

**UNIVERSITY OF ROCHESTER**  
**ENVIRONMENTAL HEALTH & SAFETY**

<b>Title: Personal Protective Equipment Program</b>	<b>Date: August 2, 2022</b>
<b>Revision No.: 8</b>	<b>Page 1 of 7</b>
<b>Prepared by: Yohana Rivero</b>	<b>Approved by: Mike Liberty</b>
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**I. PURPOSE**

This policy applies to University employees who, in the course of their duties, work in or enter areas with recognized or reasonably foreseeable hazards.

Examples of recognized hazards include, but are not limited to:

- chemical exposures
- biological exposures
- radiological exposures
- sharp objects which may cut or puncture the skin
- excessive noise
- heavy objects which may fall onto the feet or head
- flying debris which may strike the eyes
- laser energy or other non-ionizing radiation
- airborne substances that may be inhaled
- any other hazard which may cause injury, illness, or impairment by inhalation, absorption, ingestion, injection, or mechanical action

Personal protective equipment (PPE) shall not be used in lieu of engineering and/or administrative controls where such controls are feasible and can provide protection equal to or greater than that provided by personal protective equipment.

**II. DEFINITIONS**

**Biological Hazards** are those hazards created by infectious disease organisms. Examples of biological hazards are Tuberculosis, HIV, Hepatitis-B, or any other diseases that passes from person to person or animal to person through direct or indirect contact, or through laboratory procedures.

**Certification of Hazard Assessment (CHA)** is a written document confirming that jobs/tasks presenting hazards have been assessed and required PPE has been specified. The supervisor is responsible to ensure that PPE hazard assessments are performed and the certification(s) is written, signed, dated, and readily available in each location.

**Chemical Hazards** are those hazards that cause injury or illness through chemical actions or through the properties of the chemical. Chemical hazards can have physical effects, such as being burned by a fire caused by a flammable chemical, or they can have health effects such as causing chemical burns, or illnesses due to overexposure. Safety Data Sheets provide information

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on the hazards of the chemicals that are in your workplace.

**Hazard Assessment** is a process of identifying the hazards associated with a defined task and prescribing personal protective equipment along with other relevant protection measures which must be employed to reduce the risk from the hazards.

**Physical Hazards** are hazards that cause injury through some mechanical action. Some examples of this could be heat burns, tripping, cutting or puncturing the skin, or being struck by a moving object.

**Radiological Hazards** is the uncontrolled release of radiation or radioactive material (UV, IR, MW, Non-ionizing or Ionizing) that can harm people or damage the environment.

### III. RESPONSIBILITIES

#### ***Supervisor***

A Certificate of hazard assessment must be completed to document that the hazard assessment has been performed. Re-assessments must be performed whenever there is a significant change in the workplace (equipment, process, hazard) or an employee's regular duties. The CHA must be updated to reflect any required modifications. On request, Environmental Health & Safety can assist supervisors in completing hazard assessments.

It is also the supervisor's responsibility to:

- Contact EH&S to review and sign-off on all PPE Certification of Hazard Assessments
- Provide and document site specific training in the proper selection, use, limitations, and care of PPE (with the assistance of EH&S on request), or ensure that such training is provided to his or her employees
- Based on the results of the PPE hazard assessment, make sure that their employees have the appropriate equipment.
- Ensure PPE is clean and reliable, and that all necessary resources and facilities for PPE care and storage are available.
- Ensure that his or her employees correctly use any and all PPE required to protect them from all reasonably recognizable hazards present in the task(s) they are performing and/or the area(s) in which they are working.

#### ***Department or Unit***

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Any costs associated with the use of PPE are the responsibility of the employee's unit or department. In addition, departments must keep all records pertaining to their compliance with this policy, such as employee attendance at training sessions and CHA documentation.

***Environmental Health and Safety Department***

It is the responsibility of Environmental Health & Safety (EH&S) to provide assistance in performing PPE hazard assessments and selecting appropriate PPE upon request. Prior to final sign-off, EH&S must review the certificate of hazard assessment with the supervisor. Furthermore, EH&S can assist supervisors in providing any necessary PPE training and may assist departments on a regular basis by reviewing compliance with this document and providing feedback, clarification, and other assistance as needed.

***Employee***

It is the employee's responsibility to:

- Wear PPE as required to perform his or her job safely;
- Provide daily care of the equipment;
- Attend training sessions as required;
- Before each use, inspect the equipment for wear or damage;
- To immediately report any damaged, outdated, or malfunctioning PPE to his or her supervisor for repair or replacement.

**For additional information on responsibilities, refer to *The University of Rochester Human Resources Guide*, policy number 158.**

**IV. PROCEDURES**

The University shall provide PPE for the eyes, face, head, extremities, respiratory system, auditory system, and protective clothing to its employees in accordance with the Occupational Safety and Health Administration's (OSHA) standard on Personal Protective Equipment, 29 CFR 1910.132. PPE shall be used, and maintained in a sanitary and reliable condition whenever it is required due to hazards of processes or environment, chemical hazards, radiological hazards, physical 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. These standards apply to hard hats,

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gloves, safety shoes, safety glasses, welding helmets, goggles, face shields, chemical protective equipment, fall protection equipment, and other PPE items.

