



CITY OF BURLINGTON

**PERSONAL PROTECTIVE EQUIPMENT PROGRAM
AND HAZARD ASSESSMENT**

FOR THE

CITY OF BURLINGTON

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**ADOPTED BY THE
CITY OF BURLINGTON
CENTRAL SAFETY COMMITTEE
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PERSONAL PROTECTIVE EQUIPMENT HAZARD ASSESSMENT

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CITY OF BURLINGTON PPE HAZARD ASSESSMENT

I. PURPOSE

It is the intention of the City of Burlington to comply with all Occupational Safety and Health Administration (OSHA) regulations and to provide a hazard free environment to our employees. Any employee encountering hazardous conditions must be protected against potential hazards. In accordance with regulations outlined by OSHA in 29 CFR 1910.132 -.140 (Subpart I), the City of Burlington has developed a written Personal Protective Equipment (PPE) program to document and specify all information relative to our PPE needs.

II. SCOPE AND AUTHORIZATION

The purpose of this document is to ensure that any hazard that could cause harm or serious injury to an employee has been identified, that appropriate PPE has been selected and that information concerning this information is transmitted to all affected persons. The Director of Safety is the program coordinator, acting as the representative of the City of Burlington Central Safety Committee who has overall responsibility for the program. The Director of Safety will designate appropriate personnel to assist in training employees and monitoring their use of PPE. This written plan is kept in the City of Burlington Human Resources Department. The Director of Safety will review and update the program as necessary. Copies of this program shall be kept in the **locations listed on Appendix D.**

The purpose of protective clothing and equipment (PPE) is to shield or isolate individuals from chemical, physical, biological, or other hazards that may be present in the workplace. (See separate documents for respiratory protection and hearing conservation programs.) Establishing an overall written PPE program detailing how employees use PPE makes it easier to ensure that they use PPE properly in the workplace and documents the City of Burlington's PPE efforts. The City of Burlington's PPE program covers:

- Purpose
- Hazard assessment
- PPE selection
- Employee training
- Cleaning and maintenance of PPE
- PPE specific information

If after reading this program, you find that improvements can be made, please contact the Director of Safety. The City of Burlington encourages all suggestions because we are committed to the success of our PPE Program. The City of Burlington is striving for a clear understanding of all safety regulations, safe behavior and involvement in all safety programs from every level of the city.

III. ELEMENTS OF THE PPE PROGRAM

The basic element of any PPE program is an in depth evaluation of the equipment needed to protect against the hazards in the workplace. This is the initial hazard assessment for which written documentation is required. Two basic objectives of any PPE program should be to protect the wearer from incorrect use and/or

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malfunction of PPE. The purpose of this PPE Program is to document the hazard assessment, protective measures in place and PPE in use for city employees. PPE devices are not to be relied on as the only means to provide protection against hazards, but are used in conjunction with guards, engineering controls and sound operational practices. If possible, hazards will be abated first through engineering controls, with PPE to provide protection against hazards that cannot reasonably be abated otherwise.

IV. PPE HAZARD ASSESSMENT

In order to assess the need for PPE the following steps have been taken:

The Director of Safety and/or designee (identified in Appendix A of this program) have identified job classifications where exposures occur or could occur. The Director of Safety or designee examined the following records to identify and rank jobs according to exposure hazards:

- Injury/illness records
- First aid logs

The Director of Safety and/or designee conducted a walkthrough survey of workplace areas where hazards exist or may exist to identify sources of hazards to employees. The following basic hazard categories were considered:

- Impact
- Heat
- Penetration
- Harmful dust
- Compression (roll over)
- Light (optical) radiation
- Chemical

During the walk through survey, the Director of Safety and/or designee observed and recorded hazards along with PPE currently in use (type and purpose). The results of this survey are included in Appendix A and B of this program.

Following the walk through survey, the Director of Safety and/or designee organized the data and information for use in the assessment of hazards to analyze the hazards and enable proper selection of protective equipment. An estimate of the potential for injuries has now been made. Each of the basic hazards have been reviewed and a determination has been made as to the frequency, type, level of risk and seriousness of potential injury from each of the hazards found. The existence of any situations where multiple exposures occur or could occur has been considered.

The Director of Safety and/or designee documented the hazard assessment via 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 that the document as a certification of the hazard assessment.

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V. SELECTION GUIDELINES

Once hazards have been identified and evaluated through the hazard assessment, the general procedure for selecting protective equipment is to:

- Become familiar with the potential hazards and the type of PPE that are available and what they can do.
- Compare types of equipment to the hazards associated with the environment.
- Select the PPE that ensures a level of protection greater than the minimum required to protect employees from the hazards.
- Fit the user with proper, comfortable, well fitting protection and instruct employees on care and use of the PPE. It is very important that the users are aware of all warning labels for and limitations of their PPE. (See the Employee Training guidelines outlined in the next section of this program for a more detailed description of training procedures.)

