

University of Portland 

Personal Protective Equipment Safety Program

**Prepared by
Environmental Health & Safety
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Purpose

The purpose of this written Personal Protective Equipment (PPE) Program is to document the hazard assessment measures in place, as well as the eye, face, head, foot, hand, and personal fall protection systems in use, in accordance with OSHA 29 CFR 1910 Subpart I.

We at University of Portland believe it is our obligation to provide a hazard-free environment to our employees. Each employee encountering hazardous conditions must be protected against the potential hazards. This plan supplements the standard safety policies of the University of Portland by providing safety standards specifically designed to cover the use of PPE. The purpose of PPE is to shield or isolate individuals from hazards that may be present in the workplace. However, PPE devices are not to be relied on as the only means to provide protection against hazards. Rather, PPE devices are used in conjunction with other feasible control measures and sound work practices. If possible, hazards will be abated first through engineering and administrative controls, with PPE to protect against hazards that cannot reasonably be abated otherwise.

This program is designed to enable the University of Portland and its employees to recognize the hazards on the job and to establish the procedures that must be followed in order to prevent injury, and comply with applicable codes, standards, and regulations. Establishing an overall written PPE Program detailing what PPE employees use in which work areas documents our PPE efforts and makes it easier to ensure that they use PPE properly in the workplace. If, after reading this program, you find that improvements can be made, please contact Environmental Health & Safety at ehs@up.edu. We encourage all suggestions because we are committed to the success of our PPE Program. We strive for clear understanding, safe behavior, and involvement in the program from every level of the University.

Responsibilities

Administrative Responsibilities

The OSHA Safety and Health Standards for the General Industry require that the University of Portland provide PPE, set criteria and practices for this equipment, and mandate training on PPE. These standards also cover hazard assessment and safety systems.

The Environmental Health & Safety Officer is the PPE Program Coordinator, who has overall responsibility for the program. Environmental Health & Safety will designate appropriate supervisors to assist in training each employee and monitoring employee use of PPE. This written program is kept in the Department of Human Resources, Environmental Health & Safety. The Environmental Health & Safety Officer will review and update the program as necessary. Copies of this program may be obtained from The Environmental Health & Safety Officer or the Human Resources EHS website.

University of Portland must assess the workplace and work activities identify health and physical hazards.

Employee Responsibilities

The objective of a safe, accident-free work environment can only be accomplished by the dedicated, concerted effort of every individual involved in the project. Each employee must understand:

- His/her value to the University of Portland
- Complete all required safety training
- Follow safe work procedures
- Correct and/or report safety violations and unsafe conditions
- Know location and operation of safety and emergency equipment

Why does OSHA have standards for Personal Protective Equipment?

The federal Occupational Safety & Health Administration (OSHA) recognizes that accidents are generally complex events often involving a variety of factors. The standards establish that it is the employer's responsibility to initiate and maintain such programs as may be necessary for accident prevention. Additionally, OSHA states that the employer must require employees to use appropriate PPE. The use of PPE is required for all operations where there is exposure to hazardous conditions or where there are specific references in the standards indicating the need for such use.

Hazard Assessment

University of Portland must assess the identifiable hazards associated with work areas, occupations, and tasks for the purpose of eliminating or minimizing these hazards by means of engineering and administrative controls and/or by the means of the use of PPE. In order to assess the need for PPE, the following steps are taken: Environmental Health & Safety and department supervisor, with other appropriate employees including designated support staff and Human Resources staff, identifies job classifications where exposures occur or could occur. Potential records to identify and rank jobs according to exposure hazards include:

- Injury/illness records
- First aid logs

Environmental Health & Safety and department supervisors will evaluate job descriptions and Standard Operating Procedures, and may conduct a walk-through survey of workplace areas to determine where hazards exist to identify sources of hazards to employees. When conducting a survey of the workplace the following basic hazard categories are evaluated:

- Motion or impact
- Extreme temperatures
- Chemical or biological
- Harmful dust
- Light (optical) radiation
- Employee falls and falling/dropped objects
- Sharp objects

- Compressing, rolling, or pinching objects
- Electrical, including static electricity discharge

The site and job task assessment must be documented by identifying the workplace and job task(s) assessed, naming the person conducting the survey, identifying potential hazards, and recording the date of the survey.

