



2021 PERSONAL PROTECTIVE EQUIPMENT PROGRAM

Objective	Provide a comprehensive and compliant Personal Protective Equipment Program
Intended Audience	All Bay Club Associates <u>and</u> Outside Contractors
Required Documents	TBCC Personal Protective Equipment Program Training Guidelines and Participation Form

PROGRAM GOALS:

- When a hazard, or an exposure to a hazard, cannot be eliminated in its entirety through an engineering or administrative control and when such hazard or exposure cannot be reduced to a non-hazardous level for a TBCC worker, or an outside contractor, to perform a task or work activity, Managers and Supervisors are responsible to protect associates and workers and must provide Personal Protective Equipment (PPE).
- Managers and Supervisors are responsible to make sure that PPE is:
 - Available at any time
 - Provided as needed
 - Used per Mfg. recommendations (Authorized for Use)
 - Maintained in a sanitary and reliable condition
 - Stored Properly
- Increase awareness in engineering and administrative controls for certain tasks / positions and modify as needed to protect Associates from hazardous exposure.
- Increase morale, productivity and quality

BAY CLUB LEADERSHIP RESPONSIBILITIES:

1. Read this program entirely before training or allowing someone to train front-line Associates. Trainers must use any and all material in this Personal Protective Equipment Program to secure good knowledge of its requirements.
2. Document Training of new associates (upon hire) and existing associates (yearly and as needed). Use "[Personal Protective Equipment Program Training Guidelines](#)".
3. Communicate with associates and encourage them to be more aware and obey safety rules
4. Report to Club General Manager and/or HR as necessary regarding any safety concerns
5. Report to any issues related to training OR implementation of this Program, including disciplinary and corrective actions

INTRODUCTION - *The Need for Personal Protective Equipment*

In the course of "regular" daily operations, certain TBCC associates encounter physical and/or environmental hazards. When feasible, TBCC must eliminate these hazards and exposures through engineering or administrative means in order to prevent the use of PPE. When it is not feasible, or possible, use of PPE is the next line of defense to protect individuals.

During a Pandemic, the need for PPE can extend beyond the work environment (OSHA) and be necessary to protect oneself and others from airborne transmissible diseases. Requirements may be imposed (and enforced) by Federal, State, County or City Administrations through their Health Departments, under the guidance of the United States Center for Disease Control. All persons must comply with these requirements in order to work at, or enter any of The Bay Club locations.

Managers must read this program to acquire General awareness for protection of the body, head, eye, face, neck, arms, legs, hands and feet (*). After reading this program or being trained on it, Managers, Supervisors and Associates must complete a Participation Form to document their understanding of the program and that they agree to comply with it.

(*)

- 1) Protection of lungs is covered under a separate [Respiratory Protection Program](#) (use with chemicals and toxic fumes/dust).
- 2) Hearing protection may be covered under a separate [Hearing Protection Program](#) (used with loud equipment).



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This program covers:

1. Responsibilities
2. Hazard Assessment
3. Selection and Use of PPE / Pandemics
4. Training and Authorizing users of PPE
5. Care of PPE
6. Standards - California and Federal

1. Responsibilities:

TBCC’s Human Resources is responsible to maintain this program and make it available to all Managers, Supervisors and Associates with instructions to read and comply. Department Managers and Supervisors are responsible to conduct and document the following:

- A. **Hazard Assessment** – Managers must assess the hazards and exposures that may require the use of PPE, and use a Hazard Assessment - PPE Certification Form for the position that requires it.
- B. **Determine the PPE for the task** – Managers must obtain input from the users and Supervisors in selecting appropriate equipment (size, type).
- C. **Ordering PPE** - Purchasing the equipment. Planning in advance for critical PPE.
- D. **Training** Associates in the use and proper care of PPE, per Mfg. recommendations.
- E. **Assign appropriate PPE** and enforce its proper use if deemed necessary.

Associates are responsible to comply with this program and use their PPE as required by Manufacturers (SDS), Operators Manuals, Safety Orders and training instructions.