It is the responsibility of the Director of Safety and/or designee to reassess the workplace hazard situation as necessary, to identify and evaluate new equipment and processes, to review accident records and reevaluate the suitability of previously selected PPE. This reassessment will take place as needed, but at least annually.

Elements considered in the reassessment include:

- Adequacy of PPE program
- Accidents and illness experience
- Levels of exposure (this implies appropriate exposure monitoring)
- Adequacy of equipment selection
- Number of person hours that workers wear various protective ensembles
- Adequacy of training/fitting of PPE
- Program costs
- The adequacy of program records
- Recommendation for program improvement and modification
- Coordination with overall safety and health program

VI. EMPLOYEE TRAINING

The Director of Safety and/or designee provides training for each employee who is required to use personal protective equipment. Each employee shall be trained to know at least the following:

- When PPE is necessary
- What PPE is necessary
- How to properly don, doff, adjust and wear PPE
- Limitations of PPE
- The proper care, maintenance, useful life and disposal of assigned PPE

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Employees must demonstrate an understanding of the training and the ability to use the PPE properly before they are allowed to perform work requiring the use of the equipment. Employees are prohibited from performing work without donning appropriate PPE to protect themselves from the hazards they will encounter in the course of their work.

If the Director of Safety, Supervisor or designee has reason to believe an employee does not have the understanding or skills required, the employee must be retrained. Since an employee's Supervisor is in the best position to observe any problems with PPE use by individual employees, the Director of Safety or designee will seek this person's input when making this determination. Circumstances where retraining may be required include changes in the workplace and/or job assignment or changes in the types of PPE to be used which would render previous training obsolete. Also, retraining is required when there is evidence of inadequacies in an affected employee's knowledge or use of the assigned PPE, which indicates that the employee has not retained the requisite understanding or skill. The Director of Safety and/or designee certify in writing that each employee has received and understands the PPE training. Certifications are included in Appendix C of this program.

VII. CLEANING AND MAINTENANCE

It is important that all PPE be kept clean and properly maintained by the employee to whom it is assigned. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision. PPE is to be inspected, cleaned and maintained by employees at regular intervals as part of their normal job duties so that the PPE provides the requisite protection. Supervisors are responsible for ensuring compliance with cleaning responsibilities by employees. If a piece of PPE is in need of repair or replacement, it is the responsibility of the employee to bring it to the immediate attention of his or her Supervisor or the Director of Safety. It is against safety regulations to use PPE that is in disrepair or not able to perform its intended function. Contaminated PPE that cannot be decontaminated is disposed of in a manner that protects employees from exposure to hazards.

VIII. PPE SPECIFIC INFORMATION

A. Eye and Face Protection

It is the policy of the City of Burlington that as a condition of employment, all regular full time, part time and temporary employees working in designated work areas and/or job assignments are required to wear ANSI approved eye and face protection to help prevent eye and face injuries, including those resulting from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors or light radiation, for example. All employees are required to wear eye and face protection while performing duties or working in areas that have been designated as requiring eye protection.

While conducting the following assignments or working in the following

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designated work areas, all employees are required to wear the following eye and face protection:

See Appendix B for site specific/person specific PPE.

Employees from temporary work agencies and other employers are required to wear the specified eye/face protection if assigned to the above referenced duties or assigned to work in the designated areas.

All Supervisor's are responsible for ensuring employees under their charge are in compliance with this policy.

All employees who work in designated work areas and/or job assignments are responsible for wearing the selected eye/face protection, provided by the City of Burlington, to comply with this policy. Failure to comply will result in disciplinary action outlined in this program.

All employees required to wear eye/face PPE must routinely inspect and properly care for such PPE. The City of Burlington has a separate policy for Prescription Eyewear allowance.

B. Foot Protection

It is the policy of the City of Burlington that as a condition of employment, all regular full time, part time and temporary employees working in designated work areas and/or job assignments are required to wear safety shoes to help prevent foot injuries, ankle injuries, slips and falls.

Employees working in the following designated areas and/or job assignments are required to wear ANSI-approved safety shoes or safety shoes that have been demonstrated to be equally effective:

See Appendix B for site specific/person specific PPE.

Employees from temporary work agencies and/or other employers are required to wear safety shoes if assigned to perform the above referenced duties or work in the designated areas. It is the responsibility of the agency and/or other employer to ensure the employee reports to his/her temporary assignment for the City of Burlington wearing approved safety shoes.

Those employees who work in non-designated areas and vendors or visitors will be allowed to walk through the designated work areas without safety shoes as long as they remain in outlined aisles or walkways.

Members of the Emergency Response Team are required to wear safety footwear when responding to fire emergency situations. All Supervisors' are responsible for ensuring that all employees are in compliance with this policy.

