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OSHA Mandated PPE Hazard Assessment and Selection

OSHA mandates that employers keep their workplace safe and healthful for their employees through a large number of different regulations that span many industries, including General Industry and Construction. In every case, the first goal of OSHA is for the employer to eliminate the hazard from the workplace through engineering or work practice controls so that the worker never comes into contact with it in the first place. However, often this is not feasible, and the last line of defense—Personal Protective Equipment (PPE)—must be considered.

PPE comes in many forms and is specially designed to protect a specific part of the worker's body from a certain degree of hazard. Generally speaking, companies manufacture equipment that could cover a worker from "head to toe," including everything from hardhats, safety glasses, earplugs, and respirators for the head to gloves, protective apparel, and boots for the rest of the body. However, before the employer resorts to this final method of control, they need to realize that there are certain requirements they must meet to be in compliance.

The first OSHA requirement, one that is often overlooked, is the need for the performance of a "hazard assessment" on the part of the employer. This is the point that the actual hazards in the environment are identified and analyzed in order to give the employer a clear picture of what protection will be needed. Obviously, not all PPE is built for the same types of hazards. Even in one PPE category, such as gloves, a particular - type of glove may work well in one situation, but not at all in a different one. For this reason, OSHA expects the employer to make sure that it is providing the appropriate protection after having carefully considered all of its options. Once this has been completed, the employer must additionally document its efforts through a written certification that identifies (1) the workplace that was evaluated, (2) the name of the person who conducted the assessment, (3) the date of the assessment, and (4) a statement to the effect that the assessment has been completed.

Once the assessment has been done, the job of the employer is only partially complete. Next, the equipment must be assessed on a worker-by-worker basis to verify proper fit and functionality. Although this becomes extremely clear in portions of the PPE standard such as that for respirators where a medical exam and a "fit test" is required before the worker may begin to work in the equipment, the principle holds true for gloves, safety glasses, and hardhats just the same: the equipment must fit correctly if it is to protect and must protect to the level of hazard that will be encountered. In the words of OSHA, "If PPE does not fit properly, it can make the difference between being safely covered or dangerously exposed. It may not provide the level of protection desired and may discourage employee use."

Finally, once the equipment has been selected for its protection capabilities and workers have "donned" it to determine proper fit, the last initial responsibility of the employer is to train the employee on when PPE is necessary, what specifically is needed, how to wear it (including donning, doffing, and adjustment), its limitations, and how to properly care for it to ensure necessary service life. If the employer has taken the time to carefully select the equipment, it is now their responsibility to make sure that this knowledge is passed on to those who will actually be protected by it.

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