

Compliance Requirements

The compliance requirements for OSHA's Personal Protective Equipment regulations are very straightforward, and logical.

GENERAL REQUIREMENTS (29 CFR 1910.132)

The "general" OSHA Personal Protective Equipment Standard has six major compliance requirements, as follows:

- That Personal Protective Equipment be provided, used and maintained in sanitary and reliable condition in order to protect employees from workplace hazards.
- When employees provide their own equipment, the employer must ensure the adequacy (including maintenance and sanitation) of that equipment.
- All Personal Protective Equipment must be safely designed and constructed for the work environment in which it is used.
- Employers must assess their workplaces to determine if there are any hazards present. If hazards are present:
 1. Employees must be notified as to the hazards and what PPE must be worn.
 2. Appropriate PPE must be made available to all employees, and it must fit each employee properly.
- Defective or damaged Personal Protective Equipment must not be used.
- Employees must be trained regarding the selection and use of their Personal Protective Equipment.

"BODY AREA" SPECIFIC REQUIREMENTS

The Standards regarding the specific areas of the body that must be protected all have similar compliance requirements. In general they call for:

Eye and Face Protection (29 CFR 1910.133)

Employees must use appropriate eye or face protection when exposed to hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially damaging light radiation.

Employees must use eye protection that provides side protection when there is a hazard from flying objects. Detachable side protectors meeting the requirements in the Standard are acceptable.

Employees who wear prescription lenses while engaged in work that requires eye protection must wear eye protection that incorporates the prescription in its design, or must wear eye protection that can be worn over the prescription lenses without disturbing the proper position of the prescription lenses or the protective lenses.

Eye and face Personal Protective Equipment shall be distinctly marked to facilitate identification of the manufacturer.

Head Protection (29 CFR 1910.135)

Employees must wear protective helmets when working in areas where there is a potential for injury from falling objects. Protective helmets designed to reduce electrical shock hazards must be worn by employees when they are exposed to electrical conductors that could come into contact with their head.

Foot Protection (29 CFR 1910.136)

Employees must wear protective footwear when working in areas where there is danger from falling or rolling objects, or from objects that may pierce the sole and when their feet are exposed to electrical hazards.

Hand Protection (29 CFR 1910.138)

You must select and require employees to use appropriate hand protection when hazards are encouraged that could result in harmful substances being absorbed through skin, severe cuts or lacerations, severe abrasions, punctures, chemical burns, thermal burns, or injuries caused by temperature extremes. Appropriate PPE must be selected by evaluating the tasks being performed, the conditions present, and the duration of use, and by identifying present and potential hazards.

DEFECTIVE OR DAMAGED EQUIPMENT

Defective or damaged Personal Protective Equipment shall not be used. You must ensure that damaged or defective equipment is removed from use immediately.

EDUCATION AND TRAINING

All employees who are required to wear Personal Protective Equipment must be trained to know at least the following:

- When PPE is necessary.
- The appropriate PPE necessary under various conditions.
- How to put on, remove, adjust, and wear their PPE.
- How to properly care for and maintain their PPE, as well as know equipment life expectancy and when to discard deteriorating or defective equipment.
- Limitations of PPE's ability to protect against hazards.

Each employee who is required to wear PPE must demonstrate an understanding of the training, and the ability to use PPE properly. They must also show they know how to wear, use, clean and maintain their PPE before being allowed to perform work requiring the use of PPE.

RETRAINING OF EMPLOYEES

Employees must be retrained when:

- They wear, use, clean or maintain PPE improperly.
- Changes in the work area result in new or additional hazards.
- When new or additional PPE are to be worn in the facility.
- An employee no longer remembers the proper wear, use, care or maintenance of their PPE.

DOCUMENTATION

Training must be documented in a “certification record”. The record must include the following information:

- A statement that each employee has received and understands the PPE training.
- The name and signature of each employee.
- The date(s) of the training.
- The name of the person who provided the training.

Guidelines for Hazard Assessment

This section is intended to provide compliance assistance for employers and employees in fulfilling the requirements for a hazard assessment in the facility.

CONTROLLING HAZARDS

PPE alone should not be relied on to provide protection against hazards, but should be used in conjunction with guards, engineering controls and sound work practices.

