

# City of Rochelle

## Addendums to the APPA Safety Manual

### 16<sup>th</sup> Edition, 2017

#### Addendum to Section 407 c), Use and Care of Rubber Gloves

##### Addendum

*Adhering to all safety rules is critical in work application using 2-15 KV Live-line gloving techniques.*

Rubber gloves (and sleeves where appropriate) of the proper class must be worn before entering the primary area.

The Primary Area is defined as anything energized above the neutral, or, At a minimum, the immediate 2 foot, 2 inch (falling or reaching distance) area surrounding energized equipment in an area where primary contact is possible.

**Note;** Gloves and sleeves are not required when performing other maintenance or construction work above the neutral after insulating materials are installed on all energized conductors and equipment and the assigned work does not involve the energized equipment.

##### Documentation for Addendum

The City of Rochelle Electric Department has studied the changes contained in the 16<sup>th</sup> Edition to the APPA Safety Manual with regards to the "Ground to Ground, Cradle to Cradle, and Lock to Lock" rule stated in section 407 (c), and compared that section with OSHA 1910.269 and 1926 Subpart V updated on April 11, 2014. We will refer to OSHA regarding the Minimum Approach Distance and wearing of rubber gloves and sleeves.

We agree with the OSHA statement;

"It is important for employers to train employees not only in the applicable minimum approach distances, but also in how to maintain those distances.

"The training of qualified employees required under § 1926.950 and the job planning and briefing required under § 1926.952 must address selection of the proper working position." To clarify this point, final § 1926.950(b)(2)(iii) requires employers to train qualified employees in the minimum approach distances specified in this subpart corresponding to the voltages to which the qualified employee will be exposed *and the skills and techniques necessary to maintain those distances"* (page 20457 of the Federal Register as of April 11, 2014)

Therefore, we will adhere to the OSHA Standards concerning Minimum Approach Distance, and not section 407 (c) of the 16<sup>th</sup> Edition of the APPA Safety Manual. Section 407 (c) attempts to protect employees where there is no hazard and is contrary to the OSHA rule.

*Also, in the 16<sup>th</sup> Edition of the APPA Safety Manual, Definitions Tab, Introduction section, the Effectiveness paragraph on page 25 says;*

*"Existing governmental codes, statutes, rules, and orders shall be considered a part of this manual, and where any conflict exists between the two, those of governmental status shall prevail."*

*There is clearly a conflict between the OSHA standard and the 16<sup>th</sup> Edition of the Manual. The City of Rochelle shall allow the governmental status prevail.*