

Management Instruction

Personal Protective Equipment and Respiratory Protection Programs

This management instruction (MI) establishes Postal Service policy and requirements for the use of:

1. Personal protective equipment, including eye, face, head, foot, and hand protection.
2. Respiratory protection, including voluntary use of filtering facepieces (dust masks), at Postal Service facilities.

Policy

Regulatory Requirements

The Postal Service will comply with Occupational Safety and Health Administration (OSHA) standards set forth in Title 29, Code of Federal Regulations (CFR), Part 1910, Subpart I, Personal Protective Equipment, especially the following sections:

- 1910.132, General Requirements.
- 1910.133, Eye and Face Protection.
- 1910.134, Respiratory Protection, including Appendix D.
- 1901.135, Head Protection.
- 1910.136, Foot Protection.
- 1910.138, Hand Protection.

Postal Service Policy

The preferred practice of the Postal Service is to avoid and minimize the use of personal protective equipment (PPE) and respiratory protection (RP) and to eliminate workplace hazards when feasible. The following policy applies to the use of PPE and RP:

1. Implement methods to eliminate, control, and reduce workplace hazards to avoid the use of PPE and RP whenever feasible; such methods may include, but are not limited to:
 - a. Use of engineering controls (isolation, enclosures, and ventilation).
 - b. Adoption of administrative controls and approved work practices.
 - c. Substitution of hazardous materials with non-hazardous materials when feasible.
 - d. Incorporation of equipment with safety design features.

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 Performance Management



Deborah Giannoni-Jackson
 Vice President
 Employee Resource Management

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2. Perform periodic hazard assessments of the workplace to determine the presence of hazards that may require the use of PPE or RP.
3. Establish written PPE and RP programs when required.
4. Provide employees with PPE and RP and ensure their proper use as identified by the hazard assessment when:
 - a. Workplace hazards cannot be feasibly removed or controlled.
 - b. Workplace hazard controls are being evaluated or instituted, but are not yet in place.
5. Other than filtering face pieces (i.e., dust masks), no respirator type may be worn voluntarily. Filtering face pieces may be voluntarily worn by employees in accordance with OSHA guidelines.
6. Prohibit employees from entering atmospheres that are:
 - a. Immediately dangerous to life or health (IDLH);
 - b. Oxygen-deficient; or
 - c. Can result in exposure to harmful airborne substances that exceed acceptable limits.

Scope

This MI applies to the following:

- Postal Service managers and supervisors that are subject to OSHA hazard assessments of the workplace and applicable PPE and RP requirements.
- Safety personnel, managers, and supervisors who perform hazard assessments of the workplace and administer PPE and RP programs.

This MI does not cover PPE for electrical work requirements or hearing conservation (see MI-EL-810-2000-1, *Hearing Conservation Programs*). See References on page [12](#) for additional resources on PPE.

Personal Protective Equipment Program

Managers must comply with Postal Service PPE policy, 29 CFR 1910, and any other OSHA standard that requires PPE.

PPE Program Resources

PPE program resources are available on the Safety, Environmental, and Ergonomic Resources Web site. The resources listed below provide the information and forms needed to develop a site-specific written PPE program:

- PPE Program Guide.
- PPE Decision Tree.
- PPE Written Program Template.

- PPE Hazard Assessment Worksheet.
- PPE Selection Worksheet.
- PPE Program Self Evaluation.
- PPE Observation Worksheet.
- PPE Safety Talk.

To access these resources:

1. Go to <http://blue.usps.gov/>.
2. In the left column, click *Safety and Environmental Resources*.
3. In the right column, under “Safety Programs Resources,” click *OSHA Required Written Program Guides*.
4. Click *PPE Program Guide*.

For additional Postal Service resources, see References on page [12](#).

Responsibilities

See Overall Responsibilities (on page [13](#)) and PPE Responsibilities (on page [16](#)).

Hazard Assessments

Initial Assessment

Perform an initial hazard assessment to identify safety and health hazards and determine whether OSHA PPE standards apply to the workplace. See Attachment 1, PPE Hazard Assessment Certification Work Sheet (on page [29](#)), and Attachment 2, PPE Selection Work Sheet and Certification (on page [33](#)).

Note: The hazard assessment and PPE selection certification worksheets must be documented with the facility’s written PPE program.

When performing a hazard assessment:

- Conduct a walk-through survey of the workplace.
- Review records such as accident logs, material safety data sheets, and OSHA Logs.
- Evaluate the effectiveness of existing job safety analyses.
- Solicit and evaluate observations from supervisors and affected employees.
- Review work tasks, equipment, and facilities.

Reassessment

Hazard reassessments must be performed annually or as necessary, such as when new processes or equipment are introduced into the work area or when a review of records indicates that changes to existing PPE practices may be warranted.

Selection Considerations

Use the hazard assessment process to identify the appropriate PPE for Postal Service employees (see attachment 2 on page [33](#)). Describe PPE selection elements in the facility’s written PPE program. The PPE selection process must consider the following:

- Level and adequacy of protection required.

- Fit, comfort, and durability of the PPE.
- Provisions for cleaning and sanitizing the PPE.
- Compatibility of the PPE with other potential hazards present and assurance that the PPE itself does not pose an additional hazard.

Training

Resources

The National Center for Employee Development (NCED) provides PPE training materials and current safety training matrix standards (<http://nced.usps.gov/environ/index.php>).

Initial Training

Employees who use PPE must be trained to understand the following:

- When PPE is necessary.
- What PPE is necessary (i.e., the selection of PPE).
- How to properly don, doff, adjust, and wear PPE.
- The limitations of PPE.
- The proper care, maintenance, useful life, and disposal of PPE.

Retraining

Employees must be retrained on PPE when:

- Changes in the workplace render previous training obsolete.
- Changes in the types of PPE to be used render previous training obsolete.
- They demonstrate inadequacies in retaining the requisite understanding or skill to use PPE.

Training Documentation

- A description of training elements must be included in the facility's written PPE program.
- In addition, training documentation must be maintained in the NCED Learning Management System (LMS) and must include, at a minimum, the employee's name, date(s) of training, and training subject.
- Employee PPE safety service talks given at the local level should be maintained on-site at the facility.

Program Evaluation

- PPE evaluation must be performed to ensure proper implementation of the program. A PPE self-evaluation checklist is available on the Safety, Environmental, and Ergonomic Resources Web site (see PPE Program Resources on page 2).
- Describe PPE program evaluation elements and document PPE evaluations with the facility's written PPE program.
- PPE program evaluations must be performed annually or as necessary, such as when there is a change that affects the PPE program.

Other Requirements

Additional PPE program requirements include the following:

- Maintain an adequate stock of PPE and PPE cleaning supplies for employees.
- Prohibit employees from using damaged, unapproved, or defective PPE.
- Ensure the adequacy, maintenance, and sanitation of PPE that is provided voluntarily. (See also Voluntary Use of Filtering Facepieces on page [8](#).)

Types of PPE

Eye and Face Protection

Requirements

Equipment designed to protect the eye and face may include safety spectacles, goggles, laser safety goggles, and side, face, and welding shields. Eye and face protection equipment:

- Is required for employees when eye or face hazards may be present from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, biological hazards, or potentially harmful light radiation.
- Must be worn by employees for protection from radiation during activities such as welding, torching, soldering, brazing, and other operations that emit light.
- Must comply with 29 CFR 1910.133, which incorporates the “American National Standard Practice for Occupational and Educational Eye and Face Protection.”

Face Shields

Face shields do not protect the eyes from impact hazards; they must be combined with safety glasses or impact goggles to protect eyes from impact hazards.

For additional information about eye and face protection and work tasks that require such protection, consult the PPE Program Guide and MMO-025-04, *Personal Protective Equipment*. (See References on page [12](#).)

