



Personal Protective Equipment *Part One: Paperwork Requirements*

You may have been aware that OSHA requires employers to provide personal protective equipment (PPE) to employees when their work presents some hazard that can reasonably be mitigated through PPE use. But did you know that the employer has a paperwork requirement related to PPE use? Currently, OSHA is soliciting public comment concerning employer paperwork requirements specified in its standards on PPE for General Industry.

The Occupational Safety and Health Act of 1970 (the OSH Act) authorizes information collection by employers as necessary or appropriate for its enforcement or for developing information regarding the causes and prevention of accidents. The OSH Act requires OSHA to obtain such information with minimum burden upon employers, especially those operating small businesses.

General Industry PPE standards (29 CFR part 1910, subpart I) include several paperwork requirements:

▶ Hazard Assessment, Verification - 1910.132, paragraph (d)(1) requires that the employer assess work activities to determine whether there are hazards present, or likely to be present, which necessitate the employee's use of PPE. If such is the case, the employer must communicate selection decisions to affected employees and verify that a hazard assessment has been performed. Paragraph (d)(2) requires that the so-called "certification of

hazard assessment" must contain the occupation, the date(s) of the hazard assessment and the name of the person performing the hazard assessment. This requirement only applies to PPE for the eyes and face, head, feet and hands.

▶ Training, Verification - 1910.132, paragraph (f) requires that employers provide training for each employee who is required to wear PPE. Employers must also provide retraining when there is reason to believe that any previously trained employee does not have the understanding and skill to use PPE properly. Paragraph (f)(4) requires that employers certify that employees have received and understood the PPE training. The training certification must include the name of the employee(s) trained, the date of training, and the subject of the certification (i.e., a statement identifying the document as a certification of training in the use of PPE).

OSHA compliance officers may require employers to disclose the certification records during an Agency inspection.

In this public comment period, OSHA has a particular interest in comments on the following issues:

- § Whether the proposed information collection requirements are necessary for the proper performance of the Agency's functions, including whether the information is useful;
- § The accuracy of OSHA's estimate of the burden (time and costs) of the

information collection requirements, including the validity of the methodology and assumptions used;

§ The quality, utility, and clarity of the information collected; and

§ Ways to minimize the burden on employers who must comply; for example, by using automated or other technological information collection and transmission techniques.

Are you interested in letting OSHA know how this paperwork requirement helps or hinders safety and/or your business? Your comments should reference Docket No. ICR-1218-0205 and must be submitted postmarked or received by September 25, 2006. You may mail comments to the OSHA Docket Office, Room N-2625, U.S. Department of Labor, 200 Constitution Avenue, NW., Washington, DC 20210. If your comments are 10 pages or fewer, including attachments, you may fax them to the OSHA Docket Office at (202) 693-1648. You may submit comments through the Internet at <http://ecomments.osha.gov>. Follow instructions on the OSHA Web page for submitting comments.

Next month in this column, the author will present a model PPE program that addresses this and other aspects of safety and regulatory compliance.

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