COMPLIANCE BRIEF

GUARANTEEING THE RIGHT PPE FIT FOR CONSTRUCTION WORKER PROTECTION

PERSONAL PROTECTIVE EQUIPMENT (PPE) IS WORN TO MINIMIZE WORKERS' EXPOSURE TO WORKPLACE HAZARDS THAT CAN CAUSE SERIOUS INJURIES AND ILLNESSES.

In construction, PPE is vital for reducing exposure to hazards like falling objects, chemicals, and machinery. **Properly fitting PPE** is key to offering workers the maximum protection, and OSHA now requires it.

WHAT IS OSHA'S STANCE ON PPE FIT?

Unlike OSHA's General Industry PPE standards, the previous Construction PPE requirements in section §1926.95 didn't explicitly require that PPE properly fit workers.

OSHA §1926.95 only required employers to ensure PPE is safe in design and construction. However, it left ambiguity about the proper fit of PPE. As a result, workers often choose among standardized PPE that doesn't fit properly or adequately protect them from hazards.

For example:

- **Standard PPE sizes may not adequately protect smaller construction workers**
- **Ill-fitting PPE, such as standardized fall protection harness sizes, can also affect larger workers**

WHAT'S CHANGED WITH OSHA'S CONSTRUCTION PPE RULE?

On December 6, 2024, the Office of Management and Budget (OMB) approved OSHA's new PPE rule for construction, officially published in the Federal Register on December 12. As of January 13, 2025, employers must comply with these updated guidelines.

PPE FIT RULE COMPLIANCE DATE
JANUARY 13th 2025

OSHA's revisions include:

1. **Amending section §1926.95(c) to have the requirement in subparagraph (c)(2) that employers select PPE that properly fits each affected employee,**
2. **Moving the current language in section §1926.95(c) about safe design and construction to subparagraph (c)(1), and**
3. **Including language in paragraph (c) requiring employers to ensure that both requirements in subparagraphs (c)(1) and (c)(2) are met.**

Contractors are likely addressing fit problems by buying assorted sizes of PPE (small through extra-large). However, such sizes only fit some workers, limiting their options to choosing the best fitting rather than properly fitting PPE.

Ill-fitting PPE is like wearing uncomfortable shoes—it's both unsafe and impractical. A loose helmet or tight harness can increase risks. Ensuring a proper fit is vital to keeping workers fully protected.

SHOULD EMPLOYERS FOLLOW THE MANUFACTURER'S INSTRUCTIONS AND RECOMMENDATIONS ABOUT PROPER FIT?

OSHA recognizes that PPE manufacturers' instructions and recommendations can provide valuable guidance on ensuring proper fit for PPE. The Agency encourages employers to consult these instructions to determine the correct fit of PPE for workers.

However, OSHA is not making it a mandatory requirement in its construction standard, as doing so could limit employers' flexibility in selecting PPE that best meets their employees' specific needs. The clarified requirement for employers to provide PPE that fits properly applies regardless of whether the manufacturer offers fit instructions or recommendations.

If the manufacturers' guidance on proper fit is unavailable, employers can:

- Refer to consensus standards for additional direction on fitting PPE appropriately
- Select PPE for which fit guidance is available, whether from the manufacturer or other sources

WILL OSHA BE ENFORCING ITS AMENDED PPE RULE?

When an OSHA inspector observes a violation related to improper PPE fit, the Agency can issue a citation under §1926.95, Criteria for personal protective equipment, for construction.

OSHA expects employers to choose properly designed and sized PPE to protect workers from hazards without introducing new risks. The Agency asserts that this performance-based interpretation of "properly fits" strikes a balance, offering clear guidance and allowing employers to select the appropriate PPE to protect their workers.

OSHA believes that comfort is key to ensuring that PPE fits properly. Comfortable PPE is more likely to be worn consistently by workers, whereas uncomfortable PPE may be discarded or left unused. Additionally, discomfort can often signal an improper fit.

Employers should take employee complaints about discomfort seriously. They may indicate that the PPE needs further evaluation to ensure it provides adequate protection and does not introduce additional risks.

DOES OSHA ALLOW WORKERS TO USE THEIR OWN PPE?

Employers may have a situation where PPE is required, and they provide it at no cost, but the employee voluntarily wants to use their own PPE. Employers can allow workers to use their own protective equipment if it's determined to provide adequate protection, but they are not required to reimburse the employee for it.

