

Personal Protective Equipment is covered by seven standards:

- 1910.132, General requirements.
- 1910.133, Eye and face protection.
- 1910.134, Respiratory protection.
- 1910.135, Head protection.
- 1910.136, Occupational foot protection.
- 1910.137, Electrical protective devices.
- 1910.138, Hand Protection.

The General Requirements cover hazard assessment and training requirements. The following standards cover specifications for PPE selection. For instance, the Eye and Face Protection standard has a table of the shade number required for lens filters of welding eye protection.

The first step is to **read** the General Requirements standard, it can be found at this link:

http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9777&p_text_version=FALSE

While this standard does not require a program; it requires certification of the Hazard Assessment and documentation of training.

The second step is to conduct a hazard assessment of your workplace Appendix B of the General Requirements standard,

http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10120&p_text_version=FALSE, will walk you through this process.

Hazard Assessment

- The person most qualified to identify hazards and select PPE is the person who has done the job and has a fine sense of self-preservation. Therefore, employee involvement will make your life much easier.
- The standards are only interested in the following hazards:
 - IMPACT
 - COMPRESSION
 - CHEMICAL
 - HAZARDOUS DUST
 - PENETRATION
 - HEAT (as in burns)
 - LIGHT RADIATION (as in welding)

If you identify other hazards, such as noise, during the assessment note them and follow up as required by the applicable standard, 1910.95. (Marathon County Highway Department conducted a "Job Hazard Assessment" and then pulled out the parts under this standard for the required Certification document.)

- Public employee jobs are usually highly variable. Evaluate the hazards by task so the employee is not required to "suit up" for his entire shift.
- When evaluating the Hazard Potential balance risk vs severity. Is it likely to happen, has it happened before and how badly could the employee be injured if it does happen?
Example, use of a hammer: it could drop on the foot, has dropped on the foot but the severity was a bruise. Pouring an acidic solution into a bucket to dilute it: splashing could occur, it could reach the arms and face but it has not happened yet but the severity could include loss of eyesight. Decision: no steel toed boots for hammering nails but safety goggles are **required** for mixing and applying the acidic solution.
NOTE: we are not making "recommendations" here, this assessment is about enforceable PPE work practices.

- Start your assessment by documenting the PPE already in use. Then go over accident reports to identify where PPE might have prevented an injury. Next discuss the existing PPE with employees and get information about near miss accidents that might not have been reported (the ratio is about 10 near misses to 1 injury causing accident.)
- Finish the assessment by completing the Certification document. This document contains:
 - The workplace/job title/task evaluated
 - The person certifying that the evaluation has been performed
 - The date of the assessment
 - And the title that identifies the document as the certification of hazard assessment

A template is provided, see Certification of PPE Hazard Assessment Template.

PPE selection:

Remember, **what you select you must enforce**. Employee involvement in selection can help avoid such pitfalls as PPE that interferes with work, is uncomfortable, or simply impractical.

- Check the appropriate standard to identify the specific requirements before selecting the PPE. Check the MSDS before selecting a glove to protect against a chemical.
- PPE is something you can WEAR, so do not include programs, trench boxes, etc.
- If respirators are provided and/or required be sure to meet the extensive requirements of 1910.134.

Training:

The good news is that an employee only has to be trained once unless there are changes in the PPE, workplace, or observations prove the employee forgot.

Anyone knowledgeable in the hazards and the PPE can conduct the training. Again, this standard can be done effectively and cheaply in-house.

The training must contain the following topics:

1. when PPE is necessary
2. what PPE is necessary
3. how to properly don, doff, adjust, and wear PPE
4. limitations of the PPE
5. proper care, maintenance, useful life and disposal of PPE

Verification of training shall be through a written certification that contains the name of each employee trained, the date of training and the subject of certification. It does not require a signature.

The bad news is that:

1910.132(f)(2)

Each affected employee shall demonstrate an understanding of the training specified in paragraph (f)(1) of this section, and the ability to use PPE properly, **before** being allowed to perform work requiring the use of PPE.

Note: The respiratory protection and electrical protective devices standards have their own training requirements.

So, are you done? Yes, right now you are done. However, the workplace changes everyday. Whenever a new piece of equipment comes in or work process changes it needs to be assessed and included in the certification and training needs to be updated. New employees need to be trained. Annual assessments are highly recommended.