

U.S. Department of Labor

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



July 22, 1992

Artie Scruggs
Business Manager
International Brotherhood
of Electrical Workers
P.O. Box 2796
Kokomo, Indiana 46904-2796

Dear Mr. Scruggs:

This is in response to your May 14 letter requesting an interpretation of an Occupational Safety and Health (OSHA) standard addressing the use of head protection at construction sites. I apologize for the delay in responding to your inquiry.

As you know, sections 1926.100(a) and (b) require employees to be protected by protective helmets that meet the specifications of the American National Standards Institute (ANSI) standard Z89.1, 1969, Safety Requirements for Industrial Head Protection. Because ANSI only tests and certifies hard hats to be worn with the bill forward, hard hats worn with the bill to the rear would not be considered reliable protection and would not meet the requirements of 29 CFR 1926.100(a) and (b) unless the hard hat manufacturer certifies that this practice meets the ANSI Z89.1- 1969 requirements.

If we can be of any further assistance, please contact Mr. Roy F. Gurnham or Mr. Dale R. Cavanaugh of my staff in the Office of Construction and Maritime Compliance Assistance at (202) 523- 8136.

Sincerely,

Patricia K. Clark, Director
Directorate of Compliance Programs