



Date: January 28, 2008
Reviewed:
From: Peggy Munsell, Manager of Standards and Technical Resources
Subject: Rubber goods use and testing

This issue originated as an email from an employer dated September 7, 2007.

Issue: There are high voltage overhead electrical contractors in Oregon who are using defective rubber insulating blankets on the job, marked do not use for PPE. They have taken the position that they can use them on or around energized equipment or for markers of energized areas until proven wrong or fined by OSHA. My understanding is that rubber goods should not be on the job unless they have an updated test and date stamp.

They say there will also be tested blankets on the jobsite for Personal Protective Equipment.

What is the OR-OSHA position on this matter?

Answer: The rules around rubber gloves and blankets are located in Division 3, Sub-division V, Construction which say *rubber gloves and sleeves shall be electrically tested at least once each sixty days after they are checked out for use, and complete records shall be kept of all such tests and date of issue. Rubber gloves and sleeves not checked out for use within one year shall be re-tested before being issued.* (OAR 437-003-0275)

Rubber blankets, line hose and hoods shall be electrically tested at least once each six months after they are checked out for use, and complete records kept of all such tests and date of issue. Rubber protective equipment not checked out for use within one year shall be re-tested before being issued. (437-003-0265)

http://www.cbs.state.or.us/osha/pdf/rules/division_3/div3v.pdf



Division 2, Sub-division I, General Industry: *Rubber gloves and sleeves shall be electrically tested at least once every 3 months after they are checked out for use, and complete records shall be kept of all such tests and date of issue. Rubber gloves and sleeves not checked out for use within 6 months shall be retested before being issued.*
(437-002-0138)

Insulating equipment shall be inspected for damage before each days use and immediately following any incident that can reasonably be suspected of having caused damage. Insulating gloves shall be given an air test, along with the inspection.
(1910.137(b)(2)(ii))

Electrical protective equipment shall be subjected to periodic electrical tests.
(1910.137(b)(2)(viii))

http://www.cbs.state.or.us/osha/pdf/rules/division_2/1910-137.pdf

If the rubber goods are not tested based on the requirements it does not mean they are defective. However OR-OSHA would likely allege a violation if they were being used and had not been tested. After talking to several industry representatives they all said that they take rubber goods out of service after the test date requirements. Most are not equipped to do the testing and send them elsewhere to be electrically tested. Thus the industry normally has two sets for each worker.

If OR-OSHA alleged a violation based on failure to test and testing there after showed the material to be defective, the severity of the injury would reasonable be death. Death violations range from \$1,500- \$70,000 per violation.

Please contact the Technical Section at (503)378-3272 if you have additional questions.