

EH&S Management System Level: B - FM O&G Section: 4 - Safety 4.08 Personal Protective Equipment

TABLE OF CONTENTS

ECTION SUMMARY	
Purpose of Program	2
Responsibilities	
Exemptions	
Outside Contractors	
Evaluation and Review	
MINIMUM REQUIRED PPE	
Parking Area Boundaries	
Head Protection	
Eye Protection	
Foot Protection	
General Work Clothing	
TASK SPECIFIC PPE	6
Risk Assessment	
Selection Guidelines	
Certain Hazards Requiring Specific PPE	7
EMPLOYEE TRAINING	7
CLEANING AND MAINTENANCE	ş
Table 1	
Eye and Face Protection Selection Table	9
Table 2	11
Glove Selection Table	11



EH&S Management System				
Level:	B – FM O&G			
Section:	4 - Safety			
4.08	Personal Protective Equipment			

SECTION SUMMARY

This written program documents steps Freeport-McMoRan Oil & Gas (the Company) has taken to minimize injuries resulting from various occupational hazards that may be present by protecting workers through the use of Personal Protective Equipment (PPE) when the hazards cannot otherwise be eliminated.

The Company strives to provide a hazard free environment to our employees. The purpose of protective clothing and equipment is to, as much as possible, shield or isolate individuals from chemical, physical, biological or other hazards that may be present in the workplace.

PURPOSE OF PROGRAM

The purpose of this Personal Protective Equipment (PPE) Program is to document the minimum PPE requirements in use at this company. Requirements for additional PPE will be determined through the risk assessment process.

PPE devices are not to be relied on as the only means to provide protection against hazards, but are used with guards, engineering controls and sound manufacturing practices.

The following hierarchy should be used when developing protection against the hazards identified above:

- Eliminate the hazard (e.g., substitute less hazardous substances, automation, redesigning the equipment, the workstation, work methods, or tool(s), etc.).
- Incorporate engineered safety devices (e.g., guards, interface devices, lockout devices, redesigning the equipment, the workstation, work methods, or tool(s), etc.).
- Incorporate warning devices, signs, etc.
- Employ procedures, training and administrative controls.
- Issue personal protective equipment (PPE).

Responsibilities

Employees

All employees are responsible for wearing company provided or approved personal protective equipment to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

Supervisors

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

Supervisors are responsible for informing new employees who are assigned to the designated work areas of the PPE policy and the procedures for obtaining their equipment.

New Employees

The new employee is responsible for complying with this policy on his/her first day of work.

Exemptions

Management may authorize exemptions for personnel engaged in certain activities.

Upon completion of a risk analysis, management may establish certain designated walkways or areas as "PPE Free Areas" exempt from the requirements of this procedure. Such exemptions are limited to allowing passage from parking areas to offices, control rooms or locker facilities and to establishing safe viewing areas for escorted visitors.

When the risk for which the PPE required by this procedure has been eliminated or reduced to acceptable levels, either long or short term, management may exempt the requirement for the duration of the absence or reduction of the risk. This exemption shall be clearly posted in the affected area and be communicated to all employees, contractors and visitors via toolbox meetings, safe work permits or other orientation processes.

Outside Contractors

Contractors are required by law to assess for the proper use of PPE for their employees. However FM O&G may require a level of PPE greater than the contractor has determined.

Contractors are responsible for providing all necessary PPE whether required by FM O&G or the Contractor's policy.

Evaluation and Review

On an annual basis, the company will review this program, and its effectiveness, and update this program as needed.

MINIMUM REQUIRED PPE

FM O&G has determined that certain minimum PPE is required in designated areas of the Company's property. For all field operations (Production, Drilling, Construction) the minimum PPE will consist of safety glasses with side shields, hard hats, approved safety footwear and Flame Resistant Clothing (FRC). This PPE shall be worn by all employees, contractors and visitors while on Company property except when in vehicles, office buildings or other designated areas approved by local management. Details of these requirements are listed below.

