



## ADMINISTRATIVE POLICY

<b>Policy Title</b>	Personal Protective Equipment
<b>Policy Subtitle/Subject</b>	PPE
<b>Responsible Executive(s) (RE)</b>	Sr. VP and COO, Patrick Norton
<b>Responsible Office(s) (RO)</b>	Office of Environmental Health & Safety
<b>Primary Point of Contact from RO</b>	Executive Director of Environmental Health & Safety
<b>Contact Information (email and phone)</b>	oehs@tulane.edu 504-865-5653
<b>Date Proposed</b>	5/15/23
<b>Reviewed</b>	5/15/23
<b>Last Updated</b>	5/15/23
<b>Effective Date</b>	5/15/23

Permanent

Temporary

### 1.0 POLICY STATEMENT

It is the policy of Tulane University to provide a workplace that is free from recognized hazards, protect employees from recognized hazards, and to comply with applicable occupational safety and health regulations.

### 2.0 PURPOSE AND SCOPE

The purpose of this policy is to ensure the protection of employees from workplace hazards, the assessment of hazards, the control of hazards where feasible, the provision and use of appropriate personal protective equipment, and compliance with applicable regulations.

### 3.0 APPLICABILITY OF THIS POLICY

The Personal Protective Equipment Policy applies to all Tulane personnel potentially exposed to hazards inherent in the type of work performed by employees, hazardous materials used by employees, and/or hazards present in employees' work environments. Personal protective equipment must be provided and used when engineering, work practice and administrative controls are not feasible or do not provide sufficient protection to prevent occupational injury and illness.

### 4.0 WEBSITE ADDRESS FOR THIS POLICY

[www.policy.tulane.edu](http://www.policy.tulane.edu)

### 5.0 CONTACTS

Subject	Contact	Telephone	E-mail/Web Address
Clarification and general information regarding personal protective equipment.	Office of Environmental Health & Safety	504-865-5653	oehs@tulane.edu

### 6.0 CONTENT

1.0 POLICY STATEMENT .....	1
2.0 PURPOSE AND SCOPE .....	1
3.0 APPLICABILITY OF THIS POLICY .....	2
4.0 WEBSITE ADDRESS FOR THIS POLICY .....	2
5.0 CONTACTS .....	2
6.0 CONTENT.....	2
7.0 DEFINITIONS .....	3
8.0 POLICY AND PROCEDURES .....	3
8.1 Responsibilities .....	3
8.1.1. Office of Environmental Health and Safety (OEHS) .....	3
8.1.2. Unit/Department Heads, Principal Investigators, and/or Directors .....	3
8.1.3. Departmental Safety Representatives (DSR) .....	3
8.1.4. Employees .....	4
8.1.5. Supervisors/Principal Investigator Responsibilities .....	4
8.2 Requirements .....	4
8.2 Hazard Assessment.....	5
8.3 Training .....	6

8.3.1. Training Frequency .....	6
8.4 Provision of Protective Equipment/Payment for Protective Equipment.....	7
8.5 Equipment.....	8
8.6 Employee-Owned Equipment.....	8
8.7 Types of Personal Protective Equipment .....	8
8.7.1. Eye And Face Protection .....	8
8.7.2. Respiratory Protection.....	9
8.7.3. Head Protection.....	9
8.7.4. Foot Protection.....	9
8.7.5. Electrical Protective Protection.....	9
8.7.6. Hand Protection .....	10
8.7.7. Personal Fall Protection Systems/Fall Protection.....	10
8.7.8. Hearing Protection .....	10
<b>9.0 CONSEQUENCE OF VIOLATING THE POLICY.....</b>	<b>10</b>

## **7.0 DEFINITIONS**

Unit - A department, section, center, or program or any number or configuration of these components.

## **8.0 POLICY AND PROCEDURES**

### **8.1 Responsibilities**

#### **8.1.1. Office of Environmental Health and Safety (OEHS)**

- Develop and update the PPE policy, procedures, and guidance;
- Provide general safety training through the Learning Management System, and/or in person training as requested;
- The OEHS can provide appropriate audio/visual and printed material for use in training and assistance with selection of PPE;
- Assist when requested in identifying activities, work environments, and potential exposures where a PPE hazard assessment is required;
- Provide guidance on the selection and use of PPE and training as needed;
- Review completed PPE hazard assessments as needed or upon request.

#### **8.1.2. Unit/Department Heads, Principal Investigators, and/or Directors**

- Actively support PPE policies and procedures within their units;
- Ensure workplaces are assessed to determine if hazards are present, or likely to be present, which necessitate the use of personal protective equipment.

