CalOSHA Adopts Changes to Personal Protective Equipment Standard

As of April 13, 2011 revisions to Title 8 safety orders regarding personal protective equipment (PPE) are in effect. After a public hearing, the revisions were adopted by the Cal/OSH Standards Board, and are now in the California Code of Regulations.

The revision includes the following requirements:
- Employers must assess their workplace and determine if there are hazards that would require PPE.
- If there are, or are likely to be, such hazards, the employer must select PPE that will protect affected employees.
- Employers must communicate selection decisions to employees and make sure that the PPE fits each employee properly.
- Employers must verify in writing that the hazard assessment has been performed.
- Employers must remove defective or damaged equipment.
- Employers must provide training to each employee required to use PPE including:
  - When PPE is necessary
  - Which PPE is required, proper use of PPE
  - Limitations and care/maintenance.

What Must Employers Do?
1. Identify the tasks employees perform and, for those where there are or likely to be hazards, perform a Job Hazard Analysis (JHA) to identify PPE necessary to protect employees from the identified hazards.
2. Select, and have each affected employee use, the types of PPE that will protect the affected employee from the hazards identified in the JHA.
3. Communicate selection decisions to each affected employee.
4. Select PPE that properly fits each affected employee.
5. Verify that the required workplace hazard assessment has been performed through a written certification (i.e. a written PPE Program) that identifies the following:
   - Workplace evaluated
   - The person certifying that the evaluation has been performed
   - The date(s) of the hazard assessment
   - Identify the document as a certification of the hazard assessment
6. Provide training to each employee who is required by the written PPE Program to use PPE. Each such employee shall be trained to know at least the following:
   - When PPE is necessary
   - What PPE is required
   - How to properly don, doff, adjust, and wear PPE
   - The limitations of the PPE
   - The proper care, maintenance, useful life and disposal of the PPE

The full text of the changes is attached.

For Assistance in Performing the Required JHA’s, Identifying and Selecting Appropriate PPE, Employee Training or Developing a Written PPE Program, Please Contact:
David Patzer at losscontrol@sbcglobal.net or 707.373.9709
Amend Section 3380 to read:

§3380. Personal Protective Devices.

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(f) Hazard assessment and equipment selection.

(1) The employer shall assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE). If such hazards are present, or likely to be present, the employer shall:

(A) Select, and have each affected employee use, the types of PPE that will protect the affected employee from the hazards identified in the hazard assessment;

(B) Communicate selection decisions to each affected employee; and,

(C) Select PPE that properly fits each affected employee.

NOTE: Non-mandatory Appendix A contains an example of procedures that would comply with the requirement for a hazard assessment.

(2) The employer shall verify that the required workplace hazard assessment has been performed through a written certification that identifies the workplace evaluated; the person certifying that the evaluation has been performed; the date(s) of the hazard assessment; and, which identifies the document as a certification of hazard assessment.

(3) Defective and damaged equipment. Defective or damaged personal protective equipment shall not be used.

(4) Training. The employer shall provide training to each employee who is required by this section to use PPE. Each such employee shall be trained to know at least the following:

(A) When PPE is necessary;

(B) What PPE is necessary;

(C) How to properly don, doff, adjust, and wear PPE;

(D) The limitations of the PPE; and,

(E) The proper care, maintenance, useful life and disposal of the PPE.
(5) Each affected employee shall demonstrate an understanding of the training specified in subsection (f)(4) of this section, and the ability to use PPE properly, before being allowed to perform work requiring the use of PPE.

(6) When the employer has reason to believe that any affected employee who has already been trained does not have the understanding and skill required by subsection (f)(5) of this section, the employer shall retrain each such employee. Circumstances where retraining is required include, but are not limited to, situations where:

(A) Changes in the workplace render previous training obsolete; or

(B) Changes in the types of PPE to be used render previous training obsolete; or

(C) Inadequacies in an affected employee's knowledge or use of assigned PPE indicate that the employee has not retained the requisite understanding or skill.

(7) The employer shall verify that each affected employee has received and understood the required training through a written certification that contains the name of each employee trained, the date(s) of training, and that identifies the subject of the certification.

(8) Subsections (f)(1) and (2) and (f)(4) through (7) of this section apply only to Sections 3381, 3382, 3384 and 3385 of these Orders. Subsections (f)(1) and (2) and (f)(4) through (7) of this section do not apply to Section 5144 of these Orders and Section 2940.6 of the High Voltage Electrical Safety Orders. Subsection (f) does not apply to workplace operations regulated by the Construction Safety Orders or the Mine Safety Orders.