Prescription Safety Glasses

The following policy applies to the use of prescription safety glasses:

- The Postal Service must purchase prescription safety glasses for personnel who:
 - Are engaged in occupations or perform tasks with eye hazards; and
 - Cannot use nonprescription safety glasses or other eye protective equipment.
- Employees must furnish prescriptions for safety glasses at their own expense.

- A request for safety glasses must include a copy of the facility's PPE Hazard Assessment Certification Work Sheet (attachment 1 on page [29](#)) signed by the appropriate manager or supervisor and the assigned safety person.
- Prescription safety glasses must be purchased with local funds from optical companies whose products comply with 29 CFR 1910.133.

Contact Lenses

For information about limitations on wearing contact lenses, consult MMO-025-04 (see References on page [12](#)).

Head Protection

Head protection is required for employees who work in areas or at tasks where there is potential for head injury caused by:

- Falling objects.
- Striking the head against low, stationary objects.
- Bumping the head against a fixed object.
- Accidental head contact with electrical hazards.
- Any other tasks that pose a risk of head injury.

Protective headgear must comply with 29 CFR 1910.135, which incorporates the “American National Standard for Personnel Protection—Protective Headwear for Industrial Workers.”

For additional information about tasks that require head protection, consult the PPE Program Guide and MMO-025-04 (see References on page [12](#)).

Foot Protection

Employees must wear protective footwear when working in areas where foot injuries are likely to occur due to falling and rolling objects, objects piercing the sole, or electrical shock through the foot.

In assessing the need for foot protection, review accident logs and concentrate on locations where potential foot hazards are likely to exist.

When assessing potential hazards and the need for foot protection in mail processing operations, refer to Handbook EL-814, *Postal Employee's Guide to Safety*, for primary guidance.

Elements of the current postal safety system (e.g., requiring proper footwear, training, safety talks, job task observation, aisle marking and guarding by location, and removal of unsafe equipment) have proven adequate for controlling foot-related accidents. However, if the need for additional foot protection (e.g., toe caps, steel-toed shoes, puncture-proof soles) is determined through the assessment process, administrative and/or engineering controls must be considered.

If hazards are documented and no engineering or administrative controls are feasible, provide protective footwear in accordance with the OSHA standard and the PPE Program Guide (see PPE Program Resources on page [2](#)).

Hand Protection

Requirement

Hand protection is required for employees whose hands may be exposed to hazards such as skin absorption of harmful substances, severe cuts or lacerations, severe abrasions, punctures, chemical burns, thermal burns, electrical dangers, and harmful temperature extremes. Hand protection must meet the standards of 29 CFR 1910.138.

Note: Skin creams and lotions may be used, but they are not considered PPE and may not be used as hand protection.

Resources

For guidance regarding tasks that require hand protection, consult the PPE Program Guide, MMO-025-04, and other references listed on page [12](#) (Example: MI EL-810-2000-2, *Bloodborne Disease Exposure Control Plans*).

Gloves

General

Gloves and other hand protection may be worn as long as their use does not constitute or create a hazardous condition, e.g., getting caught in moving machinery or mail processing equipment (including conveyors).

Manual Handling Operations

The lack of a hazard assessment does not preclude the supply and use of various gloves or finger protectors for manual handling operations as long as their use does not constitute or create potentially hazardous conditions. Routine use of gloves in manual handling operations may or may not be based on a hazard assessment, as gloves are often used primarily for comfort, facilitating grip, or cleanliness.

Operating Equipment

A hazard assessment must be performed to determine if hazards are present that preclude the use of gloves when operating equipment.

There are situations involving powered equipment where the guarding provided by the equipment provides a safe operational situation for an ungloved finger or hand, but can result in serious bruising, crushing, bone fracturing, or amputation of gloved fingers or hands. For this reason, gloves of any kind (e.g., cotton, latex, vinyl, gauntlet, finger protectors, or tapes) must not be worn when and where they can get caught in powered machinery. This includes, but is not limited to, conveyors, mail processing machines, material handling equipment, and other equipment with moving parts that potentially have sufficient energy or conditions that could result in bodily injuries.

Nitrile Gloves

In 2003 the Postal Service issued a nitrile glove wear policy based on a national hazard assessment performed with OSHA. The policy allows employees to wear nitrile gloves while working on *nationally deployed equipment*.

OSHA determined that the use of nitrile gloves does not contribute to an increase in the number of hand injuries, based on the following findings:

- Unused portions of the mail processing equipment were found to be guarded to meet OSHA's Subpart O (29 CFR 1910) machine-guarding requirement.
- Employees maintained safe distances from unguarded, ingoing nip points while processing the mail.
- Nitrile gloves tend to fit closely.
- The Postal Service has developed procedures to remove jammed papers safely from mail processing equipment in operation.

Therefore, the Postal Service has determined (with OSHA input) that, when employees are operating nationally deployed Postal Service mail processing equipment:

- The voluntary use of nitrile gloves is allowed.
- Employees must always keep hands clear of the ingoing nip point.
- No other kind of glove (including, but not limited to, cloth gloves) is approved for use.

Latex Gloves

Postal Service employees may not use latex gloves, except in cases where their use is demonstrated by a specific hazard assessment determination, such as handling spills of biological specimens or by medical personnel. When conducting hazard assessments, consider alternatives to latex gloves due to potential allergic reactions to latex.

Protective Clothing

Conduct a hazard assessment of tasks that might require personal protective clothing. Clothing and garments worn for general cleanliness are not considered PPE pursuant to the OSHA standard. For guidance on acceptable work clothing, see handbook EL-814, IV-A1, Clothing.

Respiratory Protection Programs

Respiratory protection programs comprise two distinct categories:

1. Voluntary use of filtering facepieces (FFPs).
2. All other respiratory protection required by Postal Service policy, 29 CFR 1910.134, and any other OSHA standard.

Voluntary Use of Filtering Facepieces

The phrase *voluntary use of a filtering facepiece* (FFP) refers to situations in which:

1. An employee requests an FFP or provides his or her own FFP; and
2. The employee is not required by OSHA to use an FFP for protection from hazardous air contaminants.

An FFP, also called a *dust mask*, is a negative-pressure, particulate respirator in which:

1. The filter is an integral part of the facepiece; or
2. The entire facepiece is composed of the filtering medium.

Although FFPs are respirators, OSHA places no medical limitations on their use.

What Is Permitted

Employees may voluntarily use FFPs in accordance with the following guidelines:

- Any Postal Service employee may voluntarily wear an FFP as long as the FFP itself does not cause a hazardous condition and no hazardous air contaminants are present.
- FFPs do not necessarily protect against exposure to toxic materials. If an employee needs protection against such exposure, the Postal Service must supply an appropriate respirator in accordance with 29 CFR 1910.134.
- Local management will provide an FFP upon request or an employee may use his or her own FFP.
- Prior to voluntarily wearing an FFP, whether it is provided by the Postal Service or by the employee, any employee requesting wear of an FFP must be given the following required information:
 - The safety talk in Attachment 3, Safe Use of Filtering Facepieces (Dust Masks) on page [37](#).
 - 29 CFR 1910.134 Appendix D, Mandatory Information for Employees Using Respirators When Not Required Under the Standard (attachment 3 on page [38](#)).
- Document that required information was provided to employees using FFP. (See the Respiratory Protection Program Guide, described on page [11](#)).
- FFPs supplied by the Postal Service for voluntary use must be approved by the National Institute for Occupational Safety and Health (NIOSH).
- FFPs worn voluntarily by employees are not subject to the medical evaluation, cleaning, storage, and maintenance provisions of the written RP program.
- FFPs used voluntarily may not be worn if they are soiled, unclean, or contaminated, or if they interfere with the employee's ability to work safely.

