



NASA Incident Reminds Employers about Proper Fit for PPE

Insights

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As you may have seen in the news, an anticipated first all-female astronaut spacewalk had to be cancelled because the International Space Station did not have the appropriate sized space suits for both of the female astronauts (Anne McClain and Christina Koch) to conduct the spacewalk together. Ultimately, Koch conducted the space walk with the male astronaut (Nick Hague). According to NASA, the astronauts trained with various sized space suits, but the effect of microgravity changed the sizing preferences once in space. An ill-fitting space suit would make the job more difficult, but could also present safety concerns.

Employers must consider a similar issue when determining required Personal Protective Equipment (PPE) for their workplaces, and must make sure that the PPE properly fits the employee to ensure it provides the intended protection. A diverse workforce can include employees of various sizes. Employers must not only ensure it has the proper PPE for the hazards of the workplace, but also that the PPE fits each of the employees who may need to use it.

As a reminder, 29 CFR 1910.132(d) requires employers to conduct an assessment of the workplace to determine what hazards are present that necessitate the use of PPE. Then the employer must select the appropriate PPE to address the hazards, communicate that decision to the affected employees and “Select PPE that properly fits each affected employee.” *29 CFR 1910.132(d)(1)(iii)*. The reasons for having properly sized PPE are obvious. Gloves that are too big may make it difficult for employees to grip or manipulate tools; chemical boots that are too big could create a trip hazard, and respirators that are too big will not have the proper seal to prevent contaminants from entering the facemask.

While we are thinking of reminder regarding PPE, Employers should also keep in mind that the employer must train the affected employees on when PPE is necessary, how to don, doff, adjust and wear the PPE, the limitations of the PPE, as well as the proper care and maintenance of the PPE. Moreover, employers generally must provide the required PPE at no cost to the employee with a few exceptions. The employer is not required to pay for general, non-specialty safety footwear and prescription eye wear that the employer allows employees to wear off site. Finally, the employer must remember to document and “certify” the hazard assessment. Failing to be able to produce the certified hazard assessment is a common citation by OSHA.

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