

PERSONAL PROTECTIVE EQUIPMENT (PPE) REQUIREMENTS

Employers are responsible for providing a safe and healthy workplace for their employees. A part of this requirement, appropriate engineering, work practice or PPE controls must be implemented and used to protect employees against recognized hazards.

Personal protective equipment includes, but is not limited to:

- Safety glasses/goggles
- Face shields
- Safety shoes (steel-toes)
- Gloves
- Hard hats
- Hearing protection

Every employer in general industry that is regulated by the Occupational Safety and Health Administration (OSHA) is required to conduct **hazard assessments** to identify

Hazard assessments identify the need for personal protective equipment and are essential in the development of your health and safety program

HOW TO CONDUCT A HAZARD ASSESSMENT

You may believe that you have an understanding about the hazards which may be present in your facilities **and/or satellite work locations** that necessitate the use of PPE.

Even so, have you really walked through your facility and made a concerted effort to evaluate all operations and jobs for potential hazards? **This includes impacts from operations performed by other companies working on the jobsite.** Now is the time to do so if you haven't already. **Even if you have done this in the past, it is necessary to periodically reevaluate the**

In order to conduct a hazard assessment you must evaluate all operations and jobs for potential hazards

the need for personal protective equipment ([See 29 CFR 1910.132](#)). While this specific requirement does not apply to the construction industry, these employers are required to have employees use appropriate PPE when there are hazards that cannot be controlled through other means such as engineering and work practice

controls ([See 29 CFR 1926.95](#)).

Companies in the construction industry will find it advantageous to complete a hazard assessment on each of their jobsites. General industry employers must certify that they have completed a hazard assessment in their facilities.

Have you completed and **documented** hazard assessments **through a written certification**

and implemented **those specific findings into your health and safety** program and employee training?

various job tasks and functions at your facility.

Personnel inside your organization can perform the hazard assessment and are probably **well**

suited to do so, considering their knowledge and experience with your operations. **You may wish to assign this responsibility to a**

manager or supervisor. In most cases, it is also beneficial to involve employees throughout the facility as they can offer their unique knowledge of the hazards that are present. Using a team

approach is likely to be most effective in identifying potential hazards and providing adequate and effective protection measures.

In general, your team should evaluate each job task for potential hazards present that affect

specific body parts. Common types of hazards are noted here and should be investigated during the assessment:

Eye and Face Hazards

<input type="checkbox"/> Chemical splashes	<input type="checkbox"/> Biohazards	<input type="checkbox"/> Spray painting/mists
<input type="checkbox"/> Sanding	<input type="checkbox"/> Welding operations	<input type="checkbox"/> Lasers/other optical radiation
<input type="checkbox"/> Grinding, buffing, polishing	<input type="checkbox"/> Flying particles/dusts	<input type="checkbox"/> Soldering operations

Foot Hazards

<input type="checkbox"/> Heavy material handling	<input type="checkbox"/> Sharp edges/points	<input type="checkbox"/> Hot/molten metal
<input type="checkbox"/> Slippery/wet conditions	<input type="checkbox"/> Chemical contact	<input type="checkbox"/> Construction/Demolition
<input type="checkbox"/> Electrical	<input type="checkbox"/> Biohazards	<input type="checkbox"/> Heavy equipment

Overhead Hazards

<input type="checkbox"/> Suspended loads	<input type="checkbox"/> Overhead beams/low overhead clearance	<input type="checkbox"/> Energized wires
<input type="checkbox"/> Elevated work areas	<input type="checkbox"/> Sharp objects at head level	<input type="checkbox"/> Overhead equipment

Hand Hazards

<input type="checkbox"/> Caustic/Acidic chemicals	<input type="checkbox"/> Toxic chemicals	<input type="checkbox"/> Sharp materials, splinters
<input type="checkbox"/> Temperature extremens	<input type="checkbox"/> Biohazards	<input type="checkbox"/> Electrical hazards
<input type="checkbox"/> Pressure points	<input type="checkbox"/> Vibration from tools	<input type="checkbox"/> Welding/torch operations

Legs, Upper body and Arm Hazards

<input type="checkbox"/> Caustic/Acidic chemicals	<input type="checkbox"/> Toxic chemicals	<input type="checkbox"/> Sharp materials, splinters
<input type="checkbox"/> Temperature extremens	<input type="checkbox"/> Biohazards	<input type="checkbox"/> Electrical hazards
<input type="checkbox"/> Pressure points	<input type="checkbox"/> Vibration from tools	<input type="checkbox"/> Welding/torch operations

You should note that this assessment does not **fully** cover respiratory and hearing protection. There are specific OSHA standards ([See 29 CFR 1910.134 and 1926.103 for respiratory protection and 29 CFR 1910.95 and 1926.101 for hearing protection](#)) that cover these issues and require that you evaluate the need for PPE.

