face protection devices as determined by site PPE hazard assessment.

### 3.5.3 Face Protection

During all operations involving grinding, chipping, buffing, or where material could separate and become a projectile, a face shield shall be worn in conjunction with safety glasses/goggles or per the JSEA. Chemical handling may require the use of specific face shields per the MSDS or per the local hazard assessment.

### 3.5.4 Flame Resistant Clothing (FRC)

Flame Resistant Clothing (FRC) is required for all BP employees, contractors, and visitors when:

- Located on a production facility with hydrocarbon-containing equipment when in PPE-required areas
- An employee and/or supervisor identifies a site-specific job and/or area with potential exposure to flash/arc burn injuries (i.e., electrical circuit)

FRC is not required on drill ships/MODUs that are not located on a production facility unless conducting live well servicing, well testing or otherwise specified in local policies.

FRC shall comply with the requirements below:

- Fabric Weight: FRC material shall not be less than 4 oz/yd<sup>2</sup> (150 gram/m<sup>2</sup>).
- [FRC materials shall comply with NFPA 2112 and tested to ASTM F 1930.](#)
- [Fabrics that conform to NFPA 2112 are acceptable FRC fabrics.](#)
  - [Optional reflective stripes shall conform to the ISEA 107 Level 2.](#)

FRC shall be worn and maintained accordingly:

- Personnel shall wear FRC as the outer-most garments except when other personal protective clothing is required (e.g., chemical resistant suits, welder's leather, and personal flotation devices).
- Slicker suits or other external protective garments shall also be made of flame-retardant material.
- Personnel shall not wear synthetic blends such as nylon, polyester, rayon, or polyethylene under FRC. Natural fibers such as cottons and wools shall be worn under FRCs.
- Only long-sleeved FRC shall be worn in designated FRC areas/jobs. FRC shall cover the torso, arms, and legs (sleeves rolled down and body fully zipped or buttoned up).
- FRC shall be laundered, repaired, and taken out-of-service per the manufacturer's recommendations.

### 3.5.5 Hand Protection

Personnel shall use hand protection when performing jobs that expose the hands to absorption of harmful substances, cuts or lacerations, abrasions, punctures, chemical burns, thermal burns, and harmful temperature extremes.

Selection of hand protection shall be based on evaluation of the task being performed, conditions present, duration of exposure, potential hazards identified, and performance characteristics of glove material.

#### NOTE:

1. Refer to Table 1 (in this chapter) for types of job tasks that require hand protection to be worn and the proper selection of gloves for the tasks. Refer to Table 2 for types of job tasks that normally do not require gloves to be worn. The job tasks identified are not inclusive. Therefore, if a job task to be conducted is not listed and is not similar to the ones below, the person conducting the task shall discuss the requirements of hand protection with facility supervision.
2. Individual facilities may choose to implement more stringent hand protection program requirements. Deviations from this SWP are to be addressed through the GoM's Management of Change process.

### 3.5.6 Head Protection

Hard hats shall meet the requirements of ISEA Z89.1, Class E.

Users shall visually inspect their hard hats prior to each use per the manufacturer's recommendation. If a hard hat becomes brittle, cracks, or is otherwise damaged, it shall be replaced immediately. Painting of hard hats is prohibited.

Suspensions and shells shall be replaced per the manufacturer's recommendation.

Lanyards shall be used to secure hard hat to FRC to mitigate dropped object or marine debris potential.

#### NOTE:

1. MSA recommends that suspensions be replaced at least annually and that shells be replaced at least every 5 years.
2. The date stamp on hard hats is the date of manufacture, not the expiration date.

### 3.5.7 Hearing Protection

The hazard assessment shall identify areas where hearing protection is necessary and the type of hearing protection necessary. Various forms of hearing protection are available and shall be worn when noise levels of 85 dBA exist. Signs shall be posted where continuous noise levels are at 85 dBA or greater.

### 3.5.8 Fall Protection

Refer to the Working at Heights SWP, for PPE information regarding fall protection.

### 3.5.9 Personal Flotation Devices for Over-Water Operations

The appropriate Personal Flotation Device (PFD) will be worn by all personnel as follows:

- U.S. Coast Guard Type 1 (PFD) shall be worn when transferring to and from boats to the facility via personnel basket.
- Work Vest/Type 5 PFD, at a minimum, shall be worn while working on boats and barges.
- When flying in aircraft over water, wear an FAA approved, inflatable PFD.

