

Hobart and William Smith Colleges

Geneva, New York

Personal Protective Equipment Program

Copies of the Personal Protective Equipment Program:

1. Human Resources Office
2. Electronic Version (HWS HR website)

Last Date Reviewed: 4/14/20
Reviewed By: Stephen Valentine, CIH (Partners Environmental)

Purpose:

The purpose of the Personal Protective Equipment (PPE) Program (further referred to as the program) at Hobart and William Smith Colleges (further referred to as HWS or the colleges) is to ensure that faculty, staff and student workers are provided with and utilize proper personal protective equipment (PPE) to protect themselves from chemical and physical hazards they may encounter in the workplace/campus area.

The program provides personnel with PPE information through policies and procedures regarding:

- PPE Hazard Assessment.
- PPE use guidelines.
- Personnel training.

Program Applicability:

1. OSHA Personal Protective Equipment Standard – 29 CFR 1910 Subpart I.
2. This program is applicable to all HWS operations and activities, conducted by HWS staff, faculty and student workers. With some exceptions, this applies to the following departments/work areas:
 - Wood Shop (Elliott Arts/Building 2).
 - Fabrication Shop (Elliott Arts).
 - Art Shop (Elliott Arts).
 - Machine Shop (Eaton Hall – Physics).
 - Other Departments/Work Areas, as appropriate.
 - *Note: Medical, Campus Safety and EMT PPE requirements are covered in the BBP Program.*
3. The program also applies to the Chemistry, Biology, Geoscience and FLI laboratories, however, the provisions of the program are covered within their department-specific Chemical Hygiene Plans.
4. Buildings and Grounds (contracted service), as well as any other contracted services, are required to comply with their own PPE Program in accordance with the OSHA standard.
5. Engineering or administrative controls will be the first line of defense to control all hazards. When these controls do not eliminate the hazard or additional controls are needed, PPE will be use to provide additional protection.
6. Based on available noise exposure levels and PPE use at HWS, hearing protection (29 CFR 1910.95) is not regulated in the workplace. The hazards are addressed, but use of PPE is voluntary by faculty, staff and student workers.

7. Based on available air exposure levels and PPE use at HWS, respiratory protection (29 CFR 1910.134) is regulated in the workplace. See the Respiratory Protection Program.

Program Responsibilities:

1. The **Office of the President (Provost)** will:

- Support the policies and procedures of the program.
- Designate appropriate resources (i.e., funds, personnel, etc.) for the implementation of the program.
- Assign responsibilities and authority to designated personnel to implement and maintain the program.

2. The **EHS Coordinator** will:

- Oversee the policies and procedures of the program.
- Provide knowledge and support to the colleges on the program.
- Conduct the PPE hazard assessment for HWS.
- Work with departments/areas to coordinate proper PPE requirements and PPE procurement.
- Facilitate faculty, staff and student worker training.
- Continually evaluate and improve overall compliance with the program.
- Coordinate an annual review of the program.

3. **Department Chairperson(s)** will:

- Understand the program requirements for their department.
- Provide appropriate funding for the purchase of PPE.
- Assign department personnel with appropriate responsibilities and accountability for program implementation.
- Coordinate procurement of PPE for the department.
- Provide appropriate training to department faculty, staff and student workers.
- Continually evaluate program status in their department.
- Communicate program issues directly with the EHS Coordinator.

4. **Faculty, Staff and Student Workers** will:

- Understand and follow the requirements of the program.
- Participate in safety training, as provided.
- Know the proper use, inspection, limitations and storage requirements for PPE.
- Report any damaged PPE for repair or replacement.
- Stop and ask questions if you are unsure about the proper PPE for an activity.

PPE Hazard Assessment:

1. An HWS-wide PPE Hazard Assessment shall be conducted to evaluate and determine those hazards present at the colleges which require the use of PPE to protect the safety and health of faculty, staff and student workers. Where hazards are identified, appropriate PPE will be selected to protect these individuals from the hazard.
2. The EHS Coordinator in conjunction with the departments will conduct the PPE hazard assessments.
3. The workplace hazard assessment will identify hazards and protection for the:
 - Eyes and Face.
 - Ears.
 - Respiratory.
 - Head.
 - Body.
 - Hands.
 - Feet.
4. The written PPE hazard assessment will be formally documented (see Attachment).

