

Southern California Trade Contractors Association, Inc.

SAFETY NEWSLETTER

In This Issue

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Hardhats

SUPERVISORY TRAINING



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Question: Are adhesive stickers or paints allowed on protective helmets?

Reply: OSHA's general requirements for PPE are set forth in 29 CFR 1910.132. The specific requirements for head protection (protective helmets) are outlined in 29 CFR 1910.135, which incorporates by reference American National Standards Institute (ANSI) Z89.1-1986, Z89.1-1997, and Z89.1-2003. Both 29 CFR 1910.132 and 1910.135 do not contain provisions that explicitly prohibit painting or the placement of adhesive stickers on helmet shells. However, the employer's ability to comply with the existing requirements of these standards may be adversely affected by the painting or placement of adhesive stickers on the helmet's shell.

For instance, OSHA standard 29 CFR 1910.132(a) requires that PPE be "...maintained in a sanitary and reliable condition..." [Emphasis added.] To ensure a helmet is and remains in a "reliable" condition, the helmet must be inspected prior to use for signs of dents, cracks, penetration, and any damage due to impact, rough treatment, or wear that might reduce the degree of protection originally provided and used and maintained in accordance with the manufacturer's instructions. **Paints and stickers may eliminate electrical resistance and – depending on the location and quantity – conceal defects, cracks, penetration, and any damage that would be otherwise readily identifiable during the employee's inspection to ensure reliability. Another concern is that paints, thinners, and solvents, as discussed in Appendix A of ANSI Z89.1-2003 and the appendices of the 1986 and 1997 versions, can also attack or damage the shell of a helmet and reduce protection.**

For these reasons, painting or applying

stickers must be performed in accordance with the manufacturer's instructions, unless the employer can demonstrate that the altered protective helmet is equally as effective and protective as those meeting the requirements of Z89.1. Protective helmet manufacturers usually provide very specific instructions regarding paints, stickers, or decals that will not negatively affect the performance of a protective helmet.

OSHA would consider painting or placing adhesive stickers acceptable if the manufacturer authorizes the alteration or the employer can demonstrate that the reliability of the helmet is not affected by the paint or the adhesive on the stickers; and the paint or placement of stickers would not reduce the ability to identify defects (i.e., use of see-through stickers) or other conditions that would indicate a reduced reliability.

From:

http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=27272

Head Protection

Protecting employees from potential head injuries is a key element of any safety program. A head injury can impair an employee for life or it can be fatal. Wearing a safety helmet or hard hat is one of the easiest ways to protect an employee's head from injury. Hard hats can protect employees from impact and penetration hazards as well as from electrical shock and burn hazards.

Employers must ensure that their employees wear head protection if any of the following apply:

- Objects might fall from above and strike them on the head;
- They might bump their heads against fixed objects, such as exposed pipes or beams; or
- There is a possibility of accidental head contact with electrical hazards.

Types of Hard Hats

Hard hats are divided into three industrial classes:

- **Class A** hard hats provide impact and penetration resistance along with limited voltage protection (up to 2,200 volts).
- **Class B** hard hats provide the highest level of protection against electrical hazards, with high-voltage shock and burn protection (up to 20,000 volts). They also provide protection from impact and penetration hazards by flying/falling objects.
- **Class C** hard hats provide lightweight comfort and impact protection but offer no protection from electrical hazards.

Care Considerations

Periodic cleaning and inspection will extend the useful life of protective headgear. Never drill holes, paint or apply labels to protective headgear as this may reduce the integrity of the protection. Do not store protective headgear in direct sunlight, such as on the rear window shelf of a car, since sunlight and extreme heat can damage them.

Hard hats with any of the following defects should be removed from service and replaced:

- Perforation, cracking, or deformity of the brim or shell;
- Indication of exposure of the brim or shell to heat, chemicals or ultraviolet light and other radiation (in addition to a loss of surface gloss, such signs include chalking or flaking).

Always replace a hard hat if it sustains an impact, even if damage is not noticeable. Suspension systems are offered as replacement parts and should be replaced when damaged or when excessive wear is noticed. It is not necessary to replace the entire hard hat when deterioration or tears of the suspension systems are noticed.

Question #2: According to a letter issued by OSHA on July 22, 1992, under §1926.100(a) and (b), **hard hats used by employees must be worn with the bill facing forward unless the hard hat manufacturer certifies that the bill facing back meets ANSI Z89.1-1969.** Does OSHA still adhere to this interpretation?

Answer:

Section 1926.100(a) provides:

Employees working in areas where there is a possible danger of head injury from impact, or

from flying objects, or from electrical shock and [electrical] burns, shall be protected by protective helmets.

ANSI only tests and certifies hard hats to be worn with the bill forward [;] hard hats worn with the bill to the rear would not be considered reliable protection and would not meet the requirements of 29 CFR 1926.100(a) and (b) unless the hard hat manufacturer certifies that this practice meets the ANSI Z89.1-1969 requirements.

This continues to be OSHA's interpretation of this standard. Additionally, note that a manufacturer may certify that it would be acceptable to wear the hard hat with the bill to the rear when the hard hat liner is turned/reversed.

From:

http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=24365