

SAFETY SPOTLIGHT

Personal Protective Equipment

Subpart I of the Code of Federal Regulations (CFR), sections 1910.132-1910.138 address the requirements for various types of Personal Protective Equipment (PPE). This includes eye/face protection, hand protection, foot protection, head protection, hearing protection (fully addressed under 1910.95), respiratory protection and electrical protective equipment.

Under these regulations, employers are required to provide employees with the proper PPE for the expected job hazards and ensure they are trained to properly utilize the equipment. OSHA mandates that the employer conduct a hazard assessment to determine the job hazards of affected personnel in which PPE may be necessary. This assessment documents exposures such as impact, penetration, compression, chemical, heat, harmful dusts and light radiation. The assessment must be in writing and reviewed annually to ensure it fully addresses the required protection.

Based on this assessment, OSHA mandates control measure to minimize or eliminate job hazards. This may be accomplished by use of Administrative Controls (policies/procedures), Engineering Controls (ventilation, isolation, storage systems) or Personal Protective Equipment, or a combination of these methods. When PPE must be used, it must meet the highest degree of expected hazard.

You will be faced with myriad choices when it comes to PPE, so it is important to gather all the information you can when selecting what PPE to issue. This information can be obtained from various sources such as container labels, Material Safety Data Sheets, manufacturer operation manuals and safety guidance documents. The employer is required to provide, at no cost, all the necessary PPE for the employee to safely conduct their job tasks. The only exceptions to this rule would be prescription safety glasses and non-specialized safety shoes/boots, unless part of a negotiated labor agreement.

An employee required to wear prescription glasses must be provided with appropriate over-the-spec safety glasses designed to fit over existing glasses or safety goggles, at no cost. Employers can mandate use of certified safety shoes or boots on the job (i.e. steel-tipped leather safety boots), without paying for them unless part of a negotiated contract. Specialized protective boots and overshoes, used for things such as floor stripping, must still be provided at no cost.



A survey by the American **Society of Safety Engineers** showed an 89% noncompliance rate for use of PPE based on field observations

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Implementing Your PPE Safety Program

- Conduct a written Hazard Assessment of key job hazards to determine what PPE is required for these tasks. *Note: The JIF Safety Coordinator has sample programs that can be used as a template upon request.*
- Research the required PPE. Remember that there will be many different types, so read descriptions carefully. You may need several types of a specific category of PPE, such as gloves, to protect against different hazards.
- Solicit input from employees regarding function, fit and comfort. Remember, the goal
 is compliance and PPE does not do any good if someone does not wear it. Making the
 employees part of the selection process will help create "buy-in" to your overall safety
 program. Consider more stylish looking equipment or vanity equipment with sports
 team logos. They do not cost much more and can increase usage.
- While not required, providing each individual with their own set of PPE, where
 practical, is always best. There are no excuses when they have been issued their own
 equipment. It also imparts a feeling of ownership and makes them ultimately
 responsible for the safeguarding and upkeep of the PPE.
- Consider having the employees sign off an acceptance form showing they have received the equipment and understand the requirements to use it when necessary. Sample forms are available from the JIF Safety Coordinator upon request.
- Make sure employees are trained on the PPE that they must use. This is mandatory under the OSHA regulations. This training is available free of charge to JIF members upon request.
- Enforce usage. PPE does no good if it is sitting on a shelf. Make sure department supervisors or Principals are periodically checking to ensure employees are wearing their PPE. If not, they should be counseled or retrained, as necessary. This should be documented as proof to OSHA that the district is enforcing their policy.

If you need any assistance or have any questions, please contact the JIF Safety Coordinator, John Geitz at (P) 856.218-8772 or safetyfirst@comcast.net



