DRAFT SAMPLE WRITTEN

PERSONAL PROTECTIVE EQUIPMENT

HAZARD ASSESSMENT, EQUIPMENT SELECTION AND TRAINING DOCUMENTATION

For Compliance With

1910.132

ACKNOWLEDGEMENTS

Personal Protective Equipment (PPE): Hazard Assessment and Equipment Selection and Training Documentation

NOTE: THE USE OF PPE ALONE SHOULD NOT BE RELIED ON TO PROVIDE PROTECTION AGAINST HAZARDS. ENGINEERING CONTROLS AND/OR ADMINISTRATIVE CONTROLS MUST BE UTILIZED FIRST OR WITH PPE.

Requirements of the Standard

The employer must perform a hazard assessment of the workplace to determine if hazards are present, or are likely to be present, which require the use of personal protective equipment (PPE). If such hazards are present, or likely to be present, the employer shall:

- Select, provide and require the use of appropriate PPE for each affected employee.
- Communicate PPE selection decisions to each affected employee.
- Select and provide PPE that properly fits each affected employee.
- Conduct and document appropriate employee training.

In the past there has been confusion concerning whether employers or employees must pay for required PPE. OSHA has made it clear that failure of an employer to pay for personal protective equipment that is not commonly used by the employee away from the job is a violation. Examples of personal protective equipment that may be provided by employees include non-specialty safety glasses, safety shoes, and cold weather outerwear such as that worn by construction workers. However, shoes or outerwear subject to contamination by carcinogens or other toxic or hazardous substances, which cannot be safely worn off-site, must be paid by the employer. (Reference OSHA Compliance memorandum dated October 18, 1994 and Occupational Safety and Health Reporter 10/26/94, Pg. 1151).

Examples of equipment required to be provided by employers include but are not limited to:

- □ Welding or wire mesh gloves;
- □ Respirators;
- □ Hard hats:
- □ Specialty glasses and goggles such as those used for laser and ultraviolet radiation protection;
- □ Specialty foot protection such as metatarsal shoes and lineman's shoes with built-in gaffs [such as those used for climbing];
- □ Face shields;
- □ Rubber gloves, blankets, cover-ups; and
- □ Hot sticks and other live-line tools used by power generation workers.

To access the need for PPE, a survey of the workplace must be conducted. The following is a guide to help with the hazard assessment.

WRITTEN HAZARD ASSESSMENT

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(Company Name)	

HAZARD ASSESSMENT

The purpose of the survey is to identify sources of hazards to workers and co-workers. The enclosed worksheet (see Page 6) is provided to aid in the hazard assessment.

POTENTIAL HAZARD SOURCES

- Motion that includes tool movement, moving machinery, or machine parts, or movement of personnel that could result in collision with stationary objects
- High temperatures that could result in burns, eye injury, or ignition of protective equipment
- Chemical exposures that could result in burns or exposure to skin or eyes
- Chemical exposures that could result in lung or respiratory hazards
- Harmful dust that could result in scratches or burns to eyes or lungs
- Light radiation that could cause burns to skin and eyes, i.e., welding, brazing, cutting, furnaces, heat treating, high intensity lights
- Falling objects or potential for dropping objects
- Overhead obstructions which create head bumping hazards
- Sharp objects which might pierce the feet or cut the hands
- Rolling or pinching objects which could crush the feet
- Layout of workplace and location of co-workers
- Electrical hazards

PPE DETERMINATION

Each of the basic hazards should be reviewed and a determination made as to the type, level of risk, and seriousness of potential injury. Consideration should be given to the possibility of exposure to several hazards at once. The general procedure for determining appropriate protective equipment is to:

- Identify the potential hazards and the type of protective equipment that is available, and what protection it provides (i.e., splash protection, impact protection, etc.)
- Compare the capabilities of various types of PPE with the hazards associated with the environment (e.g., impact velocities, masses, projectile shape, and radiation intensities)
- Select the PPE which provides a level of protection greater than the minimum required to protect employees from the hazards
- Select PPE that will fit each employee properly and provides protection from the hazard

PPE SELECTION

EYE AND FACE PROTECTION: Employees must use appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids, or caustic liquids, chemical gases or vapors, or potentially injurious light radiation. Requirements for side protection, prescription lenses, filter lenses, and identification of the manufacturer are outlined in the standard. Protective eye and face devices purchased after July 5, 1994 must comply with ANSI Z87.1-1989 or be demonstrated to be equally effective. Devices purchased before that date must comply with ANSI Z87.1-1968 or be equally effective. Occupations/activities that may be exposed to these types of hazards include sheet metal fabrication, wood shops, welders, grinders, and parts cleaning.

