



Head and Eye/Face Protection Policy and FAQs

Policy Statement:

All MoDOT employees shall wear appropriate head and eye/face protection when engaged in work activities occurring on or near the right-of-way and MoDOT grounds and facilities with the following exceptions:

- *Common areas such as hallways, office areas, meeting rooms, breakrooms and restrooms where risks from overhead hazards are minimal*
- *General/public parking areas or fuel pumps where risks from overhead hazards are minimal*
- *While conducting ceremonies including ribbon cuttings, ground breakings and road/bridge openings where risks have been minimized in a controlled environment*
- *While operating or riding in enclosed cab equipment and vehicles*
- *In the vehicle bays of facilities/buildings where the area is marked as a safe zone or area, or the area has been cleared of equipment and overhead hazards minimized to create an area for employee meetings.*

FAQs

Who has to wear head and eye/face protection?

All employees on the road, roadside, right of way or at MoDOT facilities lots (except as noted above) must wear head protection (hardhat/bump cap as appropriate) and safety eyewear (glasses/goggles/face shield as appropriate) unless he/she is in an enclosed cab. This also includes all employees as they perform work beyond the right of way if they are exposed to hazards. The policy will be fully implemented by July 1, 2012.

What is a common area?

Common areas are spaces used by employees and the public which are considered reasonably free of hazards and do not require special protective equipment. Examples generally include parking areas, break rooms, office spaces, fueling stations, rest areas and private property.

Why are ceremonies and ribbon cuttings exempt?

Ceremonies and ribbon cutting events will only be exempt if measures have been actively taken to eliminate potential hazards. These measures may include a hazard analysis of the site by the Safety Manager or his/her designee, blocking or securing the area from work activity, or moving unnecessary equipment from the vicinity. These types of events include large gathering of employees for such events like Employee Appreciation Days, Safety Fairs, and other pre-approved activities.

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When is equipment considered “not enclosed”?

Any open cab equipment such as chip spreaders or vehicles equipped only with ROPS (Roll Over Protective Structure) such as rollers and open cab tractors, are not considered enclosed. Equipment with removable doors such as skid steer loaders is considered not enclosed when there is not solid safety glass windows in a metal frame in front of and behind the operator.

Examples of vehicles with “not enclosed cabs” include:



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When are you required to wear hard hat / glasses in an Enclosed Cab?

Equipment door open vs closed, when is it required? Closed = not required, open = required.
Exception: While operating a motor grader or loader when the door to the cab is open to provide better visibility of work performed or in a vehicle such as a truck or tractor when window is open for ventilation a hard hat is not required. Eye protection is still required. Keep in mind that this potentially creates issues if exiting into a "head and eye protection required" area.

Examples of vehicles with enclosed cabs include:





Equipment window open vs cracked, when is it required?

If windows are cracked for ventilation, hard hats/eye protection are not required (as long as the criteria for closed cab is met). If the windows are open, eye protection is required, hardhats are not required.

Do we have to wear head and eye/face protection at a MoDOT maintenance facility?

There are many hazards involved with the work activities and equipment operation around a maintenance facility. Employees must wear head/eye protection anytime you are beyond common areas or outside marked "Safe Zones" while inside and at maintenance facilities unless the facility is being used as a meeting/classroom location. If equipment and vehicles have been pulled out of the building and the vehicle bay areas are being used as a meeting/classroom location hardhats and eye protection are not required.

When on your work lot, how far away from someone working is considered safe without wearing your hardhat / glasses?

On work lots or in buildings, if an area is not designated a "safe zone", hard hats and appropriate eye protection must be worn, unless otherwise specifically exempt per policy. This policy does not eliminate the need for all of us to use sound judgment. Situations will differ, and appropriate precautions should be taken to prevent exposure to potential injury.

How am I supposed to change oil or perform service under equipment with a hard hat on?

Bump caps will be allowed in lieu of hard hats during oil changes, preventative maintenance activities and service repair work under the body/hood of vehicles.

What is the difference between a bump cap and a hardhat?

A bump cap is a lightweight type of head protection with a simplified suspension or padding. Bump caps do not provide impact protection from falling objects and are used only to protect the head from bumping and scraping equipment or projections.

Do mechanics have to wear head and eye/face protection if they are walking out on a maintenance lot to pull a vehicle into their bay to work?

