PERSONAL PROTECTIVE EQUIPMENT (PPE) POLICY

1. Purpose

The purpose of this policy is:

- To establish minimum personal protective equipment requirements to be followed when performing hazardous or potentially hazardous tasks.
- To comply with applicable Occupational Health and Safety Administration (OSHA) regulations.

2. Scope

The PPE policy applies to all employees whose responsibilities put them at risk of exposure to recognized hazards that require the use of personal protective equipment (PPE). Personal protective equipment is to be used as a barrier between the employee and the hazard(s) when engineering (e.g., ventilation) or administrative controls (e.g., job rotation) are not feasible to provide adequate protection.

This policy applies to:

- All employees of the University, including but not limited to full-time and part-time faculty, staff, and technicians; temporary/seasonal employees; and student employees
- Interns and volunteers
- Contractors, vendors and sub-contractors (these individuals must provide their own PPE)
- Other individuals who are visiting or have business with The New School

3. Responsibilities

3.1 Responsible Individual

The highest-ranking individual serving in a management capacity within each Program, Department, School or Division (e.g., Directors (program or facilities) and School or Divisional Deans) is the *Responsible Individual.* Responsible Individuals have the following responsibilities:

- Approving the Hazard Assessment Form for each area under their responsibility
- Enforcing compliance with the PPE program and taking disciplinary actions in accordance with collective bargaining agreement procedures, if any.
- Informing contractors, vendors or visitors of the need to comply with this policy

3.2 Supervisors are responsible for:

- Identifying hazards and potential hazards by completing the Hazard Assessment Form (Appendix A) for each location they supervise and submitting it to Environmental Health & Safety (EHS), Facilities Management.

- Notifying EHS of changes in the work area(s) and/or its processes/procedures that may introduce new hazards and require different or additional PPE. Such instances will require submission of an updated Hazard Assessment Form.
- Purchasing PPE for employees as needed.
- Communicating hazards, acceptable work practices, and PPE requirements to all employees.
- Monitoring and enforcing compliance with the PPE policy including, but not limited to: inspection, use, proper maintenance, storage, disposal, and replacement of issued PPE.
- Providing specific training to their employees on the types of PPE available for each task; the rationale for the selected PPE (including their limitations); proper fit, use, care and disposal of PPE. EHS is available to assist with training upon request.
- Ensuring engineering and administrative controls that prevent workplace hazards are maintained.

3.3 All Employees are responsible for:

- Complying with the policy: adhering to acceptable work practices; attending training; using, inspecting, properly maintaining, storing, and disposing of PPE.
- Notifying their supervisor of issues pertaining to the PPE such as improper fit, defects, or medical conditions that may affect use of PPE.

3.4 Environmental Health and Safety (EHS), Facilities Management is responsible for:

- Reviewing and selecting appropriate PPE compliant with OSHA regulations based on completed hazard assessments.
- Providing technical assistance with hazard assessment and training upon request by Supervisors.
- Administration of the PPE program including but not limited to: recordkeeping, periodically reviewing effectiveness of the policy, and updating it as needed.

3.5 Labor Relations, Human Resources Department is responsible for:

- Reviewing letters from labor unions or healthcare providers, if any, regarding issues involving the use of PPE.

4. Hazard Assessment

4.1 A written hazard assessment (Appendix A) is required of the employee's workplace to determine hazards and the appropriate PPE. The form must be completed by the Supervisor and submitted to EHS. One completed form can be submitted if it includes all tasks performed by all employees in a given work area. A separate written hazard

assessment is required for unusual tasks that arise and were excluded from the previously submitted hazard assessment.

5. Obtaining PPE

5.1 Supervisors must purchase necessary PPE identified in the hazard assessment form.

6. Training

6.1 Supervisors shall ensure their employees are trained on task-specific PPE including availability, rationale for the selection, proper fitting/use, maintenance/storage, and limitations of the PPE. EHS is available to assist with this training on a request basis.

6.2 Supervisors must submit the Training Certification (Appendix B) to EHS.

7. Retraining

7.1 When the Supervisor has reason to believe that any previously trained employee does not understand or have the skill required to use PPE, the Supervisor must retrain the employee. These circumstances include, but are not limited to:

- Changes in the workplace that make previous training obsolete.
- Change in the types of PPE that make previous training obsolete.
- Inadequacies in an affected employee's knowledge or use of assigned PPE indicating that the employee has not been trained properly.