#### **8.1.3. Departmental Safety Representatives (DSR)**

- Help ensure their units are in compliance with regulatory standards and Tulane University policies regarding personal protective equipment, and the Personal Protective Equipment-Hazard Assessment Certification Program outlined in the PPE Policy;
- Collect and submit the training documentation, PPE assessments, and other required documentation prepared by supervisors/principal investigators to OEHS.

#### 8.1.4. Employees

- Comply with the PPE policy, the safety requirements implemented by supervisors/principal investigators, and applicable regulations;
- Conduct assigned tasks in a safe manner;
- Use PPE as required and in accordance with instructions and training received;
- Care for PPE properly, and notify PI/supervisor of any contaminated, worn out, defective or otherwise damaged PPE;
- Participate in safety training;
- Report concerns, including PPE malfunctions or issues, to supervisors/principal investigators.

#### 8.1.5. Supervisors/Principal Investigator Responsibilities

- Implement PPE policy in the workplace;
- Perform PPE hazard assessments to determine if hazards are present, or likely to be present, which necessitate the use of personal protective equipment. Document and certify PPE hazard assessments;
- Review and update PPE hazard assessments when a new hazardous material, condition, or process is introduced into the work environment;
- Choose the appropriate employee PPE for identified potential hazards to which employees might be exposed;
- Ensure that employees, students, affiliates, and visitors are aware of hazardous materials, conditions or processes in their work environment;
- Ensure that employees, students, affiliates, and visitors receive applicable PPE information and training prior to exposure to the hazards;
- Supply required PPE at no cost to affected employees and ensure PPE is used properly.

### 8.2 Requirements

The United States Department of Labor, Occupational Safety and Health Administration requires employers to assess work areas to determine if hazards are present, or are likely to be present that necessitate the use of personal protective equipment (PPE). If such hazards are present, or likely to be present, and cannot be eliminated or controlled through engineering, and/or administrative controls, the employer shall select and require use of PPE that affords protection against hazards identified in the hazard assessment including hazards inherent in the type of work performed by the employee, hazardous materials used by the employee, and/or hazards present in the employee's work environment. Under no circumstance shall an unprotected person be knowingly subjected to hazardous environmental conditions.

OSHA has established personal protective equipment requirements in Title 29 of the Code of Federal Regulations (CFR) Parts 1910 (General Industry) and 1926 (Construction) that address topics

including, employer provision of personal protective equipment, employer responsibility for requiring employee use of personal protective equipment, and employee use of the equipment.

## 8.2 Hazard Assessment

In response to OSHA requirements, the Office of Environmental Health and Safety (OEHS) developed a Personal Protective Equipment Hazard Assessment Certification Program (PPEHACP) to assist Tulane University units in meeting OSHA compliance standards.

Department supervisors/principal investigators are responsible for implementation of the PPE-HACP and are to assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment. If such hazards are present, or likely to be present, the supervisor/principal investigator shall:

- Select and have each affected employee use the appropriate types of PPE that will protect the employee from the hazards identified in the hazard assessment;
- Communicate PPE selection decisions to each affected employee; and
- Select PPE that properly fits each affected employee.

Supervisors/principal investigators must complete the hazard assessment using the Personal Protective Equipment (PPE) Hazard Assessment Form provided by the OEHS. The assessment must be verified through written certification identifying:

- The workplace/area evaluated;
- The person certifying the evaluation has been performed;
- The date(s) of the hazard assessment;
- The document as certification of hazard assessment.

Laboratories: Completed PPE Hazard Assessment Forms must be maintained by the principal Investigator or supervisors and their departments. A copy of the completed form must remain accessible to employees in the work area and provided to OEHS upon request.

Completed PPE Hazard Assessment Forms are to be submitted to the OEHS via email to the OEHS Help Desk at: [OEHS@tulane.edu](mailto:OEHS@tulane.edu). A copy of the completed form must be maintained by supervisors and their departments. A copy of the completed form must also remain in the work area and accessible to employees.

Hazard reassessments must be conducted when a new hazard warrants reassessment, e.g., when processes, equipment, or materials utilized change the personal protective equipment needs of the employee. A reassessment of the work area should include:

- A review of new processes, equipment, or materials;

- A review of any accident records;
- A reevaluation of previously chosen personal protective equipment

### 8.3 Training

Employees who are required by this section to use PPE are to be provided training. OEHS provides generic training. The employee's supervisor is to provide specific training. Generalized personal protective equipment training programs are available via the Tulane University Learning Management System. The OEHS can provide appropriate audio/visual and printed material for use in training and assistance with selection of PPE. Training must meet all applicable regulations.

