

U.S. Department of Labor

Occupational Safety and Health Administration
Washington, D.C. 20210



January 21, 1980

Mr. James T. Conklin
Safety Program Coordinator
NASSCO
1350 Orange Avenue - Room 205
Winter Park, Florida 32789

Dear Mr. Conklin:

Assistant Secretary Bingham has requested that I respond to your inquiry requesting approval for sewer maintenance rehabilitation workers to wear bump caps instead of helmets per ANSI Z89.1.

Employees entering sewer manholes to clean sewers, set up TV and repair equipment, etc., are subject to probable head injuries indicated in your letter. Therefore 29 CFR 1910.135 and 29 CFR 1926.100 require that helmets meeting the requirements and specifications established in the American National Standard Safety Requirements for Industrial Head Protection Z89.1-1969 be worn for the protection of employees. Although there is a minimal chance of head injury from falling objects, employees are exposed to bumps, cuts and scalp injuries while working in manholes. Bump caps would not provide adequate employee head protection for all exposures in manholes because they are not constructed in a manner to provide the protection required.

If you have additional questions concerning OSHA safety and health standards you may wish to contact our Tampa Area Office. The address and telephone number of that office follow:

Area Director
U.S. Department of Labor - OSHA
700 Twiggs Street - Room 624
Tampa, Florida 33602
Telephone: 813-228-2821

If we may be of any further assistance, please feel free to call or write.

Sincerely,

Grover C. Wrenn, Director,
Federal Compliance and State Programs