



Date: May 1, 2014

To: Deans, Chairs, Directors, Managers, Supervisors, and Employees

From: J. Marvin Pratt, Director of Environmental Health and Safety 

Subject: Appropriate Work/Learning Attire for Employees working in the Trades, Shops, Mechanical Labs, Custodial, and Landscape and Grounds.

With the coming change in the weather it is appropriate to remind the Campus that while the weather will soon be nice, there is a minimum level of work clothing that is appropriate for many jobs performed at the University. This level of clothing is not to be confused with Personal Protective Equipment (PPE). Personal Protective Equipment is equipment that is required above and beyond daily attire and is further detailed below.

There are two primary types of hazards that should be considered when determining proper daily attire, chemical and physical hazards. While PPE requirements are often outlined in Material Safety Data Sheets (MSDSs) and equipment owner's manuals, daily attire is not typically addressed in these documents. However, OSHA does require that employers provide a safe working environment for their employees. California OSHA addresses this in the California Code of Regulations, Title 8, Construction Safety Orders Section 1522, and Title 8, General Industry Safety Orders in Section 3383 which in part states "Clothing appropriate for the work being done shall be worn."

Chemical Hazards. There are no specific daily clothing requirements detailed in Cal-OSHA regulations in regards to chemical hazards present in the workplace. The publication *Prudent Practices in the Laboratory* produced by the National Research Council, has become an industry standard, is incorporated in the University's Chemical Hygiene Plan, and is widely recognized by OSHA as detailing acceptable practices when handling chemicals. Appropriate daily wear is detailed in *Prudent Practices in the Laboratory* as:

- Clothing that fully covers the body including arms and legs.
- Shoes that cover the entire foot, provide a stable platform, and have rubber or similar slip resistant soles.
- Socks that cover the ankle.
- Lab coats (considered PPE).

Physical Hazards. As mentioned, there are no specific daily clothing requirements detailed in Cal-OSHA regulations in regards to physical hazards present in the workplace, with the exception of the electrical safety regulations. However, there are numerous potential hazards that are or could be present in the non-administrative workplace, such as sharp tools, sharp materials, insect bites, and handling or holding materials close to body.

Reviewing accidents that have taken place in recent years, reveal several injuries that could likely have been prevented if employees were dressed in appropriate daily attire. With this in mind, the requirements of the Cal-OSHA regulations and the commitment of the University to provide a safe working environment for our employees, as outlined in our Injury Illness Protection Program, employees shall be required to adhere to the following daily attire:

Custodians:

- Sleeved shirts*,
- Long pants (recommended but not required unless identified in applicable Job Safety Analysis) When long pants are required they should fall below the ankle, or socks should be worn to ensure skin is covered/protected.
- Shoes that cover the entire foot and provide a stable platform.
- Shoes that are slip resistant.**

Grounds, landscape, and outdoor workers:

- Sleeved shirts, long pants (sleeves should not be "loose" (CCR8, 1522, 3383)).
- Long pants (recommended but not required unless identified in applicable Job Safety Analysis) When long pants are required they should fall below the ankle, or socks should be worn to ensure skin is covered/protected.
- Shoes that cover the entire foot and provide a stable platform.
- Shoes with protective toes (steel or composite toe).**

Trades workers:

- Sleeved shirts, long pants (sleeves should not be "loose" (CCR8, 1522, 3383)).
- Shoes that cover the entire foot and provide a stable platform.
- Shoes with protective toes (steel or composite toe).**

Electricians:

- Must remove all conductive jewelry prior to work shift.
- 100% Cotton clothing that fully covers the body, including arms and legs.***
- Shoes that cover the entire foot and provide a stable platform.
- Shoes with protective toes (steel or composite toe) and possess an appropriate Electrical Hazard (EH) rating.**

Shop and mechanical area workers:

- Sleeved shirts, long pants (sleeves should not be "loose" (CCR8, 1522, 3383)).
- Shoes that cover the entire foot and provide a stable platform.
- Shoes with protective toes (steel or composite toe).**

* A lab coat, smock, sleeved apron, or similar PPE is required for work with highly corrosive materials.

** Considered PPE, see below for details.

*** Any work that meets the definition of All Hazard/Risk Category 1, 2, 2* tasks listed in NFPA 70E Table 130.7(C)(9) require Flame-Resistant (FR) long sleeve shirt and FR pants (minimum arc rating of 8 or FR coveralls of equal rating).

Deviations in the appropriate daily attire can be established by conducting, reviewing, and/or approving a job hazard analysis for each task that employees are likely to attempt during their work shift. If employees are expected to change clothing between tasks, appropriate arrangements should be made prior to modifications to the appropriate daily attire.

Personal Protective Equipment is equipment that is required to be worn by an employee to protect them from hazards that proper daily attire and engineering controls cannot eliminate. Examples include but are not limited to gloves, aprons, safety glasses, face shields, respirators, ear protectors, hard hats, fall restraint devices, and similar equipment. All PPE is to be provided to the employee at no cost. Employees shall be trained on proper care, use, and replacement of PPE. Typical PPE that would be worn routinely by the employees described in this memo would include boots/shoes, eyewear, and gloves.

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