Additional PPE may be required beyond these minimums. Refer to the section on Task Specific PPE below for guidance.

Parking Area Boundaries

Many of the minimum required PPE requirements below exempt parking lots. Therefore, each facility must formally assess and identify the parking areas that are to be designated as an exempted area. This may involve marking the ground or posting signs so that employees, contractors and visitors can determine when they are crossing the parking lot boundary into an area where PPE is required.

Head Protection

ANSI Z89.1-1997 Type 1, Class E Hard hats shall be worn by all employees, contractors and visitors while on Company property except when in vehicles, in office buildings, shops, warehouses or parking lots. All visitors shall be provided with a hard hat for temporary use while in the field.

Hard hats must be worn as designed by the manufacturer. Hard hats must be of the standard hat or cap design. Cowboy style hats are not permitted on Company property

Hard hats are required in the exempted locations above if there are activities underway which create a hazardous condition.

Metal hard hats are prohibited.

Eye Protection

ANSI Z87 approved eye protection shall be worn by all employees, contractors and visitors while on Company property except when in vehicles, in office buildings, shops, warehouses or parking lots. All visitors shall be provided with eye protection for temporary use while in the field.

Eye protection is required in the exempted locations above if there are activities underway which create a hazardous condition.

Personnel who require corrective lenses must wear ANSI Z87 prescription safety glasses with side shields or approved cover glasses or impact type goggles specifically designed to be worn over corrective lenses.

Personnel who wear contact lenses must inform their supervisors and co-workers that they wear contact lenses. Contact lenses are permitted if the lenses are used in conjunction with approved eye protection and as long as the employee is not engaged in any activity involving the use of chemicals.

Foot Protection

ANSI Z41 approved safety footwear shall be worn by all employees while on Company property except when in vehicles, in office buildings or parking lots.

Employees from governmental agencies, temporary work agencies and contractors are required to wear safety shoes while in the designated work areas.

Office employees, vendors and visitors will be allowed to walk through work areas without safety shoes with a FM O&G escort for a single visit.

All **ANSI Z41** approved safety footwear are acceptable except:

- Western style boots with a large heel
- Any sole containing taps or exposed nails

A low heel is recommended for any worker required to climb ladders. A puncture resistant foot bed is recommended.

All safety footwear soles are to be slip, chemical and oil resistant.

Electrical workers shall use safety footwear approved for electrical use.

The Company will provide an annual voucher to assist Company employees in purchasing acceptable safety footwear. The voucher must be approved by the EH&S Department.

General Work Clothing

Minimum clothing requirements for *all* field personnel is Flame Resistant Clothing (FRC) with a **Hazard/Risk Category (HRC)** rating of 1 and meet the requirements of *NFPA 2112 – Standard on Flame Resistant Garments for Protection of Industrial Personnel Against Flash Fire*. Specific tasks may require a higher HRC rating. See *Task Specific PPE* section.

In addition to only utilizing FRC that meets the requirements of *NFPA 2112*, with respect to FRC, the Company also complies with the requirements of *NFPA 2113 -Standard on Selection, Care, Use, and Maintenance of Flame-Resistant Garments for Protection of Industrial Personnel Against Flash Fire.*

Flame Resistant Clothing (FRC) shall be worn when at any field location and should be worn prior to exiting your vehicle. This includes, but is not limited to a: drill site, construction site, workover/completion site, production operation site, maintenance shop, yard, etc. This requirement applies to any person who enters a Company field location.

Freeport-McMoRan Oil & Gas EH&S MANAGEMENT SYSTEM

When wearing FRC:

- Shirts must have long sleeves with sleeves rolled down
- If button type cuffs, cuffs will be buttoned
- Shirt tails are to be tucked in at all times
- Tank tops, short tops and sleeveless shirts are not permitted

Full length pants are required. Shorts or cut-off jeans are not permitted.

Loose, ragged or defective clothing or shoes shall not be worn.

