

STANDARD PRACTICE INSTRUCTION

DATE: March 1, 2001

SUBJECT: Personal Protective Equipment/Job Hazard Analysis Program

REGULATORY STANDARD: 29 CFR §1910.132-138.

BASIS: Injuries in the workplace often occur because employees are not adequately trained in the proper job procedure. Establishing proper job procedures is accomplished by conducting a job hazard analysis. Improving how work is performed reduces injuries, improves absenteeism rates promotes a an increase in productivity. Job hazards pose a serious problem for exposed workers and their Employer. This standard practice instruction establishes uniform requirements to ensure that job hazards are evaluated, controls and procedures are implemented, and that the proper hazard information is transmitted to all affected workers.

GENERAL: The University will ensure that jobs having a potential for employee injury within our facility(s) are evaluated and controlled. This standard practice instruction is intended to address comprehensively the issues of; evaluating and identifying potential job hazards, work practices, training, and establishing appropriate procedures and personal protective equipment.

RESPONSIBILITY: The facility Safety Manager is responsible for the administration of this program and has full authority to make necessary decisions to ensure success of the program. All employee's are responsible for safety at all times. The Safety Manager will oversee development of detailed written instructions covering each of the basic elements in this program. This facility has expressly authorized this person to halt any facility operation where there is danger of serious personal injury.

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Salisbury University Personal Protective Equipment Program

1. Written Program. The University will review and evaluate this standard practice instruction on an annual basis, or when changes occur that prompt revision of this document, or when facility operational changes occur that require a revision of this document. Effective implementation requires a written program for job safety that is endorsed and advocated by the highest level of management within this facility and that outlines our goals and plans. This written program will be communicated to all personnel. It encompasses the total workplace, regardless of number of workers employed or the number of work shifts. It is designed to establish clear goals, and objectives.

2. General Requirements. Once trained, first line supervisors will be responsible for job hazard analysis. The supervisor controls the work environment. The University will establish personal protective equipment (PPE) requirements, job hazard analysis procedures, and improve operational procedures through the use of this document. Preventing workplace injuries in our Facility is the principle purpose of job hazard analysis. This document will provide a basis for studying and recording each step of a job, identifying existing or potential job hazards (both safety and health), determining PPE requirements and establishing the best way to perform the job to reduce or eliminate these hazards.

3. OSHA Standard Applicability. Specific standards issued by OSHA will be consulted as part of the overall job hazard analysis. When OSHA standards apply to a specific job, these standards will be incorporated into the hazard analysis to ensure that the requirements of the standard and hazard analysis are combined to create as optimally safe job conditions as is possible.

4. Selection of Jobs for Hazard Analysis. This facility will identify through the use of medical management records, injury statistics, and screening surveys, jobs that place employees at risk. After this analysis has been completed, a job hazard analysis for each job so identified will be conducted. Job hazard analyses will be routinely performed by a qualified person(s) for jobs that put workers at risk. This analysis will identify risk factors at jobs, establish a system to measure if risk factors have been reduced or eliminated to the maximum extent feasible, and recommend PPE.

4.1 The Safety Manager is responsible to perform job hazard analysis and PPE surveys for this facility when individual supervisors do not have a sufficient level of training. Supervisors will conduct the training once trained.

4.2 High risk jobs. Once the hazard analysis has been completed, this facility will compile a list of high risk jobs, if applicable. Jobs will be analyzed to determine the following:

4.2.1 Procedural hazards of each job.

4.2.2 Physical hazards of each job.

4.2.3 Environmental hazards of each job.

5. Pre-Survey for Job Hazard Analysis. Prior to beginning a job hazard analysis the following pre-survey will be conducted to evaluate the general conditions under which the job is performed.