RESPIRATORY PROTECTION: Employers must select and require the use of appropriate respirators in areas where employees are exposed to inhalation hazards in excess of the established exposure limits. Inhalation hazards may consist of exposure to gases, vapors, dusts, mists, fumes or fibers. All respirator usage shall be in accordance with the employer's Respiratory Protection Program and ANSI Z88.2-1969 (Standard Practice for Respiratory Protection). Occupations/activities that may be exposed to these types of hazards include abrasive blasting, spray painting, welding, chemical related activities and asbestos maintenance.

HEAD PROTECTION: Employees must wear protective helmets when working in areas where there is a potential for injury to the head from falling objects. Protective helmets designed to reduce electrical shock hazards shall be worn by each such affected employee when near exposed electrical conductors which could contact the head. Protective helmets purchased after July 5, 1994 shall comply with ANSI Z89.1-1986 or be equally effective. Helmets purchased before that date shall comply with ANSI Z89.1-1969 or be equally effective. Occupations/activities that may be exposed to these types of hazards include crane operations, overhead work areas and low clearance work areas.

<u>FOOT PROTECTION</u>: Employees must wear protective footwear when working in areas where there is a danger of foot injuries due to falling or rolling objects, or objects piercing the sole, or where employees' feet are exposed to electrical hazards. Protective footwear purchased after July 5, 1994 must comply with ANSI Z41-1991 or be equally effective. Protective footwear purchased before that date must comply with ANSI Z41.1-1967 or be equally effective. Occupations/activities that may be exposed to these types of hazards include steel fabrication, compressed gas cylinder distribution, recycling centers and warehousing.

HAND PROTECTION: Employers must select and require employees to use appropriate hand protection when employees' hands are exposed to hazards such as those from skin absorption of harmful substances; severe cuts or lacerations; severe abrasions; punctures; chemical burns; thermal burns and harmful temperature extremes. Employers shall base the selection of the appropriate hand protection on evaluation of the performance characteristics of the hand protection relative to the tasks to be performed, conditions present, duration of use and the hazards and potential hazards identified. Occupations/activities that may be exposed to these types of hazards include sheet metal fabrication, painters, welders, electricians, parts cleaning and food preparation.

EMPLOYEE TRAINING

After proper PPE for each process/equipment has been selected, the employer must provide the equipment to employees and train them in its proper use. At a minimum, each employee using PPE must know:

- When PPE is necessary
- What PPE is necessary and which PPE has been selected for each process the employee operates
- How to properly put on, take off, adjust and wear PPE
- The limitations of the PPE
- How to determine if PPE is no longer effective or is damaged
- How to get replacement PPE
- How to properly care for, maintain, store, and dispose of PPE

After employees have been trained, periodic assessment of the process/equipment should be conducted to ensure that the PPE is adequate and training is appropriate.

Retraining of employees is required whenever:

- Changes in the workplace render the previous training obsolete
- Changes in the type of PPE render previous training obsolete
- Employer observed inadequacies in an employees' knowledge or use of assigned PPE indicates that an employee has not retained the necessary understanding or skill

Employers must verify that each employee who is required to use PPE has received and understood the required training. This must be accomplished via a written certification of training. (Please see sample certification, Page 5.)

Finally, injury and accident data (OSHA 300 Log, first aid logs, Worker's Compensation injuries) should be reviewed to help identify problem areas.

PERSONAL PROTECTIVE EQUIPMENT:

EMPLOYEE TRAINING CERTIFICATION

PERSON(S) PERFORMING TRAINING SESSION:				
DATE(S) OF TRAINING:				
FULL NAME OF EACH EMPLOYEE TRAINED: (or attach list)				
SUBJECT(S) OF TRAINING:				
ITEMS COVERED DURING TRAINING:				
When PPE is necessary What PPE is necessary How to properly put on, take off, adjust, and wear PPE Limitations and useful life of the PPE Proper care, maintenance, replacement, and disposal of PPE Other, please specify:				
METHOD OF TRAINING:AUDIOVISUAL MATERIALS USED DURING TRAINING:				
EMPLOYEE UNDERSTANDING OF TRAINING WAS DEMONSTRATED BY:				
EMPLOYEE ABILITY TO USE PPE WAS CONFIRMED BY:				

CERTIFICATION OF PERSONAL PROTECTIVE EQUIPMENT (PPE)

HAZARD ASSESSMENT

DATE ASSESSED	HAZARD SOURCE (EQUIPMENT OR PROCESS)	HAZARDOUS TASK	ASSESSMENT OR NATURE OF THE HAZARD	BODY PART AT RISK	PPE SELECTED	DATE CORRECTED
Company)		(Locatio	n)		(Signature)	

WORKPLACE LAYOUT

Sketch workplace layout to help document the potential hazards and for development of strategies to reduce hazards by:

- Engineering controlsAdministrative controls
- PPE selection and use