CHECKLIST HAZARD ASSESSMENT FORMS AND CERTIFICATIONS

Our clients have access to checklists through <http://www.ehscompliance.com> that can be utilized to complete a hazard assessment, contact

your H&A representative for assistance. The forms list the items noted above and provide specific examples of PPE for the hazard and space

to indicate which PPE you select and require your employees to use according to each department, location or operation. The forms also serve as

your certification by providing spaces and prompting the individual using the form to fill out specific information required by the standard.

ELIMINATE THE HAZARDS IF POSSIBLE

Personal protective equipment is considered to be our last line of defense as it is subject to human error (e.g. wearing improperly, forgotten). Therefore, if engineering or work practice controls, such as machine guarding, guard railing, or blocking off, are feasible, the employer must use those controls. If such controls do not protect against all potential hazards, PPE appropriate for the hazard must be provided and used. Once your hazard assessment is complete and you have determined what hazards are present, you should take the opportunity to determine whether you can eliminate the hazards through engineering

When it comes to protecting your employees always utilize engineering equipment first, if not feasible, then use personal protective equipment

controls, work practice controls or administrative controls before you resort to using PPE. **Although there may be an upfront cost associated with implementing these types of controls, it may be offset by the savings in continuing to purchase PPE.**

IMPLEMENTING YOUR PPE PROGRAM **CHOOSING YOUR EQUIPMENT**

When you have determined which types of PPE are required in your facility and/or operations, you then need to determine **which** manufacturers, models, styles, sizes, etc. **will be used**. You should work closely with a competent safety equipment supplier to select and purchase the appropriate equipment or use the ["Ask the Expert"](#) feature at [ehscompliance.com](#) so that we may help you. **You may also wish to involve your employees in the decision-making process to ensure they are comfortable with the fit of selected PPE.** The OSHA standard specifies equipment that meets design and functional criteria established by the American National Standards Institute (ANSI) for eye protection, foot

protection and head protection. The following criteria are established for each:

- Eye Protection - ANSI Z87.1 (1989)
- Foot Protection – ANSI Z41 (1991)
- Head Protection – ANSI Z89.1 (1986)

Specific criteria are not as clear cut for gloves and clothing given the variety of hazards and materials of construction for these types of equipment, however, should be evaluated using knowledge of the hazard presented (e.g. chemical or material) and glove composition. For example, a latex glove may work for handling isopropyl alcohol, but not for hydrochloric acid.

WHO PAYS AND WHO IS RESPONSIBLE TO ENSURE PPE IS USED?

OSHA requires that the employer provide required PPE to employees at no cost to

employees. This rule applies to all required PPE
Except:

- Non-specialty safety shoes (including steel-toe shoes or steel-toe boots), provided that the employer permits them to be worn off the job-site. Non-specialty prescription safety eyewear, provided that the employer permits them to be worn off the job-site.
- Everyday clothing, such as long-sleeve shirts, long pants, street shoes, and normal work boots; or
- Ordinary clothing, skin creams, or other items, used solely for protection from weather (winter coats, gloves, rubber boots, hats, ordinary sunglasses).

You must supply employees with all required PPE

The employer must pay for replacement PPE, except when the employee has lost or intentionally damaged the PPE.

It is advisable, and in some cases required, to provide at least two types or styles of equipment for employees to choose from. This helps ensure that employees can find a size, style or type that fits and is comfortable for them. Employees should be discouraged from bringing their own PPE to work unless you can verify that it is appropriate for the hazard and meets the ANSI standards.

INFORMING EMPLOYEES

The OSHA standard requires that you communicate with employees regarding what PPE you have selected and why. This is important so that employees understand what the hazards are and why you chose the selected equipment. Providing this information to employees will be valuable as you implement your PPE program and ensure use of PPE when required.

work requiring the use of **such** PPE. Obviously, this means that the training must be conducted prior to assigning an employee to work where PPE is required.

Employees must be retrained:

Employees who are required to use PPE must be trained with regard to specific **aspects as outlined** in the OSHA standard. These include:

- When PPE is necessary
- 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

You must train your employees on their PPE prior to the use of any equipment

- If they demonstrate that they did not understand the initial training;
- When changes in the workplace render the previous training obsolete;
- When changes in the types of PPE to be used render the previous training obsolete;
- When you have reason to believe that they need additional training; and
- **On a recurring basis as outlined in specific OSHA standards (e.g. respiratory protection).**

Each affected employee must demonstrate an understanding of the training and the ability to use PPE properly before being allowed to perform

Hellman & Associates' clients have access to roster sheets to document the training as required in the standard and additional resources within

their written PPE programs to facilitate OSHA compliance.

If you have additional questions on how to conduct your hazard assessment or how to

implement your PPE program, please send a message to [Ask the Expert](#).