

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.

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.

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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.

IMPORTANT NOTICE - The information and suggestions presented by Western National Insurance Company in this Technical Bulletin are for your consideration in your loss prevention efforts. They are not intended to be complete or definitive in identifying all hazards associated with your business, preventing workplace accidents, or complying with any safety related, or other, laws or regulations. You are encouraged to alter them to fit the specific hazards of your business and to have your legal counsel review all of your plans and company policies.

PPE Hazard Assessment Certification Form

*Name of workplace:

*Assessment conducted by:

*Workplace address:

*Date of assessment:

Work area(s):

Job/Task(s):

EYES

<p>Work activities, such as:</p> <p>abrasive blasting pouring chopping sanding cutting sawing welding grinding punch press operations hammering spraying battery charging other:</p>	<p>Work-related exposure to:</p> <p>airborne dust flying particles blood splashes hazardous liquid chemicals intense light other:</p>	<p>Can hazard be eliminated without the use of PPE?</p> <p>Yes No</p> <p>If no, use:</p> <p>Safety glasses Side shields Safety goggles Dust-tight goggles Shading/Filter (#) Welding shield other:</p>
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FACES

<p>Work activities, such as:</p> <p>cleaning foundry work cooking welding siphoning mixing painting pouring molten metal dip tank operations grinding battery charging other:</p>	<p>Work-related exposure to:</p> <p>hazardous liquid chemicals extreme heat/cold flying debris potential irritant: other:</p>	<p>Can hazard be eliminated without the use of PPE?</p> <p>Yes No</p> <p>If no, use:</p> <p>Face shield Shading/Filter (#) Welding shield other:</p>
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HEAD

<p>Work activities, such as:</p> <p>building maintenance confined space operations construction walking/working under catwalks walking/working under conveyor belts walking/working under crane loads utility work other:</p>	<p>Work-related exposure to:</p> <p>beams pipes exposed electrical wiring or components falling objects machine parts other:</p>	<p>Can hazard be eliminated without the use of PPE?</p> <p>Yes No</p> <p>If no, use:</p> <p>Protective Helmet Type A (low voltage) Type B (high voltage) Type C Bump cap (not ANSI-approved) Hair net or soft cap other:</p>
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HANDS/ARMS

<p>Work activities, such as:</p> <p>baking material handling cooking sanding grinding sawing welding hammering working with glass using computers using knives dental and health care services cleaning other:</p>	<p>Work-related exposure to:</p> <p>blood irritating chemicals tools or materials that could scrape, bruise, or cut extreme heat/cold other:</p>	<p>Can hazard be eliminated without the use of PPE?</p> <p>Yes No</p> <p>If no, use:</p> <p>Gloves Chemical resistance Liquid/leak resistance Temperature resistance Abrasion/cut resistance Slip resistance Protective sleeves Other:</p>
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FEET/LEGS

<p>Work activities, such as:</p> <ul style="list-style-type: none"> building maintenance construction demolition food processing foundry work logging plumbing trenching use of highly flammable materials welding other: 	<p>Work-related exposure to:</p> <ul style="list-style-type: none"> explosive atmospheres explosives exposed electrical wiring or components heavy equipment slippery surfaces tools other: 	<p>Can hazard be eliminated without the use of PPE?</p> <p>Yes No</p> <p>If no, use:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">Safety shoes or boots</td> <td style="width: 50%;">Metatarsal protection</td> </tr> <tr> <td>Toe protection</td> <td>Heat/cold protection</td> </tr> <tr> <td>Electrical protection</td> <td>Chemical resistance</td> </tr> <tr> <td>Puncture resistance</td> <td></td> </tr> <tr> <td>Anti-slip soles</td> <td></td> </tr> <tr> <td>Leggings or chaps</td> <td></td> </tr> <tr> <td>Foot-Leg guards</td> <td></td> </tr> <tr> <td>Other:</td> <td></td> </tr> </table>	Safety shoes or boots	Metatarsal protection	Toe protection	Heat/cold protection	Electrical protection	Chemical resistance	Puncture resistance		Anti-slip soles		Leggings or chaps		Foot-Leg guards		Other:	
Safety shoes or boots	Metatarsal protection																	
Toe protection	Heat/cold protection																	
Electrical protection	Chemical resistance																	
Puncture resistance																		
Anti-slip soles																		
Leggings or chaps																		
Foot-Leg guards																		
Other:																		