[Fall protection with flotation devices should be worn by all personnel working outside of handrails. A risk assessment would be required to remove work vest. See Working at Heights SWP for further detail.](#)

**Prior to each use, the user shall examine PFDs for deterioration or damage that might affect their strength and buoyancy. Defective PFDs shall be removed from service and either repaired or replaced.**

## 4 Definitions

Term	Definition
Administrative Controls	Procedures and methods that significantly reduce exposure to hazards by altering the way in which work is performed; examples include employee rotation, job task enlargement, and adjustment of work pace
Classified Area	Facilities where hydrocarbons are handled, processed, or stored are classified according to specifications set forth by the NFPA, OSHA PSM Regulations, NEC and API Recommended Practices.
Primary Protective Clothing	Defined by ASTM as clothing that is designed to be worn for work activities where significant exposure to molten substance, splash, radiant heat, and flame is likely to occur. An example is firefighter turnout gear.

Secondary Protective Clothing	Defined as protective clothing that is designed for continuous wear in designated locations where intermittent exposure to molten substance splash, radiant heat, and flame is possible.
ATPV	ASTM 1959 Standard for determining the Arc Thermal Performance Value (ATPV) of FRC protective clothing. Note: The higher the ATPV, the more insulated a body is from second degree burn.
FRC	Fire or Flame Resistant Clothing and garments.
Engineering Controls	Design features of equipment that help reduce exposure to potential hazards either by isolating the hazard or by removing it from the work environment. Examples of engineering controls include mechanical ventilation and process enclosure.
NFPA	National Fire Protection Association
Personal Protective Equipment (PPE)	Personal Protective Equipment, commonly referred to as "PPE", is equipment worn to minimize exposure to a variety of hazards. Examples of PPE include such items as gloves, foot and eye protection, protective hearing devices (earplugs, muffs) hard hats, respirators and full body suits.
OSHA	Occupational Safety Health Association
ASTM	American Standard Testing Methods
ANSI	American National Standards Institute, a non-profit, voluntary membership organization that coordinates the U.S. Voluntary Consensus Standard System. Their Standards have been adopted throughout government and industry for various types of personal protective equipment.
API	American Petroleum Institute
Flash Suit	A complete FR clothing and equipment system that covers the entire body, except for the hands and feet. This includes pants, jacket, and bee-keeper type hood with face shield.
HRC	Hazard Risk Category rating for electrical tasks in determination of arc flash protective clothing per NFPA 70E.

## 5 Key Documents/Tools/References

[Occupational Safety and Health Administration, Department of Labor; 29 CFR 1910.95,](#)

[1910.132, 1910.133, 1910.135, 1910.136, 1910.137, 1910.138;](#) and

[1926.104, 1926.105, 1926.556, 1926.605, 1926.951, 1926.959](#)

[ANSI Practice for Occupational and Educational Eye and Face Protection, Z87.1.](#)

[ISEA Standard Industrial Head Protection Z89.1](#)

[ASTM F 2412 Standard Test Methods for Foot Protection](#)

[ASTM F 2413 Standard Specification for Performance Requirements for Foot Protection](#)

[National Institute of Safety & Health \(NIOSH\) Respirator Certification Standard, 42 CFR part 84](#)

[ASTM D 120, Standard Specification for Rubber Insulating Gloves](#)

[ASTM D 178, Standard Specification for Rubber Insulating Matting](#)

[ASTM D 1048, Standard Specification for Rubber Insulating Blankets](#)

[ASTM D 1049, Standard Specification for Rubber Insulating Covers](#)

[ASTM D 1050, Standard Specification for Rubber Insulating Line Hoses](#)

**5.1 Hand Protection Program**

Table 1: Glove Selection

Job Tasks Requiring Hand Protection	Glove Selection				
	Cotton or Leather	Chemical Resistant (per MSDS) <sup>1</sup>	Welders/ Thermally Insulated	Cut Resistant (i.e., Kevlar)	Voltage Rated (per NFPA 70E) <sup>2</sup>
Abrasive Blasting	leather				
Biological Substances – Exposure to (e.g., 1st Responders)		✓			
Chemical Handling (e.g., paints, solvents, additives, and acids)		✓			
Chipping, Chiseling, Grinding, Hammering, Scraping	✓				
Compressor/Pump/Engine/Crane – Maintenance	✓				
Cutting and Sawing	✓			✓	
Electrical Work	non-energized				energized
Food Preparation (cook using knife to cut food)				✓	
Heaters/Re-boilers – Lighting of	✓ leather				
Housekeeping (moving equipment and debris)	✓				
Hydrocarbons, engine oils, fuels, lubricants –Exposure to (e.g., collecting process samples & pigging operations)	if chemical resistant is not required	based on exposure frequency and duration			
Ladders – Use of	✓				
NORM – Exposure to		✓			
Pipe/Tubing Handling, Cutting, Threading	✓				
Pressure Washing	leather	if using chemical additives			
Process Equipment Modifications – <ul style="list-style-type: none"> <li>• Pressuring/de-pressuring lines and line breaking</li> <li>• Inserting/removing blinds, sight glasses, and gauges</li> <li>• Operating valves, orifice meters and controllers</li> </ul>	✓				
Rigging loads for lifting operations	leather				

