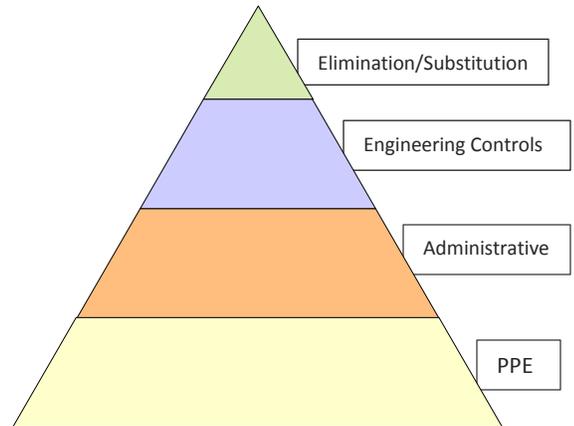


PPE Hazard Assessment and OSHA's Hierarchy of Action

OSHA states in Subpart L 1910.132 General Requirements, that the employer shall assess the workplace for hazards and determine what PPE is needed to protect their workers. This assessment must be formalized, documented, and certified.

The first step when evaluating what hazards could harm your Associates is to perform the Personal Protective Equipment (PPE) Assessment. Readers who understand OSHA's Hierarchy of Action, right now are saying "What?" Let me explain what OSHA is talking about & then I will get back to address their question. OSHA's Hierarchy of Action states that when faced with a hazard in the workplace, the employer must first try to Eliminate the hazard.



Quite simply this means to stop doing that operation or task. Since you are probably in business because of that operation or task, this is usually not feasible. Substitution is next. The clearest example of this method is to use a less hazardous chemical or material in place of a more hazardous one. I am sure you see by now that each step flows into or builds on the other.

The next step then is to apply Engineering. Engineering controls can mean that the hazard (not the operation) is eliminated or the hazard is reduced. Some examples of Engineering controls are to make the operation a closed system; installing noise enclosures or dampeners, and/or enclosing the worker. This does not mean putting the person in some type of suit, so don't jump ahead. This means putting the person in an engineered building or enclosure so they are removed from the hazard.

If the hazard is still present, the next action is to implement some Administrative controls which usually involve circulating workers through tasks. Having a worker in a noisy environment for only 2 – 4 hours instead of 8 and then having them work in a quiet environment is one example. Another example that has been used successfully when trying to reduce strain injuries is to circulate workers through tasks that use different muscle groups or from more strenuous to less strenuous tasks.

The absolute last action is to put workers in PPE. This makes sense because it can be expensive, uncomfortable, add to the work & stress load, and simply is hard to keep everyone compliant. Many existing and new workers don't realize the steps the employer took before they were handed the safety glasses, hard hat, gloves, etc.

Now, to get back to that "What?" question. You should agree that the PPE Hazard Assessment forces you to look at all of your operations and tasks to determine what hazards are present. As you encounter them you should be evaluating how the Hierarchy can be applied instead of automatically going right for PPE. You are doing the same steps when you conduct a Job Safety Analysis (JSA) or a Job Hazard Analysis (JHA). A proper PPE Hazard Assessment includes all of the body parts, the hazards that affect those body parts that can't be presently controlled by other means, and then what type of PPE will be required. This should be a living document that is constantly re-evaluated and referred to during each incident investigation. OSHA requires the employer to at least get the document out every 3 years and re-certify it. Every OSHA Compliance Officer is going to ask for the PPE Hazard Assessment along with your PPE Policy early on in their visit.



You should read into the requirement that you are performing the Hierarchy of Action each time to try to get workers out of PPE and control the hazards more permanently. Certification means that initially and every three years (or sooner), a member of management has printed and then signed their name to say they did the assessment and it is correct.

Mark A. Alexander, CSP, CHSP, NREMT

For additional compliance assistance, contact RiskControl360° by email at info@riskcontrol360.com or by phone at 1-877-360-3608.