



Oregon

Kate Brown, Governor

Department of Consumer and Business Services
Oregon Occupational Safety & Health Division (Oregon OSHA)

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Issued: January 28, 2008

Revised: March 19, 2018

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 personal protective equipment. 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 Oregon OSHA's position on this matter?

Answer: The rules around rubber gloves and blankets are located in Division 2/I for General Industry, and Division 3/E for Construction. The rule states:

"Rubber insulating gloves are to be tested before first issue and every 6 months thereafter; upon indication that insulating value is suspect; after repair; and after use without protectors. Rubber insulating sleeves are to be tested before first issue and every 12 months thereafter; upon indication that insulating value is suspect; and after repair."

"Rubber blankets shall be electrically tested before first issue and every 12 months thereafter; upon indication that insulating value is suspect; and after repair."

"Rubber protective equipment not checked out for use within one year shall be re-tested before being issued."

See [Table 1-5, Division 2/I 1910.137](#), and [Table 5, Division 3/E 1926.97](#)

If the rubber goods are not tested based on the requirements it does not mean they are defective. However Oregon OSHA would likely allege a violation if they were being used and had not been tested. Several industry representatives 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 Oregon OSHA alleged a violation based on failure to test and testing thereafter showed the material to be defective, the severity of the injury would reasonably be rated death. Death violations range from \$12,500 - \$126,749 per violation.

If we can be of further assistance, call Oregon OSHA's Technical Section at 503-378-3272. You are also invited to visit Oregon OSHA's website at www.osha.oregon.gov

Sincerely,

A handwritten signature in black ink that reads "Trena VanDeHey". The signature is written in a cursive, flowing style.

Trena VanDeHey, Standards & Technical Resources Manager
Oregon Occupational Safety & Health Division