When workers provide their own PPE, fit issues can arise:

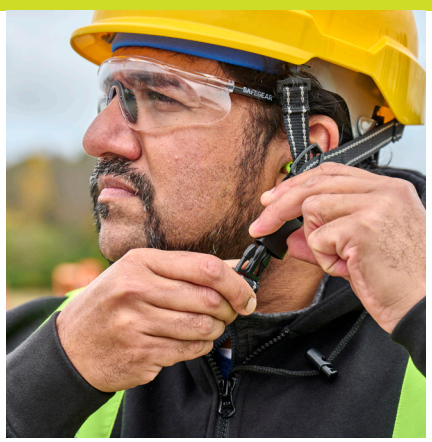
- Workers may choose either too tight, loose, or uncomfortable PPE, which can affect safety and performance.
- Without employer oversight, there's a higher risk of using improperly fitted or outdated PPE, compromising worker safety and increasing the likelihood of injuries.

OSHA clarifies that you must not require employees to provide or pay for their own necessary PPE. This prevents employers from avoiding their obligations by requiring workers to purchase PPE as a condition of employment.

OSHA SAYS YOU MUST NOT

REQUIRE EMPLOYEES TO PROVIDE OR PAY FOR THEIR OWN NECESSARY PPE.

WHAT ARE SOME COMMON TYPES OF PPE FIT ISSUES?



HEAD PROTECTION

OSHA's standard on head protection (§1926.100) requires the use of equipment when working in areas where there is a potential for injury to the head from falling objects. The equipment must also be designed to reduce the electrical shock hazard when working near exposed electrical conductors that could contact the head.

Proper fitting of helmets is important to ensure that they will not fall off during work operations. A chin strap may sometimes be necessary to keep the helmet on an employee's head. (Chin straps should break at a reasonably low force to prevent a strangulation hazard). PPE manufacturers' instructions should be followed carefully.

OSHA's standard references American National Standards Institute (ANSI) Z89.1, American National Standard for Industrial Head Protection at §1926.100(b)(1). Head protection must comply with the standard's 2009, 2003, or 1997 editions.

COMMON TYPES OF PPE FIT ISSUES *continued*

EYE AND FACE PROTECTION

OSHA's standard on eye and face protection (§1926.102) states that protection is needed when exposed to eye or face hazards from:

- **Flying particles**
- **Molten metal**
- **Liquid chemicals, acids or caustic liquids**
- **Chemical gases or vapors, or**
- **Potentially injurious light radiation.**

Side protection is required when there is a hazard from flying objects.

Oversized or undersized eye and face protection can undermine a worker's safety by compromising the effectiveness of the gear. An oversized face shield or goggles may shift or fog up, obstructing vision and leaving the face vulnerable to hazards. Conversely, protection that's too small may not fully cover the eyes or face, leaving areas exposed to potential risks like flying debris or chemicals. Properly fitting eye and face protection ensures clear vision, full coverage, and maximum safety while on the job.

OSHA's standard references ANSI Z87.1, American National Standard Practice for Occupational and Educational Eye and Face Protection at §1926.102(b). Protective eye and face protection devices must comply with the standard's 2010, 2003, or 1989 editions.

OVERSIZE GOGGLES MAY SHIFT OR FOG UP, PROTECTION THAT IS TOO SMALL MAY LEAVE AREAS EXPOSED TO HAZARDS

HAND PROTECTION

At §1926.95(a), OSHA requires employers to provide workers with extremity protection, such as gloves for hands. Gloves must be worn when employees' hands are exposed to hazards such as such as skin absorption of harmful substances, severe cuts or lacerations, severe abrasions, punctures, chemical burns, thermal burns, and harmful temperature extremes. Oversized or undersized gloves can create serious safety risks for workers.

Oversized gloves can:
- Impair dexterity
- Make it difficult to grip tools or handle materials properly
- Increase the risk of gloves getting caught in machinery

Undersized gloves can:
- Restrict movement
- Cause discomfort
- Lead to hand injuries

Ensuring gloves are the right size helps maintain safety and comfort, allowing workers to perform tasks effectively without compromising protection.

OSHA does not reference any industry consensus standard for hand protection. §1926.28(a) states, "the employer is responsible for requiring the wearing of appropriate personal protective equipment in all operations where there is an exposure to hazardous conditions or where this part indicates the need for using such equipment to reduce the hazards to the employees."