Amend Article 10 to add a new Appendix A to read as follows:

Non-Mandatory Appendix A

This Appendix is intended to provide compliance assistance for employers and employees in implementing requirements for a hazard assessment and the selection of personal protective equipment.

1. Controlling hazards. PPE devices alone should not be relied on to provide protection against hazards, but should be used in conjunction with guards, engineering controls, and sound manufacturing practices.

2. Assessment and selection. It is necessary to consider certain general guidelines for assessing the foot, head, eye and face, and hand hazard situations that exist in an occupational or educational operation or process, and to match the protective devices to the particular hazard. It should be the responsibility of the safety officer to exercise common sense and appropriate expertise to accomplish these tasks.

3. Assessment guidelines. In order to assess the need for PPE the following steps should be taken:

a. Survey. Conduct a walk-through survey of the areas in question. The purpose of the survey is to identify sources of hazards to workers and co-workers. Consideration should be given to the basic hazard categories:

   (a) Impact
   (b) Penetration
   (c) Compression (roll-over)
   (d) Chemical
   (e) Heat
   (f) Harmful dust
   (g) Light (optical) radiation
b. Sources. During the walk-through survey the safety officer should observe:

(a) sources of motion; i.e., machinery or processes where any movement of tools, machine elements or particles could exist, or movement of personnel that could result in collision with stationary objects;

(b) sources of high temperatures that could result in burns, eye injury or ignition of protective equipment, etc.;

(c) types of chemical exposures;

(d) sources of harmful dust;

(e) sources of light radiation, i.e., welding, brazing, cutting, furnaces, heat treating, high intensity lights, etc.;

(f) sources of falling objects or potential for dropping objects;

(g) sources of sharp objects which might pierce the feet or cut the hands;

(h) sources of rolling or pinching objects which could crush the feet;

(i) layout of workplace and location of co-workers; and

(j) any electrical hazards. In addition, injury/accident data should be reviewed to help identify problem areas.

c. Organize data. Following the walk-through survey, it is necessary to organize the data and information for use in the assessment of hazards. The objective is to prepare for an analysis of the hazards in the environment to enable proper selection of protective equipment.

d. Analyze data. Having gathered and organized data on a workplace, an estimate of the potential for injuries should be made. Each of the basic hazards (subsection 3.a.) should be reviewed and a determination made as to the type, level of risk, and seriousness of potential injury from each of the hazards found in the area. The possibility of exposure to several hazards simultaneously should be considered.

4. Selection guidelines. After completion of the procedures in subsection 3, the general procedure for selection of protective equipment is to:
(a) Become familiar with the potential hazards and the type of protective equipment that is available, and what it can do; i.e., splash protection, impact protection, etc.;

(b) compare the hazards associated with the environment; i.e., impact velocities, masses, projectile shape, radiation intensities, with the capabilities of the available protective equipment;

(c) select the protective equipment which ensures a level of protection greater than the minimum required to protect employees from the hazards; and

(d) fit the user with the protective device and give instructions on care and use of the PPE. It is very important that end users be made aware of all warning labels for and limitations of their PPE.

5. Fitting the device. Careful consideration must be given to comfort and fit. PPE that fits poorly will not afford the necessary protection. Continued wearing of the device is more likely if it fits the wearer comfortably. Protective devices are generally available in a variety of sizes. Care should be taken to ensure that the right size is selected.

6. Devices with adjustable features. Adjustments should be made on an individual basis for a comfortable fit that will maintain the protective device in the proper position. Particular care should be taken in fitting devices for eye protection against dust and chemical splash to ensure that the devices are sealed to the face. In addition, proper fitting of helmets is important to ensure that it will not fall off during work operations. In some cases a chin strap may be necessary to keep the helmet on an employee's head. (Chin straps should break at a reasonably low force, however, so as to prevent a strangulation hazard). Where manufacturer's instructions are available, they should be followed carefully.

7. Reassessment of hazards. It is the responsibility of the safety officer to reassess the workplace hazard situation as necessary, by identifying and evaluating new equipment and processes, reviewing accident records, and reevaluating the suitability of previously selected PPE.