What Is Not Permitted

Employees may not voluntarily use tight-fitting, air-purifying respirators or supplied air respirators (devices that provide clean breathing air from uncontaminated sources).

The most commonly used tight-fitting respirators (half-face or full-face) include elastomeric respirators, which are normally made of a rubber-like material in which an appropriate filter (i.e., canister) can be attached. Voluntary use of tight-fitting, air-purifying respirators and lesser-used supplied air respirators is prohibited.

Guidance for Voluntary Users of FFP

Employees who use FFPs voluntarily must:

1. Read and follow the instructions to ensure a comfortable and effective fit.
2. Follow recommendations for fit testing and use, storage, and cleaning; a soiled FFP can cause skin irritation and other health problems.
3. Not wear an FFP if they experience breathing problems or other discomfort; they must consult medical or safety personnel if these occur.

Filtering Facepiece Responsibilities

| Position | Responsibilities |
|--|--|
| Installation Head | <ul style="list-style-type: none">■ Ensure that requirements, policies, and procedures for FFPs worn voluntarily are implemented. |
| District and Plant Safety Personnel and Collateral Duty Facility Safety Coordinators | <ul style="list-style-type: none">■ If FFPs are used voluntarily for comfort and are supplied by the Postal Service, ensure that they are NIOSH-approved; OSHA advises that NIOSH-approved FFPs are the most effective.■ Assist responsible managers and supervisors to select appropriate FFP for voluntary use.■ Provide responsible managers and supervisors with guidance on 29 CFR 1910.134 Appendix D and the safety talk on voluntary FFPs (attachment 3). |
| Managers and Supervisors | <ul style="list-style-type: none">■ Ensure that any employee who wears an FFP voluntarily is given the information in attachment 3, whether the FFP is provided by the Postal Service or by the employee.■ Document and maintain records showing that employees have received the information in attachment 3.■ Ensure that employees do not wear FFPs that are soiled, unclean, or contaminated.■ Ensure that the FFP itself does not present a hazardous condition. |

Respiratory Protection Requirements

Managers must comply with Postal Service policy, 29 CFR 1910.134, and any other OSHA standard that requires the use of respirators (other than FFPs used voluntarily). If a written RP program is required, it must include all elements required by the OSHA RP standard.

Note: Most Postal Service facilities will not be required to implement an OSHA Written Respiratory Protection Program (29 CFR 1910.134). OSHA's RP standards are complex. Consult with the appropriate occupational nurse, medical staff, and safety personnel before establishing an RP program.

RP Program Resources

RP program resources are available on the Safety, Environmental, and Ergonomic Resources Web site. The resources listed below provide information and forms to use in developing a site-specific, OSHA-required written RP program.

- Respiratory Protection Program Guide.
- Respiratory Decision Tree Written Program Template.
- Respiratory Program Self Evaluation.
- Filtering Facepiece (Dust Mask) Safety Talk.
- Respiratory Safety Talk.

To access these resources:

1. Go to <http://blue.usps.gov/>.
2. In the left column, click *Safety and Environmental Resources*.
3. In the right column, under “Safety Programs Resources,” click *OSHA Required Written Program Guides*.
4. Click *Respiratory Protection Program Guide*.

For additional Postal Service resources, see References on page [12](#).

Responsibilities

See Overall Responsibilities (on page [13](#)) and RP Responsibilities (on page [20](#)).

Requirements

To ensure Postal Service compliance with applicable RP regulations, the following activities are required:

- Select a Respiratory Protection Program Administrator (RPPA) to implement, manage, and evaluate the program.
- Perform an RP hazard assessment (see attachments 1 and 2).
- Perform RP medical evaluations, and establish procedures for performing medical re-evaluations as needed.
- Establish requirements for and perform annual RP fit testing, to include fit test protocols and retesting.
- Establish procedures for RP use, including seal-check requirements and prohibitions on wear.
- Establish procedures for RP maintenance and care, to include cleaning and disinfecting, storage, inspection, and repair.
- Establish standards for the quality of breathing air provided by the RP (OSHA standard Type 1-Grade D Breathing Air).
- Establish procedures for labeling and using NIOSH-approved RP filters, cartridges, and canisters.
- Establish and implement an RP training and information program, to include requirements for initial training, retraining, annual training, training topics, training certification and recordkeeping.
- Establish procedures for and perform RP evaluations, to include frequency requirements, effectiveness, corrective measures, and self-evaluation checklist.

- Establish procedures for RP recordkeeping and documentation, to include retention of medical and fit test records and other documents related to the written RP program.
- Provide respirators, training, and medical evaluations at no cost to employees when an RP program is necessary. This must include maintaining an adequate stock of respirators and cleaning, repair, and maintenance supplies as identified in the facility's written RP program.

References

Postal Service

The following handbooks and management instructions are available at the PolicyNet Web site <http://blue.usps.gov/cpim/>:

- Handbook EL-801, *Supervisor's Safety Handbook*.
- Handbook EL-803, *Maintenance Employee's Guide to Safety*.
- Handbook EL-814, *Postal Employee's Guide to Safety*.
- MI EL-810-2000-2, *Bloodborne Disease Exposure Control Plans*.
- MI EL-810-2006-3, *Response to Hazardous Materials Releases*.
- MI-EL-810-2008-4, *Hazard Communication (HazCom) Program*.
- MI-EL-810-2009-X*, *Confined Space Safety*.

*X stands for a number that will be assigned when the MI is published.

The following maintenance management orders (MMOs) are available at the Maintenance Technical Support Center Web site <http://www.mtsc.usps.gov/>:

- MMO-025-04, *Personal Protective Equipment*.
- MMO-087-07, *Pandemic Flu Cleaning Contingency*.

The following resources are available at the Safety, Environmental, and Ergonomic Resources Web site <http://safetytoolkit.usps.gov/resources/resources.aspx>:

- PPE and RP Program Guides: see PPE Program Resources on page [2](#), and RP Program Resources on page [11](#).
- Job Safety Analyses for specific jobs and tasks: in the right column, under "Safety Programs Resources," click *Job Safety Analysis*.
- For resources about hurricanes and floods: in the right column, under "Safety Programs Resources," click *Emergencies*, then click *Disaster Response*.

Occupational Safety and Health Administration

For federal regulations enforced by OSHA, go to <http://www.osha.gov>. In the left column, under "Laws and Standards," click *Standards*. This will take you to regulations in the 29 CFR series.

- For OSHA resources on PPE, go to <http://www.osha.gov/SLTC/personalprotectiveequipment/>.
- For OSHA resources on RP, go to <http://www.osha.gov/SLTC/etools/respiratory/index.html>.