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All employees who work in designated work areas and/or job assignments are responsible for wearing safety shoes to comply with this policy. Failure to comply will result in disciplinary action outlined in this program. The City of Burlington will contribute a shoe reimbursement equal to an amount of \$100 plus sales tax to use toward the purchase(s) of safety shoes made for all employees covered by this policy. Employees are allowed to purchase safety shoes from outside vendors or the City of Burlington's scheduled shoemobile. If an employee chooses to upgrade to a more expensive shoe, the employee will be responsible for the difference in price. All safety shoes chosen by the employee shall comply with ANSI specifications and be appropriate to the job. The Director of Safety or designee are responsible for the selection of approved vendors.

The respective Supervisor is responsible for informing new employees who are assigned to the designated work areas or job assignments of the safety shoe policy and the procedures for obtaining them. The new employee is responsible for reporting to his/her first day of work wearing approved safety shoes.

C. Hand Protection

It is the policy of the City of Burlington that as a condition of employment, all regular full time, part time and temporary employees working in designated work areas and/or job assignments are required to wear gloves to help prevent hand injuries, including cuts, burns or chemical exposure, for example.

Employees in the following designated work areas and/or job assignments are required to wear protective gloves:

See Appendix B for site specific/person specific PPE.

Employees from temporary work agencies and/or other employers are required to wear protective gloves if assigned to work in the designated work areas or job assignment.

All Supervisors' are responsible for ensuring employees under their charge are in compliance with this policy.

All employees who work in designated work areas and/or above referenced job assignments are responsible for wearing the proper gloves to comply with this policy. Failure to comply will result in disciplinary action outlined in this program.

All employees required to wear protective gloves must evaluate their selection based on the job and routinely inspect for damage their assigned gloves.

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D. Head Protection

It is the policy of the City of Burlington that as a condition of employment, all regular full time, part time and temporary employees working in designated work areas and/or job assignments are required to wear ANSI approved hard hats to help prevent head injuries, including those resulting from falling objects, bumping the head against a fixed object or electrical shock.

Employees working in the following designated areas and/or job assignments are required to wear hard hats:

See Appendix B for site specific/person specific PPE.

Employees from temporary work agencies and/or other employers are required to wear hard hats if assigned to perform the above referenced duties or work in the designated areas.

All Supervisors' are responsible for ensuring employees under their charge are in compliance with this policy.

All employees who work in designated work areas and/or job assignments are responsible for wearing hard hats to comply with this policy. Failure to comply will result in disciplinary action outlined in this program.

All employees required to wear hard hats must routinely inspect and properly care for their hard hats. In addition to routine inspections, hard hats shall be discarded after 5 years.

IX. DISCIPLINARY ACTION

City employees are required to follow all safety rules and regulations. Failure to follow safety regulations may result in disciplinary action for "*Unsatisfactory Performance of Duties*," in accordance with City Ordinance 84-73, Section 2-399.

X. PROGRAM AVAILABILITY

A copy of this program will be made available, upon request, to employees and their representatives. This written program will be available in the City of Burlington's Human Resources Department for review by any interested employee. Copies of this program can be found in the **locations listed on Appendix D**.

XI. AUDITS

The PPE Hazard Assessment will be audited and reviewed at least annually by the Director of Safety or departmental designee.

XII. LIMITATIONS

Information obtained and presented as part of this written program is based on available data at the time this document was prepared. The validity of any resulting conclusions is limited by methodological constraints.

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Therefore, there is no warranty, expressed or implied, that additional or new information and/or additional measures will not be required to ultimately comply with all applicable regulations. Additionally, Occupational Compliance and Safety Specialists, P.C. (OCSS) assumes no responsibility for the validity of subjective interpretations, whether or not implied or indicated, although an attempt is made to qualify such.

APPENDIX A

PPE HAZARD ASSESSMENT

The following PPE Hazard Assessment was conducted on _____.
(date/year)

DEPARTMENT:
EMPLOYEE TITLE:

DATE:
EMPLOYEE:

Based on data gathered during a PPE Hazard Assessment, conducted on the above referenced date, the following hazards have been identified:

TYPE OF HAZARD	SOURCE OF HAZARD
Impact	
Heat	
Chemicals	
Harmful Dusts	
Light Radiation	
Temperature Extremes	
Falling Objects	
Sharp Objects	
Nip Points	
Electrical	

Assessment Conducted By:

APPENDIX B PPE EQUIPMENT SELECTION - CONTINUED

C. HAND PROTECTION -- GLOVES

Based on data gathered during a PPE Hazard Assessment conducted on **(date)**, _____, while working in the following designated areas and/or job assignments is required to wear ANSI-approved hand protection or hand protection that has been demonstrated to be equally effective:

WORK AREA/ASSIGNMENT:	POTENTIAL HAZARD	TYPE OF PROTECTIVE GLOVE

D. HEAD PROTECTION – HARD HATS

Based on data gathered during a PPE Hazard Assessment conducted on **(date)**, _____, while working in the following designated areas and/or job assignments is required to wear ANSI-approved head protection or head protection that has been demonstrated to be equally effective:

WORK AREA/ASSIGNMENT:	POTENTIAL HAZARD	TYPE OF HEAD PROTECTION