2. Hazard Assessment:

Managers must assess if current or developing hazards are creating the need for PPE. Department Managers must complete the Hazard Assessment Certification Forms for their department and conduct ongoing inspections of work areas to stay updated with hazards to which staff and Members are exposed. Here are some Certification Forms to help managers comply in this area:

[Blank Form](#) - Department Managers: [GM](#) / [Tennis](#) / [Golf](#) / [Fitness](#) / [Childcare](#) / [Aquatics](#) / [Facilities](#) / [Cook](#) / [Housekeeping](#).

When assessing hazards, give special consideration to the following hazards that can cause serious injuries or death:

o Impact / Struck-by (equipment, vehicle)	o Laceration (knives, blades)	o Penetration (sharp objects)
o Compression / Caught-between (dropping heavy objects on foot)	o Chemical exposures*	o Harmful dust*
o Heat (temperature)	o Light (optical) radiation	o Electrical (panels, outlets, cords)
o Noise (equipment, group-ex)	o Falls (ladder, roof, lift)	o Pandemic Infections

* When an exposure to chemicals and harmful dusts requires the use of a half-mask or full-face respirator, users must follow the Respiratory Protection protocols, and have completed the medical questionnaire and evaluation for clearance to confirm that the worker has been cleared by a doctor to wear the respirator. See SDS for proper use recommendations.

Whenever there is a change in process in the workplace that might introduce or change an exposure or hazard, the Manager and direct Supervisor must determine if there is a need for a change in PPE. These supplemental hazard assessments will be documented as often as possible using the Hazard Assessment Certification Form for that position, signed and dated by the person performing the assessment. Workplace Hazard Assessments must be reviewed on an annual basis.

3. Selection of PPE

Personal Protective Equipment is selected on the basis of the hazards to which a person is exposed OR “potentially exposed”. PPE selection is made by Supervisors with input from Department Managers and Associates performing the tasks or work activity. Below are some of the PPE found at TBCC:



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PPE	Department	Hazards
HEAD 	a) Maintenance, Construction b) Lifeguards, Landscapers, Golf Grounds c) Contractors	"Struck-by" - Flying objects - Construction - Using an Aerial Lift Sun burns - Heat Illness Protection
NECK 	Housekeeping Maintenance Lifeguards Contractors	Sun burns - Heat Illness Protection
FACE 	Housekeeping Maintenance Contractors	Chemicals Splashes Bloodborne Pathogens Splashes when cleaning - certain areas (street) - during Pandemic Construction / Welding
EYES 	Housekeeping Maintenance Sports (Squash, Tennis) Lifeguard Contractors	Cleaning Products Splashes Chemicals Splashes / COVID-19 Projectile - Ball to Eye Impact Long Term Sun Exposure Construction
HEARING 	Maintenance Housekeeping (not all) Landscapers Contractors	Above 85db Pump Rooms (not all) Equipment (leaf blower) Construction (demolition, wood floor resurfacing and sanding)
RESPIRATORY 	Maintenance Housekeeping (not all) Landscapers Contractors	Cleaning Products Chemicals / Pump Rooms Construction COVID-19 (ALL PERSONS)
BODY 	Maintenance Contractors	Using an Aerial Lift / Fall Chemicals / Pump Rooms Construction / Visibility
HANDS 	Housekeeping Kitchen Maintenance Contractors	Bloodborne Pathogens (towels, surfaces) Contamination / Food / COVID-19 Chemical Products Construction
FEET 	Housekeeping Kitchen Maintenance Contractors	Slippery Floor - Showers, Soap - Oil, Grease Rubber Boots / Cleanup Boots required on "jobsites"



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<p>PANDEMICS</p> 	<p>Housekeeping Maintenance Cleaning Crew Contractor</p>	<p>Infectious diseases may require complete body and face protection. Must follow state order requirements for sanitization.</p>
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- ✓ Personal Protective Equipment used in working environment must meet OSHA Standards (See Section 6).
- ✓ Use [PPE Appendix A](#) Supplemental Information to guide and assist with hazard assessment and controls.