Roles and Responsibilities

Overall Responsibilities

Headquarters

| Position | Responsibilities |
|---|---|
| Vice President, Employee Resource Management (ERM) | <ul style="list-style-type: none"> ■ Serve as Chief Safety and Environmental Officer for the Postal Service. ■ Communicate safety and environmental policies, including those for PPE and RP. |
| National Medical Director and National Occupational Health Nurse Administrator (OHNA) | <ul style="list-style-type: none"> ■ Provide technical support and guidance on PPE and RP program issues. ■ Consult on RP medical evaluations and recordkeeping. |
| Director, Safety and Environmental Performance Management (SEPM) | <ul style="list-style-type: none"> ■ Establish strategic direction and oversight of Postal Service safety and environmental programs, including PPE and RP. ■ Establish policies and procedures and interpret standards and other criteria related to PPE and RP and compliance with OSHA PPE and RP standards. ■ Provide guidance about PPE and RP to Headquarters functional areas and field managers and support functions. |
| Engineering | <ul style="list-style-type: none"> ■ Evaluate, design, and engineer equipment, processes, and systems, including ventilation systems, where feasible, to eliminate the need for PPE and RP. |
| Maintenance Policies and Programs, Engineering | <ul style="list-style-type: none"> ■ Establish procedures (i.e., current MMO) for implementing PPE and RP for maintenance personnel in accordance with Postal Service policy. |
| Manager, Vehicle Operations, Delivery | <ul style="list-style-type: none"> ■ Establish procedures for implementing PPE and RP for vehicle maintenance operations in accordance with Postal Service policy. |
| National Center for Employee Development (NCED) | <ul style="list-style-type: none"> ■ Provide PPE and RP training and resources. ■ Update training programs as necessary. |
| All Employees | <ul style="list-style-type: none"> ■ Wear PPE and respiratory protection when required and attend training when scheduled. See handbook EL-814, IV, Personal Safety and Protective Equipment. |

Areas

| Position | Responsibilities |
|--|--|
| Managers of Human Resources | <ul style="list-style-type: none"> ■ Monitor and evaluate area PPE and RP programs. |
| Medical Director and National Occupational Health Nurse Administrator (OHNA) | <ul style="list-style-type: none"> ■ Provide technical support and guidance on PPE and RP program issues. ■ Consult on RP medical evaluations and recordkeeping. |
| Managers of Safety | <ul style="list-style-type: none"> ■ Provide technical support and guidance on PPE and RP program issues. ■ Evaluate and review alternatives to PPE and RP use, where feasible. |
| All Employees | <ul style="list-style-type: none"> ■ Wear PPE and respiratory protection when required and attend training when scheduled. See handbook EL-814, IV, Personal Safety and Protective Equipment. |

Performance Clusters

| Position | Responsibilities |
|--------------------------|---|
| District Managers | <ul style="list-style-type: none"> ■ Ensure that PPE and RP programs are established and implemented. |
| Installation Heads | <ul style="list-style-type: none"> ■ Ensure that requirements, policies, and procedures for PPE and RP programs are established and implemented. ■ Ensure that sufficient funding and personnel are available to implement PPE and RP programs effectively. ■ Maintain awareness and knowledge of tasks and operations that require PPE and RP. ■ Designate a qualified RPPA if an RP program is required. |
| Managers and Supervisors | <ul style="list-style-type: none"> ■ Provide employees who request FFPs voluntarily with NIOSH-approved FFP respirators. ■ Provide employees who voluntarily use FFP respirators with the information required to use them properly and document that the information was provided. ■ Comply with the current MMO on PPE and RP. ■ Ensure that hazard assessments are periodically performed for OSHA applicability to the PPE and RP programs. ■ Evaluate and review alternatives to PPE and RP. ■ Coordinate with and assist the designated facility RPPA to implement and administer the RP program. |

| Position | Responsibilities |
|---|---|
| Managers and Supervisors (continued) | <ul style="list-style-type: none"> ■ Ensure that written PPE and RP programs are implemented and administered for large offices, plants, bulk mail centers, and vehicle maintenance facilities (VMFs) when required. ■ Consult with safety and medical staff when selecting appropriate PPE or RP. ■ Maintain awareness of tasks under their supervision that require PPE or RP. ■ Ensure employee adherence to PPE and RP requirements. ■ Ensure that appropriate PPE or RP is provided and properly cleaned, maintained, inspected, and stored. ■ Ensure that employees wearing PPE or RP are trained and that training records are documented in the LMS. ■ Ensure that PPE and RP evaluations are performed annually or as necessary; document the evaluations. ■ Ensure that all required PPE and RP program documents and records are maintained. |
| District Manager, Safety | <ul style="list-style-type: none"> ■ Guide, support, and monitor PPE and RP programs. ■ Assist safety personnel to implement and administer written PPE and RP programs. ■ Assist district, plant, and collateral duty safety officers to implement and administer PPE and RP programs. ■ Evaluate and review alternatives to use of PPE and RP. |
| District and Plant Safety Personnel | <ul style="list-style-type: none"> ■ Provide technical support and guidance on PPE and RP program issues. ■ Consult with responsible medical office on PPE and RP programs. ■ Provide assistance to ensure that: <ul style="list-style-type: none"> – Employees who voluntarily request FFP are given NIOSH-approved FFP respirators. – Employees who voluntarily use FFP respirators are given the required information. – Hazard assessments are performed periodically to determine OSHA applicability to the PPE and RP programs. ■ Evaluate and review alternatives to PPE and RP use. ■ Coordinate with and assist the designated facility RPPA to implement and administer the RP program. |

| Position | Responsibilities |
|--|--|
| District and Plant Safety Personnel (continued) | <ul style="list-style-type: none"> ■ Assist managers and supervisors to implement and administer written PPE and RP programs for large offices, plants, bulk mail centers, and VMFs. ■ Assist collateral duty facility safety coordinators to implement and administer written PPE and RP programs in smaller offices and facilities. ■ Observe the use of PPE and RP during routine inspections; report deficiencies. |
| Collateral Duty Facility Safety Coordinators | <ul style="list-style-type: none"> ■ Consult with district and plant safety personnel and the appropriate medical office on PPE and RP program requirements. ■ Consult with district and plant safety personnel to: <ul style="list-style-type: none"> – Perform hazard assessments periodically to determine OSHA applicability to the PPE and RP programs. – Ensure that the required PPE and RP programs are implemented and administered in smaller offices and facilities. ■ Coordinate with and assist the designated facility RPPA if an RP program is necessary. |
| All Employees | <ul style="list-style-type: none"> ■ Wear PPE and respiratory protection when required and attend training when scheduled. See handbook EL-814, IV, Personal Safety and Protective Equipment. |

PPE Responsibilities

For responsibilities related to program administration, see Personal Protective Equipment Program on page [2](#).

| Position | Responsibilities |
|--------------------|---|
| Installation Heads | <ul style="list-style-type: none"> ■ Ensure that requirements, policies, and procedures for PPE programs are implemented, maintained, and evaluated. ■ Provide sufficient funding and personnel to implement PPE programs effectively. ■ Maintain awareness and knowledge of tasks and operations in the facilities that require PPE and RP. |

| Position | Responsibilities |
|--------------------------|---|
| Managers and Supervisors | <ul style="list-style-type: none"> ■ Perform or assist safety personnel with hazard assessments to determine OSHA applicability to the PPE program (attachment 1). ■ Ensure that a hazard assessment is completed, documented, and maintained in the facility to certify compliance with the OSHA standard (attachment 1). ■ Evaluate and review alternatives to the use of PPE where feasible. ■ If PPE is deemed necessary (as determined by a hazard assessment or other evaluation), perform, complete, maintain, and document the PPE selection review for the hazard identified (attachment 2). ■ Review and evaluate the effectiveness of the PPE selected periodically; update PPE as necessary. ■ Implement and administer written PPE programs for large offices, plants, bulk mail centers, and VMFs. ■ Consult with collateral duty facility safety coordinators on PPE requirements for smaller offices. ■ Maintain awareness of tasks under their supervision that require PPE. ■ Ensure employee adherence to PPE requirements. ■ Monitor operations to determine that changes to existing PPE practices may be warranted due to: <ul style="list-style-type: none"> – New processes or equipment introduced into the workplace. – Results of a review of records. ■ Consult with affected employees, safety, and medical staff. ■ Ensure that all employees (including new hires) who need or use PPE receive appropriate training. ■ Ensure that retraining is performed when workplace changes or changes in PPE render previous training obsolete. ■ Ensure retraining for employees whose inadequacies in knowledge or use of assigned PPE indicate that they have not retained the requisite understanding or skill. ■ Document all training and retraining. |