Personnel wearing FRC must wear FRC as the outermost layer, except when other personal protective clothing is required (e.g., chemical resistant suits, welder's leather, etc.).

Garments worn under FRC must be of natural fiber (100% cotton or wool) or manufactured of a FR rated material. Do not wear synthetics (nylon, polyester, rayon, polyethylene, etc.) or synthetic blends under or over FRC.

The hazards present for the office and warehouse are not the same as those found "in the field." Personnel working in these areas should utilize good judgment when selecting work apparel.

Individuals participating in a field tour will not be required to wear FRC and will be restricted to pre-designated safe viewing zones. Those participating in a field tour are prohibited from entering an active work zone, facility or electrically classified (NEC Class 1, Division 1 or 2) areas. FRC is required for entry in these areas.

Disposable or other "loaner" coveralls will be available for visitors at the discretion of the Region's Operations Manager.

Local, state and federal agency inspectors that are at field locations must wear FRC when performing inspections

NOTE: When an inspector arrives onsite without FRC:

- Inform Inspector of the company policy FM O&G Management System 4.08 PPE:
 - "Local, state and federal agency inspectors that are at field locations must wear FRC when performing inspections"
- Offer a loaner pair of FRC to the inspector if they do not have their own
- Allow access if the inspector declines to wear FRC
- All visitors, including agency personnel should be escorted by company personnel
- If the inspector declines to wear the FRC or follow our safety policies, send an email at the earliest to your Supervisor and EH&S of the refusal
 - EH&S will then document the refusal in RIMS (Agency Interaction, NRTA)
- If you feel there is a genuine safety concern, advise the inspector why and temporarily deny access while contacting your Supervisor and EH&S immediately to get final instructions. If the inspector

insists, do not physically restrain but Stop Work, if practical, until the inspector leaves

Exemptions

With the approval of the area Construction Manager and the region's Operations Manager, new construction sites, outside of existing production facilities and without the possibility of hydrocarbons being present, may be set aside as temporary *FRC Free Zones* until the point of final tie in. Work clothing will be 100% cotton during this time. FRC will still be required for all electrical work and fire watch vests.

Delivery or truck drivers dropping off/picking up materials away from the immediate work zone are exempt from this requirement. Additionally, individuals that come on location during drilling operations only to enter the office trailers are also exempt from this requirement.

Entanglement

When working around moving or rotating machinery, the following are prohibited due to the risk of becoming entangled in the machinery:

- Baggy, loose or ragged clothes;
- Handkerchiefs or rags;
- Gauntlet gloves or gloves that fasten around the wrist; or
- Neckties; earrings, rings, wrist watches or neck chains

In addition:

- Shirts shall be buttoned up the front,
- Shirt tails shall be tucked into the trousers

Jewelry

Wearing jewelry on the job is discouraged because they can contribute to an increase in the severity of injury.

Rings and wristwatches shall always be removed when working around energized electrical equipment and circuits.

TASK SPECIFIC PPE Risk Assessment

Additional PPE may be required depending on the risk imposed by the task. The completion of risk assessments to identify proper PPE is the responsibility of Regional and Area management.

All additional Regional, Area or Facility specific PPE requirements must be determined and outlined in a Level C procedure for that Region, Area or Facility.

At a minimum, the PPE required shall be determined by the proper completion of a job specific JSA or JSP.

Selection Guidelines

Once any hazard has been identified and evaluated through a risk assessment, the general procedure for selecting protective equipment is to:

- Become familiar with the potential hazards and the types 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 the protection required to reduce the risk to an acceptable level,

• 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.

It is the responsibility of area Operations personnel to inform the EH&S Department of any new hazards or process changes.

The EH&S Department will reassess the new risk to identify and evaluate the suitability of previously selected PPE or modify the PPE requirement if necessary.

Certain Hazards Requiring Specific PPE

Electrical Hazards

Flame Resistant Clothing (FRC) of the appropriate *arc rating and NFPA 70E hazard risk category* is required for employees and contractors working on energized electrical systems >50V. Refer to Procedure *4.11 Electrical Safety* for specific information.