ASSESSMENT AND SELECTION

In order to assess the need for PPE, the following steps should be taken:

Survey

Conduct a walk-through survey of the area. The purpose of the survey is to identify sources of hazards to workers and co-workers. Consideration should be given to the basic hazard categories:

- Impact
- Sharp objects
- Falling/rolling objects
- Chemicals
- Heat
- Electrical
- Light (optical) radiation

Sources

During a walk-through of your area, you should observe the following:

- Sources of motion (machinery, processes involving any movement of tools, machine elements or particles, or movement of personnel that could result in collision with stationery objects).
- Sources of high temperatures that could result in burns, eye injury or ignition of protective equipment.
- Types of chemical exposures.
- Sources of light radiation (welding, cutting, furnaces, heat treating, high intensity lights, lasers).
- Sources of sharp objects which might pierce the feet or cut the hands
- Sources of rolling or pinching objects which could crush the feet.
- The layout of the workplace and locations of co-workers.
- Any electrical hazard.

It is a good idea to review your injuries and accident history (OSHA logs) for more information on identifying problem areas.

Organize

You must organize the information from the walk-through so that you can analyze the hazards and be better equipped to select the proper protective equipment.

Analyze Data

From the data you have obtained and organized, you can estimate the potential for injuries. Each of the basic hazards you recognized should be reviewed and a determination made as to the type, level of risk, and seriousness of potential injury, as well as the potential of exposure to several hazards simultaneously.

Selection Guidelines

Become familiar with the potential hazards, the type of protective equipment that is available to protect against the hazards and what the PPE can do. Compare the hazards with the capabilities of the protective equipment. Select the equipment which ensures a level of protection greater than the minimum required to protect the employee.

Cleaning and Maintenance

It is important that all PPE be kept clean, and is properly maintained. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision.

PPE should be inspected, cleaned and maintained at regular intervals so that it provides the required protection. Make sure that all damaged or contaminated PPE is either decontaminated or disposed of in a manner that protects the employees from exposure to hazards.

Hazard Assessment and OSHA Log Review

March 31, 1997

1989-1996 Log Review

Trends Identified	Corrective PPE and Procedures
Cuts to fingers	Wear cut resistant gloves
Rashes on hands	Supply disposable gloves and cotton liners as needed
Slips	Encourage wearing of appropriate shoes Stress awareness of work environment Provide and require use of wet floor signs
Back injuries	Back support option Lift training
Chemical splashes	Provide and require usage of goggles Vinyl aprons Neoprene gloves

Environmental Department PPE Processes and Procedures

The Environmental Services Department will provide appropriate PPE to all their employees requiring them to attend training one time per year to learn to:

1. Recognize that potential hazards do exist in their workplace.
2. Analyze hazards and determine what type of PPE should be used in each situation.
3. Select specific protective equipment for each task.
4. Know the limitations of any PPE.
5. Properly wear, adjust, maintain, and dispose of PPE.

Survey Forms and Lists

The forms and lists on the following pages can be used to help you comply with OSHA'S revised Personal Protective Equipment Standards. Using these forms and lists, you will be able to do the following:

- Survey your work areas and operations for potential hazards which require that Personal Protective Equipment be worn by employees in order to do their jobs safely.
- List what type of PPE should be worn in each work area or for each operation.
- Indicate where Personal Protective Equipment is located in your facility and what type of equipment can be found in each location.

When you are doing your surveys, remember that OSHA requires that the following information be documented in writing (just use the appropriate spaces on the forms).

- The workplace that was evaluated.
- The person certifying that the evaluation has been performed.
- The date that the hazard assessment was conducted.
- That the list is in fact a "certification" that the hazard assessment has taken place.

These forms will develop the backbone of the documentation, certification, and record of where equipment is located, that is essential to your PPE program. Completed forms should be filed under the tab "Survey Forms and Lists".

PPE Instructions and Care

Personal Protective Equipment should always be with your person at all times on the job.

GLOVES

Cotton: Protection for mild abrasions and from climate changes (hot or cold). Check for soiling, tears, and holes before and after use. Replace when damaged.

Kelvar: Protection for abrasions and cuts. Not puncture resistant. Check for soiling, tears and holes before and after use. Replace when damaged.

NBR: Protection from chemical splashes and contact. NBR gloves should be inspected each time before use for cracks or holes. Wash or rinse gloves with warm water and mild soap after each use.

Latex: (disposable) Protection from bacteria and some forms of biohazards. Care should be taken when removing soiled latex gloves, that the soiled side does not contact any unprotected skin area. As always, gloves should be inspected for defects before use.

GOGGLES OR SAFETY GLASSES

Chemical Splash Goggles: Protects eyes from direct splashing or spraying of chemicals. To care for goggles, always check for cracks or damaged lenses and frame. If damaged or scratched where sight is obstructed, replace before use. Inspect the elastic band for wear. Clean goggles with warm water and a soft cloth.

Safety Glasses: Not for use with chemicals. Protection from flying objects, sparks, and dust. Clean with warm water and a soft cloth.