8. Selection chart guidelines for eye and face protection. Some occupations (not a complete list) for which eye protection should be routinely considered are: carpenters, electricians, machinists, mechanics and repairers, millwrights, plumbers and pipe fitters, sheet metal workers and tinsmiths, assemblers, sanders, grinding machine operators, lathe and milling machine operators, sawyers, welders, laborers, chemical process operators and handlers, and timber cutting and logging workers. The following chart provides general guidance for the proper selection of eye and face protection to protect against hazards associated with the listed hazard "source" operations.
## Eye and Face Protection Selection Chart

<table>
<thead>
<tr>
<th>Source</th>
<th>Assessment of Hazard</th>
<th>Protection</th>
</tr>
</thead>
<tbody>
<tr>
<td>IMPACT -- Chipping, grinding machining, masonry work, woodworking, sawing, drilling, chiseling, powered fastening, riveting, and sanding</td>
<td>Flying fragments, objects, large chips, particles sand, dirt, etc</td>
<td>Spectacles with side protection, goggles, face shields. See notes (1), (3), (5), (6), (10). For severe exposure, use faceshield.</td>
</tr>
<tr>
<td>HEAT -- Furnace operations, pouring, casting, hot dipping, and welding</td>
<td>Hot sparks</td>
<td>Faceshields, goggles, spectacles with side protection. For severe exposure use faceshield. See notes (1), (2), (3).</td>
</tr>
<tr>
<td></td>
<td>Splash from molten metals</td>
<td>Faceshields worn over goggles. See notes (1), (2), (3).</td>
</tr>
<tr>
<td></td>
<td>High temperature exposure</td>
<td>Screen face shields, reflective face shields. See notes (1), (2), (3).</td>
</tr>
<tr>
<td>CHEMICALS -- Acid and chemicals handling, degreasing plating</td>
<td>Splash</td>
<td>Goggles, eyecup and cover types. For severe exposure, use face shield. See notes (3), (11).</td>
</tr>
<tr>
<td></td>
<td>Irritating mists</td>
<td>Special-purpose goggles.</td>
</tr>
<tr>
<td>DUST -- Woodworking, buffing, general dusty conditions</td>
<td>Nuisance dust</td>
<td>Goggles, eyecup and cover types. See note (8).</td>
</tr>
<tr>
<td>LIGHT and/or RADIATION --</td>
<td></td>
<td>Welding helmets or welding shields. Typical shades: 10-14. See notes (9), (12)</td>
</tr>
<tr>
<td>Welding: Electric arc</td>
<td>Optical radiation</td>
<td>Welding goggles or welding face shield. Typical shades: gas welding 4-8, cutting 3-6, brazing 3-4. See note (9)</td>
</tr>
<tr>
<td>Welding: Gas</td>
<td>Optical radiation</td>
<td>Spectacles or welding face-shield. Typical shades, 1.5-3. See notes (3), (9)</td>
</tr>
<tr>
<td>Cutting, Torch brazing, Torch soldering</td>
<td>Optical radiation</td>
<td>Spectacles with shaded or special-purpose lenses, as suitable. See notes (9), (10).</td>
</tr>
<tr>
<td>Glare</td>
<td>Poor vision</td>
<td></td>
</tr>
</tbody>
</table>
Notes to Eye and Face Protection Selection Chart:

(1) Care should be taken to recognize the possibility of multiple and simultaneous exposure to a variety of hazards. Adequate protection against the highest level of each of the hazards should be provided. Protective devices do not provide unlimited protection.

(2) Operations involving heat may also involve light radiation. As required by the standard, protection from both hazards must be provided.

(3) Faceshields should only be worn over primary eye protection (spectacles or goggles).

(4) As required by the standard, filter lenses must meet the requirements for shade designations in Section 3382. Tinted and shaded lenses are not filter lenses unless they are marked or identified as such.

(5) As required by the standard, persons whose vision requires the use of prescription (Rx) lenses must wear either protective devices fitted with prescription (Rx) lenses or protective devices designed to be worn over regular prescription (Rx) eyewear.

(6) Wearers of contact lenses must also wear appropriate eye and face protection devices in a hazardous environment. It should be recognized that dusty and/or chemical environments may represent an additional hazard to contact lens wearers.

(7) Caution should be exercised in the use of metal frame protective devices in electrical hazard areas.

(8) Atmospheric conditions and the restricted ventilation of the protector can cause lenses to fog. Frequent cleansing may be necessary.

(9) Welding helmets or faceshields should be used only over primary eye protection (spectacles or goggles).

(10) Non-sideshield spectacles are available for frontal protection only, but are not acceptable eye protection for the sources and operations listed for "impact."

(11) Ventilation should be adequate, but well protected from splash entry. Eye and face protection should be designed and used so that it provides both adequate ventilation and protects the wearer from splash entry.
(12) Protection from light radiation is directly related to filter lens density. See note (4). Select the darkest shade that allows task performance.