| Position | Responsibilities |
|---|--|
| Managers and Supervisors (continued) | <ul style="list-style-type: none"> ■ Ensure that all employee PPE training records are entered in the LMS. <p>Note: To certify compliance with the OSHA standard, the training record must include the name of the employee trained, date of training, and subject of training.</p> <ul style="list-style-type: none"> ■ Ensure the adequacy of all PPE, whether provided by the employee or by the Postal Service, to include proper maintenance, storage, care, and sanitation. ■ Ensure that damaged or defective PPE is not used. ■ Ensure the availability of appropriate PPE, accessories, and supplies. ■ Evaluate or assist safety personnel to evaluate the PPE program annually or whenever there is a change that affects the PPE program. ■ Ensure that hazard assessments (attachment 1), PPE selection documentation (attachment 2), training records, and PPE evaluations are completed, maintained, and documented in the facility's written PPE program. ■ Ensure that the facility's written PPE program is reviewed and updated annually or as necessary. |
| District and Plant Safety Personnel | <ul style="list-style-type: none"> ■ Assist the responsible manager or supervisor and the collateral duty safety coordinators with hazard assessments to determine OSHA applicability to the PPE program (attachment 1). ■ Ensure that hazard assessments are completed, documented, and maintained in the facility to certify compliance with the OSHA standard (attachment 1). ■ Assist responsible managers and supervisors to implement and administer a written PPE program for large offices, plants, bulk mail centers, and VMFs. ■ Assist collateral duty facility safety coordinators to implement and administer written PPE programs in smaller offices and facilities. ■ Evaluate and review alternatives to the use of PPE where feasible. ■ If PPE is deemed necessary (as determined by a hazard assessment or other evaluation), assist with performance of the PPE selection review for the hazard identified (attachment 2). |

| Position | Responsibilities |
|--|--|
| District and Plant Safety Personnel (continued) | <ul style="list-style-type: none"> ■ Assist with PPE selection, wear, use, care, and maintenance. ■ Assist with PPE training and with monitoring the integrity of the training program. ■ Monitor PPE adequacy, condition, wear, care, and maintenance during routine inspections; report deficiencies to responsible managers and supervisors immediately. ■ Ensure that PPE training records are entered in the LMS by responsible managers, supervisors, and collateral duty facility safety coordinators. <p>Note: To certify compliance with the OSHA standard, the training record must include the name of the employee trained, date of training, and subject of training.</p> <ul style="list-style-type: none"> ■ Assist with evaluation of the PPE program annually or whenever there is a change that affects the program. ■ Ensure that hazard assessments (attachment 1), selection documentation (attachment 2), training records, and evaluations are maintained and documented in the facility's written PPE program. ■ Assist with review and update of the facility's written PPE program annually or as necessary. |
| Collateral Duty Facility Safety Coordinators | <ul style="list-style-type: none"> ■ Consult with district and plant safety personnel, managers and supervisors, and the appropriate medical office on PPE program requirements. ■ Perform or assist district and plant safety personnel with hazard assessments to determine OSHA applicability to the PPE program (attachment 1). ■ Maintain awareness of tasks that require PPE. ■ Implement and administer required PPE programs in smaller offices and facilities in consultation with district and plant safety personnel. ■ In consultation with district and plant safety personnel, monitor operations to determine that changes to existing PPE practices may be warranted due to: <ul style="list-style-type: none"> – New processes or equipment introduced into the workplace. – Results of a review of records. |

| Position | Responsibilities |
|-----------------|---|
| Medical Staff | <ul style="list-style-type: none"> ■ Consult with the safety office, responsible managers and supervisors, and affected employees on medical and health issues related to PPE. |
| NCED | <ul style="list-style-type: none"> ■ Provide PPE training and resources. ■ Update training programs as necessary. |

RP Responsibilities

For responsibilities related to program administration, see Respiratory Protection Programs on page [8](#).

| Position | Responsibilities |
|--|--|
| Installation Heads | <ul style="list-style-type: none"> ■ Designate a qualified RPPA. ■ Ensure that requirements, policies, and procedures for RP programs are implemented, maintained, and evaluated. ■ Provide sufficient funding and personnel to implement the RP program effectively. ■ Maintain awareness and knowledge of tasks and operations in their facilities that require RP. ■ Prohibit employees from entering or performing tasks in IDLH or oxygen-deficient atmospheres. |
| Facility RPPA (Appointed by Installation Head) | <ul style="list-style-type: none"> ■ Prepare and administer all aspects of the facility's written RP program. ■ Provide technical advice and consultative assistance to responsible managers and supervisors regarding the RP program. ■ Conduct hazard assessments with responsible managers and supervisors, safety personnel, and medical staff (attachment 1). ■ Ensure that a hazard assessment is completed, documented, and maintained in the facility to certify compliance with the OSHA standard (attachment 1). ■ If an RP is deemed necessary (as determined by the hazard assessment or other evaluation), perform, complete, maintain, and document the NIOSH-certified RP selection for the hazard identified (attachment 2). ■ Periodically review and evaluate the effectiveness of the RP selected; update if necessary. ■ Coordinate with the responsible medical office regarding medical evaluations, follow-up examinations, medical determinations, recordkeeping, and related requirements. |

| Position | Responsibilities |
|---|---|
| Facility RPPA (Appointed by Installation Head) (continued) | <ul style="list-style-type: none"> ■ Ensure that no employee wears RP without a medical evaluation. ■ Coordinate or conduct the required initial and annual qualitative or quantitative respiratory fit testing; perform additional fit tests if conditions affecting respirator fit change. ■ Document all fit-testing activities. ■ Monitor proper use and wear of respirators in accordance with the facility's written RP program. ■ Monitor to ensure that no employee wears a tight-fitting respirator. ■ Ensure proper maintenance, repair, storage, and care of respirators, to include inspection, cleaning, and disinfection. ■ Ensure that all RP equipment (filters, cartridges, and canisters) used in the workplace is labeled and color-coded with the appropriate NIOSH-approved labels. ■ Ensure that employees who require or use RP receive initial training prior to use and annual retraining. ■ Ensure that retraining is performed when workplace changes or changes in the type of RP used render previous training obsolete. ■ Ensure retraining for employees whose inadequacies in knowledge or use of assigned PPE indicate that they have not retained the requisite understanding or skill. ■ Ensure that employee RP training records are entered in the LMS. <p>Note: To certify compliance with the OSHA standard, the training record must include the name of the employee trained, date of training, and subject of training.</p> <ul style="list-style-type: none"> ■ Evaluate the RP program with the responsible managers and supervisors, safety personnel, and medical staff annually or whenever there is a change that affects the RP program; document the evaluation. ■ Review and update the written RP program with responsible managers and supervisors, safety personnel, and medical staff. ■ Maintain all documentation required by the program (the facility's written RP program, training records, medical evaluations, fit tests, hazard assessments, respiratory selection criteria, and evaluations). |

| Position | Responsibilities |
|-------------------------------------|--|
| District and Safety Plant Personnel | <ul style="list-style-type: none"> ■ Prohibit employees from entering or performing tasks in IDLH or oxygen-deficient atmospheres. ■ Provide technical support and guidance to the RPPA in implementing the RP program. ■ Assist the RPPA, responsible managers and supervisors, safety personnel, and medical staff to conduct hazard assessments (attachment 1). ■ Ensure that a hazard assessment is completed, documented, and maintained in the facility to certify compliance with the OSHA standard. ■ Review and evaluate alternatives to the use of respirators where feasible. ■ Assist the RPPA, managers and supervisors, and medical staff to implement and administer the facility's written RP program. ■ If RP is deemed necessary (as determined by a hazard assessment or other evaluation), assist the RPPA to select the appropriate NIOSH-certified respirator for the identified hazard (attachment 2). ■ Periodically review and evaluate the effectiveness of the RP selected; update if necessary. ■ Ensure that employees do not wear tight-fitting respirators. ■ Assist the RPPA to consult with the responsible medical office regarding medical evaluations, follow-up examinations, medical determinations, recordkeeping, and related requirements. ■ Assist the RPPA to conduct initial and annual qualitative or quantitative respiratory fit testing; document testing. ■ Monitor the performance of additional fit tests if conditions affecting respirator fit change. ■ Monitor the use and wear of respirators in the facility during routine inspections; report deficiencies immediately to the RPPA and responsible manager and supervisors. ■ Assist with PPE training and with monitoring the integrity of the training program. |

