

UNIVERSITY OF TOLEDO

SUBJECT: PERSONAL PROTECTIVE EQUIPMENT

Procedure No: S-08-032

PROCEDURE STATEMENT

In accordance with 29CFR1910 Subpart I, the University of Toledo will assess the workplace for hazards which necessitate the use of Personal Protective Equipment (PPE) and will make appropriate PPE available to all persons on campus, as necessary.

PURPOSE OF PROCEDURE

To ensure University of Toledo employees who have a need for PPE have access to the appropriate PPE available and that PPE is appropriate for the task and identified risks.

PROCEDURE

The University of Toledo shall provide protective equipment in accordance with 29CFR1910.132 (General Requirements), 133 (Eye & Face Protection), 134 (Respirator Protection), 135 (Head Protection), 136 (Foot Protection), 138 (Hand Protection). Protective equipment discussed in this procedure include, but are not limited to personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields and barriers, wherever 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. PPE is designed to prevent employee exposure to hazards in the workplace and is not substitute for engineering or administrative controls, but will be used in conjunction with those controls.

Hazard Assessment and Equipment Selection

The University of Toledo will assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE). Additionally, the University of Toledo will select the correct PPE for each affected employee by utilizing the hazard assessment tool as a guide.

The University of Toledo will then communicate the PPE selection decision to each affected employee, and ensure that the PPE they are assigned fits properly.

Refer to Appendix B of S-08-032 for the Hazard Assessment and Selection of Personal Protective Equipment template.

- A. **Department Managers** are responsible for :
 1. Conducting a hazard assessment of the work area to identify sources of hazards. Sources include impact, penetration, compression, chemical, heat, dust, electrical sources and light radiation.
 2. Document assessment in and SOP or using Appendix B
 3. Reassessing hazards, as needed.
 4. Selecting PPE in coordination with Environmental Health and Radiation Safety.
 5. Purchasing and issuing appropriate PPE.
 6. Ensuring that the appropriate PPE is available for department employees and visitors.
 7. Training staff as to the need, use and care of PPE.
 8. Ensuring that the required PPE is being used when and where appropriate.
 9. Ensuring defective or damaged equipment is not used.
 10. Maintaining documentation of hazard assessment, PPE selection, and employee training.
- B. The **Environmental Health and Radiation Safety Department** is responsible for:
 1. Assisting in a hazard assessment of the work area to identify sources of hazards, as requested by supervisors.
 2. Assisting in the reassessing of hazards, as needed or requested.

3. Providing technical assistance in the selection of appropriate PPE.

Acquisition and Availability

The protective equipment, including personal protective equipment (PPE), used to comply with this procedure, will be provided by the employer at no cost to employees, including replacement PPE, except when the employee has lost or intentionally damaged the PPE.

All new personal protective equipment items are to be approved by the Environmental Health and Radiation Safety Department prior to routine purchase and/or stocking. Environmental Health and Radiation Safety Department must be consulted for assistance in determining need and in initial product selection. Personal protective equipment shall meet the appropriate standards promulgated by the American National Standards Institute (ANSI). The cost of PPE is an operational cost factor to be covered by the individual department unless some other funding means have been established. Signs required by this procedure will be provided and installed by Facilities Maintenance.

Each department having need for PPE MUST make that PPE readily available to its employees.

Refer to Procedure S-08-021 regarding the acquisition and reimbursement for Protective Footwear and Prescription Safety Eyewear.

The University of Toledo is not required to provide reimbursement for everyday clothing, such as long-sleeve shirts, long pants, street shoes, and normal work boots, or 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. The University of Toledo is also not required to provide reimbursement for employee-owned protective equipment, but is responsible to assure its adequacy, including proper maintenance, and sanitation of such equipment. For this reason, department managers are strongly discouraged from allowing employees to use employee-owned protective equipment.

