



Wellesley College Personal Protective Equipment Program

Revision History

Revision June 2023

Purpose

The purpose of the Personal Protective Equipment (PPE) Program is to develop and implement the procedures for the identification, use, care, and maintenance of PPE required to be used by employees for the prevention of illness and injury.

All employees are required to follow the minimum procedures outlined in this program. Any deviations from this program must be immediately brought to the attention of Wellesley College EHS.

Scope

This policy applies to the use of PPE at Wellesley College and related facilities and operations. This program is integrated into our organization's written safety and health program and is a collaborative effort that includes all employees. Wellesley College is responsible for the program's implementation, management, training, and recordkeeping requirements.



Program Responsibilities

The EHS Department of Wellesley College is committed to the safety and health of its workers. Management of all trades present on campus supports the efforts of Wellesley College by pledging financial and leadership support for the identification of hazards and implementation of appropriate PPE for those hazards. Management will regularly communicate with EHS and employees about this program.

Wellesley College EHS works directly with management to create hazard assessments, implementation, training and administration of the PPE program. EHS will monitor the results of the program to determine additional areas of focus as needed. Wellesley EHS is always open to suggestions and ideas from managerial staff, supervisors, and employees. EHS will also:

- Conduct workplace hazard assessments to determine the presence of hazards that require the use of PPE
- Advise PPE selection
- Review, update and conduct PPE hazard assessments when management notifies EHS or during an EHS audit:
 - A job or process changes
 - New equipment is used or added
 - There has been an accident
 - A supervisor or employee requests it
- Maintain records on hazard assessments
- Maintain records on PPE training
- Provide training, guidance, and assistance to supervisors and employees on the proper use, care and cleaning of approved PPE
- Periodically re-evaluate the suitability of previously selected PPE
- Review, update and evaluate the overall effectiveness of PPE use, training, policies and program

Supervisors. Supervisors have the primary responsibility for implementing and enforcing PPE use in their work area, including, but not limited to:

- Providing and purchase appropriate PPE and making it available to employees
- Ensuring that employees are trained on the proper use, care, storage and cleaning of PPE
- Ensuring that PPE training is completed
- Ensuring that employees properly use and maintain their PPE
- Notifying the Wellesley College EHS when new hazards are introduced or when processes are added or changed
- Ensuring that defective or damaged PPE is immediately disposed of and replaced

Employees. The PPE user is responsible for following the requirements of the PPE program, including, but not limited to:

- Properly wearing PPE as required
- Attending required training sessions
- Properly caring for, cleaning, storing, maintaining and inspecting PPE as required
- Following program policies and rules
- Informing the supervisor of the need to repair or replace PPE

Employees who repeatedly disregard and do not follow PPE procedures and rules may face disciplinary action.



General Requirements

Appropriate PPE is required to be worn at all times when employees are exposed to hazards that cannot be eliminated through the use of preferred elimination, substitution, engineering or administrative controls.

The workplace will be evaluated, and all uncontrolled hazards will be identified periodically based on changes to the workforce and workplace operations. Assessments will include, but are not limited to, the following items:

- Torso and abdominal protection
- Eye and face protection
- Head protection
- Foot protection
- Leg protection
- Hand protection
- Hearing protection (Separate written program)
- Respiratory protection (Separate written program)
- Fall protection (Separate written program)

*PPE hazard assessment instructions are located in **Appendix A**.*

PPE appropriate for the identified hazards will be identified, purchased by managers and provided to all employees exposed to those hazards. All PPE will be properly fit to each employee before relying on it as a protective measure.

Employees will be trained upon hire; managers will continue to provide guidance on the types of PPE necessary for the workplace hazards and its limitations. Training will also include the proper way to wear, use and maintain the PPE.

PPE Program Implementation

The following implementation steps will be used for this program:

- Conduct and document PPE assessment for each work task, assignment or location (see form in **Appendix B**)
- Select appropriate PPE based on hazard assessment
- Communicate PPE selection decisions to employees
- Provide PPE free of charge to all affected employees (obtain, purchase, rent, etc.)
- Train each affected employee
- Document training and employee testing results
- Retrain as necessary
- Enforce PPE requirements

*Essential functions for all tasks/assignments where PPE is required.