8. Using PPE

8.1 Employees must inspect their issued PPE for defects prior to putting them on each time.

8.2 Employees must wear the issued PPE properly when performing tasks that put them at risk of recognized hazards identified in the hazard assessment.

8.3 Employees must not perform a task when required PPE is unavailable nor use damaged or improperly fitting PPE.

9. Maintaining & Storing PPE

9.1 It is the responsibility of the employee to properly maintain (e.g., store, clean) his/her issued PPE in a sanitary manner.

10. Replacing PPE

10.1 Supervisors must provide replacements for PPE as needed due to damage or improper fit.

11. Program Evaluation

11.1 EHS will periodically evaluate the PPE policy and make changes as necessary.

Appendices

Appendix A – Personal Protective Equipment Hazard Assessment Form
Appendix B – Personal Protective Equipment Training Certification
Appendix C – PPE Elements

References

OSHA Regulations: Personal Protective Equipment-General Requirements (29 CFR 1910. 132), Hand Protection (29 CFR 1910.138), Head Protection (29 CFR 1910.135), Eye & Face Protection (29 CFR 1910.133), Foot Protection (29 CRF 1910.136), Electrical Protective Devices (29 CFR 1910.137), Respiratory Protection (1910.134), Occupational Noise Exposure (29 CRF 1910.95).

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APPENDIX A

Personal Protective Equipment: Hazard Assessment Form

Instructions: Complete each section of this form and submit a copy to the office for Environmental Health & Safety, Facilities Management.

Section 1 – Fill in Supervisor's contact information.

Supervisor Completing this form: _____Title:_____

Email Address:_____Phone Number:_____

Section 2 - Certification by *Responsible Person.*

Name:_____Title:_____

Signature:_____Date:_____

Section 3 - List all work areas and job titles included in this hazard assessment.

Work Area(s):_____

_____

List of job titles included in this hazard assessment:

_____

_____

Section 4 - Identify hazards for each body part and indicate when corresponding PPE is required by listing the specific task(s).

Body Part	**Hazard** (Check all that apply):	**Potential PPE**	**When Required** (List specific task)
Head	☐ Falling objects	Hard hat (class C)	
	☐ Head bump, lacerations	Bump hat	
	☐ Burn, Heat, Electrical	Hard hat (class A for low voltage, class B for high voltage, class E for 600V or more)	
	☐ Molten metal, sparks	Welding helmet	
Face	☐ Splash/spray, dust	Face shield (+ eye protection)	
	☐ Molten metal, sparks, flying fragments	Reflective face shield/helmet (+ eye protection)	
	☐ Light (optical), welding, brazing, radiation	Welding shield/helmet (+ eye protection)	

Eyes	☐ Splash/spray of chemicals or body fluids	Splash goggles	
	☐ Flying particles, impact/projectile, dust	Safety glasses with side shields, impact resistant goggles	
	☐ Light (optical) radiation, laser, UV	Welding goggles with appropriate filter shade, laser eyewear (use appropriate type for wavelength & optical density), UV glasses	
	☐ Molten metal, sparks	Welding goggles	
Neck	☐ Molten metal, sparks	Welding helmet	
Ears*	☐ Noise	Ear muffs/ear plugs	
Respiratory system*	☐ Dusts ☐ Vapors ☐ Mists ☐ Fumes	Respirator specific to the contaminant and exposure level	
Hands	☐ Chemicals*	Chemical resistant gloves	
	☐ Electric shock	Insulating gloves (use appropriate class for voltage)	
	☐ Sharp objects/cuts	Kevlar gloves/metal mesh	
	☐ Puncture	Hex Armor gloves	
	☐ Dirt, chafing, abrasions	Fabric and coated fabric gloves	
	☐ Sparks, moderate heat, blows, chips, rough objects	Leather gloves	
	☐ Bloodborne pathogens	Disposable latex or nitrile gloves	
	☐ Cold/Hot surfaces	Temperature resistant gloves	
Arms	☐ Chemicals	Chemical resistant sleeves	
	☐ Molten metal, sparks	Flameproof gauntlets, fire retardant sleeves	
Legs	☐ Molten metal, welding sparks	Fire-resistant leggings	
Feet	☐ Puncture or penetration of soles	Safety shoes with metal insoles	
	☐ Falling or rolling objects >15 lbs, crushing	Steel-toed or composite-toed safety shoes	
	☐ Electrical shock	Non-conductive safety shoes	
	☐ Molten metal,	High-top safety shoes	

	welding sparks		
Body	☐ Dust and non-hazardous chemical splashes	Disposable paper-like fiber or Tyvek suit	
	☐ Chemical splash or spray	Lab coat, chemical resistant apron	
	☐ Molten metal, welding sparks	Leather apron	

*Requires exposure assessment by EHS

APPENDIX B

Personal Protective Equipment Training Certification

Instructions: The Trainer must complete this form and submit a copy to Environmental Health & Safety, Facilities Management.

