



OSHA English | Spanish

Find it in OSHA



A TO Z INDEX

ABOUT OSHA WORKERS EMPLOYERS REGULATIONS ENFORCEMENT TOPICS NEWS & PUBLICATIONS DATA TRAINING

Standard Interpretations - Table of Contents

• Standard Number: 1910.132(d); 1910.135; 1926.100

August 01, 2014

The Honorable Charles E. Grassley
United States Senate
Washington, D.C. 20510-1401

Dear Senator Grassley:

Thank you for your letter to Ms. Laura de la Torre, Senior Legislative Officer, Office of the Assistant Secretary for the Occupational Safety and Health Administration (OSHA), on behalf of your constituent [Name withheld]. Your constituent has expressed concerns regarding OSHA's personal protective equipment (PPE) standard, as it relates to the use of hard hats while working on roofs in the heat.

OSHA shares [Name withheld] concerns about the proper use of PPE to ensure that workers are appropriately protected. OSHA's PPE standard, 29 CFR 1910.132, requires employers to perform a hazard assessment of their workplaces and then provide the appropriate PPE in accordance with §1910.132(d). OSHA generally requires hard hats for employees working in areas where there is a possible danger of head injury from impact, falling or flying objects, or electrical shock and burns. OSHA's General Industry and Construction head protection standards, §1910.135 and §1926.100, respectively, do not require workers to wear hard hats when there is no risk of head injury. However, even where there may not be an OSHA requirement to wear head protection, numerous employers require 100 percent hard hat use as a company policy. A universal hard hat policy is common on construction sites where workers work on roofs as well as other areas of the jobsite.

To assist you in responding to [Name withheld] concern, please also refer to a previously written letter from OSHA to Mr. Bret W. Barnard dated February 20, 2004. The letter, entitled *Hard hat requirements for workers on a roof, 29 CFR 1926.100*, can be accessed on our website and is enclosed for your information.

[Name withheld] also raised a concern regarding roofers' risk of heat-related illnesses from exposure to excessive heat. We would like to make you aware that, since July 2011, OSHA has implemented a heat-related illness prevention campaign to reinforce the need for employers to prevent heat-related illnesses and possible deaths.

Thousands of workers experience serious heat-related illnesses every year and dozens are killed. This is why OSHA, for the fourth year in a row, is sponsoring its campaign to Prevent Heat Illness in Outdoor Workers. We want to make sure that employers and workers know the steps they can take to prevent heat-related illness and death. Scheduling frequent water breaks, providing shade and ample time to rest - these are simple but critical precautions that can help save workers' lives.

OSHA has developed an easy to use smartphone heat safety application (app) to help workers and employers monitor dangerous heat levels. The app also displays the protective measures needed. For more information visit: www.osha.gov/SLTC/heatillness/index.html.

Since OSHA does not have a specific heat stress standard, OSHA relies on Section 5(a)(1) of the Occupational Safety and Health Act of 1970 (OSH Act) (also known as the General Duty Clause) to require employers to provide a safe and healthy environment for all workers and recommends that employers, including roofing employers, implement policies to address working during hot weather conditions.

A few of the elements that an employer's policy should include are:

1. Implementing a work/rest regimen in accordance with the American Conference of Governmental Industrial Hygienists (ACGIH) heat exposure Threshold Limit Values.
2. Acclimatizing new workers or returning workers by gradually increasing workloads and allowing more frequent breaks. Workers new to the heat can be the most vulnerable.
3. Rescheduling work during the cooler periods of the day (e.g., early morning and/or in the evening).
4. Encouraging employees to drink small amounts of cool water (approximately 4 to 6 ounces) every 15 to 20 minutes, but no more than 1 quart/hr. and 12 quarts/24 hrs.
5. Providing a training program for all employees regarding the health effects associated with heat stress, recognizing symptoms of heat-induced illnesses and methods of preventing such illnesses.

As the information on our website suggests, there are many environmental and job-specific factors that put workers at risk for heat-related illnesses. We recommend that employees first attempt to resolve any safety and health concerns they have with their employers. In the event that an employee is unable to resolve concerns directly with the employer, the employee can contact his or her local OSHA Area Office for information or to file a complaint.

Act. Iowa State Plan operates its programs under state law with OSHA approval, matching grants, and oversight to ensure that the State's programs are "at least as effective" as OSHA. Iowa State Plan retains the flexibility to tailor programs to address Iowa's local issues and concerns.

The Iowa State Plan can be contacted at:

Stephen Slater, Deputy Labor
Commissioner/IOSH Administrator
Iowa Occupational Safety and Health Enforcement
1000 E Grand Avenue
Des Moines, Iowa 50319-0209
Phone: (515) 281-3469
Fax: (515) 281-7995

We hope you and your constituent find this information helpful. If you have any further questions, please feel free to contact Margaret Cantrell in the Office of Congressional and Intergovernmental Affairs at (202) 693-4600.

Sincerely,

David Michaels, PhD, MPH

Enclosure

 Standard Interpretations - Table of Contents

UNITED STATES DEPARTMENT OF LABOR

Occupational Safety and Health Administration
200 Constitution Ave., NW,
Washington, DC 20210
☎ 800-321-6742 (OSHA)
TTY
www.OSHA.gov

FEDERAL GOVERNMENT

White House
Affordable Care Act
Disaster Recovery Assistance
USA.gov
Disability.gov
Plain Writing Act
Recovery Act
No Fear Act
U.S. Office of Special Counsel

OCCUPATIONAL SAFETY AND HEALTH

Frequently Asked Questions
A - Z Index
Freedom of Information Act
Read the OSHA Newsletter
Subscribe to the OSHA Newsletter
OSHA Publications
Office of Inspector General

ABOUT THE SITE

Freedom of Information Act
Privacy & Security Statement
Disclaimers
Important Web Site Notices
Plug-ins Used by DOL
RSS Feeds from DOL
Accessibility Statement