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Handling of wire rope					
Scaffolding – Erection and use of	✓				
Sharp Objects/Materials – Exposure to	✓			✓	
Temperature Extremes – Exposure to	✓		✓		
Tool Use (non-powered and powered)	✓				
Welding/Cutting / Brazing	fitters and helpers		welders		

Although BP encourages the use of hand protection while conducting work, the following job tasks may be performed without wearing gloves:

- Where the task being performed is considered low risk with respect to hand/finger injury potential
- Where the task being performed requires micro/precise movement of the fingers and the use of gloves could cause significant loss of dexterity

Examples of job tasks that normally do not require the use of gloves are listed in Table 2 below.

Table 2: Non Hand Protection Tasks (not inclusive)

Job Tasks Not Requiring Hand Protection	Specific Examples
Activities conducted inside of living quarter, control room, and break room settings	Office work, eating, smoking, etc.
Walking between buildings and/or across decks (same or different levels) without manipulating equipment	Visual surveys, sketching equipment layouts, conducting clipboard/paperwork activities, placing weight indicator stickers on loads for back loading onto boat, taking meter readings, etc.
Working with small hardware and equipment	¼" bolts/nuts/screws/pins, tube fittings and ferrules, Teflon tape, wiring connections, adjusting programmable flow meters and level controllers, etc.
Using fine instruments and electronics	Multi-meters, Pride Route meters, gas meters, cameras, two-way radios, etc.
Donning PPE	Hearing protection, fall protection, cleaning safety glasses, SCBAs, respirators, etc.



## Revision Log

Revision Date	Authority	Custodian	Revision Details
08/15/12	GoM H&S Director	GoM Safety Programs Lead	Reformatted document to meet new GoM document control template standardization guidelines. 3.5.6 Lanyards shall be used to secure hard hat to FRC to mitigate dropped object or marine debris potential.
02/07/2012	GoM HS Director	GoM Safety Programs Lead	Updated Section A with OMS Elements and specified as minimum PPE. Special PPE will be covered in the applicable chapter. Updated section E.5 to reference ASTM 2413 footwear requirement. Moved Training requirements from section E.4 to C.4 Revised fabric selection from Cotton and Nomex to Fabrics conforming to NFPA 2112 in section E.4.d Added Type 5 work vest in conjunction with fall protection equipment for work over water in section E.4.i Removed PPE matrix for facility Risk Assessments
11/29/2010	GoM Health and Safety Manager - Brad Smolen	GoM HSSE Programs Advisor	Removed embedded PPE Matrix; added link in Table 1 to the updated PPE matrix which now has a document number.
07/16/2008	GoM HSSE Director	GoM HSSE Programs Manager	Changed references to correct industry standards and specifications listed Sections E.5 and F.
06/01/2008	GoM HSSE Director	GoM HSSE Programs Manager	Electrical protection section moved to Electrical Safety practice
06/09/2006	S. Garner/ S. Tink/ C. Jackson/ R. DeLeonardis	Kathy Kanocz	Modified PPE Matrix. Incorporated new sections 6.1 Appendix A - PPE Matrix and 6.2 Appendix B - Hand Protection Program. Added definition for a distinctive heel in foot protection section. Added Flame Resistant Clothing (FRC) section and Personal Floatation Devices (PFD) section. Deleted Today's Vision information and authorization form. Changed CD # from 10063 to UPS-US-SW-GOM-HSE-DOC-00124-2 to conform to new numbering nomenclature in the new GoM HSSE doc base. Changed 3 authorities and 1 custodian.

Revision Date	Authority	Custodian	Revision Details
05/02/2003	S. Garner/ B. Herbert/ R. DeLeonardis/ S. Flynn	Ray Britt	Changed the vendor, address and phone number information in the table on page 4 and added the a BP GoM Today's Vision Safety Glasses Authorization Form that the employee is required to complete and get signed by a BP Safety Representative to go to Today's Vision and order safety glasses; also changed one authority.
01/29/2002	S. Garner/ B. Herbert/ R. White/ S. Flynn	Ray Britt	Initial issue as controlled document. Prior revision history located in hard-copy consolidated manual.