| Position | Responsibilities |
|--|--|
| District and Safety Plant Personnel (continued) | <ul style="list-style-type: none"> ■ Ensure that the RPPA enters RP training records in the LMS. <p>Note: To certify compliance with the OSHA standard, the training record must include the name of the employee trained, date of training, and subject of the training.</p> <ul style="list-style-type: none"> ■ Assist the RPPA, responsible managers and supervisors, safety personnel, and medical staff to: <ul style="list-style-type: none"> – Perform RP evaluations annually or whenever there is a change that affects the RP program, – Review and update the facility’s written RP program. – Maintain the documents required for the program (the facility’s written RP program, training records, medical evaluations, fit tests, hazard assessments, respiratory selection criteria, and evaluations). |
| Managers and Supervisors | <ul style="list-style-type: none"> ■ Prohibit employees from entering or performing tasks in IDLH or oxygen-deficient atmospheres. ■ Assist the RPPA, safety personnel, and medical staff to conduct hazard assessments (attachment 1). ■ Ensure that a hazard assessment is completed, documented, and maintained in the facility to certify compliance with the OSHA standard. ■ Maintain awareness of tasks under their supervision that require RP. ■ Ensure employee adherence to RP requirements. ■ Monitor work areas and operations to identify potential respiratory hazards and consult with the RPPA, safety personnel, and medical staff for employees under their supervision. ■ If RP is deemed necessary (as determined by a hazard assessment or other evaluation), assist the RPPA to select the appropriate NIOSH-certified respirator for the identified hazard (attachment 2). ■ Periodically review and evaluate the effectiveness of the RP selected; update if necessary. ■ Work with the RPPA to ensure that the written RP program is implemented and administered properly. |

| Position | Responsibilities |
|---|--|
| Managers and Supervisors (continued) | <ul style="list-style-type: none"> ■ Ensure that employees under their supervision who need or use RP have received: <ul style="list-style-type: none"> – Medical clearance prior to use, – Initial and annual fit tests and retests, as necessary. – Initial training prior to use and annual retraining. ■ Ensure that retraining for employees under their supervision is conducted when workplace changes or changes in RP render previous training obsolete. ■ Ensure retraining for employees whose inadequacies in knowledge or use of assigned RP indicate that they have not retained the requisite understanding or skill. ■ Document all training and retraining. ■ Ensure that RP training records for employees under their supervision are entered in the LMS. <p>Note: To certify compliance with the OSHA standard, the training record must include the name of the employee trained, date of training, and subject of training.</p> <ul style="list-style-type: none"> ■ Monitor to ensure that employees under their supervision do not wear tight-fitting respirators. ■ Work with the RPPA to ensure that employees under their supervision: <ul style="list-style-type: none"> – Have a sufficient supply of NIOSH-certified respirators and NIOSH-approved equipment, accessories, and other supplies. – Inspect, use, clean, disinfect, maintain, repair, and store RP properly. ■ Work with the RPPA, responsible managers and supervisors, safety personnel, and medical staff to ensure that they: <ul style="list-style-type: none"> – Perform RP evaluations annually or whenever there is a change that affects the RP program. – Review and update the facility’s written RP program when required. – Maintain required program documents (the facility’s written RP program, training records, medical evaluations, fit tests, hazard assessments, respiratory selection criteria, and evaluations). |

| Position | Responsibilities |
|--|---|
| Collateral Duty Facility Safety Coordinators | <ul style="list-style-type: none"> ■ Prohibit employees from entering or performing tasks in IDLH or oxygen-deficient atmospheres. ■ Consult with the RPPA, district and plant safety personnel, and the appropriate medical office on RP program requirements. ■ Assist the RPPA, managers and supervisors, district and plant safety personnel, and medical staff to conduct and document hazard assessments (attachment 1). ■ Maintain awareness of tasks that require RP programs. ■ Assist the RPPA to implement and administer RP programs in smaller offices and facilities in consultation with district and plant safety personnel. ■ In consultation with district and plant safety personnel, monitor operations to determine that changes to existing RP practices may be warranted due to: <ul style="list-style-type: none"> – New processes or equipment introduced into the workplace. – Results of a review of records. |
| Medical Staff | <ul style="list-style-type: none"> ■ Assist the RPPA, responsible managers and supervisors, and safety personnel to conduct hazard assessments (attachment 1). ■ Coordinate and assist with RP medical evaluations, fit testing, and recordkeeping requirements. ■ Assist the RPPA, responsible managers and supervisors, and safety personnel to conduct annual RP evaluations. ■ Consult with the RPPA, responsible managers and supervisors, affected employees, and safety on medical and health issues related to RP. |
| NCED | <ul style="list-style-type: none"> ■ Provide PPE and RP training and resources. ■ Update training programs as necessary. |

Definitions

Air-purifying respirator. A respirator with an air-purifying filter, cartridge, or canister that removes specific air contaminants by passing ambient air through the air-purifying element.

Assigned protection factor (APF). The workplace level of respiratory protection that a respirator or class of respirators is expected to provide to employees when the employer implements a continuing, effective respiratory protection program.

Atmosphere-supplying respirator. A respirator that supplies the respirator user with breathing air from a source independent of the ambient atmosphere, and includes supplied-air respirators (SARs) and self-contained breathing apparatus (SCBA) units.

Canister or cartridge. A container with a filter, sorbent, or catalyst, or combination of these items, which removes specific contaminants from the air passed through the container.

Demand respirator. An atmosphere-supplying respirator that admits breathing air to the facepiece only when a negative pressure is created inside the facepiece by inhalation.

Elastomeric respirator. Normally made of a rubber-like material in which an appropriate filter (i.e., canister) can be attached.

Emergency situation. Any occurrence such as (but not limited to) equipment failure, rupture of containers, or failure of control equipment that may or does result in an uncontrolled significant release of an airborne contaminant.

Employee exposure. Exposure to a concentration of an airborne contaminant that would occur if the employee were not using respiratory protection.

End-of-service-life indicator (ESLI). A system that warns the respirator user of the approach of the end of adequate respiratory protection, for example, that the sorbent is approaching saturation or is no longer effective.

Escape-only respirator. A respirator intended to be used only for emergency exit.

Filter or air purifying element. A component used in respirators to remove solid or liquid aerosols from the inspired air.

Filtering facepiece (dust mask). A negative pressure particulate respirator with a filter as an integral part of the facepiece or with the entire facepiece composed of the filtering medium.

Fit factor. A quantitative estimate of the fit of a particular respirator to a specific individual, and typically estimates the ratio of the concentration of a substance in ambient air to its concentration inside the respirator when worn.

Fit test. The use of a protocol to qualitatively or quantitatively evaluate the fit of a respirator on an individual. (See qualitative fit test and quantitative fit test below.)

Helmet. A rigid respiratory inlet covering that also provides head protection against impact and penetration.

High efficiency particulate air (HEPA) filter. A filter that is at least 99.97% efficient in removing monodisperse particles of 0.3 micrometers in diameter. The equivalent NIOSH 42 CFR 84 particulate filters are the N100, R100, and P100 filters.

