

## A PPE PRIMER

One of the most common questions I field from members is, “What personal protective equipment is required in a scrapyards?” I’m tempted to tell them what I’d require if I were in charge, but they usually want to know what the law requires. Here’s what it says:

*The employer shall assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE). If such hazards are present, or likely to be present, the employer shall: Select, and have each affected employee use, the types of PPE that will protect the affected employee from the hazards identified in the hazard assessment; Communicate selection decisions to each affected employee; and Select PPE that properly fits each affected employee. ...”*

In simpler terms, the above language is a great example of a performance-based standard: If your yard presents hazards that can be controlled by the use of PPE, then you have an obligation to provide it, train workers on its use, and ensure it is properly maintained. If your assessment shows no such hazards exist, you are under no obligation to provide any PPE. Note that you must document your assessment and explain your rationale.

With that out of the way, let’s talk about what I consider the basic elements of PPE in scrap recycling operations.

**Safety glasses.** Blindness is a devastating, horrifying injury. Recycling operations present many potential eye hazards—from blowing dust to flying fragments—so safety glasses are essential PPE in my book. Remember, though, that the impact-resistant everyday glasses from your optometrist are unlikely to meet safety eyewear standards. In fact, standard glasses compound eye injuries by increasing the amount of shrapnel propelled into the eyeball if an object were to strike them.

**Safety shoes.** This one’s a no-brainer, too, but you might be surprised by the amount of pushback I’ve received from recyclers over the years. One popular excuse for denying the need for foot protection is the myth that the steel toe in a safety shoe will *cause* injury to the wearer’s toes if something heavy falls on his or her foot. Think about that for a minute. If something hits the foot with enough force to collapse the structure of the steel toe cap, it’s hard to place the blame

on the shoe for any injury that results. There’s also an argument that steel toes hasten frostbite in cold weather, but your employees can address that concern by wearing better socks or selecting shoes with composite toe caps instead of steel.

In selecting safety shoes, consider the nature of the hazards your employees could encounter. High-top boots provide more protection than low-top shoes for yard workers—the folks who are in and around scrap all day. They offer not only physical protection from ankle lacerations, but also support for the ankle joint. Boots with protected shanks—the area under the arch—are worth serious consideration as well. For every impact hazard, there’s also a penetration hazard.

Safety shoes are among the few exceptions to OSHA’s requirement that employers provide PPE to employees at no cost, but don’t forget this point: Even if you require your employees to buy their own safety shoes, it’s still your responsibility to ensure their shoes are adequate to the task and are properly maintained. You can’t allow employees to wear gnarly, torn-up shoes when they’re working in your facility.

**Hard hats.** In a traditional metal recycling yard, there’s no valid argument against hard hats. Wherever metal goes flying—however rarely—it always comes to earth somewhere, and that’s reason enough to require hard hats. In less-intense environments, such as an electronics recycling facility or some warehouse operations, you might be able to make a convincing argument against the need for hard hats. Your assessment of hazards in your workplace will lead you to the correct answer for your situation.

**Gloves.** Wherever there’s a risk of cuts, burns, or chemical exposures, gloves are essential for hand protection, but you must match the glove to the hazard—and don’t go cheap. Kevlar gloves might be expensive, but they provide vastly better protection against cuts than standard leather gloves. Also, since few, if any, gloves are effective against both cuts and chemicals, you need to provide both types if your operation presents such hazards.

The PPE assessment process often is extremely instructive. If you need help getting started, give ISRI Safety a call. ■



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