- 5.1 Are there tripping hazards in the job vicinity?
- 5.2 Is the lighting adequate for work conditions?
- 5.3 Are there explosive hazards associated with the job?
- 5.4 Are there electrical hazards associated with the job?
- 5.5 Are tools associated with the job in good condition?
- 5.6 Is the noise level excessive (below 85db TWA)?
- 5.7 Is communication hampered because of excessive noise?
- 5.8 Is the vibration level excessive, leading to numbness?
- 5.9 Is fire protection equipment readily available?
- 5.10 Have employees received fire training?
- 5.11 Are emergency exits properly marked and accessible?
- 5.12 Are employees wearing proper protective equipment?
- 5.13 Are trucks/motorized vehicles properly equipped?
- 5.14 Have employees received training in the use of trucks?
- 5.15 Have industrial hygiene complaints been received?
- 5.16 Does the job involve confined spaces?
- 5.17 Does the job involve lock-out tag-out?
- 5.18 Do employees know emergency response procedures?
- 5.19 Does the job isolate workers from other co-workers?

- 5.20 How often does the supervisor visit the job location?
- 5.21 What is the maximum amount of time a worker is alone?
- 5.22 Do employees know the evacuation relocation point?
- 5.23 What atmospheric testing has been performed?
- 5.24 What atmospheric contaminants are present?
- 5.25 Will jewelry or clothing get caught in machinery?
- 5.26 Can the worker get caught between moving parts?
- 5.27 Can the worker fall from one level to another?
- 5.28 Can anything fall on the worker from above?
- 5.29 Is the worker in an off-balance position at any time?
- 5.30 Is the standing surface clean to maintain stability?
- 5.31 Are the environmental conditions (heat/cold) adequate?
- 5.32 Do possible eye/face injury conditions exist?
- 5.33 Do possible head injury conditions exist?
- 5.34 Do possible foot injury conditions exist?
- 5.35 Do possible hand injury conditions exist?

6. Job Hazard Analysis. Once trained, supervisors will be responsible for job hazard analysis. Once the pre-survey has been conducted this information will be used to reduce general hazards in the work area. After the general hazards in the work area have been reduced to the lowest appropriate level. The following procedures for job hazard analysis will be followed:

6.1 Supervisor involvement. The procedure will be discussed with the employee's supervisor to explain its purpose. Ensure the supervisor understands that the job is being analyzed, not the employee's job performance. This will also serve as training for the supervisor. First line supervisors will be versed in the procedures used for job hazard analysis. Once trained, supervisors will be required to conduct future job hazard analyses for this Facility.

6.2 Employee involvement. Discuss the procedure with the employee performing the job to explain its purpose. Ensure the employee understands that the job is being analyzed, not the employee's job performance. Their input to procedural changes is critical.

6.3 Hazard analysis. Record the steps required to accomplish the job on the job hazard task analysis form. If the job is complex, it should be broken down into detailed segments. Each step will be reviewed in the order of occurrence as the employee is observed performing the job. Each segment will be reviewed in proper sequence.

6.4 Videotape hazard analysis method. The use of videotape, where feasible, will be used as a method for analysis of the work process. Slow-motion videotape or equivalent visual records of workers performing their routine job tasks will be used where practical to determine the demands of the task on the worker and how each worker actually performs each task. A job hazard analysis log/form will be used to break down the job into components that can be individually analyzed.

6.5 Immediate feedback. From reviewing the job steps discuss the potential hazards with the worker. Obtain his/her comments concerning safety improvements.

6.6 Documentation. Each job hazard analysis will be documented. The Facility will use the "Protective Measures Determination" form found in the appendixes to this instruction. Attachments will be included to the form as required to document or support protective measures requirements for the specific job. Copies of the form will be maintained as follows:

- I. Employee's will be given a copy of the form.
- II. The supervisor will maintain a copy in his or her office files.
- III. A copy of the form will be maintained in the employee's personnel record.
- IV. The University will maintain a copy of the form in the office.

6.7 Job hazard reevaluation. Supervisors will conduct a reevaluation when one or more of the following conditions occur:

6.7.1 When an accident or injury occurs. It must be determined if the incident occurred as a result of the employee ignoring established safety practices, or if the safety practices need revision.