Visitors should be restricted from these areas to the greatest extent possible.

All FRC used by FM O&G personnel must be approved by FM O&G EH&S staff.

Outer Layer Exceptions

The following work activities that require additional protective clothing are exceptions to the outer clothing requirement. In these situations, FR clothing shall be worn under the garment specified for the specific type of work:

- Chemical Handling Chemical clothing and other PPE as specified in the Safety Data Sheet (SDS) or by a Job Safety Plan (JSP)
- Spray Painting disposable coveralls. Other PPE as specified in the Safety Data Sheet (SDS) or by a Job Safety Plan (JSP)
- While wearing rain gear (in the rain) for non-electrical work
- Other As specified in a Job Safety Plan

Heat Stress

FRC may increase the possibility for Heat Related Stress. Appropriate measures should be taken to manage this hazard when present. See procedure **3.05 Heat/Cold Stress** for guidance.

Task Specific Eye & Face Protection

Refer to *Table 1* in this section for specific job task eye or face protection PPE requirements.

Refer to the specific chemical's SDS for the additional required PPE material when handling chemicals.

Chemical Protection for Feet

Rubber boots should be worn when handling chemicals and other materials which require protection from absorption.

Refer to the specific chemical's SDS for the required PPE material when handling chemicals.

Task Specific Hand Protection

Refer to *Table 2* in this section for specific job task hand protection PPE requirements.

EMPLOYEE TRAINING

The employee's supervisor is responsible to ensure training is provided to each employee who is required to use personal protective equipment. Training includes:

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- When PPE is necessary
- What PPE is necessary
- How to wear assigned PPE
- Limitations of PPE
- The proper care, maintenance, useful life and disposal of assigned PPE

Employees are to 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.

CLEANING AND MAINTENANCE

It is important that all PPE be kept clean and properly maintained by the employee to whom it is assigned. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision. PPE is to be inspected, cleaned and maintained 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 or her supervisor or the EH&S Department. It is against manufacture and federal guidelines 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.

TABLE 1 Eye and Face Protection Selection Table

In evaluating the protection from this table, it is helpful to evaluate the protection needed for the eyes independently and then evaluate the protection needed for the face. Safety glasses and goggles are designed for eye protection and do not provide adequate face protection. Likewise, face shields are designed for face protection and do not provide adequate eye protection.

Source	ASSESSMENT OF HAZARD	PROTECTION
IMPACT - Chipping, grinding, machining, masonry work, woodworking, sawing, drilling, chiseling, powered fastening, riveting, and sanding.	Flying fragments, objects, large chips, particles, sand, dirt, etc.	Face shield for the face, goggles for the eyes, See notes (1), (3), (4), (5), (6), (10).
HEAT - Furnace operations, pouring, casting, hot dipping, and welding.	Hot Sparks	Face shield for the face, goggles for the eyes. See notes (1), (2), (3), (5).
	Splash From Molten Metals	Face shield for the face, goggles for the eyes. See notes (1), (2), (3).
	High Temperature Exposure	Reflective face shield for the face. UV filtering safety glasses for the eyes. See notes (1), (2), (3).
CHEMICALS - Acid and chemicals handling, degreasing	Splash	Face shield for the face, goggles for the eyes. See notes (3), (11).
plating.	Irritating Mists	Special-purpose goggles.
		(Refer to SDS of material.)
DUST - Woodworking, buffing, general dusty conditions.	Nuisance Dust	Goggles, eyecup and cover types. See note (8).
LIGHT and/or RADIATION Welding: Electric Arc (Arc Current <250 amp)	Optical radiation.	All Hazards, see note (13). Welding helmets or welding shields of shades 10-14 plus eye protection as required for other sources above. See notes (9), (12). Helper: goggles with shade 6 or darker plus eye protection as required for other sources above. See note (9).
Welding & Cutting: Gas Torch Brazing, Soldering	Optical radiation.	Welding goggles or welding face shield plus eye protection as required for other sources above. Typical shades: gas welding 4-8, cutting 3-6, brazing 3-4. See note (9). Helper: goggles or face shield with shade 4 plus eye protection as required for other sources above. See note (9).
Glare	Poor Vision	Shaded safety glasses or face shield of shades 1.5-3. See notes (3), (9). When using face shield, eye protection is required as appropriate for other sources above. Safety glasses with shaded or special-purpose lenses. See notes (9), (10).