You can also rely on the glove manufacturer to help educate you on both the benefits and drawbacks of the hand protection you need to protect your employees effectively. This information can also be used to train employees on the proper use, fit, and maintenance of gloves.

HIGH-VISIBILITY APPAREL

Safety vests are very common on jobsites and often not sized properly. Certified high-visibility vests must comply with garment design requirements in ANSI/ISEA 107, The American National Standard for High-Visibility Safety Apparel and Headwear.

Oversized or undersized vests can significantly compromise worker safety and comfort. An ill-fitting vest may shift during movement, limiting visibility or reducing the effectiveness of other protective gear. Conversely, a vest that is too small can restrict movement, cause discomfort, and potentially leave areas of the body exposed to hazards. Properly fitting vests ensure that workers are both safe and comfortable while performing their duties.

Non-certified vests aren't required to conform to this Standard but are acceptable to use in low-risk work areas. Although OSHA hasn't adopted this Standard, many state-OSHA plans have. Buying ANSI-rated high-visibility apparel may also allow an employer to demonstrate it met its duties under OSHA's General Duty Clause. When workers are exposed to motor vehicle traffic, need to be more conspicuous for safety reasons, or are working near roadways, high-visibility apparel is ideal. Besides construction applications, high-visibility apparel can be used in every industry to ensure your workers are adequately visible to others. Alternative options for high-visibility clothing include sweatshirts, jackets, coveralls, and t-shirts.

Vest Types:
- **Type R** is for roadway work, construction, and nighttime operations.
- **Type O** is for off-roadway work.
- **Type P** is used for public safety workers.

Vest Classes:
- **Class 1** certified vests have the least amount of visible material but allow workers to be identified in the work area.
- **Class 2** offers increased visibility, providing more definition of the worker's form.
- **Class 3** has the most visibility, allowing workers to be recognized in complex work environments.

CONCLUSION

Fit and comfort can distinguish between an effective PPE program and a failed effort. OSHA's construction PPE standards don't provide employers guidance about the fit and comfort of PPE.

OSHA's Women in Construction webpage states, "PPE must fit properly so that it can effectively protect the employee from the hazard for which it was designed. Today, there has been tremendous progress in the availability of PPE for women."

OSHA suggests that employers use body measurements. Most PPE is manufactured using standardized body measurement data, aiming to fit 5-10 percent of females and 90-95 percent of males. This often leads to PPE being too small or large. OSHA recommends that female workers test PPE provided by their employer to ensure it fits properly and is comfortable. If not, they should immediately report the improperly fitting PPE to their employer.

All protective devices must:

- Provide adequate protection against the particular hazards for which they are designed,
- Be of safe design and construction for the work to be performed,
- Be reasonably comfortable when worn under the designated conditions,
- Fit snugly and not unduly interfere with the movements of the wearer,
- Be durable,
- Be capable of being disinfected,
- Be easily cleanable, and
- Be distinctly marked to facilitate identification only of the manufacturer.

OSHA recommends that female workers test PPE provided by their employer to ensure it fits properly and is comfortable.

If several types of PPE are worn together, ensure they are compatible. If PPE does not fit properly, employees could be dangerously exposed. Ill-fitting PPE may not provide the level of protection desired and may discourage employee use.

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Ray Chishti joined J. J. Keller in 2017 as a Workplace Safety Editor. He has 15 years of EH&S experience in a variety of industries, including EPC projects, construction, railway, fossil fuel power plants, gas distribution and transmission, electrical transmission, and retail. His experience includes working knowledge in OSHA safety, environmental, HR, workers' compensation, and DOT topics. As a safety professional, his previous roles included auditing and leadership positions with new construction, existing facilities, and large EPC projects valued between one million and two billion dollars. His experience includes positions within law enforcement as a police officer and fraud specialist.

His degrees include a Bachelor of Arts (BA) in Law Enforcement, a Master of Business Administration (MBA), and a Juris Doctor (JD) – with a certificate in Occupational Safety and Health. Ray also participated as an intern in his law school's Innocence Project – part of the Innocence Network, which has been credited with the release of over 350 wrongfully convicted prisoners, mainly through the use of DNA testing. His training in environmental, health, safety, and DOT topics includes certifications as a construction and general industry OSHA Outreach Instructor, in root cause analysis (Sologic), basic first aid, CPR, and AED use.

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