***Design***

All personal protective equipment shall be of safe design and construction for the work to be performed in conformance of ANSI/ASTM standards.

***Hazard Assessment and Equipment Selection***

The Supervisor shall ensure that a hazard assessment is performed to determine if hazards exist, are/or likely to exist that require the use of personal protective equipment. The Supervisor must provide written certification (CHA) identifying all workplace hazards, the person certifying that the assessment was performed, and the date(s) of the assessment. If hazards or potential hazards are found, the Supervisor shall ensure that all feasible measures are taken to mitigate those hazards through elimination, substitution, engineering or administrative controls, and that correct and appropriate, properly-fitting personal protective equipment is provided to, and properly used, by all employees who are or may be exposed to those hazards if they cannot be mitigated. A CHA form is located on the EH&S website at

<http://www.safety.rochester.edu/ih/jha/pdf/hazardassessment.pdf>.

UR Environmental Health and Safety can assist with completing CHA and selecting appropriate personal protective equipment.

The University of Rochester website contains resources on potential hazards, good work practices, and PPE, including but not limited to:

- Bloodborne Pathogens Exposure Control Plan
- Respiratory Protection Program
- Chemical Hygiene Plan
- Laser Safety Manual
- Hearing Conservation Program
- Hazardous Drug Policy
- Standard Operating Procedures (SOP's) for laboratory chemicals
- SOP's Work Instructions, Preventative maintenance Plans (PMs) for facilities and equipment
- UCAR Chemical Safety

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***Defective and Damaged Equipment***

Defective or damaged personal protective equipment must not be used and must be labeled as defective or damaged before being removed from service for repair or disposal.

***Training***

The Supervisor shall provide or ensure that each employee who is required to use personal protective equipment receives training. Personal protective equipment training must include at least the following components:

- When PPE is required
- What PPE is required
- How to properly don, doff, adjust, and wear PPE
- The limitations of the PPE
- Proper care, maintenance, useful life, and disposal of the PPE.

EH&S Personal Protective Equipment training is available on MyPath and is the preferred method for general training. Additionally, area / task specific training must be provided at the local department level. The local training should concentrate on the specific PPE used in that work area (when to use, where stored, how to replace, etc.)

Before performing work requiring the use of PPE, each affected employee must demonstrate understanding of the training described above, as well as the ability to properly use the PPE. Re-training/refresher training is required whenever:

1. The Supervisor has reason to believe that an affected employee does not have the required understanding or skill to properly use the PPE.
2. Changes in the workplace, tasks, or protective equipment render previous training obsolete.

***Payment for Personal Protective Equipment***

The University provides required PPE at no cost to the employee (29CFR 1910.132). Exceptions will be evaluated on an individual basis.

***Replacement***

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

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***Upgrades and Personalized PPE***

An employer may allow an employee to “upgrade” or personalize their PPE beyond what the employer is required to purchase, as long as it doesn’t change its effectiveness. The employer is not required to pay for these upgrades if the employer provides adequate “basic” PPE.

***Hand Tools***

PPE does not include common hand tools. Some tools may have unique protective properties (electrically insulated handles). These are "engineering" controls rather than PPE.

**V. REFERENCES**

- OSHA PPE Hand Protection  
<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.138>
- OSHA PPE Foot Protection  
<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.136>
- OSHA PPE Head Protection  
<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.135>
- OSHA PPE for the Face and Eyes  
<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.133>
- UR Electrical Safety Program  
<https://www.safety.rochester.edu/ih/electrical/electricalcontents.html>
- UR Hearing Protection Program  
<https://www.safety.rochester.edu/ih/hearing/hearing.html>
- UR Respiratory Protection Program  
<https://www.safety.rochester.edu/ih/respiratoryprotection/respprogram.html>
- UR Blood Borne Pathogens Exposure Control Plan  
<https://www.safety.rochester.edu/ih/bbp/bbpindex.html>
- UR Chemical Hygiene Program  
<https://www.safety.rochester.edu/labsafety/chp/chpindex.html>
- UR Human Resources Personnel policy 158  
<https://www.rochester.edu/policies/policy/protective-equipment/>
- Non-mandatory Compliance Guidelines for Hazard Assessment and PPE  
<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910SubpartIAppB>
- Certificate Hazard Assessment Document  
<http://www.safety.rochester.edu/ih/jha/pdf/hazardassessment.pdf>.

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**VI. REVISION HISTORY**

Date	Revision No.	Description
5/10/2000	1	Job Hazard Assessment Section updated General Requirements section- wording changed from "University" to "each department" Changed Environmental Health and Safety to University Risk Management and Environmental Safety Deleted respirator language under EH&S responsibilities Added SMH Tb program to the respiratory protection section References to Job Hazard Assessment changed
10/10/2002	2	Changed University Risk Management and Environmental Safety to Environmental Health & Safety
4/1/2008	3	Updated OSHA final rulemaking on "Employer Payment for Personal Protective Equipment" Added link to Electrical Safety program for PPE for Electrical Safety
5/1/2009	4	References to Job Hazard Assessment changed
2011		Reviewed - no changes
11/7/2012	5	Appendix B added
9/2017	6	Revised and updated
6/2019	7	Revised and updated
8/2/2022	8	Updated JHA to PPE CHA Other revisions and changes to wording for clarity