

“Which Employees Need to Wear Hard Hats?”

Why It Matters:

- ☞ Head injuries are no joke – they can often be disabling and even fatal.
- ☞ There are many instances each year of a worker’s life being saved by wearing a hard hat.
- ☞ Violations of OSHA’s PPE standard were cited 1,800 times in general industry in FY 2004, with penalties totaling over \$1 million.

OSHA’s “head protection” regulation doesn’t tell the whole story. OSHA’s rule for head protection in general industry (29 CFR 1910.135) specifies two types of employees who are required to wear head protection:

- Those who work in areas where there is a potential for head injury from falling objects, *and*
- Those who are working near exposed electrical conductors that could contact the head.

But those two specific examples just begin to cover the range of situations in which employees should be required to wear a hard hat. The head protection rule is only a part of a much broader Personal Protective Equipment(PPE) standard (29 CFR 1910, Subpart I) that starts with a more detailed description of employees who are affected.

“Physical contact” hazards trigger hard hat requirement. OSHA’s general requirement for PPE states that protective equipment shall be used “wherever it is necessary by reason of hazards of processes or environment” that could cause injury through (among other things) physical contact. More simply put, whenever there is a reasonable chance that someone could suffer a head injury, head protection should be required.

Causes of head injuries might include:

- Falling objects including both small objects, such as tools, and large objects, such as loads falling from a raised forklift
- Flying objects including objects being swung from a crane or similar device
- Bumping the head on overhead objects, such as piping
- Contact with electrical hazards, such as power lines or wires



Hazard assessment is the key. Another important part of OSHA’s PPE standard is the requirement to perform a hazard assessment of the workplace to determine what kinds of PPE employees must wear. (Note that you must have a written certification that the hazard assessment has been performed.) A hazard assessment can be an ideal training exercise for employees: Have them inspect their own work areas for conditions that might cause head injuries, then report back a list of their findings. It should help make them more aware of hazards and how to protect themselves – and perhaps even encourage them to wear hard hats whether or not they are specifically required to do so.

Some Tips for Hard Hat Maintenance:

- *Clean it* –Run your hard hat through the dishwasher every so often. It is a quick and easy way of cleaning your hat. If you don’t think it’s dirty, try running your finger along the inside upper rim, you’ll be surprised!
- *Inspect it* – Don’t forget to look inside your hard hat for the ANSI stamp. If your hat is 5 years old, it’s time to retire it.



