

THE LAST RESORT

Remember that Personal Protective Equipment is the LAST level of control.

Before you just go putting people in hard hats, ear plugs, safety glasses, or any other form of PPE—have you tried to reduce or eliminate those hazards in any other way?

OSHA standards require that employers must exhaust all feasible administrative and/or engineering controls *before* instituting a program of personal protective equipment. According to a recent decision by the U.S. Supreme Court, “feasible” is defined as “capable of being done.” ISRI has heard stories of aggressive enforcement of this requirement in recent weeks, with a specific focus on occupational noise exposure.

An administrative (or work practice) control limits workers’ exposure to a potential hazard by, among other means, limiting the amount of time a worker is exposed. An example of this would be job rotating torch cutters to reduce lead exposure, or rotating shifts in noisy areas to risk exposure to noise.

An engineering control makes physical design changes to an operation to reduce the likelihood of injury. An example of this would be to enclose a hammer mill to reduce noise.

The first step is to quantify the potential exposure risks (industrial hygiene surveys), and to document the results. Where problems are found, it’s incumbent upon the management team to find a way to mitigate them.

It’s a different world out there these days when it comes to compliance. Better know what you’re doing, or be prepared to pay.

Safely—or not at all.

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