Training

General Employee Training

Before any employee is allowed to perform work in areas requiring PPE, they must first receive training in the proper use and care of the PPE they will be using. Periodic retraining will be offered to PPE users as identified by the lack of knowledge or the improper use of PPE, after changes in work tasks or at the supervisor's request. The training will include, at a minimum, the following subjects:

- Wellesley College requires that PPE be worn at all times during identified tasks or in areas requiring PPE
- When it is necessary to wear PPE
- What PPE is necessary
- How to properly put on, take off, adjust and wear PPE
- The limitations of the PPE
- The proper care, maintenance, useful life and disposal of the PPE

Wellesley College staff use safety skills as their current training website. Any employee wearing and using PPE must attend the PPE training. Offered is general personal protective equipment training and specialized training for specific pieces of PPE.

Manager Training

Managerial staff should complete safety skills training, conduct a detailed review of this plan, and contact EHS for any further information needed.

Types of PPE

Eye and Face Protection

Each affected employee will:

- Use appropriate eye and face protection equipment when exposed to hazards from flying objects or particles, molten metal, fumes, chemical liquids, gasses, vapors, dusts, acids, caustics, and other potentially injurious chemical or physical hazards.
- Use appropriate eye protection equipment with filter lenses that have a shade number appropriate for the work being performed when exposed to an eye hazard from potentially injurious light radiation.
- When wearing prescription lenses while engaged in operations that involve eye hazards, wear eye protection that incorporates the prescription in its design, or wear eye protection that can be worn over the prescription lenses without disturbing the prescription lenses or the protective lenses.

Foot Protection

Each affected employee will wear protective footwear when working in areas where there is danger of objects falling on or rolling across the foot, piercing the sole, and where the feet are exposed to electrical or chemical hazards. Foot protection will comply with appropriate ANSI standards.

Hand and Body Protection

The Wellesley College EHS will select and require employees to use appropriate hand protection when employees' hands are exposed to hazards from cuts, abrasions, punctures, chemical or thermal burns, harmful temperature extremes, vibration and skin absorption of harmful substances.



Head Protection

Each affected employee will wear appropriate protective head gear (hard hats, bump caps, etc.) when working in areas where there is a potential for injury to the head from falling objects, impact hazards, extreme temperatures or high UV levels.

Hearing Protection

The Wellesley College EHS will select and require employees to wear appropriate hearing protection in environments where noise levels equal or exceed the OSHA Occupational Noise Exposure Standard (OSHA 29 CFR 1910.95) 8-hour time weighted average (TWA) of 85 dBA. See Hearing Protection Program for details. (Link hearing program)

Respiratory Protection

Each affected employee will wear respiratory protective equipment (respirators) when working in areas where respiratory hazards exist. All respirators will be in compliance with the OSHA 29 CFR 1910.134. See Respiratory Protection Program for details. (Link res program)

After training, employees will demonstrate that they understand how to use PPE properly. If they cannot demonstrate a sufficient understanding, they will be retrained. The Record documents that the employee has received and understands the required training on the specific PPE they will be using.

Retraining

The need for retraining will be indicated when:

- An employee's work habits, or knowledge indicate a lack of necessary understanding, motivation or skills required to properly use the PPE
- New equipment is installed that requires new or different PPE
- Changes in the workplace make previous training obsolete
- Changes in the types of PPE to be used make previous training obsolete
- Upon supervisor requests

Periodic Program Review

The Wellesley EHS will conduct a periodic program review to assess the progress and success of the program. The review will consider the following:

- Evaluation of all training programs and records
- The need for retraining of managers, supervisors and employees
- The jobs, processes or areas that have produced a high incidence rate of injuries or illnesses
- The Program's success will be determined and reported to senior management based upon comparison to previous years, using the following criteria:
 - Cost and frequency of workers' compensation cases
 - Employee and supervisor feedback through direct interviews and questionnaires

Outside Contractors

Whenever outside personnel are contracted to work on-site at Wellesley College, EHS or location management will communicate all necessary PPE safety requirements to the contractor before any work commences.



