

OSHA STANDARD INTERPRETATIONS

OSHA requirements are set by statute, standards and regulations. Interpretation letters explain these requirements and how they apply to particular circumstances, but they cannot create additional employer obligations. Enforcement guidance may be affected by changes to OSHA rules.

Painting or placement of adhesive stickers on a protective helmet shell

Date of response: Oct. 27, 2009

Standard #1910.132, 1910.135

QUESTION: *Are adhesive stickers or paints allowed on protective helmets?*

ANSWER: OSHA's general requirements for PPE are set forth in 29 CFR 1910.132. The specific requirements for head protection (protective helmets) are outlined in 29 CFR 1910.135, which incorporates by reference American National Standards Institute (ANSI) Z89.1-1986, Z89.1-1997, and Z89.1-2003. Both 29 CFR 1910.132 and 1910.135 do not contain provisions that explicitly prohibit painting or the placement of adhesive stickers on helmet shells. However, the employer's ability to comply with the existing requirements of these standards may be adversely affected by the painting or placement of adhesive stickers on the helmet's shell.

For instance, OSHA standard 29 CFR 1910.132(a) requires that PPE be "... maintained in a sanitary and reliable condition ..." [Emphasis added.] To ensure a helmet is and remains in a "reliable" condition, the helmet must be inspected prior to use for signs of dents, cracks, penetration, and any damage due to impact, rough treatment, or wear that might reduce the degree of protection originally provided and used and maintained in accordance with the manufacturer's instructions. Paints and stickers may eliminate electrical resistance and – depending on the location and quantity – conceal defects, cracks, penetration, and any damage that would be otherwise readily identifiable during the employee's inspection to ensure reliability. Another concern is that paints, thinners, and solvents, as discussed in Appendix A of ANSI Z89.1-2003 and the appendices of the 1986 and 1997 versions, can also attack or damage the shell of a helmet and reduce protection.

For these reasons, painting or applying stickers must be performed in accordance with the manufacturer's instructions, unless the employer can demonstrate that the altered protective helmet is equally as effective and protective as those meeting the requirements of Z89.1. Protective helmet manufacturers usually provide very specific instructions regarding paints, stickers, or decals that will not negatively affect the performance of a protective helmet.

OSHA would consider painting or placing adhesive stickers acceptable if the manufacturer authorizes the alteration or the employer can demonstrate that the reliability of the helmet is not affected by the paint or the adhesive on the stickers; and the paint or placement of stickers would not reduce the ability to identify defects (i.e., use of see-through stickers) or other conditions that would indicate a reduced reliability.

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