

Appropriate Footwear – Guidance for Utilities

Safety Footwear

A hazard analysis is required to be completed by the employer to determine the appropriate type of protective head, eye and foot protection for the specific task.

This is what OSHA states

Personal Protective Equipment 1910.136(a) Foot protection General requirements. The employer shall ensure that each affected employee uses protective footwear when working in areas where there is a danger of foot injuries due to falling or rolling objects, or objects piercing the sole, or when the use of protective footwear will protect the affected employee from an electrical hazard, such as a static-discharge or electric-shock hazard, that remains after the employer takes other necessary protective measures.

1910.136(b)(1) Protective footwear must comply with any of the following consensus standards:
1910.136(b)(1)(i) ASTM F-2412-2005, “Standard Test Methods for Foot Protection,” and ASTM F-2413-2005, “Standard Specification for Performance Requirement for Protective Footwear,” which are incorporated by reference in §1910.6

1910.136(b)(ii) ANSI Z41-1999, “American National Standard for Personal Protection – Protective Footwear,” which is incorporated by reference in §1910.6; or

1910.136(b)(iii) ANSI Z41-1991, “American National Standard for Personal Protection – Protective Footwear”, which is incorporated by reference in §1910.6.

1910.136(b)(2) Protective footwear that the employer demonstrates is at least as effective as protective footwear that is constructed in accordance with one of the above consensus standards will be deemed to be in compliance with the requirements of this section.

OSHA standards Part 1926.96 is the compliance standard specifically for construction type work, where 1926 Subpart E – Personal Protective and Life Saving Equipment,

1926.96 – Occupational foot protection states, Safety-toe footwear for employees shall meet the requirements and specifications in American National Standard for Men’s Safety-Toe Footwear, Z41.1-1967. Although reference is made to a 1967 standard, OSHA does reference the latter standards on most of their documents, therefor would likely expect compliance to these updated standards.

OSHA has a letter of interpretation regarding the use of steel-toes and steel-shanked tennis shoes at a construction site and states this in response dated November 17, 1993.

“Please be advised that if the protective footwear meets the requirements and specifications in the American National Standard Institute (ANSI) consensus standard Z41.1-1967 for safety-toe footwear, the shoes would be considered by OSHA to be suitable for use at construction sites for those situations that do not require special foot protection. However, specific site conditions may also warrant the need for metatarsus protection or protection from hazardous liquids, sparks or electric shock.

Please note that ANSI Z41.1-1991 has replaced ANSI Z41.1-1967.”

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This is MoDOT's policy for footwear

Employees in positions with routine exposure to foot hazards (safety sensitive):

All safety sensitive employees shall wear *approved safety footwear* when engaged in work activities occurring on or near the right-of-way and MoDOT grounds and facilities. *Approved safety footwear* is defined as footwear which meets or exceeds the ASTM F2413-11 classification. Footwear should have abrasion resistant uppers, soles that are oil and skid (slip) resistant, defined heels, which do not exceed one and one-half inches in height, and be a minimum of a 6-inch boot. When work activities include exposure to heavy "drop" hazards, such as, fabrication, bridge and concrete repairs, etc., employees shall wear protective footwear with metatarsal protection. Workers temporarily assigned to jobs with exposure to heavy drop hazards, such as jack hammering, concrete replacement or deck repair activities, etc., shall wear removable metatarsal protection. Employees involved in any activities with electrical hazards, such as, signal and lighting, etc. shall wear footwear constructed of soles with electrical hazard (EH) protection.

Employees in positions occasionally exposed to foot hazards (non-safety sensitive):

Non-safety sensitive employees should wear *appropriate footwear* for the activity and location of their work assignment. When entering areas requiring protective footwear the employee should wear, as a minimum, *appropriate footwear* that has abrasion resistant uppers that fully covers the toe, heel, & foot up to the ankle. If work activities present drop, crush, or compression hazards, removable safety toe caps/guards should be used.

For employees working inside in a laboratory or warehouse operation, steel-toed tennis shoes have been allowed. However, boots are the expectation for those working outside where stepping in holes, maneuvering slopes could cause foot injuries such as sprains, strains or breaks.