Employees must be trained to know:

- When PPE is necessary;
- What PPE is necessary;
- How to properly don, doff, adjust, and wear PPE;
- The limitation of the PPE; and
- The proper care, maintenance, useful life, and disposal of the PPE

Before being allowed to perform work requiring the use of PPE, each affected employee must demonstrate an understanding of:

- When PPE is necessary;
- What PPE is necessary;
- How to properly don, doff, adjust, and wear PPE;
- The limitation of the PPE;
- The proper care, maintenance, useful life and disposal of the PPE; and
- The ability to use properly PPE

All training must be documented using the:

- Training Record Form – Group Listing  
(<http://www2.tulane.edu/oehs/training/upload/training-record-formgroup.pdf>);
- Training Record Form – Individual Listing  
(<http://www2.tulane.edu/oehs/training/upload/training-recordform.pdf>); or
- Tulane University Learning Management System.

Training Record Forms must be submitted to the OEHS via email to OEHS Help Desk at: OEHS@tulane.edu. A copy of the Training Record is to be retained in the unit.

#### 8.3.1. Training Frequency

Training must be conducted when a new employee is hired. Circumstances in which retraining is required include, but are not limited to:

- Workplace changes render previous training obsolete, e.g., introduction of new hazards.
- Changes in the type of PPE to be used render previous training obsolete;
- Inadequacies in an affected employee's knowledge or use of assigned PPE indicate the employee has not retained the requisite understanding or skill;

- Periodic training

The University shall provide employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new chemical hazard the employees have not previously been trained on is introduced into their work area. Employees are obligated to learn and understand the hazards of the chemicals through reading the SDSs and chemical labels.

Information and training should be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals. Chemical-specific information must always be available through labels and safety data sheets.

#### 8.4 Provision of Protective Equipment/Payment for Protective Equipment

OSHA 29 CFR 1910.132, General Requirements for 1910 Subpart I - Personal Protective Equipment; and 1926.95, Criteria for Personal Protective Equipment for 1926 Subpart E – Personal Protective and Life Saving Equipment requires employers to provide PPE to employees required to use PPE, including PPE for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields and barriers, whenever “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.”

The cost of implementation and maintenance (training, equipment, recordkeeping) of the Personal Protective Equipment policy shall be the responsibility of the respective units.

The protective equipment, including personal protective equipment (PPE), used to comply with applicable regulations must be provided by the unit at no cost to employees, with the exceptions listed below as identified by OSHA:

- The unit is not required to pay for non-specialty safety-toe protective footwear (including steel-toe shoes or steel-toe boots) and non-specialty safety eyewear, provided the unit permits items to be worn off the job-site.
- When the unit provides metatarsal guards and allows the employee, at his/her request, to use shoes or boots with built-metatarsal protection, the unit is not required to reimburse the employee for the shoes or boots.
- The unit is not required to pay for:
  - Everyday clothing, such as long-sleeve shirts, long pants, street shoes, and normal work boots;
  - Ordinary clothing, skin creams, or other items, used solely for protection from weather, such as winter coats, jackets, gloves, parkas, rubber boots, hats, raincoats, ordinary sunglasses, and sunscreen; or
  - Logging boots required by 29 CFR 1910.266, Logging Operations standard as addressed in the 1910.132, General Requirements standard

- The unit must pay for replacement PPE, except when the employee has lost or intentionally damaged the PPE.

When an OSHA standard other than 29 CFR OSHA 1910.132, General Requirements standard or 29 CFR 1926.95, Criteria for Personal Protective Equipment specify if the employer must pay for specific equipment, the payment provision of that standard will prevail.

## 8.5 Equipment

Supervisors/principal investigators are responsible for choosing the appropriate PPE for employees under their supervision.

All personal protective equipment must be of safe design and construction for the work to be performed.

The equipment must be properly fitted and must be maintained in a sanitary, safe, and reliable condition.

Defective or damaged personal protective equipment must not be used

## 8.6 Employee-Owned Equipment

Where employees provide their own protective equipment, the supervisor/principal investigator shall be responsible to assure its adequacy, including proper maintenance and sanitation of such equipment.

Where an employee provides adequate protective equipment he/she owns in accordance with the item above, the supervisor/principal investigator may allow the employee to use it and is not required to reimburse the employee for that equipment. The supervisor/principal investigator shall not require an employee to provide or pay for his or her own PPE, unless an exception in 6.3-Payment for Protective Equipment applies.

## 8.7 Types of Personal Protective Equipment

### 8.7.1. Eye And Face Protection

The supervisor/principal investigator must ensure each employee wears appropriate eye or face protection when potential for exposure to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation exists. Eye protection that provides side protection must be worn when the potential for exposure to hazards of flying objects exists.