Some of the hazards that could be observed include:

- Sources of motion or impact (e.g., 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): This area varies by department but includes laboratories, shops, and technical spaces on campus such as the Maker Space.
- Sources of extreme temperatures that could result in burns, eye injury, ignition of protective equipment, frostbite, etc.: furnace operations, welding, autoclave operations.
- Types of chemical and biological exposures: acid and chemical handling, degreasing, biological agent handling.
- Sources of harmful dust: including but not limited to woodworking, buffing, general industry conditions, and laboratory equipment.
- Sources of light (optical) radiation, e.g., welding, brazing, cutting, furnaces, heat treating, high-intensity lights, etc.: welding, brazing, cutting, furnaces, high-intensity lights, etc.
- Sources of employee fall hazards or the potential for falling or dropping objects: Working from heights, working on or near a roof, and working from a ladder
- Sources of sharp objects that might pierce the feet or cut the hands: tools, knives, nails or other construction equipment
- Sources of compressing, rolling, or pinching objects that could crush the feet: carts, tools, various equipment such as forklifts or pallet jacks.
- Sources of electrical hazards such as electric shock or burns (from electric arcs, blasts, or heat), as well as static electricity

- discharge: (enter your answer)
- Layout of workplace and location of co-workers: varies by department
- Sources of entrapment, engulfment, or insufficient maneuverability

Following a hazard assessment, the data and information is organized and analyzed to enable proper selection of protective equipment. A written PPE assessment for the job duty should be developed. An estimate of the potential for injuries is then made for each hazard.

When necessary the University may request the use of outside safety consultants and companies to evaluate hazards and PPE selection for specific job duties.

PPE Selection Guidelines

The University of Portland will use all feasible engineering and administrative controls to mitigate or minimize the injury and illness from exposure to hazards. Where hazards still exist after application of these controls, PPE is utilized. Adequate protection against the highest level of each of the identified hazards will be provided.

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

1. Become familiar with the potential hazards, the type of PPE that are available, and what they can do.
2. Compare types of PPE to:
 - The hazards,
 - The work conditions,
 - The work environment (including seasonal weather changes),
 - The jobs impacted.
3. Review any PPE performance information from suppliers so that we know if the PPE meets OSHA requirements.
4. Select the PPE that meets selection requirements found in the OSHA regulations and ensures a level of protection equal to or greater than

the minimum required to protect employees from the hazards. Outside consultation, manufacturers' assistance, and other recognized authorities may be consulted if there is any doubt regarding proper selection.

5. Fit the user with proper, comfortable, well-fitting protection and instruct each employee 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.

It is the responsibility of Environmental Health and Safety, in conjunction with department supervisors, to reassess the workplace hazard situation as necessary, to identify and evaluate new equipment and processes, to review injury and illness records, and reevaluate the suitability of previously selected PPE. This reassessment will take place as needed, and when requested by an employee.

Elements that should be considered in the reassessment include:

- Adequacy of PPE Program
- Injury and illness experience
- Levels of exposure (this implies appropriate exposure monitoring)
- Adequacy of equipment selection
- Whether PPE or PPE components have been or will be modified or substituted (modified or substituted parts should be evaluated to determine if they meet OSHA regulations before they are put into use)
- Number of person-hours that workers wear various protective ensembles
- Adequacy of training/fitting of PPE
- PPE costs
- Adequacy of PPE Program records
- Recommendation for PPE Program improvement and modification
- How PPE coordinates with overall safety and health efforts

PPE Provision and Payment

Where PPE is required by OSHA regulations or by University of Portland guidelines, it will be provided to each employee required to use that PPE.

The PPE is provided at no cost to each employee, unless provided by the exceptions listed in the OSHA regulations. The University of Portland will provide all necessary/required PPE unless other arrangements have been agreed upon. The University of Portland will also provide the necessary equipment for cleaning, laundering, and/or disposal of the PPE as needed. The University of Portland will also pay for PPE replacement, except when the employee has lost or intentionally damaged the equipment. If an employee pays for and provides his or her own required PPE, and there is a necessary reason for utilizing the employees PPE rather than using PPE provided by the University, Environmental Health & Safety must determine that that equipment is adequate, maintained, and in sanitary condition. If the employee is permitted to use their own PPE the University is not required to reimburse the employee for the cost of it.