A bump cap may be used in lieu of a hard hat to pull a vehicle into their bay, unless there is work in the direct vicinity creating a hazard to the head that requires head protection. In order to ensure only a bump hazard exists, all tools must be secured and loose debris removed before raising buckets and booms. Eye protection is required.



My office and the restrooms at the maintenance facility require me to walk through areas which are not safe zones. Do I have to wear head and eye/face protection?

These situations should be evaluated by the Safety and Health Manager or his/her designee to determine if the safe zone can be safely extended, or if there is a way to arrange work areas away from restrooms and offices in order to keep these common areas. Head/eye protection is required if the hazards cannot be removed from the area.

Am I supposed to wear head and eye/face protection every time I exit my vehicle on state right-of-way, even to meet with a property owner, take a picture, or investigate a complaint?

Yes.

Are head and eye/face protection required if I am outside of the right of way performing work such as issuing permits, managing claims, or negotiating right of way?

Head and eye protection is not required when off the right of way and/or in a common area, unless there are hazards or work activity in the vicinity.

For surveyors - when they are not working on the right of way or in a construction zone, do they need to wear head and eye/face protection?

Work being performed beyond the right of way, including activities such as driving stakes, trimming trees, and walking through brush and weeds, will require head/eye protection.

Does my hard hat have to be lime/yellow?

Hard hats can be colors other than hi-vis yellow. Flagger operations require flaggers to wear a high visibility hard hat such as hi-vis yellow.

Are these “new” requirements for head and eye protection in line with OSHA requirements?

OSHA does not provide requirements for use of hard hats and eye protection. Rather, they require entities to establish their own hazards/tasks criteria that require protection. In the past, this approach has resulted in inconsistent application of policy among districts and employees have requested more uniform policy statewide in order to avoid misinterpretation when working in other districts. OSHA investigates injuries and incidents after the fact and provides citations based on the sufficiency of the hazard anticipation of the entity.



Will our head/eye protection policy statement be included in contract language and utility/permit work?

Not specifically. However, these contracts will require contractors provide a safety plan for the work for which they are bidding. This will maintain flexibility for contractors and not automatically restrict contractors from obtaining work from MoDOT.

Is wearing a hard hat while flagging a standard industry practice? Employees have expressed concerns related to heat (even with vented hard hats) and reduced range of visibility.

No, it does not appear to be industry standard although many contractors will require flaggers to utilize head protection while flagging. It is recommended to protect against flying debris and may reduce the severity of injury should a flagger be struck by a vehicle.

What do we plan to offer as MoDOT provided head protection? hard hat, hi-vis hard hat, bump caps, liners, chin straps, replacement sweat bands, etc.

We plan to offer hi-vis lime/yellow hard hats as currently available through the Distribution Center. We also currently offer winter liners (and plan to upgrade from our current offering) and replacement sweatbands and will continue to do so. Other offerings will be available through district/division.

What hazard is being mitigated with a hard hat and eye protection for R/W or permit staff meeting with someone on the right of way.

It is simply the right thing to do to protect our employees. Although the likelihood of an injury may be less in these instances, there is still exposure.

Will we be expanding the eligibility for prescription safety eye wear?

Current policy states that prescription safety eyewear is available to all full time, safety sensitive employees with routine exposure. The only issue here appears to be how we will handle this for seasonal employees. Prescription safety eyewear will be made available to seasonal that require prescription eyewear that are routinely exposed to flying debris or other eye hazards.

Will we provide hard hats/eye protection to incarcerated personnel?

We do currently, and will continue to do so.

Will we be changing our PPE requirements for Adopt-a-highway volunteers?

No, they are volunteers, not employees, so we will not require head/eye protection. We are required to provide vests, which we do. Internally, MoDOT employees involved in litter removal will be required to wear head and eye protection.



In many of our facilities, we are very limited on the ability to rearrange the workspace. How will head protection usage be handled in facilities?

Facilities will be able to determine “safe zones” that are unique to each building that do not require hard hat usage.

Why is head and eye protection required during mowing operations?

There are a number of potential exposures while mowing that warrant the use of hard hats, including overhanging limbs and flying debris (especially if more than one mower is being used).

Can I have stickers on my hard hat?

The use of stickers and decals typically do not affect the performance of the hard hat under normal conditions.

The decals should be placed at least three-fourths of an inch away from the edge of the hard hat. This prevents the possibility of the decal acting as a conductor between the outside and inside of the shell.

The areas of the hard hat covered by stickers/decals should be kept to a practical minimum to permit regular inspection for damage, typically not to cover more than 1/3 of the outer shell.