BODY/SKIN

<p>Work activities, such as:</p> <ul style="list-style-type: none"> baking or frying battery charging dip tank operations fiberglass installation asbestos abatement irritating chemicals sawing other: 	<p>Work-related exposure to:</p> <ul style="list-style-type: none"> chemical splashes extreme heat/cold sharp or rough edges dust other: 	<p>Can hazard be eliminated without the use of PPE?</p> <p>Yes No</p> <p>If no, use:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">Vest, jacket</td> <td style="width: 50%;">Apron</td> </tr> <tr> <td>Coveralls, body suit</td> <td>Welding leathers</td> </tr> <tr> <td>Raingear</td> <td>Abrasion/cut resistance</td> </tr> <tr> <td></td> <td>Other:</td> </tr> </table>	Vest, jacket	Apron	Coveralls, body suit	Welding leathers	Raingear	Abrasion/cut resistance		Other:
Vest, jacket	Apron									
Coveralls, body suit	Welding leathers									
Raingear	Abrasion/cut resistance									
	Other:									

BODY/WHOLE 1

<p>Work activities, such as:</p> <ul style="list-style-type: none"> building maintenance construction logging utility work road work other: 	<p>Work-related exposure to:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">working from heights of four feet or more (general industry)</td> <td style="width: 50%;">working near traffic</td> </tr> <tr> <td>working from heights of six feet or more (construction)</td> <td>working near heavy equipment</td> </tr> <tr> <td>working near water</td> <td>working on excavation</td> </tr> <tr> <td></td> <td>other:</td> </tr> </table>	working from heights of four feet or more (general industry)	working near traffic	working from heights of six feet or more (construction)	working near heavy equipment	working near water	working on excavation		other:	<p>Can hazard be eliminated without the use of PPE?</p> <p>Yes No</p> <p>If no, use:</p> <p>Fall Arrest/Restraint: Type:</p> <p>Personal Floatation Device: Type:</p> <p>High Visibility Vest (ANSI Class II)</p> <p>Other:</p> <p>*(See Footnote 1)</p>
working from heights of four feet or more (general industry)	working near traffic									
working from heights of six feet or more (construction)	working near heavy equipment									
working near water	working on excavation									
	other:									

LUNGS/RESPIRATORY 1

<p>Work activities, such as:</p> <ul style="list-style-type: none"> cleaning mixing painting spraying fiberglass installation asbestos abatement compressed air or gas operations other: 	<p>Work-related exposure to:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">pouring <td style="width: 50%;">sawing</td> </td></tr> </table> <p>irritating dust or particulate</p> <p>irritating or toxic gas/vapor</p> <p>other:</p>	pouring <td style="width: 50%;">sawing</td>	sawing	<p>Can hazard be eliminated without the use of PPE?</p> <p>Yes No</p> <p>If no:</p> <p>Refer to Respiratory Protection standard (29 CFR 1910.134) for more information and guidance</p> <p>*(See Footnote 1)</p>
pouring <td style="width: 50%;">sawing</td>	sawing			

EARS/HEARING 1

<p>Work activities, such as:</p> <ul style="list-style-type: none"> grinding machining sawing sanding pneumatic equipment punch or brake presses use of conveyors other: 	<p>Work-related exposure to:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">generator</td> <td style="width: 50%;">loud noises</td> </tr> <tr> <td>loud work environment</td> <td></td> </tr> <tr> <td>noisy machines/tools</td> <td></td> </tr> <tr> <td>motors</td> <td></td> </tr> <tr> <td>punch or brake presses</td> <td></td> </tr> <tr> <td>routers</td> <td></td> </tr> <tr> <td>ventilation fans</td> <td></td> </tr> <tr> <td>other:</td> <td></td> </tr> </table>	generator	loud noises	loud work environment		noisy machines/tools		motors		punch or brake presses		routers		ventilation fans		other:		<p>Can hazard be eliminated without the use of PPE?</p> <p>Yes No</p> <p>If no:</p> <p>Refer to Occupational Noise Exposure standard (29 CFR 1910.95) for more information and guidance</p> <p>*(See Footnote 1)</p>
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other:																		

(1) NOTE: You should consider all hazards when you conduct your hazard assessment. However, there are hazards requiring PPE (such as respiratory, noise, and fall hazards), that have specific requirements which may not be covered in this bulletin. Please refer to the OSHA regulations and/or consult your Loss Control Consultant or other safety professional for more information and assistance.