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## Personal Protective Equipment – Not So Easy

Personal protective equipment (PPE) is deployed to protect employees from physical and health hazards when engineering controls or other measures are not feasible. PPE includes a broad spectrum of equipment including but not limited to respirators, safety glasses, hard hats, safety shoes, gloves, RF suits, arc flash clothing, wildfire protective clothing, ballistic gear and high visibility vests. Requirements for the selection, use and maintenance of PPE are found in numerous OSHA regulations and consensus standards. With respect to OSHA alone, there are six broadly worded performance based general industry PPE specific standards that dictate PPE use and mandate preparation of written hazard assessments. In addition more than eighty other OSHA standards for general industry and construction contain various PPE requirements.

In looking at the OSHA and other standards in total, effective and compliant management of PPE encompasses just five principal elements:

- A written hazard assessment process is the key ingredient in the proper selection of PPE. It is imperative that the hazards and the performance characteristics of the PPE be well understood to ensure a match between the hazard(s) and the gear.
- Employee training in the use and care of the PPE is a must. It is not necessarily intuitive and for PPE to work as intended, it has to be donned correctly, used when conditions warrant and taken care of by the user so it works when needed.
- Scheduled PPE inspection and maintenance go hand in hand. This entails thorough documented inspections on a prescribed schedule and procedures for taking damaged or worn equipment out of service for repair or replacement as appropriate.
- The employer provides the PPE at no cost to the employee (minor exception for some footwear). Similarly, employee-provided PPE is not allowed.
- Fit is the deciding factor at the individual level. PPE has to fit the person to which it is being assigned. Fit is an explicit OSHA requirement. Respirators must fit the wearer's face, protective clothing has to fit body size and limb length, gloves have to fit the wearer's hands, harnesses can't be too small or too big, etc.

While in the beginning stages, we are working with vendors to develop an easy-to-use CBS catalog of PPE vetted for use for specific purposes. For more information, or help, please contact David Templeman at [david.templeman@cbs.com](mailto:david.templeman@cbs.com).

### Respirator Evaluation and Fit Testing

OSHA Standard 1910.134 requires that a medical evaluation be given to all employees who are required to wear a respirator as part of their job. We have contracted with the 3M Online Respirator Medical Evaluation System to allow employees to easily complete the medical questionnaire.

Employees will be asked questions about their medical history and current health problems. Based on information provided, most people will know at the end of the evaluation if they are medically cleared. In some cases the doctor may need additional information. In this case the doctor will notify you in writing within two (2) business days. No employee health information is shared with us.

In addition to the medical evaluation, OSHA requires that employers conduct fit testing to ensure that the respirator correctly fits the wearer. We have the capability internally to perform fit testing on elastomeric respirators using a Quantifit® respirator fit test device. Please contact [David Templeman](#) if you require fit testing.