Record Retention

Written records will be kept which include trainee names, the type of training provided ,and the dates when training occurred. These training records are maintained by EHS along with the job hazard analysis forms. Hazard assessments are available on Google Drive and trainings are available on our learning management system, SafetySkills.



Survey

Wellesley EHS will conduct a walk-through survey of the workplace to develop the hazard assessments. This will be reevaluated as needed and upon request. The survey is to identify sources of hazards to employees. The following hazard categories will be examined in each area and for each person and their tasks:

- Impact
- Penetration
- Compression
- Chemical/Gasses
- Heat/Cold
- Harmful dust
- Light (Optical) radiation
- Noise
- Falling objects
- Vibration
- Electrical shock

Hazard Sources

During the walk-through survey, EHS will observe:

- Sources of motion; i.e., machinery or processes where any movement of tools, machine elements or particles could exist, or movement of personnel that could result in collision with stationary objects
- Sources of high temperatures that could result in burns, eye injury, ignition of protective equipment, etc.
- Types of chemical exposures
- Sources of harmful dust
- Sources of light radiation, i.e., welding, brazing, cutting, furnaces, heat treating, high-intensity lights, etc.
- Sources of falling objects or potential for dropping objects
- Sources of sharp objects which might pierce the feet or cut the hands
- Sources of rolling or pinching objects which could crush the feet
- Layout of workplace and location of coworkers
- Any electrical hazards

Injury and accident data will also be reviewed to help identify problem areas.

Results

Following the walk-through survey, the data and information will be organized by work area and job description. An estimate of the potential for injuries will be made. Each of the basic hazards will be reviewed and analyzed in determination of the job hazard analysis. The possibility of exposure to multiple hazards simultaneously will be considered.

Strategies for elimination, substitution, engineering and administrative controls will be identified and implemented for all possible identified hazards. After applying all appropriate reduction and elimination technique, the remaining hazards will be analyzed and the proper PPE to reduce the hazards will be selected. PPE will be identified for hazards that are in the process of being reduced or eliminated and/or when hazard-reduction efforts are not 100% effective in eliminating the hazards.

Appendix B –Evaluation Report

Date of evaluation:	Evaluated by (list all present):
Written program reviewed: Yes No	
Detailed description of the procedures reviewed:	
Describe any procedure modifications:	
Have any new procedures been added?	
A review of the log of occupational injuries and illnesses (OSHA Form 300 or equivalent) and the associated accident reports and injury and illness reports was made: Yes No	
The following injuries resulted from failure to use the correct PPE:	
Any actions needed or taken to ensure PPE use:	
Comments:	

Appendix C – Training Outline

Hazard Identification/PPE Selection

- Familiarize the employees with the potential hazards and the type of protective equipment that is available.
- Compare the hazards associated with the environment; i.e., impact velocities, projectile shape of masses, radiation intensities, with the capabilities of the available protective equipment.
- Identify the selected protective equipment which is at a level of protection greater than the minimum required to protect the employee from the hazards.
- Fit the user with the protective device and give instructions on care and use of the PPE.
- Ensure that employees are made aware of all warning labels and limitations of their PPE.

Fitting the Device

Each employee will be fitted with appropriate PPE. PPE that fits poorly may not afford the necessary protection. Protective devices are generally available in a variety of sizes. Care should be taken to ensure that the right size is selected. Continued wearing of the device is more likely if it fits the wearer comfortably. Please note respirator fit testing follows its own program and should be completed and documented by Wellesley College EHS in conjunction with OEHS and medical professionals.

Hazard Changes

It is the responsibility of supervisors and employees to inform the Wellesley EHS if they identify a change in the workplace hazard situation. Changes in the workplace hazard situation can result in updating the job hazard analysis, PPE program, and potentially required PPE.

Guidelines

Training will cover the company requirement of PPE usage. Each type of PPE provided will be reviewed as to its purpose and function in the work environment. As required, the following types of PPE must be covered:

- Eye and face protection
- Head protection
- Foot protection
- Hand protection
- Hearing protection
- Respiratory protection

Cleaning and Maintenance

It is important that all PPE be kept clean and properly maintained. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision. It is also important to ensure that contaminated PPE which cannot be decontaminated is disposed of in a manner that protects employees from exposure to hazards.