Signs for Designated Personal Protection Required Areas

Some areas may have hazards that threaten the safety of all those who enter the area. These areas must have sign warnings entrants of the need for PPE and/or a warning of the hazards. These signs must be visible at all times when work is in progress and must be promptly removed or covered when the hazard no longer exists. Signs must conform with regulations in the OSHA regulation 1910.0145 “Specifications for Accident Prevention Signs and Tags.”

“Danger” signs will be used only when there is an immediate danger to the lives of employees or others.

“Caution” signs will be used to warn against a potential hazard and to caution against unsafe practices.

Employee Training

The most thorough PPE program will not be effective if employees do not wear PPE, or if they wear the equipment, they do not do so appropriately. The only way to ensure that each of our employees is aware of the purpose of wearing PPE and how the equipment is to be worn is to train each

employee. Simply put, employee training is an important part of the PPE Program and is essential for correct PPE use.

Department supervisors must provide training for each employee who is required to use PPE. Training includes:

- When PPE is necessary
- What PPE is necessary
- How to put on, take off, adjust, and wear assigned PPE;
- Limitations of PPE; and
- The proper care, maintenance, useful life, and disposal of assigned PPE.

In addition, if personal fall protection systems are used (such as personal fall arrest systems, positioning systems, and travel restraint systems), a qualified person must train the employee in:

- The nature of the fall hazards in the work area and how to recognize them;
- The procedures to be followed to minimize those fall hazards;
- The correct procedures for installing, inspecting, operating, maintaining, and disassembling the personal fall protection systems that the employee uses; and
- The correct use of personal fall protection systems and equipment, including, but not limited to, proper hook-up, anchoring, and tie-off techniques, and methods of equipment inspection and storage, as specified by the manufacturer.

Employees utilizing fall protection systems must complete additional training in Fall Protection, provided by Environmental Health & Safety.

Employees are prohibited from performing work without donning appropriate PPE to protect them from the hazards they will encounter in the course of that work.

If a department supervisor or Environmental Health & Safety has reason to believe an employee does not have the understanding or skill required, the University is required to retrain the employee. Circumstances where retraining may be required include:

- Changes in the workplace, which would render previous training obsolete;
- Changes in the types of PPE to be used, which would render previous training obsolete; and
- Inadequacies in an affected employee's knowledge or use of the assigned PPE, which indicates that the employee has not retained the necessary understanding or skill.

Because failure to comply with company policy concerning PPE can result in employee injury or illness, an employee who does not comply with this PPE Program may be subject to discipline.

Cleaning and Maintenance

It is important that all PPE be kept clean and properly maintained by the employee to whom it is assigned. 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 PPE is for general use, the Safety and Health Manager has responsibility for cleaning and maintenance.

Employees may not use PPE that is in disrepair or not able to perform its intended function. If a piece of PPE is in need of repair, adjustment, or replacement, it is the responsibility of the employee to bring it to the immediate attention of his or her supervisor. If the supervisor does not address the PPE in issue, the employee should contact Environmental Health & Safety. The supervisor or Environmental Health & Safety will remove the faulty PPE from service and have it properly discarded, repaired, or adjusted as necessary. The supervisor or Environmental Health & Safety will ensure the employee is loaned proper PPE as necessary if his or her PPE is being serviced or new PPE is being ordered.

PPE-Specific Information

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, it is the policy of the company that as a condition of employment, all regular full-time, part-time, contract, and temporary employees working in designated work areas and/or job assignments are required to wear eye and face protection when there is a possible danger of eye and face injuries due to impact from flying objects, or where there is inherent danger to the eyes and face.

Design Standards: Protective eye and face protection devices should comply with the current edition of ANSI Z87.1 “Practice for Occupational and Educational Eye and Face Protection.”

Designated work areas and/or job assignments are:

- Responsible for wearing eye and/or face protection as required by this policy
- May not alter or remove eye and/or face protection when eye and/or face hazards are present, even though an employee may find it cumbersome
- Must routinely inspect and properly care for their eye and face protection.

Foot Protection

Foot protection should not be used as a substitute for engineering and work practice controls. Protective footwear does not eliminate a hazard. For this reason, we use foot protection in conjunction with these controls to provide for employee safety and health in the workplace. Each affected employee must use protective footwear where there is a danger of foot injuries due to falling or rolling objects, objects piercing the sole, or electrical hazards like static discharge or electric shock.