General PPE Guidelines:

1. The following criteria will be followed for all PPE selection and use:
 - All PPE will be selected to provide appropriate protection against the potential chemical and physical hazards. As applicable, PPE will be selected to meet OSHA requirements and established design criteria (i.e., ANSI guidelines).
 - PPE will be provided in several sizes to accommodate use by all personnel.
 - PPE will be made available and distributed by each department, as appropriate.
 - Faculty, staff and student workers are required to use selected PPE for their particular activity.
 - Loose PPE (i.e., gloves) should never be used around rotating machines or equipment.
 - All PPE will be inspected prior to each use for defects or damage. Defective or damaged PPE will be repaired or replaced prior to use.
 - Single use PPE (i.e., ear plugs, dust masks, etc.) will be discarded follow each use.
 - All PPE will be cleaned following each use.
 - PPE will be stored in a clean and dry location when not in use.
2. The following criteria will be used for eye and face PPE selection

- Eye and face protection will be used when the eyes and face are exposed to hazards from flying particles, liquid chemicals, acids or caustic liquids or light radiation.
 - All safety glasses/goggles must comply with ANSI Z87 standards.
 - All eye protection must have side shields or side protection.
 - Face shields will be used when there is the potential for flying materials (i.e., grinding) or splashing chemicals (i.e., pressure washer). Face shields must be used in addition to safety glasses/goggles, and are not a replacement for safety eyewear.
 - Personnel exposed to intense light radiation, such as from welding or torch cutting, will use lens filters with the appropriate shading for their welding helmet (i.e., welding) or tinted face shield (i.e., torch cutting).
3. The following criteria will be used for hearing PPE selection:
- Hearing protection will be used when working in loud areas (i.e., grinding).
 - Available hearing protection will include single use ear plugs or re-usable ear muffs.
 - The minimum Noise Reduction Rating (NRR) for any hearing protection will be 25.
 - *Note: 8 hour noise levels exceeding OSHA action levels (85 decibels) are not anticipated during any activities at HWS. Hearing protection use is voluntary and hearing protection will be made available for use, as appropriate.*
4. The following criteria will be used for respiratory PPE selection:
- See Respiratory Protection Program.
5. The following criteria will be used for foot PPE selection:
- Foot protection will be used when the foot is exposed to potential injury from falling or rolling objects, objects piercing the sole or contact with electrical hazards.
6. The following criteria will be used for body PPE selection:
- Body protection will be used when the body is exposed to potential injury from chemical or physical hazards.
 - Personnel performing welding or torch cutting work will use welding coats, or similar, to provide protection from the light radiation and sparks.
7. The following criteria will be used for hand PPE selection:
- Hand protection will be used when the hand is exposed to potential injury from chemical contact, temperature extremes or sharp objects.

- Personnel performing welding or torch cutting work will use welding gloves to provide protection from the light radiation and sparks.
- Personnel handling sharp materials or objects will use protective gloves (i.e., work gloves, cut resistant, etc.) to protect cuts to the hands.
- Personnel handling chemicals will use chemical protective gloves (i.e., nitrile, neoprene, etc.) to protect from chemical exposure to the hands.
- Personnel handling hot materials or objects will use heat resistant gloves (i.e., furnace) to protect from burns to the hands.

8. The following criteria will be used for Head PPE selection:

- Head protection will be used when the head is exposed to potential injury from falling objects, striking the head on an object or contact with electrical hazards.
- All head protection must comply with ANSI Z89.1 standards.

Information and Training:

1. All faculty, staff and student workers required to use PPE will be provided with PPE training. Training will be conducted:

- At the time of their initial job assignment/enrollment.
- With changes in PPE usage.
- As needed, to continually ensure faculty, staff and student workers understand the proper use of the required PPE.

2. PPE training includes the following topics:

- Review of the PPE hazard assessments.
- What PPE is required.
- When PPE is required to be used.
- How to properly wear and use the PPE.
- Limitations of the PPE.
- Proper care, maintenance and disposal of PPE.

Program Evaluation:

1. The EHS Coordinator will review the program on an annual basis to ensure the continued effectiveness of the policy and procedures.
2. The program will be updated, as needed, to address any deficiencies and to reflect any changes in the implementation of the program.