6.7.2 Anytime there is a change in the methods, materials, machinery, or procedures used in the conduct of the job.

6.7.3 Periodic review. A periodic review will be conducted on a(n) annual basis to ensure that the job is evaluated for safety.

7. Training and Education. The purpose of training and education is to ensure that our employees are sufficiently informed about the job hazards to which they may be exposed and thus are able to participate actively in their own protection.

7.1 Employees will be adequately trained about the facility's personal protective equipment program. Proper training will allow managers, supervisors, and workers to better understand the hazards associated with a job, task, or process. The training program will include:

7.1.1 All affected employees.

7.1.2 Engineers and maintenance personnel.

7.1.3 Supervisors.

7.1.4 Managers.

7.1.5 Health care providers.

7.2 Learning level. The program will be presented in language and at a level of understanding appropriate for the individuals being trained. It will provide an overview of the potential job hazards, their causes, and means of correction.

7.3 Evaluation. The program will also include a means for adequately evaluating its effectiveness. This will be achieved by using combinations of:

7.3.1 Employee surveys.

7.3.2 Injury and illness statistics.

7.3.3 Observation of work practices.

7.4 Training for affected employees will consist of both general and specific job training:

7.4.1 General Training. Employees who are working in jobs requiring changes do to a job hazard analysis will be given formal instruction on the hazards associated with their jobs and with their equipment. This will include information on the varieties of hazards associated with the job, what risk factors cause or contribute to them, how to recognize and report suspected hazards. This training will be conducted on an annual basis.

7.4.2 Job-Specific Training. New employees and reassigned workers will receive an initial orientation and hands-on training prior to being placed in a full-production job. Each new hire will receive a demonstration of the proper use of and procedures for all tools and equipment. The initial training program will include the following:

7.4.2.1 Care, use, and handling techniques pertaining to tools.

7.4.2.2 Use of special tools and devices associated with work stations.

7.4.2.3 Use of appropriate guards and safety equipment, including PPE.

7.4.2.4 Use of proper lifting techniques and devices.

7.5 Training for Supervisors. Supervisors are responsible for ensuring that employees follow safe work practices and receive appropriate training to enable them to do this. Supervisors therefore will undergo training comparable to that of the person doing the initial job hazard analysis. First line supervisors are in the best position to control hazards in the workplace, and to correct such deficiencies.

7.6 Training for Managers/Senior Facility officials. Managers/Senior Officials will be made aware of their safety and health responsibilities and will receive sufficient training pertaining to PPE and job hazard analysis issues so that they can effectively carry out their responsibilities.

7.7 Training for Engineers and Maintenance Personnel. Facility engineers and maintenance personnel will be trained in the prevention and correction of job hazards through job and work station design and proper maintenance, both in general and as applied to the specific conditions of the facility.

7.8 Training for Visitors. Visitors observing operations will have the same level of protection provided to the worker being observed.

7.9 Initial training. Worker training will involve instruction, and where necessary hands-on training in the following:

7.9.1 A description and identification of the hazards associated with particular jobs/tasks/machines/workstations.

7.9.2 Specific safeguards, how they provide protection, and the hazards for which it is intended to block.

7.9.3 How to properly use the safety devices and why.

7.9.4 How to install, operate, and remove safety devices.

7.9.5 What to do if the device is damaged, missing, unable to provide adequate protection.

7.9.6 Training in the recognition of applicable hazard sources.

7.9.7 Recognition of applicable hazards associated with guarding devices.

7.9.8 Procedures for removal of a guard from service.

7.9.9 Guard identification. Guards having identification numbers will be checked for legibility. Guards having illegible identification will be turned in for testing and remarking.

7.9.10 Personal Protective Equipment requirements of the individual worker.

7.9.11 Certification. This facility shall certify that employee training has been accomplished and is being kept up to date. The certification shall contain each employee's name and dates of training.