Hood. A respiratory inlet covering that completely covers the head and neck and may also cover portions of the shoulders and torso.

Immediately dangerous to life or health (IDLH). An atmosphere that poses an immediate threat to life, would cause irreversible adverse health effects, or would impair an individual's ability to escape from a dangerous atmosphere.

Interior structural firefighting. The physical activity of fire suppression, rescue or both, inside of buildings or enclosed structures which are involved in a fire situation beyond the incipient stage. (See 29 CFR 1910.155).

Loose-fitting facepiece. A respiratory inlet covering that is designed to form a partial seal with the face.

Maximum use concentration (MUC). The maximum atmospheric concentration of a hazardous substance from which an employee can be expected to be protected when wearing a respirator, and is determined by the assigned protection factor of the respirator or class of respirators and the exposure limit of the hazardous substance. The MUC can be determined mathematically by multiplying the assigned protection factor specified for a respirator by the required OSHA permissible exposure limit, short-term exposure limit, or ceiling limit. When no OSHA exposure limit is available for a hazardous substance, an employer must determine an MUC on the basis of relevant available information and informed professional judgment.

Negative pressure respirator (tight fitting). A respirator in which the air pressure inside the facepiece is negative during inhalation with respect to the ambient air pressure outside the respirator.

Oxygen deficient atmosphere. An atmosphere with an oxygen content below 19.5% by volume.

Physician or other licensed health care professional (PLHCP). An individual whose legally permitted scope of practice (i.e., license, registration, or certification) allows him or her to independently provide, or be delegated the responsibility to provide, some or all of the health care services required by paragraph (e) of this section.

Positive pressure respirator. A respirator in which the pressure inside the respiratory inlet covering exceeds the ambient air pressure outside the respirator.

Powered air-purifying respirator (PAPR). An air-purifying respirator that uses a blower to force the ambient air through air-purifying elements to the inlet covering.

Pressure demand respirator. A positive pressure atmosphere-supplying respirator that admits breathing air to the facepiece when the positive pressure is reduced inside the facepiece by inhalation.

Qualitative fit test (QLFT). A pass/fail fit test to assess the adequacy of respirator fit that relies on the individual's response to the test agent.

Quantitative fit test (QNFT). An assessment of the adequacy of respirator fit by numerically measuring the amount of leakage into the respirator.

Respiratory inlet covering. That portion of a respirator that forms the protective barrier between the user's respiratory tract and an air-purifying device or breathing air source, or both. It may be a facepiece, helmet, hood, suit, or a mouthpiece respirator with nose clamp.

Self-contained breathing apparatus (SCBA). An atmosphere-supplying respirator for which the breathing air source is designed to be carried by the user.

Service life. The period of time that a respirator, filter or sorbent, or other respiratory equipment provides adequate protection to the wearer.

Supplied-air respirator (SAR) or airline respirator. An atmosphere-supplying respirator for which the source of breathing air is not designed to be carried by the user.

Tight-fitting facepiece. A respiratory inlet covering that forms a complete seal with the face.

User seal check. An action conducted by the respirator user to determine if the respirator is properly seated to the face.

Acronyms

| | |
|-------|---|
| ANS | American National Standard |
| APF | assigned protection factor |
| CFR | Code of Federal Regulations |
| ERM | Employee Resource Management |
| ESLI | end-of-service-life indicator |
| FFP | filtering facepiece |
| HEPA | high efficiency particulate air |
| IDLH | immediately dangerous to life or health |
| JSA | Job Safety Analysis |
| LMS | Learning Management System |
| MI | management instruction |
| MMO | maintenance management order |
| MSDS | Material Safety Data Sheet |
| MTSC | Maintenance Technical Support Center |
| MUC | maximum use concentration |
| NCED | National Center for Employee Development |
| NIOSH | National Institute for Occupational Safety and Health |
| OHNA | Occupational Health Nurse Administrator |
| OSHA | Occupational Safety and Health Administration |
| PAPR | powered air-purifying respirator |
| PLHCP | physician or other licensed health care professional |
| PPE | personal protective equipment |
| QLFT | qualitative fit test |
| QNFT | quantitative fit test |
| RP | respiratory protection |
| RPPA | Respiratory Protection Program Administrator |
| SAR | supplied-air respirator |
| SCBA | self-contained breathing apparatus |
| VMF | vehicle maintenance facility |

Attachment 1 – PPE Hazard Assessment Certification Work Sheet

Instructions

Completion of a hazard assessment must be certified in accordance with the OSHA standard listed in 29 CFR 1910, Sections 132, 133, 135, 136, and 138, concerning personal protective equipment (PPE).

Refer to the *Personal Protective Equipment Program Guide* available in the Safety Toolkit; refer to Subpart I, Appendix B, of the OSHA Standard.

This work sheet describes and provides a format to document a two-part process for hazard assessment:

Part 1. Review of Records

The full-time or collateral duty facility safety coordinator responsible for the facility conducts a review of records by checking the following:

1. Facility accident data, using the installation's OSHA Form 300 Log or electronic equivalent.
2. Safety Toolkit Hazard Log and Summary.
3. Material Safety Data Sheets (MSDSs) for chemicals in use and equipment manufacturers' recommendations.
4. Other pertinent records.

Depending on the size and complexity of the facility or operation, the review can cover the entire facility, groups of operations, or specific operations.

After completing Part 1, the manager or supervisor works with the safety professional to complete part 2.

Part 2. Walk-through Survey and Risk Determination

The walk-through survey is conducted and documented by the safety representative and the manager or supervisor of the location or operation being assessed. Managers and supervisors should review existing Job Safety Analyses (JSAs) and verify that the hazards identified are correct.

At a minimum, the manager or supervisor completes the *Location/Operations* and *Potential Hazard* portions. Safety personnel will consult with the manager or supervisor about the risk category and potential hazards.

Assessment Certifications

- **Both the manager or supervisor and the safety professional must sign the hazard assessment to certify it.**
- Assessment certifications must be retained in the safety office for the facility or, in smaller offices, by the collateral duty facility safety coordinator.
- Certifications must be reviewed annually or when conditions in the workplace change.

Part 1. Records Review

Review the facility accident data, using the OSHA Form 300 Log, the Safety Toolkit Hazard Log and Summary, and other pertinent records (such as MSDSs) for 3 previous years. Look for injuries or illnesses that could have been prevented by PPE if it were properly selected and worn.

Use the guidance provided in the *Employee and Labor Relations Manual*, 821.3, Accident Analysis.

The analysis may cover the entire facility, operation by operation, or selected operations and locations. Use this checklist for analysis or create your own. Whichever method you use, share the review of records with supervisors so that they can examine and use them in their assessments of the workplace.

| Records Review | Findings |
|-----------------------------|----------|
| ■ OSHA Form 300 Log | |
| ■ Safety Toolkit Hazard Log | |
| ■ MSDSs | |
| ■ | |
| ■ | |

Comments:

Reviewer: _____ Date: _____

1. *Potential Hazard* — Use these codes:
 - I* = *impact*
 - P* = *penetration*
 - COM* = *compression (rollover)*
 - F* = *falling objects*
 - CHEM/BIO* = *chemical/biological hazards*
 - H* = *heat*
 - HD* = *harmful dust (eye hazard)*
 - L* = *light or radiation*
 - E* = *electrical*
2. *Risk Code* — Use the following guidelines for determining if employees must be supplied with PPE. These are guidelines and require the judgment of the safety professional. Enter one of the codes below:
 - 1 = High Risk.** If any of the following conditions exist, PPE **must** be supplied and worn:
 - a. Observed conditions at the time of the walk-through clearly warrant PPE; PPE has been used historically based on known risks (e.g., fallen or falling objects are observed, a chemical is routinely used, or welding is performed); or an OSHA standard requires PPE.
 - b. The operation or task has a history of accidents or injuries associated with a hazard that cannot be controlled by engineering controls.
 - 2 = Moderate Risk.** If any of the following conditions are met, PPE must be supplied and worn:
 - a. A potential hazard is noted due to the nature of the operation but is not directly observed during the walk-through. Employees have reported hazards using PS Form 1767, Report of Hazard, Unsafe Condition, or Practice (check the Safety Toolkit Hazard Log).
 - b. Accident analysis indicates a reasonable potential for injury.
 - 3 = Minimal Risk.** If either of the following conditions apply, PPE may not be required:
 - a. Hazards are noted but are controlled by engineering methods (e.g., guarding, interlocks) that prevent employee injury.
 - b. No history of injuries is associated with this operation.