4. Training

Training on PPE must be conducted by a Manager or Supervisor of an affected Associate, and documented in writing with names of each associate trained, the date(s) of the training, and the subject matter covered. Use an Attendance Log and/or Participation Forms to document training.

Each associate who is required to use PPE must be trained on the following BEFORE using the PPE:

- ✓ Why PPE is necessary for the task or position (review engineering and administrative controls)
- ✓ When PPE is necessary during working hours **and** outside of work areas during a Pandemic
- ✓ What PPE is necessary and any alternative PPE choices
- ✓ How to properly put on, take off, adjust, and wear PPE
- ✓ The proper care, maintenance, storage, useful life, and disposal of PPE

Training must include an opportunity for the trained Associate to handle the equipment **AND** demonstrate that they understand the training, have the ability to use the PPE properly and agree to comply with this program.

If an Associate demonstrates a lack of understanding during training or behaves in such a way that the Trainer, Supervisor or Manager has reasons to believe that the Associate is either not able to properly understand and use the equipment **OR** appears to be intentionally ignoring the requirements for that equipment, that associate must be retrained before the use of said equipment resume or the associate must be assigned to a different task where such PPE is not used/needed.

If there are changes in the workplace or processes that change the exposures or type of PPE to be used, all affected associates must be trained on these changes.

5. Care of PPE:

Personal Protective Equipment must be taken care of in order to **protect its users as intended by the manufacturer**. This applies to all forms of PPE.

One-Time Use – PPE designed for general uses against infections and contamination:

<p>➤ Latex-type Gloves</p> <p><input checked="" type="checkbox"/> Do not share</p>	<p>➤ Face Masks</p> <p><input checked="" type="checkbox"/> Do not re-use</p>	<p>➤ Foot / Body Covers</p> <p><input checked="" type="checkbox"/> Dispose in designated trash bag</p>
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Disposable/Re-usable – Can be cleaned properly and sanitized before re-use by the same user:

<p>➤ Ear Plugs for loud noises</p> <p><input checked="" type="checkbox"/> Do not share.</p>	<p>➤ Goggles / flying particles / infections</p> <p><input checked="" type="checkbox"/> Re-use by same user is allowed if after each use PPE is cleaned and sanitized and stored in a sealed plastic bag labeled with user name.</p>	<p>➤ Cloth Face Masks</p> <p><input checked="" type="checkbox"/> Dispose of PPE in a designated trash bag.</p>
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Durable PPE - Designed to be used over long periods of time. Read manufacturers recommendations for proper care of PPE to extend the life of the equipment. The following durable PPE is assigned / available to individuals for specific uses:

- **Shoes** (Slip-Resistant) - Take good care of your working shoes, or boots. An average person takes over 10,000 steps each day so watch the treads of your shoes and boots for usage and clean daily for traction.
- **Hats** (Sun, Construction) - Keep your hats clean and in good condition.
Sun hats: maintain free of holes and tears. Construction hard hats: change inside liner every 2 years
- **Clothing** (Protective/Visibility) - Keep your protective and visibility clothing clean and in good condition. Visibility must remain “visible”. Wash work clothes separate than family clothes.
- **Gloves** (rubber, leather, material) – Use the proper gloves for the tasks. Keep your gloves in a safe place. In the event these gloves are shared between workers, wear a latex-type glove underneath to prevent skin contact with rubber, leather or material (prevent contamination).
- **Ear Muffs** (Noise) – Clean and sanitize after each use. Avoid sharing.
- **Respirators** (Half Face and Full Face). When TBCC dispenses Half-Face or Full-Face Respirators to Associates required to use it, these Associates are responsible for the care of their respirators and must report to their Manager or Supervisor any issue that would prevent them from storing, cleaning or using the respirator. Anyone using a half-face or full-face respirator is responsible to:
 - Maintain the unit in excellent working condition
 - Inspect regularly for quality of rubber, valves (must be fresh) and for cracks
 - Clean and Disinfect the unit after each use before storing
 - Be trained on [Respiratory Protection Program - 2020](#)
 - Understand and Comply with [Protocol for anyone using a Respirator - 2020](#)

- 📄 Store according to manufacturer’s recommendations
- 📄 Defective or damaged PPE shall not be used
- 📄 Associates are to report any defective or damaged equipment to their supervisor for repair or replacement
- 📄 Managers, Supervisors and Associates must know how to store PPE. When stored in the wrong place, or stored incorrectly, PPE can become unusable or contaminated, even if it looks good.

