

Game plan for PPE safety by Ron Abrams

Before you begin

- Become familiar with your company's policies on personal protective equipment (PPE).
- Bring in examples of PPE commonly used in your workplace.
- Review OSHA 29 CFR 1910 Subpart I Personal Protective Equipment.



Introduction

In a dream, you decide to go to a football game. You settle in your seat equipped with a hot dog and your favorite beverage. You look down on the field and see some of the players are playing without helmets. You notice others are not wearing shoulder pads, and some are not wearing either.

You then turn to the fan sitting next to you and ask the fan why they are not wearing equipment. The fans say the coach lets the players on the team (company) decide for themselves if they want to wear the safety gear. The coach (the players' supervisor), believes the players (workers) may be uncomfortable wearing that safety gear (PPE) and it may get in the way of scoring points (production).

In your dream, you ask why the coach (supervisor) is OK with this. The fan next to you explains that during yesterday's practice, the coach (supervisor) made using safety equipment optional. Since no one was hurt, he decided to continue the policy during games.

Of course, you know this would never happen. The coach (supervisor) would never allow the players (workers) out on the field without the proper PPE (safety equipment). The coach (supervisor) trained the players (workers) for years about the importance of PPE and the players (workers) have complete "buy in".

Even if the coach (supervisor) called in sick for the game (shift) the players (workers) could still play (work) using the proper safety gear (PPE).

However, there are the league rules – Occupational Safety and Health Administration (OSHA) and the referees (compliance officers). They penalize the team (company) for such risky behavior.

But, how do you get the workers (team members) to wear the proper safety equipment?

Game plan: A, B and C

A: Know how much injuries cost

What are the potential costs to your company for not requiring employees to wear PPE? It is important to know the bottom-line price of painful and costly injuries. There are direct and indirect costs. Direct costs are the injured workers' medical costs and wages.

Indirect costs can include:

- The impact it has on workers and families;
- The workers' job performance.

Your employer may have to deal with unwanted publicity, regulatory agencies, lawyers and the news media for a partial list of extracurricular, non-core business activities. These costs can be one to four times an injury's direct costs.

Example: Calculating the cost of workplace injuries:

A) Direct cost of the injury	<u>\$10,000</u>
B) Indirect cost	<u>\$20,000</u>

(One to four times is the direct cost.
We will use two times.)

C) Add A+ B	<u>\$30,000</u>
D) Profit margin	<u>5 percent</u>
E) Sales needed to cover the cost of the injury \$30,000/10 percent	<u>\$600,000</u>

B: PPE hazard assessment

Potential hazards may be physical or health-related. A comprehensive hazard assessment identifies hazards in both categories.

Examples of physical hazards include moving objects, fluctuating temperatures, high-intensity lighting, rolling or pinching objects, electrical connections and sharp edges. Examples of health hazards include overexposure to harmful dusts, chemicals or radiation.

To develop a list of potential hazards in the basic hazard categories, the hazard assessment begins with a walk-through facility survey. When you complete the walk-through, organize and analyze the data so you may use it efficiently to determine the proper PPE types required at your work site. Select PPE that provides a level of protection greater than the minimum required to protect employees from hazards.

Periodically reassess the workplace for any condition changes, equipment or operating procedures that could affect occupational hazards. When you see any trends or areas of concern, take the appropriate corrective action. This periodic reassessment also includes a review of injury and illness records. For the reassessment, existing PPE suitability includes evaluating its condition and age.

Know who pays for the PPE

When you determine you will use PPE, the employer provides the PPE free of charge. The exception is PPE that an employee desires even after the employer determines the PPE is not required.

In addition, the employer does not have to supply steel-toed safety shoes and prescription-safety glasses that an employee loses, alters, or purposefully destroyed.

C: Coach for success, four critical skills

1. **Observational skills** — Watch for opportunities to help employees improve.
2. **Analytical skills** — Help employees identify specific skills they could improve.
3. **Interviewing skills** — Learn how to ask the workers open-ended questions to help the employees

rethink a problem. Close-ended questions help guide a discussion and reflective questions help with empathy and communication.

4. **Feedback**— Offer specifics. Explain why you think a worker needs to change a certain behavior.

These tips can help make sure employees wear PPE. The bottom line is helping each other be safe and watching out for each other. At the end of the workday, we want everyone to go home safely.

Group activities

- o Discuss areas that require PPE.
- o Decide which areas and/or tasks may need a reassessment.
- o Gather information. Give tasks to participants with activities such as:
 - Collecting OSHA 300 logs;
 - Obtaining accident reports,
 - Acquiring first-aid logs;
 - Reviewing near-miss reports;
 - Gathering vendor information;
 - Getting a claims-history report from your BWC safety consultant.

In addition, you can request a BWC industrial hygienist conduct a noise survey and a BWC ergonomist perform an ergonomics survey.

Conclusion

Based on your findings, apply the three primary means of hazard control. They are:

- o **Engineering controls** — Eliminate the hazard through redesign or substitution;
- o **Administrative controls** — Revise procedures and/or policies to perform the task differently;
- o **PPE** — This is the last resort for protecting your workers. PPE is necessary when engineering and administrative controls are either not possible or not sufficient.

References

Websites

www.osha.gov/SLTC/personalprotectiveequipment/

www.osha.gov/dcsp/smallbusiness/safetypays/background.htm

BWC is not associated with any of the websites, and we do not endorse them.

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