

OSHA 1910.269 Question & Answer Sheet



No Compromise

NOTE: The new 29 CFR 1910.269 regulation is a massive document which is still being studied and interpreted by the marketplace. The comments presented here summarize our current understanding of the regulation. Bulwark reserves the right to update this advisory periodically to provide clear guidance to our customer base.

1 WHAT IS 29 CFR 1910.269?

Often referred to as OSHA 1910.269, it is the federal regulation (law) and defines the safety practices of employees working in the generation, transmission and distribution of electricity.

2 HOW WAS FLAME RESISTANT CLOTHING ADDRESSED IN PAST OSHA REGULATIONS?

The previous version of this regulation was issued in 1972. It didn't mandate the use of flame resistant/arc-rated clothing but did require that clothing worn by electrical workers not contribute to the burn injury caused by exposure to an electric arc. It even allowed the use of clothing made from heavy fabrics containing natural (non-melting) fibers.

3 WHAT CHANGES IN THE REGULATION WILL AFFECT MY FR CLOTHING PROGRAM?

The new language mandates the use of flame resistant/arc-rated clothing by all electrical workers who could be exposed to an electric arc while on the job. It also presents specific deadlines for the completion of hazard assessments and the issuance of proper PPE.

4 HOW MUCH TIME DO I HAVE TO COMPLY WITH THE NEW REGULATION?

There are a number of deadlines which end users need to be aware of. The final rule is effective on **July 10, 2014** at which time employers must have assessed the workplace for electric arc hazards and provided clothing that does not melt or ignite and continue to burn to employees at risk of exposure to electric arc.

Completion of some activities have extended deadlines.

January 1, 2015: Date by which employers must have estimated incident energies to workers who may be exposed.

April 1, 2015: Date by which employers must properly clothe workers in flame resistant/arc-rated garments having arc ratings (ATPV or EBT) equal to or greater than estimated incident energies.

5 WILL I BE ABLE TO COMPLY WITH THE NEW LAW BY LAYERING FR GARMENTS?

Yes, layering is allowed and is one way to achieve an arc rating greater than or equal to the incident energy that a worker could possibly be exposed to.

NOTE: The total arc rating of a layered clothing system must be arc tested as a composite; simply adding the arc ratings of separate clothing layers is not enough.

6 WHAT OTHER STANDARDS WHICH RECOGNIZE THE NEED FOR FLAME RESISTANT/ARC-RATED CLOTHING DID OSHA CITE IN THE REVISION OF 1910.269?

Several consensus standards are referenced in the final rule. Among them, NFPA 70E which cites the performance standard ASTM F1506 as the minimum requirement for fabrics and garments worn to protect against exposure to electric arc. One requirement of ASTM F1506 is that the garment label show the arc rating of the fabric the garment is made of.

7 HOW DO I KNOW I AM SPECIFYING THE RIGHT CLOTHING FOR MY EMPLOYEES?

If clothing is labelled as meeting the requirements of ASTM F1506-10a (or ASTM F 1891 for rainwear) and has an arc rating sufficient to protect against the incident energies identified in your hazard/risk assessment, you can feel confident about your selection.

8 DO THE CHANGES IN OSHA 1910.269 INCLUDE JACKETS AND RAINWEAR?

Yes. The final rule requires that the outermost layer of clothing be flame resistant/arc rated. Compliant jackets/outerwear meet the requirements of ASTM F1506-10a; compliant rainwear meets the requirements of ASTM F1891.



9 WHO IS REQUIRED TO PAY FOR THE FLAME RESISTANT/ARC RATED CLOTHING THAT EMPLOYEES MUST WEAR?

Employers are required to provide and pay for flame resistant/arc-rated clothing for employees at risk of exposure to an electric arc.

10 DO THE CHANGES IN THE REGULATION AFFECT CONTRACTORS?

All requirements mandated by the revised OSHA 1910.269 regulation apply to contractors who must wear PPE which meets the level of performance indicated by the results of the host employer's hazard/risk assessment.

- 11**
- A. MY LINEMAN ARE IN FR SHIRTS AND NON-FR JEANS NOW....WHAT DO WE NEED TO DO TO COMPLY WITH THE NEW LAW?**
 - B. WHY CAN I NO LONGER WEAR HEAVY WEIGHT COTTON GARMENTS?**
 - C. ARE FR BOTTOMS DEFINITELY REQUIRED NOW?**

Non-flame resistant/non-arc rated pants are no longer acceptable under the new regulation, even if they are made of heavy weight natural (non-melting) fibers. Workers are now required to wear flame resistant/arc-rated clothing which should cover the entire body.

12 WILL SHORT SLEEVES STILL BE ALLOWED?

The regulation mandates that the body be fully covered by flame resistant/arc rated clothing to minimize burn injury. A short sleeved shirt is acceptable only if another piece of PPE is worn to cover and protect the arms (rubber sleeves, for example).

13 IS IT POSSIBLE THAT I WON'T HAVE TO MAKE ANY CHANGES IN MY FR CLOTHING PROGRAM?

Yes, if an organization has already completed a hazard/risk assessment and has outfitted its employees in flame resistant clothing with an arc rating greater than or equal to the incident energy identified in your assessment, you may not need to make any changes.