Face shields are intended to protect the face from hazards and are secondary protection for the eyes. Safety glasses or safety goggles, which are primary eye protection, are to worn with the face shield. The choice of safety glasses or goggles worn under the face shield is to be determined by the potential hazard(s) to which the employee may be exposed.



Compliance with OSHA 29 CFR 1910.133, Eye and Face Protection standard; 1926.102, Eye and Face Protection standard; and any other applicable regulations are required.

### 8.7.2. Respiratory Protection

Refer to Tulane's Respiratory Protection policy via [policy.tulane.edu](http://policy.tulane.edu).

Compliance with OSHA 29 CFR 1910.134, Respiratory Protection; 1926.103, Respiratory Protection; and any other applicable regulations are required.

### 8.7.3. Head Protection

The supervisor/principal investigator must ensure each employee wears a protective helmet:

- When working in areas where there is potential for injury to the head from falling objects;
- Designed to reduce electrical shock hazard is worn when near exposed electrical conductors that could contact the head; or
- Where there is possible danger of head injury from impact, or from falling or flying objects, or from electrical shock and burns.

Compliance with OSHA 29 CFR 1910.135, Head Protection standard; and 29 CFR 1926.100, Head Protection; and any other applicable regulations are required.

### 8.7.4. Foot Protection

The supervisor/principal investigator must ensure each employee uses protective footwear when working in areas where there is a danger of foot injuries due to falling or rolling objects, or objects piercing the sole, or when the use of protective footwear will protect the employee from an electrical hazard, such as a static-discharge or electric shock hazard that remains after the employer takes other necessary protective measures.

Appropriate shoes, offering protection for both feet and toes, shall be worn in areas where hazardous chemicals are in use. Clogs, perforated shoes, sandals, and cloth shoes do not provide protection against spilled chemicals. In some cases, safety shoes are required. Shoe covers may be required for work with especially hazardous materials. Shoes with conductive soles are useful in preventing buildup of static charge, and insulated soles can protect against electrical shock.

OSHA 29 CFR 1926.26, Occupational Foot Protection standard for Construction Industry requires safety-toe footwear to meet the requirements and specifications in American National Standard for Men's Safety-Toe Footwear, Z41.1-1967.

Compliance with OSHA 29 CFR 1910.136, Foot Protection standard; 1926.96, Occupational Foot Protection; and any other applicable regulations are required.

### 8.7.5. Electrical Protective Protection

Refer to the OSHA 29 CFR 1910.137, Electrical Protective Equipment standard and 1926.97, Electrical Protective Equipment standard for equipment specifications, in-service care, and use of electrical protective equipment.

Compliance with OSHA 29 CFR 1910.137, Electrical Protective Equipment standard; 1926.97, Electrical Protective Equipment standard; and any other applicable regulations are required.

#### 8.7.6. Hand Protection

Employees must use appropriate hand protection when employees' hands are exposed to hazards such as those from skin absorption of harmful substances; severe cuts or lacerations; severe abrasions; chemical burns; thermal burns; and harmful temperature extremes.

Compliance with OSHA 29 CFR 1910.138, Hand Protection standard and any other applicable standards are required.

#### 8.7.7. Personal Fall Protection Systems/Fall Protection

Contact the Office of Environmental Health and Safety regarding fall protection by emailing the OEHS Help Desk at: [OEHS@tulane.edu](mailto:OEHS@tulane.edu).

Compliance with all applicable regulations, including the following OSHA standards, are required:

- General Industry OSHA standards such as: OSHA 29 CFR 1910.28, Duty to Have Fall Protection and Falling Object Protection; 1910.29, Fall Protection Systems and Falling Object Protection-Criteria and Practices; 1910.30, Training Requirements for Subpart D Walking-Working Surfaces; and 1910.140, Personal Fall Protection Systems
- Construction OSHA standards such as: 1926 Subpart M- Fall Protection; 1926.760, Fall Protection and 1926.761, Training (1926 Subpart R – Steel Erection); and 1926.1423, Fall Protection and 1926.1430, Training (1926 Subpart CC – Cranes & Derricks in Construction)

#### 8.7.8. Hearing Protection

Refer to Tulane University Hearing Conservation Policy via [policy.tulane.edu](http://policy.tulane.edu).

Compliance with OSHA 29 CFR 1910.95, Occupational Noise Exposure; 1926.101, Hearing protection; and any other applicable regulations are required.

### 9.0 CONSEQUENCE OF VIOLATING THE POLICY

Violation of this policy may result in disciplinary action, up to and including termination.

For consequences of violating the policy refer to the Faculty and Staff handbooks found at [policy.tulane.edu](http://policy.tulane.edu).