Therefore, to prevent foot injuries, it is the policy of the University of Portland that as a condition of employment, all regular full-time, part-time, contract, and temporary employees working in designated work areas and/or job assignments are required to wear proper foot protection. Departments may have their own requirements for footwear and foot protection. Purchase of foot protection is done by individual departments and stipends are provided when certain foot protection is required.

Certain work areas, job duties, or job descriptions may require employees to wear a safety toe that meets ANSI standards.

All University of Portland employees who work in or are assigned to designated work areas and/or job assignments:

- Are responsible for wearing foot protection as required by this policy;
- May not alter or remove foot protection when foot hazards are present, even though an employee may find it cumbersome; and
- Must routinely inspect and properly care for their foot protection.

Hand Protection

Hand injuries are common in any workplace. Common hazards to the hands include: mechanical injuries (cuts, punctures, crushing, and scrapes); extreme heat or cold; electrical shock or burns from electric arcs, blasts, or heat; and skin irritation from chemicals or germs. Therefore, it is the policy of the University that as a condition of employment, all regular full-time,

part-time, contract, and temporary employees working in designated work areas and/or job assignments are required to wear proper hand protection.

All our University employees who work in or are assigned to designated work areas and/or job assignments:

- Are responsible for wearing hand protection as required by this policy;
- May not alter or remove hand protection when hand hazards are present, even though an employee may find it cumbersome; and Must routinely inspect and properly care for their hand protection.

Gloves will be worn when employees are handling acids, caustics, solvents, herbicides, and other toxic materials.

Head Protection

To help prevent head injuries, including those resulting from falling objects, bumping the head against a fixed object, or electrical shock, it is the policy of the University that as a condition of employment, all employees must wear head protection when required. Head protection for protection against impact and the penetration of falling or flying objects must meet the current edition of ANSI Z89.1. Helmets for protection against electrical shock and burns will meet the requirements of the current edition of ANSI Z89.2. Protective helmets will bear a manufacturer's label indicating design compliance with the appropriate class requirements.

All University employees who work in or are assigned to designated work areas and/or job assignments:

- Are responsible for wearing head protection as required by this policy;
- May not alter or remove head protection when head hazards are present, even though an employee may find it cumbersome; and
- Must routinely inspect and properly care for their head protection.

Hardhats will be equipped with chinstraps where necessary. Winter hardhat liners will be provided when weather conditions warrant.

Hearing Protection

To help prevent hearing injuries it is the policy of the University that as a condition of employment, all employees must wear hearing protection when required. Hearing protection is designed to protect when there is a possible danger from noise exposures. Employees will be provided with ear protection when working in areas where, despite feasible engineering and administrative controls, noise levels or duration of exposure exceed those shown below when measures on the A- scale of a standard Type II sound level meter at a slow response.

Permissible Noise Exposure	
duration per day, hours	sound level, dBA, slow response
8	90
6	92
4	95

All University employees who work in or are assigned to designated work areas and/or job assignments:

- Are responsible for wearing hearing protection as required by this policy
- May not alter or remove hearing protection when hearing hazards are present
- Must routinely inspect and properly care for their hearing protection

Hardhats will be equipped with chinstraps where necessary. Winter hardhat liners will be provided when weather conditions warrant.

Respiratory Protection

Please see the University of Portland Respiratory Protection Plan for information on respirator regulations. (It is available on the Environmental Health & Safety website or by emailing ehs@up.edu).

Additional Protective Clothing

High visibility apparel: all employees will wear high visibility fluorescent apparel when needed, such as when exposed to vehicular traffic, or when surveying or inspecting issues in low visibility areas.

Seat belts: Seat belts and anchorages will be provided on all motor vehicles. Seat belts and anchorages will meet the requirements of 49 CFR Part 571 (Department of Transportation Federal Motor Vehicle Standards).

Biohazard equipment: Handling biohazard materials, exposures, and work environments

- All employees are required to be trained and educated in dealing with bloodborne pathogens and how to safely respond to exposures. To schedule a bloodborne pathogen training email ehs@up.edu.
- Assume all human blood and body fluids are infectious with HIV, HBV, and other bloodborne pathogens. See the University of Portland Bloodborne Pathogens plan for additional information.

Other Protective Equipment: Other protective equipment, fire and rescue devices, first-aid and medical facilities, seatbelts, and special devices and equipment for protecting personnel from specific hazards not previously addressed in this program will be included as need in site specific Standard Operating Procedures.