PPE HAZARD ASSESSMENT

HWS

Personal Protective Equipment Hazard Assessment

Date: April 14, 2020

Reviewed by: Stephen Valentine, CIH

Required PPE for:

General (non-specific locations):

- Eye Protection (safety glasses with side shields):
 - Activities where there is the potential for flying materials.
- Face Shield:
 - Handling chemical cleaners and corrosives.
 - Activities where there is the potential for flying materials.
- Foot Protection (Closed toe/heel shoes or sneakers):
 - Activities where there is the potential for foot injury.
- Leather/Protective Work Gloves:
 - Handling sharp objects or materials.
- Chemical Protective Gloves (Nitrile or similar):
 - Using chemical cleaners, corrosives and solvents.

Fabrication Shop (at Elliott Arts):

- Eye Protection (safety glasses with side shields):
 - All activities.
- Foot Protection (Closed toe/heel shoes or sneakers):
 - All activities.
- Face Shield:
 - Grinding or similar tasks with flying materials.
- Welding Helmet (with appropriately tinted glass):
 - Welding (welding helmet) activities.
- Tinted Face Shield (with appropriately tinted shield):
 - Torch cutting activities.
- Leather/Protective Work Gloves:
 - Handling sharp objects or materials. *Note: Not to be used around rotating equipment.*
 - Welding or torch cutting activities (welding gloves).
 - Furnace activities (heat resistant gloves).
- Protective Work Coat:
 - Welding (welding jacket) activities.
- Dust Mask:
 - Dust Mask (N95) – Dusty tasks or during welding activities.
 - *Note: Dust mask use is not required (voluntary only).*
 - *Rubber mask/cartridge type respirators are not permitted for use.*

Wood Shop (at Elliott Arts and Building 2):

- Eye Protection (safety glasses with side shields):
 - All activities.
- Foot Protection (Closed toe/heel shoes or sneakers):
 - All activities.
- Leather/Protective Work Gloves:
 - Handling sharp objects or materials. *Note: Not to be used around rotating equipment.*
- Dust Mask:
 - Dust Mask (N95) – Dusty tasks.
 - *Note: Dust mask use is not required (voluntary only). Rubber mask/cartridge type respirators are not permitted for use.*
- Hearing Protection:
 - Ear plugs or ear muffs (with a 25 dB of higher NRR).
 - Noisy tasks.
 - *Note: Hearing protection is not required (voluntary only).*

Art Shop (at Elliott Arts):

- Eye Protection (safety glasses with side shields):
 - All activities.
- Foot Protection (Closed toe/heel shoes or sneakers):
 - All activities.
- Chemical Protective Gloves (Nitrile or similar):
 - Using chemical cleaners, corrosives and solvents.
 - Operating the water wash spray booth.
- Face Shield:
 - Handling chemical cleaners and corrosives.
 - Operating the water wash spray booth.

Machine Shop (in Eaton Hall – Physics):

- Eye Protection (safety glasses with side shields):
 - All activities.
- Foot Protection (Closed toe/heel shoes or sneakers):
 - All activities.
- Leather/Protective Work Gloves:
 - Handling sharp objects or materials. *Note: Not to be used around rotating equipment.*

Scandling Boat (see boat procedures for additional boat PPE):

- Eye Protection (safety glasses with side shields):
 - All activities.
- Foot Protection (Closed toe/heel shoes or sneakers):

- All activities.
- Leather/Protective Work Gloves:
 - Handling sharp objects or materials. *Note: Not to be used around rotating equipment.*
- Dust Mask:
 - Dust Mask (N95) – Dusty tasks.
 - Rubber mask/cartridge type respirators (for use during painting, scraping, etc.
- Hearing Protection:
 - Ear plugs or ear muffs (with a 25 dB of higher NRR).
 - Noisy tasks.
 - *Note: Hearing protection is not required (voluntary only).*

APPENDIX D (to the RESPIRATOR STANDARD)

Information for Employees Using Respirators When Not Required Under the Standard (Appendix D to Sec. 1910.134 - Mandatory)

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.
2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.
Keep track of your respirator so that you do not mistakenly use someone else's respirator.