Employee's Name: _____ Job Title: _____

Work Area:_____ Supervisor's Name :_____

Trainer's Name: _____ Date of Training: _____

The following personal protective equipment (PPE) are available and have been assigned for use:	
Check applicable boxes	**Identify specific assigned PPE**
☐ Eye and Face Protection	
☐ Head Protection	
☐ Foot Protection	
☐ Hand Protection	
☐ Respiratory Protection	
☐ Hearing Protection	
☐ Other Protection	

The following information and training on the PPE listed above were covered in the training session:

____ When PPE is necessary.

____ What PPE is necessary.

____ The limitations of the PPE.

____ How to use the PPE properly including putting it on, taking it off, and wearing and adjusting it.

____ How to properly care for, maintain, store and dispose of the PPE.

EMPLOYEE: I understand the training I have received, and I can use PPE properly.

_____ _____

Employee's signature Date

TRAINER: The employee has shown an understanding of the training and the ability to use the PPE properly.

_____ _____

Trainer's signature Date

APPENDIX C

PPE Elements

Eye and Face Protection (29 CFR 1910.133)

1. All employees, contractors and visitors will wear the required eye and face protection where required.

2. Safety glasses will be provided to employees when necessary, and all safety glasses will be issued with side shields. When employees require prescription safety glasses, The New School will provide safety eyewear that may be worn over personal glasses.

3. Employees who wear contact lenses may wear non-prescription safety glasses (Plano) over their contact lenses, but they should be aware that contact lenses could present additional hazards to employees in dusty or chemical environments. In these cases, affected employees must use additional eye protection, such as dust-tight or liquid-tight goggles.

4. To be compliant, eye and face protection must follow one of these standards: ANSI Z87.1-2003, ANSI Z87.1-1989 (R-1998) or ANSI Z87.1-1989.

The following charts will be used to assist with specification of eye and face protection.

Selection Chart-Guidelines for Eye and Face Protection		
The following chart provides general guidance for the proper selection of eye and face protection to shield against hazards associated with the listed sources.		
Source	**Hazard**	**Protection**
IMPACT - Chipping, grinding machining, masonry work, woodworking, sawing, drilling, chiseling, powered fastening, riveting, and sanding	Flying fragments, objects, large chips, particles, sand, dirt, etc.	Spectacles with side protection, goggles, face shield For severe exposure, use face shield
HEAT- Arc welding	Hot sparks	Face shields, spectacles with side shields.
CHEMICALS - Acid and chemical handling, degreasing	Splash	Goggles, eyecup and cover types. For severe exposure, use face shield with goggles.

DUST - Woodworking, buffing, general, general dusty conditions.	Nuisance dust	Goggles, eye cup and cover type

Filter Lenses for Protection Against Radiant Energy			
Operations	**Electrode Size 1/32 in**	**Arc Current**	**Protective Shade**
Shielded metal arc welding	Less than 3	Less than 60	7
	3-5	60-160	8
	5-8	160-250	10
	More than 8	250-550	11
Gas metal arc welding & flux cored arc welding		Less than 60	7
		60-160	10
		160-250	10
		250-500	10
Gas tungsten arc welding		Less than 50	8
		50-150	8
		150-500	10
Air carbon arc cutting	(Light)	Less than 500	10
	(Heavy)	500-1000	11
Plasma arc welding		Less than 20	6
		20-100	8
		100-400	10

		400-800	11
Plasma arc cutting	(Light)**	Less than 300	8
	(Medium)**	300-400	9
	(Heavy)**	400-800	10
Torch brazing			3
Torch soldering			2
Carbon arc welding			14
Filter Lenses for Protection Against Radiant Energy			
Operations	**Plate Thickness-inches**	**Plate thickness-mm**	**Minimum(*) Protective Shade**
Gas welding:			
Light	Under 1/8	Under 3.2	4
Medium	1/8 to 1/2	3.2 to 12.7	5
Heavy	Over 1/2	Over 12.7	6
Oxygen cutting:			
Light	Under 1	Under 25	3
Medium	1 to 6	25 to 150	4
Heavy	Over 6	Over 150	5