Any sticker or emblem placed on a hard hat or bump cap must comply with appropriateness guidelines applied to other clothing. In general, stickers must not be obscene, communicate controversial or hateful messages, or advocate for political beliefs or candidates for political office.

Hard hats used during flagging operations shall not have any stickers with the exception of retro-reflective strips/tape.

Do Motorist Assist/Incident Response employees have to wear head and eye/face protection?

Motorist Assist employees must wear head/eye protection unless he/she is in an enclosed cab. Bump caps will be made available for those times when it is not practical to wear a hard hat, such as under the hood or under a vehicle.



Do hard hats have an expiration date?

Most manufacturers recommend replacing hard hats every five years regardless of outward appearance. If work conditions include exposure to higher temperature extremes, sunlight, or chemicals, hard hats should be replaced after two years of use. Some manufacturers recommend the replacement of the hard hat suspension every 12 months, regardless of appearance.

Each hard hat must be permanently marked with the name or identification mark of the manufacturer, the date of manufacture, the ANSI standard designation, the applicable ANSI type and class designations and the approximate head size range.

Hard hat components should be inspected daily for signs of dents, cracks, penetration and any damage due to impact, rough treatment or wear. Any hard hat that fails the visual inspection should be removed from service.

Can I carry or wear anything inside or outside of my hard hat?

A clearance must be maintained between the hard hat shell and the wearers head for the suspension/protection system to work properly. Items such as gloves, cigarettes and earplugs should NEVER be stored between the suspension and the shell.

Any object in this space may limit this clearance and overall performance of the hard hat. Objects placed in this space that contain metal can also diminish the dielectric protection provided by the hat.

There are many products designed specifically to work in conjunction with hard hats such as face shields, hearing protection, winter liners and welding shields. Be sure to follow the manufacturer's recommendations for the use of these products.

Peripheral hard hat mirrors may be stored in the hard hat but must be removed prior to use.

Can I wear hoodies and/or rain gear with a hard hat?

Hoodies shall never be worn under a hard hat, and extra care should be taken at all times when wearing hoodies due to the additional hazards they create. Rain hoods and hoods to protect against cold may be worn over a hard hat, as long as they do not compress the suspension of the hat, which will compromise the protection of the hard hat.


Stocking caps should not be worn under the hard hat, unless specifically designed for such and approved by the manufacturer of the hard hat.

It is generally acceptable to wear most tight-fitting fabric stocking caps (skull caps, weld caps, winger liners, etc.) under any of the Bullard Hard Hats that are certified to the ANSI/ISEA Z89.1-2009 standard providing that:

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1. The garment does not contain any metal parts or pieces
2. The garment is located below the suspension ribbons (between the users' head and the hat's suspension)
3. The hard hat will remain on the head with the suspension adjusted snugly.

Can I wear my hard hat backward?

Hard hats marked with a "reverse donning arrow"  can be worn frontward or backward in accordance with the manufacturer's wearing instructions. They pass all testing requirements, whether worn frontward or backward.

I have an employee that has requested to purchase his own hard hat that resembles a cowboy hat. I do know that they meet specs but not sure if MoDOT will allow it. Can you help with some guidance?

As long as it is ANSI approved and meets MoDOT specs, employees can purchase these hard hats on their own. However, when the employee is flagging they must wear a high visibility color.

What are the different classes of hard hats and what do they specify?

Three classes of hard hats are recognized:

Class G (general) hard hats meet impact, penetration and dielectric requirements. The shell is tested at 2,200 volts for one minute.

Class E (electrical) hard hats also meet impact, penetration and dielectric requirements. The shell is tested at 20,000 volts for three minutes.

Class C (conductive) hard hats provide impact and penetration protection only. They do not have any electrical insulation.



How do I conduct an inspection?

During the inspection of your hard hat shell, you need to conduct a field test. Make sure you wear gloves and eye protection during this test. The field test compares the elasticity of your current hard hat shell to a new shell of a hard hat. Conduct the field test in the following manner:

Compress the shell inward from the sides about 1" with both hands and then release the pressure without dropping the shell. The shell should quickly return to its original shape, exhibiting elasticity.

If your current hard hat shell does not exhibit elasticity similar to that of a new shell, or if it cracks due to brittleness, it needs to be replaced immediately.

Will there be a grace period once the policy becomes in effect?

Policy becomes effective July 1, 2012, there will be no grace period.