

QUESTIONS AND ANSWERS CONCERNING THE PPE FINAL STANDARDS

1. Does all PPE have to be replaced with PPE that meets the new revised standards?

Answer: No. The final standards "grandfather" existing PPE. That is, PPE that was purchased before the effective date of the standard can continue in use if it meets the pertinent ANSI standard in effect at the time of purchase, or if it can be demonstrated to be equally effective.

2. Must all eye protective devices be equipped with side protectors?

Answer: No, not in all situations. However, side protectors, such as side shields, are required when it is determined (through the hazard assessment) that there is a hazard from flying objects.

3. May side protectors be detachable?

Answer: Yes. Detachable side protectors (i.e., clip-on or slide-on side shields) are permitted if they meet the pertinent requirements of §1910.133.

4. Is it permissible to wear contact lenses with eye protection?

Answer: Yes. OSHA believes that contact lenses do not pose additional hazards to the wearer. However, it is important to note that contact lenses are not eye protective devices. If eye hazards are present, appropriate eye protection must be worn instead of, or in conjunction with, contact lenses.

5. Do PPE manufacturers have to obtain third party certification that their equipment has been tested in accordance with, and meets the requirements of, the OSHA PPE standards?

Answer: No. However, many PPE manufacturers already, voluntarily, obtain third party certification of their equipment.

6. Since PPE manufacturers are not required to obtain third party certification, what should employers do when purchasing PPE?

Answer: Employers can request the manufacturer to document that the PPE has been tested to meet specified criteria, and employers can determine if the PPE is marked as meeting the

pertinent ANSI standard. For instance, head protective devices should be marked as meeting ANSI Z41.1. Additionally, as stated previously, many PPE manufacturers already obtain third party certification. Therefore, when purchasing PPE, employers should determine whether or not the PPE has such certification.

7. Is an employer required to have a written hazard assessment?

Answer: No, although a written hazard assessment is certainly recommended. Employers are, however, required to verify that the 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.

8. Is PPE required for certain SIC codes or certain job titles? For example, is foot protection required for employees who work in a warehouse?

Answer: The PPE standard contains performance-oriented requirements, and does not specify SIC codes or job titles to mandate the use of certain types of PPE. Instead, the employer is required to perform a hazard assessment of the workplace to determine what hazards, if any, are present. The employer must then make a selection of the appropriate PPE that will protect employees from the hazards identified by the hazard assessment.

9. Many female employees have complained that they have to wear PPE that does not fit properly because the PPE has been sized to fit only male employees. Is this situation going to continue?

Answer: No. One of the new requirements of the PPE standard is that employers are now required to select PPE that properly fits employees [§1910.132(d)(1)(iii)]. PPE is now available in many different sizes or can be adjusted to many sizes (such as head protective devices). Even protective footwear is now available in sizes that will properly fit female employees.

10. How often must employees be trained?

Answer: Employees must be trained **before** being allowed to perform work requiring the use of PPE. Employees must also be retrained: when there are changes in the workplace which impact the use of PPE; when there are changes in the types of PPE to be used; or, when inadequacies in an employee's knowledge or use of assigned PPE indicate that the employee has not retained understanding or skill.

11. The final standards reference specific editions of the ANSI standards that different types of

PPE must meet. For example, protective eye and face devices must meet the 1989 edition of ANSI Z87.1. In the future, what happens if an employer wants to purchase PPE that meets a later edition of the same ANSI standard?

Answer: The Agency will accept PPE as complying with the standard if the PPE is demonstrated to be as effective as the PPE meeting the specific ANSI standard referenced by the final standard. For example, eye and face protective devices meeting a subsequent edition of the same ANSI standard would be acceptable to the Agency if it could be demonstrated that they were as effective as those meeting the 1989 edition. Employers would need to establish either that there was no substantive difference between a subsequent edition of Z87.1 and the 1989 edition, or that PPE which satisfied subsequently modified test criteria provided protection equivalent to that provided by PPE which satisfied the 1989 edition.

12. What constitutes an adequate hazard assessment?

Answer: The final standard is performance-oriented to allow the flexibility needed for employers to perform a hazard assessment which best reflects their particular workplace. An adequate hazard assessment will result as long as the employer meets the requirements of §1910.132(d)(1). Additionally, Appendix B contains an example of procedures that satisfy the hazard assessment requirement.