Review conditions and accident data for this category annually or if conditions change.

Attachment 2 – PPE Selection Work Sheet and Certification

Instructions

Completing the PPE Selection Record

When potential hazards that require PPE are identified by a hazard assessment (attachment 1):

- The safety professional completes the PPE Selection Record using the appropriate part, e.g., eye and face, hand, foot, or head protection.
- The safety professional (full-time or collateral duty facility safety coordinator) should review the Job Safety Analysis (JSA) for the operation or task with the manager or supervisor and ensure that the hazards noted and PPE selected are included in the JSA.

Selecting PPE

To select PPE, use the tables provided in OSHA standard 29 CFR 1910, sections 132, 133, 135, 136, and 138, and Appendix B to Subpart I, Non-mandatory Compliance Guidelines for Hazard Assessment and Personal Protective Equipment Selection. Consult the PPE Program Guide, which provides tables from the OSHA standard and other references to help you select appropriate PPE based on the hazards identified. Also see the guidance supplied in the footnotes to the PPE Selection Record.

Certifications

Certifications must be retained in the safety office for the facility or, in smaller offices, by the collateral duty facility safety coordinator. The certifications must be reviewed annually or when conditions in the workplace change.

1. *Potential Hazard* — Use these codes for all PPE selection **except** hand protection:

| | | |
|-----------------|---|------------------------------------|
| <i>I</i> | = | <i>impact</i> |
| <i>P</i> | = | <i>penetration</i> |
| <i>COM</i> | = | <i>compression (rollover)</i> |
| <i>F</i> | = | <i>falling objects</i> |
| <i>CHEM/BIO</i> | = | <i>chemical/biological hazards</i> |
| <i>H</i> | = | <i>heat</i> |
| <i>HD</i> | = | <i>harmful dust (eye hazard)</i> |
| <i>L</i> | = | <i>light or radiation</i> |
| <i>E</i> | = | <i>electrical</i> |

Use these codes for selecting PPE for hand protection hazards:

| | | |
|-------------|---|------------------------------------|
| <i>T</i> | = | <i>toxic</i> |
| <i>C</i> | = | <i>severe cuts or lacerations</i> |
| <i>A</i> | = | <i>severe abrasions</i> |
| <i>P</i> | = | <i>punctures</i> |
| <i>COR</i> | = | <i>corrosives (chemical burns)</i> |
| <i>B</i> | = | <i>thermal burns</i> |
| <i>TEMP</i> | = | <i>temperature extremes</i> |

2. *Type of PPE* — The following provides guidance on types of PPE:

- a. **Eye and Face Protection.** Consult Appendix B of the OSHA standard and the Personal Protective Equipment Program Guide for details on eye and face protection.
- b. **Head Protection.** Consult Appendix B of the OSHA standard and the Personal Protective Equipment Program Guide for details on head protection.
The OSHA standard does not specifically address bump caps, but they should be provided as necessary in accordance with existing policy. Bump caps may be listed here for purposes of tracking their use. Additionally, OSHA may at some future date consider protection from impact with fixed objects to be within the purview of the standard.
Under "PPE Selected" indicate the class of electrical protection if necessary.
- c. **Hand Protection.** Select hand protection appropriate to the hazard. Gloves used in manual handling operations for comfort, improving grip, or cleanliness are not normally listed as PPE. Provide information about the PPE selected, to include the glove materials, e.g., butyl rubber or viton.
- d. **Foot Protection.** Select foot protection appropriate to the hazard. Employees, contractors, customers, and others visiting or observing the operation are not normally required to wear foot protection unless their activities put them directly at risk.

3. *Risk Code — Follow these guidelines for determining if employees must use PPE. These guidelines require the judgment of the safety professional. Enter one of the codes below:*

1 = High Risk. *If any of the following conditions exist, PPE **must** be supplied and worn:*

- a. *Observed conditions at the time of the walk-through clearly warrant PPE; PPE has been used historically based on known risks (e.g., fallen or falling objects are observed, a chemical is routinely used, or welding is performed); or an OSHA standard requires PPE.*
- b. *The operation or task has a history of accidents or injuries associated with a hazard that cannot be controlled by engineering controls.*

2 = Moderate Risk. *If any of the following conditions are met, PPE must be supplied and worn:*

- a. *A potential hazard is noted due to the nature of the operation but is not directly observed during the walkthrough. Employees have reported hazards (e.g., on PS Form 1767).*
- b. *Accident analysis indicates a reasonable potential for injury.*

3 = Minimal Risk. *If either of the following conditions apply, PPE may not be required:*

- a. *Hazards are noted but are controlled by engineering methods (e.g., guarding, interlocks) that prevent employee injury.*
- b. *No history of injuries is associated with this operation.*

Review conditions and accident data for this category annually or if conditions change.

4. *PPE Selected — Provide sufficient detail to ensure that the PPE is approved (that is, that it meets the OSHA standard) and is adequate to protect personnel from the hazard, and that its use can easily be checked by referring to this information. Provide shade numbers as necessary for protective eye wear (welding helmets).*

Attachment 3 – Guidance Concerning Filtering Facepieces

Safe Use of Filtering Facepieces (Dust Masks)

The following information must be shared with all employees who voluntarily wear a filtering facepiece (dust mask) on the job:

1. The Occupational Safety and Health Administration (OSHA) requires that you be given the information provided on the second page of this attachment if you wear a filtering facepiece (FFP), also known as a dust mask, while working.
2. This information applies whether the Postal Service offers you an FFP or you choose to wear your own.
3. Postal Service employees may wear an FFP while working unless it would cause a hazardous condition (see OSHA Appendix D0).
4. Employees are not permitted to wear tight-fitting, air-purifying respirators or other non-FFP respirators unless they are supplied by the Postal Service in conformance with OSHA regulations. This policy is for your protection.
5. The information OSHA requires the Postal Service to share with you deals mostly with tight-fitting respirators (such as the rubber-mask-type with canisters attached). However, some of this information is also pertinent to FFPs. Note the following points when wearing an FFP, whether it is your own or it is offered for your comfort by the Postal Service:
 - a. Read and follow the instructions for a more comfortable fit and effectiveness. Follow recommendations for fit testing and use, storage, and cleaning, because a dirty FFP can cause skin irritation or other health problems.
 - b. FFPs may be suitable to provide comfort and to avoid allergens (like pollen) and nuisance dust. However, they do not necessarily protect you from toxic materials. If necessary, the Postal Service will supply you with a carefully selected respirator for that purpose in conformance with OSHA regulations.
 - c. Do not wear an FFP if it causes breathing problems or other discomfort. Consult with safety or medical personnel.

Appendix D to 29 CFR 1910.134

**Mandatory Information for Employees Using Respirators When Not Required Under the Standard*

“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 respirator’s 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.
4. Keep track of your respirator so that you do not mistakenly use someone else’s respirator.”