

- Fact Sheet -

Personal Protective Equipment Requirements for Arboricultural Work



The role of PPE in worker protection

There are situations in the everyday work of the arborist (tree trimmer, tree worker) that expose the individual worker to hazards. Whenever feasible, recognized hazards must be removed from the work environment or reduced through the use of accepted safe work practices or other means. But often the hazards cannot be completely eliminated; and personal protective equipment (PPE) provides the employee with additional protection.

PPE alone should not be relied on to provide protection against hazards, but should be used in conjunction with guards, engineering controls, and safe work practices.

This **Fact Sheet** reviews the overlapping requirements of OSHA General Industry (29 CFR Part 1910) standards as well as guidance from ANSI Z133.1-2006, American National Standard for Arboricultural Operations – Safety Requirements (Z133), as they pertain to PPE.

The employer's general obligations

Under OSHA's §1910.132 – General Requirements, PPE for eyes, face, head, etc. "...shall be provided, used, and maintained in a sanitary and reliable condition..." wherever there is a workplace hazard that PPE can reduce or eliminate.

OSHA's PPE standards are for the most part "performance oriented," requiring the employer to identify hazards, perform a certification of hazard assessment, provide and in most cases pay for the PPE, provide training and enforce its own policy concerning PPE use.

There are some situations in which OSHA is more prescriptive about PPE use. For example, under §1910.95, the employer must ensure the use of hearing protection when employees are

exposed to harmful levels of noise. Employees exposed to chainsaws above 90 dBA as an 8-hour time-weighted average must wear hearing protection.

Personal climbing equipment is specifically required by §§1910.268(g) and 1910.269(g)(2). Those standards cover telecommunications and utility line maintenance work, respectively.

OSHA currently has no standard to apply broadly to all arborists, but Z133 requires the arborist to be secured or tied in at all times while off the ground, except when ascending a ladder. OSHA's §1910.67 as well as Z133 address fall protection in aerial lift devices. So in effect, there is a universal "fall protection PPE" requirement for all arborists working aloft.

Specific employer obligations

Hazard assessment - 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:

PPE selection & use - 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. Be sure to select PPE that properly fits each affected employee. Head protection (hard hats) and eye protection are specific types of PPE that Z133 deems to be universally required in "arboricultural operations."

Certification of hazard assessment - The employer shall verify that the required workplace hazard assessment has been performed through a written certification that identifies the workplace evaluated; the person certifying that the evaluation has been performed; the date(s) of the hazard assessment; and, which identifies the document as a certification of hazard assessment.

Training & communication - Communicate selection decisions to each affected employee.

Further training must assure that each affected employee knows at least the following:

- When PPE is necessary;
- What PPE is necessary;
- How to properly don, doff, adjust, and wear PPE;
- The limitations of the PPE; and,
- The proper care, maintenance, useful life and disposal of the PPE.

Each affected employee shall demonstrate an understanding of the training as well as the ability to use PPE properly, before being allowed to perform work requiring its use.

When the employer has reason to believe that any affected employee who has already been trained does not have the understanding and skill outlined above, re-training is required. Other circumstances where re-training is required include, but are not limited to:

- Changes in the workplace that render previous training obsolete
- Changes in the types of PPE to be used that render previous training obsolete

The employer shall verify that each affected employee has received and understood the required training through a written certification (record of training) that contains the name of each employee trained, the date(s) of training, and the training subject.

Enforcement – The employer has a general obligation to enforce safety rules. The most effective way to achieve compliance with PPE policies and training is through a system of documented, progressive discipline.

Employer payment for PPE

PPE used to comply with OSHA requirements shall be provided by the employer at no cost to employees. Specific exceptions for certain types of PPE and other items that may have personal protective qualities include:

- Non-specialty safety-toe protective footwear (including steel-toe shoes or steel-toe boots) and non-specialty prescription safety eyewear, provided that the employer permits such items to be worn off the job-site.
- The logging boots required by 29 CFR 1910.266(d)(1)(v);
- Everyday clothing, such as long-sleeve shirts, long pants, street shoes, and normal work boots; or
- Ordinary clothing, skin creams, or other items used solely for protection from weather, such as winter coats, jackets, gloves, parkas, rubber boots, hats, raincoats, ordinary sunglasses, and sunscreen.

The employer must pay for PPE that is replaced due to normal wear or due to circumstances outside the employee's control. Employers may establish policies obligating the employee to pay some or all of the cost of replacement when the employee has lost or intentionally damaged the PPE.

When an employee opts to use PPE that he or she owns, the employer may allow the employee to use it and is not required to reimburse the employee for that equipment.

References

OSHA Standards with PPE requirements

1910.95 - Occupational noise exposure.

1910.67 - Vehicle-mounted elevating and rotating work platforms.

1910 Subpart I - Personal Protective Equipment

1910.132 - General requirements.

1910.133 - Eye and face protection.

1910.134 - Respiratory Protection.

1910.135 - Head protection.

1910.136 - Occupational foot protection.

1910.137 - Electrical protective devices.

1910.138 - Hand Protection.

1910.266 - Logging operations.

1910.268 - Telecommunications.

1910.269 - Electric Power Generation, Transmission, and Distribution.

OSHA Directive CPL 02-01-045, Citation Guidance Related to Tree Care and Tree Removal Operations (Aug. 21, 2008).

ANSI Z133.1-2006, American National Standard for Arboricultural Operations – Safety Requirements. Secretariat: International Society of Arboriculture, PO Box 3129, Champaign, IL 61826-3129.

Through the OSHA and Tree Care Industry Association (TCIA) Alliance, TCIA developed this Fact Sheet for informational purposes only. It does not necessarily reflect the official views of OSHA or the U.S. Department of Labor. (Aug 2010)