Footnote *: As a rule of thumb, start with a shade that is too dark to see the weld zone and then move to a lighter shade that gives sufficient view of the weld zone without going below the minimum. In oxy-fuel gas welding or cutting where the torch produces a high yellow light, use a filter lens that absorbs the yellow or sodium line in the visible light of the (spectrum) operation.
Footnote **: These values apply where the actual arc is clearly seen. Experience has shown that lighter filters may be used when the arc is hidden by the work piece.

Respiratory Protection (29 CFR 1910.134)

Procedures regarding respiratory protection are contained in the Respiratory Protection Program.

Head Protection (29 CFR 1910.135)

1. All affected employees will use appropriate head protection when exposed to falling objects or energized electrical equipment. Employees who are working near exposed electrical conductors will wear protective helmets designed to reduce electrical shock.
2. Head protection is designed to provide protection from impact and penetration hazards caused by falling objects, but it is capable of providing protection from electric shocks and burns. When selecting head protection, knowledge of potential electrical hazards is important.
3. Class A helmets, in addition to impact and penetration resistance, provide electrical protection from low-voltage conductors and are proof-tested to 2,200 volts. Class B helmets provide impact and penetration resistance as well as electrical protection from high-voltage conductors, and they are proof tested to 20,000 volts. Class C helmets provide impact and penetration resistance only and are usually made of aluminum, a conductor; therefore, Class C helmets should not be used around electrical hazards. Bump caps are not designed to provide impact protection, but they do protect against scalp lacerations while working in congested or low-clearance areas.
4. The New School will select, purchase and provide employees with required head protection when required. Selected head protection will meet ANSI Z89.1-2003, ANSI Z89.1-1997 or ANSI Z89.1-1986 standards.

Foot Protection (29 CFR 1910.136)

1. All employees, contractors, and visitors will use appropriate foot protection where required. Foot protection is not necessary when traveling within the designated aisles.

2. The New School will identify acceptable types of foot protection that meets ASTM F-2412-2005, ANSI Z41-1999 or ANSI Z41-1991 standards.

Electrical Protective Equipment (29 CFR 1910.137)

All electrical protective devices purchased by The New School will meet requirements outlined in the OSHA Electrical Protective Equipment standard 29 CFR 1910.137(a). All equipment will be appropriately marked with the proper class and type specifications.

Electrical PPE will be required where contact with energized electrical conductors or flash/arc hazards exist. The New School will provide PPE, insulating blankets and insulated tools as needed. The New School requires that all electrical protective equipment be inspected prior to use by the employee and also immediately after any incident involving possible damage. Electrical protective equipment will be stored to protect against visible light, extreme temperatures, extreme humidity, ozone chemicals and other damage. The

New School will also maintain a testing program for electrical protective equipment that ensures performance, and testing will occur according to the following schedule:

Electrical PPE Testing Schedule

Type of Equipment	When to Test
Rubber insulating line hose	Upon indication that insulating value is suspect
Rubber insulating covers	Upon indication that insulating value is suspect
Rubber insulating blankets	Before first issue and every 12 months
Rubber insulating gloves	Before first issue and every six months
Rubber insulating sleeves	Before first issue and every 12 months

If the electrical equipment has been in storage, it must have been tested within the previous 12 months prior to issue

Hand Protection (29 CFR 1910.138)

EHS will select all hand protection to ensure the greatest degree of defense against hazards by consulting with manufacturers/suppliers to identify gloves that will provide the desired protection against mechanical, thermal and chemical hazards. Special care will be taken when evaluating the need for hand protection in areas with moving machine parts, especially rotating and revolving equipment. The New School does not permit employees to use their own, owned hand protection.

Body Protection

Body protection in the form of aprons or other protective clothing will be required when employees are exposed to chemical splash or contact, sharp or jagged objects, heat, sparks or flame. EHS will consult manufacturers/suppliers to select equipment that will provide the desired protection against mechanical, thermal and chemical hazards.

Hearing Protection

Procedures regarding hearing protection are contained in the Hearing Conservation Program.