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Managing Risk. Leading People.



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Why PPE?

- Is it an OSHA rule?
- Is it a GC rule?
- Is it a company rule?
- To keep our employees safe

When is it necessary?

- 29CFR1926.95(a)***Application.*** Protective equipment, ... shall be provided, used, and maintained in a sanitary and reliable condition **wherever it is necessary by reason of hazards of processes or environment**, ... in a manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact.

When is it necessary?

Process or environment?

Manufacturer recommendations?

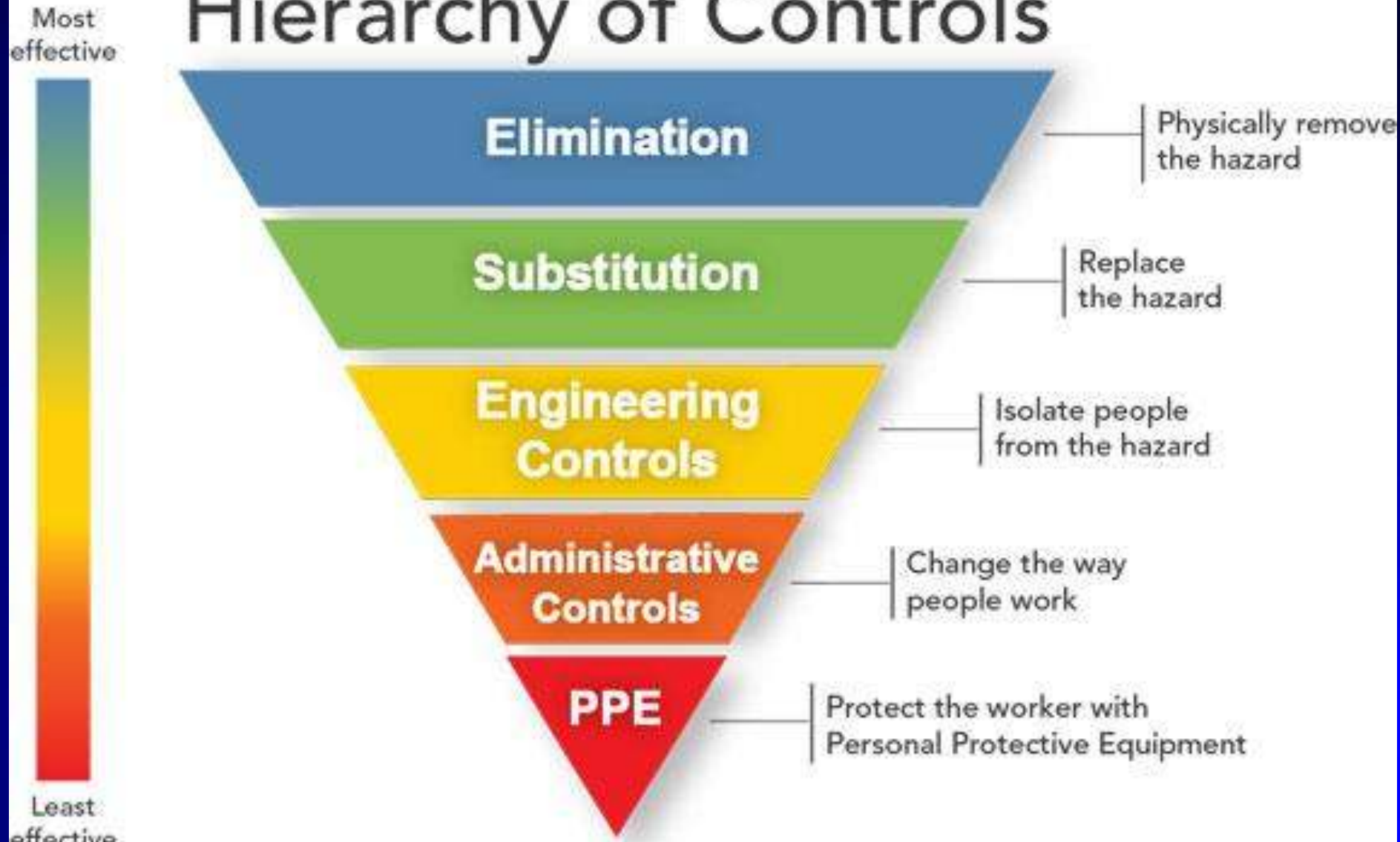
Blanket company policy

Contractual agreement

What if it wasn't necessary?

- When we can find a more effective way to reduce the risk.

Hierarchy of Controls



Cost Cannot be a factor

➤ Hard Hats vs.



\$10 = \$3.40 - ULINE

Helmets



\$90 – ULINE – Recommended for tree trimmers

Bring on the Heat

- Over 100 days above 100 degrees
- 1 study stating there is no temperature difference
- Incidents say otherwise



The Scientific Method

- The scientific method involves careful observation coupled with rigorous skepticism, because cognitive assumptions can distort the interpretation of the observation. Scientific inquiry includes creating a hypothesis through inductive reasoning, testing it through experiments and statistical analysis, and adjusting or discarding the hypothesis based on the result
- Essentially, you have to formulate a theory then try to disprove that theory. Only when you can not disprove it can you call it fact.

The Root Cause



Peer Reviewed

- Professional Safety Journal, August 2008
 - 40% of fatal falls to lower levels resulted in intracranial injuries
 - Cited advancements in motor sports, etc.
 - Stated Taiwan requires helmets with chin straps
 - Cited no evidence they have made a difference
 - No mention of preventing the falls in the first place.

Fall from a Silo

- From this same article:
- Cites a man falling 40 feet from a silo, but admits he was not wearing head protection at all, even before the fall.
- Steel worker fell 18 ½' landing on his head and sustaining spinal cord injuries. The author theorizes that if he had a chin strap, he would be OK.
- Again, no mention of preventing the fall.

Is this OK?



Is this OK?



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7/22/2019

Letter of Interpretation

- *Paints and stickers may eliminate electrical resistance and – depending on the location and quantity – conceal defects, cracks, penetration, and any damage that would be otherwise readily identifiable during the employee's inspection to ensure reliability. Another concern is that paints, thinners, and solvents, as discussed in Appendix A of ANSI Z89.1-2003 and the appendices of the 1986 and 1997 versions, can also attack or damage the shell of a helmet and reduce protection.*

LOI, part 2

- *For these reasons, painting or applying stickers must be performed in accordance with the manufacturer's instructions, unless the employer can demonstrate that the altered protective helmet is equally as effective and protective as those meeting the requirements of Z89.1. Protective helmet manufacturers usually provide very specific instructions regarding paints, stickers, or decals that will not negatively affect the performance of a protective helmet.*

From a 3M Technical Bulletin

- • Do not use paints, solvents, chemicals, **adhesives**, gasoline or like substances on this hard hat. These materials can cause deterioration to the shell's ability to withstand impact and penetration.
- • Do not store objects between the suspension and the shell of a hard hat.

REMEMBER

- PPE is not bad
- PPE should be evaluated and selected in the scope of the Hierarchy of Controls.
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