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Personal Protective Equipment

Part II: Policies & Best Practices

Last month we ran PPE Part One: Paperwork Requirements.

The employer is compelled to provide and maintain personal protective equipment, or PPE, when there is a reasonable probability of injury or illness that can be prevented by it. The employer must also train employees in the proper fit, proper use and proper care of PPE; and enforce a PPE policy so that there is compliance in the field.

OSHA defines PPE as protection for eyes, face, head, ears, hands and feet as well as protective clothing, respiratory devices, protective shields and barriers. Incidentally, OSHA does not yet require an employer to pay for PPE even though it must be provided. Tree care company policies vary, but by far the most common practice is for the employer to provide and pay for PPE.

Can your top climber wear that fancy helmet he picked up at TCI EXPO last year? Sure, as long as it has been deemed appropriate for tree work. Indeed, when employees provide their own PPE, the employer is responsible to assure its adequacy. Helmets for example must conform to ANSI Z89.1 and when worn near electrical conductors, must be designated Class E.

All personal protective equipment needs to be of safe design and construction for the work to be performed. See ANSI Z133 as well as the other ANSI standards it references for details.

Assessing PPE Hazards

Last month we said that the employer must assess the workplace for PPE haz-

ards, perform a written certification of hazard assessment, then provide the necessary PPE and get employees to wear it. Your written certification must identify the workplace evaluated, the person certifying that the evaluation has been performed, and the date(s) of the hazard assessment. You should clearly identify the document as a certification of hazard assessment.

As a general rule, all tree care operations require the arborist to wear head and eye protection at all times. In fact, we can generalize about most tree care operations enough that it is possible to develop generic certifications of written hazard assessment. To develop your own certification you should take the following steps:

Survey. Conduct a walk-through survey of the job site(s) or the operation(s) in question to identify sources of hazards to workers. Consider the basic types of hazard that an arborist might face. Some examples of each are provided:

- ▶ Struck-by's - from branch slaps, falling debris; flying wood chips, etc.
- ▶ Punctures/Cuts - from thorns, splinters, frayed cable, etc.; chain saw cuts; hand saw/pole saw cuts
- ▶ Crushing injuries - from logs, trailer tongues, heavy equipment, roll-over
- ▶ Chemical - inhalation/dermal exposure/ingestion of pesticides, solvents, gasoline, etc.
- ▶ Heat/Burns - ambient temperature and humidity, open flames, hot surfaces
- ▶ Harmful dust - eye or lung irritants
- ▶ Light radiation - welding arc, sun
- ▶ Poisonous plants
- ▶ Stinging/Biting Insects and Animals
- ▶ Vehicular Traffic
- ▶ Slips, Trips & Falls - ice, snow, mud, wet walking or working surfaces



Analyze your findings. Estimate the potential for injuries. Review accident data to help identify problem areas.

Select PPE

Select PPE that ensures a level of protection greater than the minimum required to protect employees from the hazards; fit the employee with PPE and give instructions on its care and use. Consider human behavior – your employee is much more likely to wear the PPE if it fits comfortably.

Reassess

You should reassess the workplace hazard situation as necessary, by identifying and evaluating new equipment and processes, reviewing accident records, and reevaluating the suitability of previously selected PPE.

Since the need for most types of PPE – hard hats, eye protection, saw chaps, etc. – is the norm rather than the exception in tree work, compliance can be incorporated into your written policy and documented training.

For “specialty PPE” such as respirators, nitrile boots or gloves, etc., hazard assessment and PPE assignment can be accommodated on a work order.

If employees are exposed to potentially harmful levels of noise and if their total exposure exceeds 90 decibels on a time-weighted average over an eight-hour day, then they must be provided with hearing protection that will attenuate, or reduce, the noise to acceptable levels.

As with any PPE, employees must be

trained in when to use hearing protection and how to use it.


Do the noise levels in your field or shop operations approach the threshold allowed by OSHA regulation? Only noise level measurements in the field can accurately tell you whether your chippers, chain saws or other equipment produces harmful noise levels, and even then your employees' exposure to that noise will vary with the amount of time they are exposed to the noise and their distance from the source.

Most employers choose to "play it safe" by requiring hearing protection for operators of chippers, chain saws and other similarly noisy equipment. This is another "best practice" in the industry.

Full compliance with OSHA's Hearing Conservation Standard is problematic at

best for the small employer. To fully comply, you would have to: 1) measure field noise levels, 2) conduct baseline and annual audiometric exams for all employees with exposure and 3) follow the PPE protocols we have just discussed to ensure that employees' hearing is protected.

In conclusion, the Tree Care Industry Association strongly recommends as the best of all possible practices, that your management and sales staff demonstrate 100 percent commitment to the company's PPE policy by wearing PPE themselves whenever they are on a job site.

Tree care industry PPE standards are clearly spelled out in Section 3.4 of the newly-revised ANSI Z133 Standard. Do you need to order a copy of this comprehensive tree care safety standard? Call 1-800-733-2622. 



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