Training

The Department Manager is responsible for providing training to each employee and visitor who is required to use PPE. The training must occur prior to use of PPE. Each employee will be trained on:

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

Retraining will be required when there are changes in the workplace that render the previous training obsolete, when there are changes in the types of PPE that render the previous training obsolete, or when inadequacies in a trained employee's knowledge or use of assigned PPE indicate that the employee has not retained the requisite understanding or skill.

Doffing PPE

PPE is to be removed in the area of use, unless otherwise instructed. Disposable PPE should never be washed or disinfected for reuse, unless permitted by the EHRS department. No person shall wear PPE outside of the area of use EXCEPT if required by the need to transport a hazardous material outside of the original area of use. However, typically secondary containers should be used during transportation which would eliminate the need for PPE during transportation. All PPE should be disposed of in the appropriate waste stream. Hands should be washed after removal of gloves.

Enforcement

The department manager is responsible for enforcing the appropriate use of PPE within their department and during any activities being performed by their department staff regardless of location. Failure to comply with PPE policies in the use of personal protective equipment is to be treated as a breach of this procedure and acted upon by the department manager or employee's supervisor. Failure to comply with PPE policy by individuals not within the purview of the department manager, but working within their department, shall be addressed by contacting the Environmental Health and Radiation Safety Department.

Employee Responsibility

Employees will use and maintain protective equipment in a sanitary and reliable condition wherever it is deemed necessary by the University of Toledo. Defective or damaged personal protective equipment shall not be used.

Source: Safety & Health Committee

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3/8/23

Appendix A Latex Sensitivity

The following is guidance on reducing latex allergy exposures in the workplace.

Prevention of Latex Allergic Reactions

When feasible, provide workers with non-latex gloves; if latex gloves are chosen, provide reduced protein, powder-free gloves to protect workers from infectious materials.

Utilize good housekeeping practices to remove latex-containing dust from the workplace by identifying areas contaminated with latex dust for frequent cleaning and ensuring ventilation filters and vacuum bags are frequently changed when used in latex-contaminated areas.

Provide education and training on latex allergies, and periodically screen high-risk workers for latex allergy symptoms to detect symptoms early and remove symptomatic workers from latex exposure. Evaluate current prevention strategies whenever a worker is diagnosed with latex allergy.

Identify Workers with Latex Allergy

Refer all employees with skin or respiratory problems related to employment to Employee Health on the Health Science Campus; the Employee Health Nurse will evaluate the employee and refer to a specialist for allergy testing. Based on the evaluation, work practice modifications may be suggested if latex allergy is diagnosed. The department manager will review the employee's job description and requirements to determine the risk of latex exposure. If the employee can be accommodated in his/her home department, there is no need to contact Human Resources. If the employee needs job modification or reassignment, the department manager will contact Human Resources for assistance in work assignment options.

Assess the Workplace

The department manager will assess the work environment for presence of latex-containing products. The most dangerous products are those that are powdered and those that are made by a "dipped" process (gloves and balloons). Aerosols from these products remain in the environment and on clothing causing serious problems for the latex allergic employee. The department manager will also assess whether powdered products can be removed and if non-latex products can be substituted. New products for the workplace should be evaluated for latex content. Every effort should be made to purchase latex free products.

Monitor the Workplace

The manager must check with the latex allergic employee to determine if the environmental plan is effective in controlling latex exposure and allergic symptoms. If symptoms recur, the employee should be referred to the Employee Health Nurse for additional evaluation. When off-site activities such as meetings or altered work assignments require the participation of the latex allergic employee, the alternative work areas must be assessed for latex exposure risk.

Latex Allergic Employees

It is recommended that an employee with a latex allergy inform their department manager, any supervisors and co-workers of their allergy, in order for adequate response in the event of an allergic reaction. In the event of an allergic reaction, the employee should be taken directly to the Emergency Department. It is also recommended that an employee with a latex allergy wear a medical alert bracelet. Employees with a Type I latex allergy should carry an Epi-Pen for emergencies.

For specific assistance and workplace evaluation, contact the Employee Health Nurse.