OTHER

Apron: Protects from chemical splashes to the mid-section of the body. Inspect before use for tears and holes. Rinse with warm water after use.

Ear Plugs: Protects ears and hearing from extreme noise. Discard when soiled and request another pair.

Dust mask: Protects from dust only. Do not use for chemical fumes. Discard when soiled.

Note: Chemical splash goggles, NBR gloves with use of the latex disposable gloves, and chemical apron are approved protection to guard against bio-hazard clean-up and should be worn when dealing with a bio-hazard situation. **All chemical spills should be called in immediately to your supervisor, Custodial Associate Director or Assistant Custodial Manager. Do not attempt to clean-up on your own.**

PERSONAL PROTECTIVE EQUIPMENT

HAZARD ASSESSMENT

Title of person conducting assessment:		Date:
Name (Signature):		Page ____ of ____
<input type="checkbox"/> Eye Protection	<input type="checkbox"/> Foot Protection	<input type="checkbox"/> Face Protection
<input type="checkbox"/> Head Protection	<input type="checkbox"/> Hand/Arm Protection	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Other: _____	<input type="checkbox"/> Other: _____
Walk Through Survey		
Identify Area Surveyed: _____		
SOURCE	ASSESSMENT OF HAZARD	PROTECTION
IMPACT Chipping, grinding, sanding, Machining, sawing, chiseling, Woodworking, masonry work, Air nailers, etc.	Flying fragments, objects, chip turnings, Particles, grinding dust	Safety glasses, side shields, face shields, goggles, apron
LIGHT OR NON-IONIZING RADIATION Welding, cutting, brazing, Torch soldering, laser	Optical Radiation	Welding goggles/shields with shades, appropriate shielding, signage
HEAT/COLD Furnace operations, process steam, freezer, other	High temperatures, hot sparks, molten metal, live steam	Face shields (reflective), Arm sleeves, gloves, aprons Appropriate shoes/boots
CHEMICALS Acid and chemical handling, fumes, degreasing, dipping, plating	Splash, irritation mists, direct contact	Gloves, chemical goggles, face shields, aprons, special shoes/boots.
FALLING & ROLLING OBJECTS Working in areas where Potential for falling objects, bumping hazards, or rolling hazards exits	Steel loading areas, heavy parts transfer, overhead conveyors for parts movement, pinch points, mechanisms prone to injury, or low ceilings.	Hard hat, bump caps, safety shoes
SHARP OBJECTS Handling sharp edged parts, clearing turnings, objects which may pierce a foot or hand, needle sticks	De-burring, removing turnings, assembling sharp parts, sharps handling procedure	Special cut resistant gloves, Penetration resistant shoes, sharps handling procedure
ELECTRICAL Direct or indirect contact with Electricity	Electricity	Non-conductive safety shoes, hard hats designed to reduce electric shock, gloves designed to reduce electric shock

Refer to Federal Register (29 CFR 1910.132, 133, 135, 136, 138) for additional information.

PERSONAL PROTECTIVE EQUIPMENT

HAZARD ASSESSMENT

Review of OSHA 200 Log (5 years)	Trends Identified: <input type="checkbox"/> Yes <input type="checkbox"/> No (Identify trends on attached sheet)		
Date:			
Equipment Selection: This section of the Hazard Assessment provides a Description, identifies the specific Make/Model, Style and additional remarks for each item the facility has selected to meet the PPE standards.			
DESCRIPTION	MAKE/MODEL	STYLE	REMARKS
Eye Glasses			
Eye Glasses with Side Shield			
Goggles			
Chemical Goggles			
Face Shields			
Safety Shoes			
Safety Shoes with guards.			
Gloves			
Gloves			
Gloves			
Bump Caps			
Hard Hats			
Hair Nets			
Aprons			
Sleeves			
Boots			
POLICY: Please identify where the facility policies and procedures that reflect the use, care, and maintenance of specific Items of Personal Protective Equipment that comply with ANSI Standards are located.			

AREAS INVENTORIED FOR WORKPLACE HAZARDS

The following areas/operations have been surveyed to determine what workplace hazards may exist that requires employees to use Personal Protective Equipment in order to work safely. The Personal Protective Equipment that employees should wear in these work areas/operations is also listed.

AREA (Walk-through survey)	HAZARD	PPE REQUIRED

Date: _____ Name: _____

(Person who performed survey)

Personal Protective Equipment Locations

Personal Protective Equipment (PPE) can be obtained at a number of locations in the facility. Each area where supplies of PPE are located is listed below, along with the type of protective equipment that is available at that location.

LOCATION	PPE AVAILABLE