6. California and Oregon / Federal Standards for PPE

California (Title 8)

Subchapter 7. General Industry Safety Orders
Group 2. Safe Practices and Personal Protection
Article 10. Personal Safety Devices and Safeguards

- (TBCC)
- [§3381. Head Protection.](#)
- [§3382. Eye and Face Protection.](#)
- [§3383. Body Protection.](#)
- [§3384. Hand Protection.](#)
- [§3385. Foot Protection.](#)
- [§3386. Jewelry.](#)
- [§3387. Sanitation.](#)
- [§3389. Life Rings and Personal Flotation Devices.](#)
- [§3390. Protection from Electric Shock.](#)
- [§3395. Heat Illness Prevention.](#)
- [§3400. Medical Services and First Aid.](#)

Oregon / Federal - General Industry (29 CFR 1910)

- [1910.132](#), General requirements (Personal protective equipment)
- [1910.133](#), Eye and face protection
- [1910.134](#), Respiratory protection
- [1910.135](#), Head protection
- [1910.136](#), Foot protection
- [1910.137](#), Electrical protective equipment
- [1910.138](#), Hand protection
- [1910 Subpart I - Appendix A](#), References for further information (Non-mandatory)
- [1910 Subpart I - Appendix B](#), Non-mandatory compliance guidelines for hazard assessment and personal protective equipment selection
- [1910.146](#), Permit-required confined spaces
- [1910.252](#), General requirements (Welding, cutting, and brazing)
- [1910.94](#), Ventilation
- [1910.95](#), Occupational noise exposure
- [1910.120](#), Hazardous waste operations and emergency response
- [1910 Subpart Z](#), Toxic and hazardous substances



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ADDITIONAL RESOURCES:

The material and links below must be used as additional assistance for Managers and Trainers to help raise their awareness about PPE and how they can use the material to best communicate with their teams.

Source/Website	Material / Link (Review and use as appropriate)	Audience
CalOSHA	California Workplace Guide to Aerosol Transmissible Diseases	- Managers - Maintenance of Air Filtration Systems
Oregon OSHA	Web page on PPE	- Managers - Trainers
FedOSHA	Web page on PPE	- Managers - Trainers
CDC / NIOSH	CDC / NIOSH Web page on PPE	- Managers - Trainers
* / ** Other Training Material / Videos	<ol style="list-style-type: none"> 1. Video: Safety Culture (2:57) ** 2. Video: PPE Basics (2:50) ** 3. Video: Risk Assessment (3:50) * 4. Video: Speaking up for Safety (3:12) * 	- Managers - Trainers <u>MUST watch first BEFORE sharing with Dept. Associates</u>
TBCC Safety Tips English / Spanish	<ol style="list-style-type: none"> 5. ALL: How to Remove Gloves / Dust Masks / Pandemics 6. Housekeeping / Kitchen: Slip-Resistant Shoes 7. Facilities / Maintenance / Golf Grounds: Hearing Protection 8. Housekeeping / Childcare: Electrostatic Sprayers 9. TBCC Safety Tips Library 	- Post in working areas - Use for: A. Ongoing Training B. Compliance.

* Mandatory for Trainers and Managers must watch to reinforce understanding and knowledge

** Mandatory for Trainers and Managers – Sharing with Associates is acceptable and encouraged as time allows

RECORDS:

Records from each Club associated with this program are maintained by Club Managers and are available to HR for review and audit at any time. HR maintains records it receives or collects from each club in The Bay Club Company digital folders and files.

Please contact Human Resources with any questions | 888.830.7160 | hr@bayclubs.com