Specific Activities				
Flying particles	Face shield for face, goggles for eyes.			
Flying particles	Safety glasses with side shields or impact goggles.			
Flying particles	Face shield for face, goggles for eyes.			
Flying particles, dusts, mists,	Same PPE as the worker.			
	Flying particles Flying particles Flying particles			

Notes: Eye & Face Protection Selection Table

- Care should 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 should be provided. Protective devices do not provide unlimited protection.
- 2. Operations involving heat may also involve light radiation. Protection from hazards must be provided.
- Face shields shall be worn over primary eye protection (safety glasses or goggles) when the hazard is a threat to both the eyes and the face. Filter lenses must meet the requirements for shade designations in 29 CFR 1910.133.
- 4. Tinted and shaded lenses are not filter lenses unless they are marked or identified as such.
- 5. Persons whose vision requires the use of prescription (Rx) lenses must wear either protective devices fitted with prescription lenses or protective devices designed to be worn over regular prescription eyewear.
- Wearers of contact lenses must also wear appropriate eye and face protection devices in an hazardous environment. It should be recognized that dusty and/or chemical environments might represent an additional hazard to contact lens wearers.
- 7. Caution should be exercised in the use of metal frame protective devices in electrical hazard areas.
- 8. Atmospheric conditions and the restricted ventilation of the protector can cause lenses to fog. Frequent cleansing may be necessary.
- 9. Welding helmets or face shields are only to be used over primary eye protection (safety glasses or goggles) since this activity is a threat to both the eyes and the face.
- 10. Non-sideshield safety glasses are available for frontal protection only, but do not provide adequate protection and are not acceptable by FM O&G.
- 11. Ventilation should be adequate, but well protected from splash entry. Eye and face protection should be designed and used so that it provides both adequate ventilation and protects the wearer from splash entry.
- 12. Protection from light radiation is directly related to filter lens density; see note 4. Select the darkest shade that allows task performance.
- 13. Anyone observing welding operations must wear proper eye protection. In addition, personnel in the area near night welding operations may be required to wear tinted safety glasses with side shields.
- 14. For Arc Welding with current >250 amps, refer to 29 CFR 1926.102.

TABLE 2Glove Selection Table

GLOVE TYPE	Purpose	Common Uses
Cotton/Canvas Cloth	Protects from abrasion Provides warmth and cleanliness	Light work (e.g. pipe handling, small hand tools and materials with rough surfaces)
Leather, Leather Reinforced	Protects from: Abrasions Puncture wounds Lacerations	Handling rough, rigid or abrasive materials during work activities such as wire-rope handling, grinding and blasting
Leather Reinforced with metal or metal stitching	Protects from: Lacerations Abrasions	Handling edged tools for cutting, such as knives, chainsaws and skill saws
Leather Insulated or Heat Resistant	Protects from thermal burns (hot or cold)	Welding, operating/maintaining cryogenic equipment or equipment around engines, boilers and steam lines
Electrical Insulated	Protection from electrical burns and shock	Work on energized electrical equipment
Chemical Resistant	Protection from: Skin contact Skin irritation and absorption Burns	Handling chemicals such as acids, caustics, soda ash and most hydrocarbons Reference: For more information, refer to the SDS for the chemical being handled
Disposable Exam Gloves	Protection from: Bloodborne pathogens Mild detergents	First aid, emergency response, cleaning and as glove liners