7.10 Refresher training. This standard practice instruction shall be provided to, and read by all employees receiving refresher training. The training content shall be identical to initial training. Refresher training will be conducted on an annual basis or when the following conditions are met, whichever event occurs sooner.

7.10.1 Retraining shall be provided for all authorized and affected employees whenever there is a change in their job assignments, a change in machines, equipment or processes that present a new hazard, or when there is a change in the type guard installed on a given machine. Training will be provided before reassignment.

7.10.2 Additional retraining shall be conducted whenever a periodic inspection reveals, or whenever this facility has reason to believe, that there are deviations from or inadequacies in the employees' knowledge of safe job operations.

7.10.3 The retraining shall reestablish employee proficiency and introduce new or revised safe work practices, methods, procedures, and use of PPE as necessary.

7.10.4 Certification. This facility shall certify that employee training has been accomplished and is being kept up to date. The certification shall contain each employee's name and dates of training.

8. Protective Clothing and Personal Protective Equipment (PPE). Where engineering controls and job hazard analyses do not eliminate all job hazards, employees will (where appropriate) wear personal protective equipment (PPE).

8.1 These include items such as, hard hats, face shields, safety goggles, glasses, hearing protection, footguards, gloves etc. Supervisors will ensure that equipment selected will meet the following requirements:

8.1.1 It will be appropriate for the particular hazard.

8.1.2 It will be maintained in good condition.

8.1.3 It will be properly stored when not in use, to prevent damage or loss.

8.1.4 It will be kept clean, fully functional and sanitary.

8.2 Hazards associated with wear of protective clothing, PPE, personal clothing and jewelry. Protective clothing and PPE can present additional safety hazards. Supervisors will ensure workers wear appropriate clothing and PPE. These items will be worn so as not create additional hazards.

8.3 Documentation. PPE requirements will be documented on the "Protective Measures Determination" form and properly filed.

9. Tool Selection, Evaluation and Condition. The greatest hazards posed by tools usually result from misuse and or improper maintenance. Tool selection sometimes is not considered a priority when arrangements are made to begin work. The tools, personal protective equipment, and dimensions and adjustability of the work station will be noted for each job hazard analysis. All employees will consider the following when selecting tools:

9.1 Is the tool correct for the type work to be performed?

9.2 Are guards installed properly and in good condition?

9.3 Are grounding methods sufficient when working in wet conditions?

9.4 Does the tool create sparks or heat? Has this been considered when working around flammable substances?

9.5 Do impact tools such as chisels, wedges, or drift pins have mushroomed heads? The heads can shatter on impact, sending sharp fragments flying!

9.6 Are wooden handled tools loose or splintered? This can result in the heads flying off and striking the user/coworkers!

9.7 Are cutting tools sharp? Dull tools are more hazardous than sharp ones.

9.8 Is the tool used on the proper working surface? Tools used on dirty or wet working surfaces can create a multitude of hazards.

9.9 Are tools stored properly when not being used? Saw blades, knives, scissors and like sharp tools should be stored so that sharp edges are directed away from aisles and coworkers.

9.10 Is there sufficient clearance for tools requiring swinging motions such as hammers, axes, picks, etc.?

9.11 Tools will be checked for excessive vibration.

9.12 Have tools been modified beyond the manufacturers specification. If so have the modifications been approved by a "competent person". See the appendix to this instruction for a sample of a modified tool documentation form.

10. Hazard Prevention and Control. This facility understands that engineering solutions, where feasible, are the preferred method of control for workplace hazards. The focus of the facility's PPE/job hazard analysis program is to eliminate hazards from the workplace. This is accomplished whenever possible by redesigning the work station, work methods, or tool(s) to reduce the hazards associated with the demands of the job. This program will whenever possible research into currently available controls and technology. PPE will be a last choice.

11. Employee Notification. Employee's will be notified when they are placed in job descriptions where it is known or suspected that unresolved job hazards exist. These positions will be identified through the PPE/job hazard analysis program, and from the list of known high-risk jobs.