

Frequently Asked Questions
Personal Protective Equipment

(The following are Technical Interpretations provided by the Florida Department of Labor and Employment Security)

Q: Is there a standard, either OSHA or ANSI, that covers/requires employees with long hair to put it in a hair net while they are working on or near powered machinery?

A: There is no specific OSHA standard in either 1910 Subpart I (personal protective equipment) or 1910 Subpart O (machinery and machine guarding) regarding hair nets and usage. However, if a machine guard does not provide adequate protection and long hair could become entangled in moving parts of machinery, the employer should require that the employee's hair be covered or confined. (*OSHA publication 2095, p. 14*) Caps and hair nets should be used to confine hair to prevent the worker's hair from being caught in machinery. (*OSHA publication 3067, p. 10*) Generally, employers should cover this area in a safety policy that prohibits such items as unconfined neckties, dangling jewelry, as well as unconfined long hair from being situated near operating machinery where injury could result. Certain workplaces have standards on sanitation that may further influence the workplace in this regard. **{29 CFR 1910.132 (a)}**

Q: A manufacturer's MSDS recommends the use of gloves. Is the employer required to provide gloves for the employees use?

A: Yes, if required on the MSDS. Whenever it is necessary by reason of hazards of processes or environment, CHEMICAL HAZARDS, radiological hazards, or mechanical irritants encountered in a manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact, personal protective equipment for the extremities must be provided, used, and maintained. **{29 CFR 1910.132 (a)}**

Q: Are there any personal protection requirements for employees using household bleach in the workplace?

A: Yes. Employers are required to provide protective gloves, chemical goggles, and a face shield for employees who are exposed to corrosive liquids. Household bleach (i.e., Clorox), also known as sodium hypochlorite (CAS No. 7681-52-9), is a strong eye, skin, and mucous membrane irritant that is commercially available in 5% and 12 % concentrations. The extent of irritation depends on the concentration of sodium hypochlorite and the duration of exposure. **{29 CFR 1910.132 & .133}**

Q: What are the medical requirements for wearing a respirator?

A: There are no specific medical requirements for wearing a respirator. A local physician must determine what health and physical condition is pertinent for the employee to use the equipment and perform the work. This medical determination may or may not consist of a full or partial physical examination of the employee. If, in the judgement of the local physician, no physical examination is deemed necessary, then a statement from the physician indicating that the employee may use the respirator at work is acceptable. **{29 CFR 1910.134 (b) (10)}**

Q: Respirators are used in a facility. Are physical examinations required on an annual basis?

A: No. The standard on respiratory protection provides that persons should not be assigned to tasks requiring the use of respirators unless it has been determined that they are physically able to perform the work and use the equipment. The local physician shall determine what health and physical conditions are pertinent.

There is no examination requirement for an annual physical examination. However, this section recommends, but does not mandate, that the respirator user's medical status be reviewed periodically.

Q: What is meant by medical evaluation and fit testing for respirators?

A: 29 CFR 1910.134 (a) (2) does require that an employer provide respirators when such equipment is necessary to protect the health of the employee. This standard further requires that an employer providing respirators shall be responsible for the establishment and maintenance of a respiratory protective program. The requirements of such a respiratory protective program are listed under 29 CFR 1910.134 (b).

Medical examinations are not required by 29 CFR 1910.134 (b) (10). However, other specific standards, for example: 29 CFR 1910.1025 (j) (3), "Lead," and 29 CFR 1910.1001 (l) (1) - (3), "Asbestos," do require medical examinations for certain users of respiratory protection devices.

29 CFR 1910.134 (b) (10) describes one of the required elements of a respiratory protective program. The program must address the instruction that persons who are not physically able to use respirators should not be assigned to tasks requiring respirator use. The standard does not specify how the employer shall address this issue. It does provide, however, that any determination of whether or not a particular condition of a specific employee precludes him or her from respirator use shall be made by a local physician.

29 CFR 1910.134 (b) (10) does not require, but recommends, periodic review of the medical status of employees who use respirators. Other specific standards, such as 29 CFR 1910.1011 (g) (1) (ii), "4-Aminodiphenyl," and 29 CFR 1910.1017 (k) (2), "Vinyl Chloride," mandate employers establish and maintain medical surveillance programs providing employees with periodic medical examinations at no cost to the employee. These standards, however, shield specific operations and do not apply to other applications.

Examples of policies that could be included within a respiratory protective program to meet the requirements of (b) (10) are: 1) requiring each employee to bring a note from his or her doctor saying that the employee is physically able to perform the work and use the respirator, 2) providing medical exams for all employees by a physician designated by the employer, or 3) requiring each employee to respond to a questionnaire which asks if the employee has any existing condition or other reason that would make him or her physically unable to perform the work and wear a respirator; any employee responding positively to the questionnaire would not be assigned tasks requiring use of respirator, unless a physician determines that he or she is able to use a respirator.

Fit-testing for all users of respirators is required by 29 CFR 1910.134 (e) (5). The American National Standards Practices for Respiratory Protection Z88.2-1969, incorporated by reference in 29 CFR 1910.134c, defines a respirator as: "A device designed to protect the wearer from the inhalation of harmful atmospheres." The procedures specified in 29 CFR 1910.134 (e) (5) apply whenever respirators are used. This means that whenever respirators are required or permitted by the employer, any employee who is a user of the respiratory protective device must be fitted and fit-tested. Fitting may be accomplished in accordance with the manufacturer's facepiece fitting instructions. The actual fitting and fit-test are part of the employer's respirator training program.

