WESTERN NATIONAL
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Developing Your Personal Protective Equipment (PPE) Program

A variety of hazards can exist in every workplace that may be exposing your employees to a potential injury or illness. All employers you have a responsibility to implement effective strategies to protect employees from the hazards they may encounter in order to reduce the likelihood of an incident from occurring.

The priority for controlling hazards should follow the hierarchy of controls which includes:

1. Elimination
2. Substitution
3. Engineering
4. Administrative Controls
5. Personal Protective Equipment (PPE)

The following information can help you develop your last line of defense against a hazard: your PPE program.

When the hazard cannot be removed or controlled adequately utilizing the hierarchy of controls, PPE may be used as a last resort. PPE should be considered the last level of protection when all other methods have been exhausted to control the hazard or when the other controls are not available or feasible. It is important to keep in mind that PPE use does not eliminate the hazard. PPE reduces or minimizes the potential exposure or contact to the hazard, which reduces the risk of injury.

An effective PPE program must be comprehensive. It will require commitment and active participation at the planning, development, and implementation stages from all levels: senior management, supervisors, and workers. The greater the workers' involvement in all stages of the program, the smoother it will be to implement the program. A good PPE program consists of these essential elements:

- Management support
- Hazard assessment
- Selection of appropriate PPE
- Training and maintenance
- Auditing of the program

Management Support

The success of a PPE program depends upon winning the cooperation and support of all those concerned. This can best be achieved by helping workers understand the need to wear the PPE and by encouraging them to want to wear it. Encouragement can be achieved through positive reinforcement when a supervisor sees a worker wearing proper PPE and by warning employees of the potential hazards of not wearing PPE. The protection provided will be dramatically reduced if workers remove the PPE for even short periods of time. The loss of protection during these periods may easily outweigh the protection when it is used. The overall program should be supported by a clear company policy that assigns responsibility for the use of PPE and which is firmly backed.

Hazard Assessment

The first step in the development of a PPE program is to identify the particular hazards your employees face in the workplace. A PPE Hazard Assessment is a tool to assist in helping to identify what hazards your employees are exposed to, and how to adequately protect them. When PPE is identified as a method to protect your employees from a given hazard, the hazard assessment can assist you in determining what PPE may be required. You should complete a documented hazard assessment of your workplace to:

- Help you locate hazards
- Help you determine what PPE your employees need for protection
- Ensure you are in compliance with the PPE OSHA regulations (29 CFR 1910.132)

The PPE Hazard Assessment form included with this bulletin can be used to assist you in evaluating when PPE may be required by identifying activities that may create hazards for your employees. The activities are grouped according to parts of the body that may require PPE. You can make copies, modify and customize this assessment to fit the specific needs of your particular workplace, or develop your own form that is appropriate to your work environment.

This tool can also serve as written certification that you have completed a hazard assessment as required by the OSHA regulations (29 CFR 1910.132).

Particular attention should be paid to job requirements that may have important consequences for the PPE selected because some types of hazards require multiple PPE solutions. For example, working with chlorine may require respiratory, eye and hand protection because chlorine irritates the respiratory system, mucous membranes of the eyes, and the skin. It is important to continually review Safety Data Sheets (SDS's) as part of the inspection when evaluating hazardous chemicals, as the SDS will indicate the types of hazards associated with specific materials and will provide guidance on the appropriate PPE.

PPE Selection

All PPE clothing and equipment should be of safe design and construction and should be maintained in a clean and reliable fashion. Employers should take the fit and comfort of PPE into consideration when selecting appropriate items for their workplace. PPE that fits well and is comfortable to wear will encourage employee use. Most protective devices are available in multiple sizes and care should be taken to select the proper size for each employee. If PPE does not fit properly, it can make the difference between being safely covered or dangerously exposed. It may also discourage employee use. If several different types of PPE are worn together, ensure they are compatible with each other.

Training

Employers are required to train each employee who must use PPE on the following:

- When PPE is necessary
- What PPE is necessary
- How to properly put on, take off, adjust and wear the PPE
- The limitations of the PPE
- Proper care, maintenance, useful life and disposal of PPE

Employers should ensure that each employee demonstrates an understanding of the training as well as the ability to properly wear and use PPE before they are allowed to perform work requiring its use. If an employer believes that a previously trained employee is not demonstrating the proper understanding and skill level in the use of PPE, that employee should receive retraining. Other situations which may require additional training or retraining include: changes in the workplace, exposure to new hazards, or changes in the type of PPE that is required.

The employer must document the training of each employee required to use PPE including at a minimum: the name and signature of each employee trained, the date of training, and a clear identification of the topic discussed.

Auditing

As with any program or procedure implemented in an organization, the effectiveness of the PPE program should be monitored by inspection of the equipment and auditing of the procedures. Annual audits are common but it may be advisable to review critical areas more frequently or when new work processes or hazards are identified.

Resources

OSHA - Eye and Face Protection eTool:

https://www.osha.gov/SLTC/etools/eyeandface/ppe/selection.html

OSHA - Personal Protective Equipment Booklet:

https://www.osha.gov/Publications/osha3151.pdf

PPE Hazard Assessment Instructions:

The PPE Hazard Assessment form can be used to assist you in evaluating when personal protective equipment (PPE) may be required by identifying activities that may create hazards for your employees.

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This tool can also serve as written certification that you have completed a hazard assessment as required by OSHA 29 CFR 1910.132.

It is important to continually review Safety Data Sheets (SDSs) as part of the inspection when evaluating hazardous chemicals. The SDSs will indicate the types of hazards associated with specific materials and will provide guidance on the appropriate PPE.

1. Complete the following fields on the form (indicated by *) to certify that a hazard assessment was completed:
   a. Name of your workplace
   b. Address of the workplace where you are doing the hazard assessment
   c. Name of person certifying that a hazard assessment was completed
   d. Date the hazard assessment was completed

2. Complete a walk through survey of each work area. Review the job procedures, job tasks, and PPE currently in use. Read through the list of work activities in the first column and put a check next to the activities performed in that work area or job.

3. Read through the list of hazards in the second column and put a check next to the hazards employees may be exposed to while performing the work activities (ex. chopping wood) or while present in the work area (ex. flying particles).

4. Decide how you are going to control the hazards. Try considering engineering controls, work practices, and/or administrative controls to eliminate or reduce the hazards before resorting to using PPE. If the hazard cannot be eliminated without using PPE, indicate which type(s) of PPE will be required to protect your employee from the hazard.