9. Selection guidelines for head protection. All head protection (helmets) is designed to provide protection from impact and penetration hazards caused by falling objects. Head protection is also available which provides protection from electric shock and burn. When selecting head protection, knowledge of potential electrical hazards is important. Class A helmets, in addition to impact and penetration resistance, provide electrical protection from low-voltage conductors (they are proof tested to 2,200 volts). Class B helmets, in addition to impact and penetration resistance, provide electrical protection from high-voltage conductors (they are proof tested to 20,000 volts). Class C helmets provide impact and penetration resistance (they are usually made of aluminum which conducts electricity), and should not be used around electrical hazards.

Where falling object hazards are present, helmets must be worn. Some examples include: working below other workers who are using tools and materials which could fall; working around or under conveyor belts which are carrying parts or materials; working below machinery or processes which might cause material or objects to fall; and working on exposed energized conductors.

Some examples of occupations for which head protection should be routinely considered are: carpenters, electricians, linemen, mechanics and repairers, plumbers and pipe fitters, assemblers, packers, wrappers, sawyers, welders, laborers, freight handlers, timber cutting and logging, stock handlers, and warehouse laborers.

10. Selection guidelines for foot protection. Safety shoes and boots which meet either the ANSI Z41-1999 or the American Society for Testing and Materials (ASTM) F2412-05 and ASTM F2413-5 Standards provide both impact and compression protection. Where necessary, safety shoes can be obtained which provide puncture protection. In some work situations, metatarsal protection should be provided, and in other special situations electrical conductive or insulating safety shoes would be appropriate.

Safety shoes or boots with impact protection would be required for carrying or handling materials such as packages, objects, parts or heavy tools, which could be dropped; and, for other activities where objects might fall onto the feet. Safety shoes or boots with compression protection would be required for work activities involving skid trucks (manual material handling carts) around bulk rolls (such as paper rolls) and around heavy pipes, all of which could potentially roll over an employee's feet. Safety shoes or boots with puncture protection would be required where sharp objects such as nails, wire, tacks, screws, large staples, scrap metal etc., could be stepped on by employees causing a foot injury.
Some occupations (not a complete list) for which foot protection should be routinely considered are: shipping and receiving clerks, stock clerks, carpenters, electricians, machinists, mechanics and repairers, plumbers and pipe fitters, structural metal workers, assemblers, drywall installers and lathers, packers, wrappers, craters, punch and stamping press operators, sawyers, welders, laborers, freight handlers, gardeners and groundskeepers, timber cutting and logging workers, stock handlers and warehouse laborers.

11. Selection guidelines for hand protection. Gloves are often relied upon to prevent cuts, abrasions, burns, and skin contact with chemicals that are capable of causing local or systemic effects following dermal exposure. The Division of Occupational Safety and Health is unaware of any gloves that provide protection against all potential hand hazards, and commonly available glove materials provide only limited protection against many chemicals. Therefore, it is important to select the most appropriate glove for a particular application and to determine how long it can be worn, and whether it can be reused.

It is also important to know the performance characteristics of gloves relative to the specific hazard anticipated; e.g., chemical hazards, cut hazards, flame hazards, etc. These performance characteristics should be assessed by using standard test procedures. Before purchasing gloves, the employer should request documentation from the manufacturer that the gloves meet the appropriate test standard(s) for the hazard(s) anticipated. Other factors to be considered for glove selection in general include:

(A) As long as the performance characteristics are acceptable, in certain circumstances, it may be more cost effective to regularly change cheaper gloves than to reuse more expensive types; and,

(B) The work activities of the employee should be studied to determine the degree of dexterity required, the duration, frequency, and degree of exposure of the hazard, and the physical stresses that will be applied.

With respect to selection of gloves for protection against chemical hazards:

(A) The toxic properties of the chemical(s) must be determined; in particular, the ability of the chemical to cause local effects on the skin and/or to pass through the skin and cause systemic effects;

(B) Generally, any "chemical resistant" glove can be used for dry powders;

(C) For mixtures and formulated products (unless specific test data are available), a glove should be selected on the basis of the chemical component with the shortest breakthrough time, since it
is possible for solvents to carry active ingredients through polymeric materials; and,

(D) Employees must be able to remove the gloves in such a manner as to prevent skin contamination.

12. Cleaning and maintenance. It is important that all PPE be kept clean and properly maintained. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision.

For the purposes of compliance with Section 3380(a) and (d), PPE should be inspected, cleaned, and maintained at regular intervals so that the PPE provides the requisite protection.

It is also important to ensure that contaminated PPE which cannot be decontaminated is disposed of in a manner that protects employees from exposure to hazards.