Foot Protection

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PDH: 1

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Module 1: Introduction

Learning Objectives

By the end of this section, you will be able to:

- **Identify** the legal requirements for protecting employees under OSHA's general PPE standards.
- **Evaluate** the hierarchy of controls to determine when PPE is the appropriate method of protection.
- **Select** the broad categories of personal protective equipment necessary for various anatomical protection needs.

Executive Summary: OSHA requires employers to protect workers from hazards through a hierarchy of controls, prioritizing engineering and work practice adjustments. When these are insufficient, employers must implement a formal PPE program to provide, maintain, and train employees on appropriate protective gear.

Applicability and Scope

If you employ one or more persons, you must comply with OSHA requirements to protect them from workplace hazards, including machinery, hazardous substances, and dangerous work procedures. This guide assists in:

- **Examining** the workplace for potential injury sources.
- **Reviewing** established work procedures.
- **Selecting** appropriate PPE (excluding respirators and rubber insulating equipment).
- **Training** employees on the proper wear and care of provided equipment.

⚠️ **Safety Constraint:** This content serves as a guide for 29 CFR 1910.132 but is not a substitute for the actual OSHA standards. Employers must establish a formal **PPE program** to provide equipment and training.

The Hierarchy of Hazard Control

Controlling a hazard at its source is the primary objective. PPE is considered an alternative or supplementary method when primary controls are not feasible.

- **Engineering Controls:** Physically changing a machine or the work environment (e.g., building a barrier) to prevent exposure.
- **Work Practice and Administrative Controls:** Changing the way employees perform their tasks to remove them from exposure.
- **Personal Protective Equipment (PPE):** Devices or garments worn to minimize exposure to hazards that cannot be eliminated by the above controls.

💡 **Design Tip:** While this guide focuses on general industry, the methods are applicable to and help ensure compliance with 29 CFR 1926.95 for construction and 29 CFR 1915.152 for the maritime industry.

Defining Personal Protective Equipment

PPE includes a variety of devices designed to protect specific parts of the body from injury.

Anatomical Protection Categories

- **Eyes and Face:** Goggles, face shields, and safety glasses.
- **Head:** Hard hats.
- **Ears/Hearing:** Earplugs and earmuffs.
- **Hands and Arms:** Various types of protective gloves.
- **Feet:** Safety shoes.
- **Whole Body:** Vests and full body suits.

⚠️ **Safety Constraint:** Respirators and insulating rubber equipment are subject to specific OSHA standards (29 CFR 1910.134 and 29 CFR 1910.137) and require separate, specialized programs.

Checkpoint Quiz

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1. **According to the hierarchy of controls, which method should an engineer prioritize to mitigate an identified workplace hazard?**
   a) Distribution of high-quality PPE.
   b) Implementation of engineering or work practice controls.
   c) Employee safety training.
   d) Periodic workplace surveys.

Answer: (b). OSHA specifies that the preferred way to protect employees is through engineering or work practice controls; PPE is used only when these are not feasible or sufficient.

2. **Which of the following protective devices is specifically excluded from the scope of this general PPE guide?**
   a) Impact-resistant safety shoes.
   b) Ventilated goggles for dust protection.
   c) Rubber insulating blankets for electrical work.
   d) High-visibility safety vests.

Answer: (c). Insulating devices and respirators require separate, specific programs under 29 CFR 1910.137 and 1910.134 and are not covered in this general guide.

3. What is a mandatory requirement for employers under the Title 29 CFR 1910.132 standard?

a) Providing all PPE at no cost regardless of industry.
b) Establishing a formal PPE program including procedures and training.
c) Ensuring all employees provide their own ANSI-rated gear.
d) Replacing engineering controls with PPE to reduce costs.

Answer: (b). The standard requires employers to establish general procedures (a PPE program) to provide necessary equipment and ensure employees are trained to use it properly.

Module 2: Establishing a PPE Program

Learning Objectives

By the end of this section, you will be able to:

- **Formulate** a structured PPE program based on OSHA's administrative and procedural requirements.
- **Evaluate** the components of an effective safety training curriculum for technical staff.
- **Identify** the criteria for program enforcement and periodic evaluation.

Executive Summary: A PPE program is a systematic set of procedures for selecting, providing, and using protective equipment. While unwritten policies may exist, a written program is significantly easier to maintain as company policy, evaluate for effectiveness, and use as a basis for regulatory compliance.

Program Fundamentals and Scope

A PPE program integrates safety equipment into routine operations. It is important to note that while respirators and rubber insulating equipment (gloves, sleeves, and blankets) are technically PPE, they are governed by specific, more stringent OSHA requirements and are not covered in this general framework.

⚠️ **Safety Constraint:** For respiratory protection specifically, refer to 29 CFR 1910.134 and OSHA Instruction CPL 2-2.54, **Respiratory Protection Program Manual**. Electrical insulating equipment is governed by 29 CFR 1910.137.

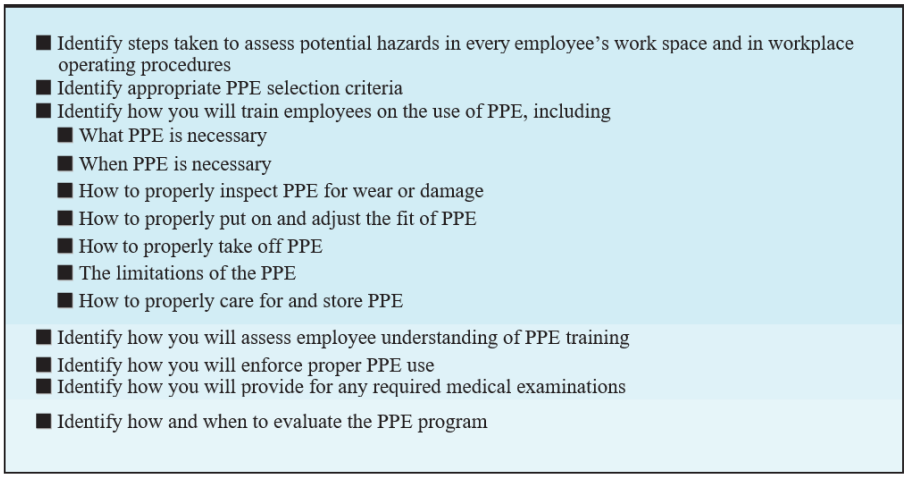
Development and Implementation

Developing a program begins with hazard awareness and the systematic selection process. Beyond equipment selection, engineers must establish protocols for enforcement, medical examinations where required, and program auditing.

PPE Program Component Checklist

Program Phase	Implementation Requirements
Hazard Assessment	Identify steps taken to assess potential hazards in every employee's work space and in workplace operating procedures.
Selection Criteria	Identify appropriate PPE selection criteria based on identified risks.
Training Protocols	Define what and when PPE is necessary; procedures for inspection, donning, adjusting, doffing, and limitations; and methods for care and storage.
Accountability	Identify how you will assess employee understanding of training and enforce proper use.
Medical & Audit	Identify how you will provide for required medical examinations and establish a schedule to evaluate the PPE program.

Checklist A: Establishing a PPE Program



- Identify steps taken to assess potential hazards in every employee's work space and in workplace operating procedures
- Identify appropriate PPE selection criteria
- Identify how you will train employees on the use of PPE, including
  - What PPE is necessary
  - When PPE is necessary
  - How to properly inspect PPE for wear or damage
  - How to properly put on and adjust the fit of PPE
  - How to properly take off PPE
  - The limitations of the PPE
  - How to properly care for and store PPE
- Identify how you will assess employee understanding of PPE training
- Identify how you will enforce proper PPE use
- Identify how you will provide for any required medical examinations
- Identify how and when to evaluate the PPE program

Training Requirements

Engineering managers must ensure that training is not merely a "check-the-box" activity but a verification of competency.

💡 **Design Tip:** Assessing employee understanding is a critical step. Use practical demonstrations (e.g., proper adjustment of a harness or fit-testing of hearing protection) rather than just written tests to ensure the "know-how" is effectively transferred.

Checkpoint Quiz

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1. **According to Checklist A, which of the following is a required component of a PPE training program?**
   a) Documentation of equipment purchase price.
   b) Instruction on the limitations of the selected PPE.
   c) A list of all OSHA regional office addresses.
   d) Identification of primary engineering control costs.

Answer: (b). Checklist A explicitly requires that employees be trained on the limitations of the PPE they are using.

2. **Why is a written PPE program preferred over an unwritten policy for a professional engineering firm?**
   a) It is required for all Class C head protection.
   b) It is easier to establish as company policy and simpler to evaluate.
   c) It replaces the need for medical examinations.
   d) It provides a substitute for 29 CFR 1910.134.

Answer: (b). A written PPE program is easier to maintain as company policy and provides a clear baseline for evaluation.

Purchase this course to see the remainder of the technical materials.