

## Respiratory Protection Program – Option 3

This sample policy statement is provided only as a guide to assist in complying with 29 CFR 1910.134, OSHA's Respiratory Protection Program standard. It is not intended to supersede the requirements detailed in the standards. Review the standard for particular requirements which are applicable to your specific situation. Employers will need to delete or add information relevant to your particular facility in order to develop an effective, comprehensive plan.

This sample covers situations [where employees are required to wear respiratory protection](#). This program must be specific for your particular workplace. Fill in all blanks where indicated; delete all information that does not pertain to your facility.

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### RESPIRATORY PROTECTION PROGRAM

#### **Purpose:**

We have decided that employees are exposed to respiratory hazards during routine operations. These hazards include **(insert operations, such as sand blasting, spray painting, acid washing, chipping)**. The purpose of this program is to ensure that we protect all employees from exposure to these respiratory hazards.

Engineering controls such as ventilation and substitution of less toxic material is the first line of defense in employee protection. However, engineering controls have not always been feasible for some of our operations, or have not always controlled the identified hazards. In these situations, we provide and require the use of respirators and other protective equipment.

#### **Scope & Application:**

This program applies to all employees required to wear respirators during normal work operations. All employees working in these areas and engaged in certain processes or tasks as shown below must be involved in the respiratory protection program. In addition, any employee who:

- Voluntarily wears a respirator when they do not require a respirator is subject to the medical evaluation, cleaning, maintenance and storage elements of this program.
- Voluntarily wears a filtering facepiece (dust mask) is not subject to the medical evaluation provisions of this program.

Employees participating in the respiratory protection program do so at no cost to them. We cover all expenses associated with training, medical evaluations and respiratory protection equipment.

<b>Voluntary &amp; Required Respirator Use</b> (example only-employer must complete for the jobsite)		
Respirator	Voluntary or Required	Department/Process (i.e., spray painting, etc.)
Filtering Facepiece (dust masks)		
Half-mask cartridge		
Filtering Facepiece (dust masks)		
Full or half-mask vapor cartridge		
Full or half-mask mist cartridge		
Loose fitting hoods		

### **Responsibilities**

Every employee has some responsibility for the success of our program. Specific responsibilities include these:

1. Program Administrator. The Respirator Program Administrator is **insert position or name of person.** The administrator is responsible for our program. Duties of the administrator include the following:
  - Identifying work areas, processes or tasks that require workers to wear respirators and evaluating hazards.
  - Selection of respiratory protection.
  - Monitoring respirator use to ensure that respirators are used according to their certifications.
  - Arranging for and/or conducting training.
  - Ensuring proper storage and maintenance of respiratory protection equipment.
  - Conducting qualitative fit testing with **insert type of testing used, i.e., saccharin, isoamyl acetate, Bitrex or irritant smoke.**
  - Administering the medical evaluation program.
  - Maintaining records required by the program.
  - Evaluating and updating the program as needed.
  
2. Supervisors. Supervisors are responsible for ensuring that they carry out the respiratory protection program in their particular areas. Besides being knowledgeable about the program requirements for their own protection, supervisors must also ensure that their employees understand and follow the program. Duties of the supervisor include the following:

- Ensuring employees under their supervision (including new hires) have received appropriate training annually, fit testing annually and medical evaluation.
  - Ensuring the availability of appropriate respirators and accessories.
  - Being aware of tasks requiring the use of respiratory protection.
  - Enforcing the proper use of respiratory protection when necessary.
  - Ensuring that respirators are properly cleaned, maintained, and stored according to the respiratory protection plan.
  - Ensuring that respirators fit well and do not cause discomfort.
  - Continually monitoring work areas and operations to identify respiratory hazards.
  - Coordinating with the Program Administrator on how to evaluate respiratory hazards or other concerns regarding the program.
3. Employees. Each employee has the responsibility to wear the respirator when and where required and in the manner in which they were trained. Employees must also do the following:
- Care for and maintain their respirators as instructed and store them in a clean and sanitary location.
  - Inform their supervisor if the respirator no longer fits and request a new one that fits properly.
  - Inform their supervisor or the Program Administrator of any respiratory hazards which may need evaluation in the workplace and of any other concerns that they have about the program.

### **Program Elements**

1. Selection Procedures. The Program Administrator will select respirators used on the site, based on the exposure hazards of employees. The Program Administrator will conduct a hazard evaluation of each operation, process or work area where airborne contaminants may be present in routine operations or during an emergency. The hazard evaluation includes:
- Identification and development of a list of hazardous substances in the workplace, by department or work process.
  - Review of work processes to decide where potential exposures to these hazardous substances may occur by surveying the workplace, reviewing process records and talking with employees and supervisors.
  - When we cannot conduct our own exposure monitoring, we will contract out exposure monitoring to evaluate hazard exposures to **identify who does the exposure monitoring, self, insurance company, onsite consultation, a private contractor, etc.** We include the exposure monitoring results in the appendix section of this program.

2. Hazard Assessment. The Program Administrator will revise and update the hazard assessment as needed (i.e., any time work process changes may potentially affect exposure.) If an employee feels that they need respiratory protection during a particular activity, contact the supervisor or Program Administrator. The Program Administrator will evaluate the hazard, arranging for outside assistance as necessary. Results of the assessment are provided to employees. If respiratory protection is necessary, all other elements of this program will take effect.
3. Certification. All respirators must be certified by the National Institute for Occupational Safety & Health (NIOSH) and used according to the terms of that certification. Also, all filters and cartridges must be labeled with the appropriate NIOSH approval label. Employees must not remove or deface the label on the respirator.
4. Voluntary Respirator Use. We will provide respirators at no charge to employees. Possible work processes considered "voluntary" include the following:
  - filtering facepiece dust masks or
  - half-facepiece air purifying respirators (APR) with **insert type of filter or cartridge.**

The Program Administrator will provide all employees who voluntarily choose to wear respirators with the information contained in Appendix D of the standard that details the requirements for voluntary use. Employees choosing to wear a half facepiece APR must comply with the procedures for medical evaluation, respirator use, cleaning, maintenance and storage.

The Program Administrator will authorize voluntary use of respiratory protective equipment as requested by all other workers on a case-by-case basis, depending on specific workplace conditions and the results of the medical evaluations.

5. Medical Evaluations. We do not permit employees to wear respirators until a physician or other licensed health care provider (PLHCP) {note: at this time, the PLHCP can be a physician, physician's assistant or nurse practitioner) has determined that they are medically able to do so. Any employee refusing the medical evaluation will not be allowed to work in an area requiring respirator use.

Contact the Program Administrator for the name and phone number of our medical evaluator. The Program Administrator has given the medical evaluator a copy of this program, a copy of OSHA's Respiratory Protection standard 29 CFR 1910.134, the list of hazardous substances by work area, and for each employee requiring evaluation: his work area or job title, proposed respirator type and weight, length of time required to wear a respirator, expected physical work load (light, moderate, heavy), potential temperature and humidity extremes and any additional protective clothing required. Medical evaluation procedures are as follows:

- The employee will complete the medical evaluation questionnaire (Appendix C of OSHA's Respiratory Protection Standard). To the extent feasible, the company will help employees who cannot read the questionnaire (by providing help in reading the questionnaire). When this is not possible, we will send the employee directly to the medical evaluator.
  - We will provide the employee with a stamped envelope addressed to the medical evaluator. The employee can place the completed questionnaire in the envelope to be mailed.
  - All examinations and questionnaires are to remain confidential between the employee and the medical evaluator.
  - We will permit employees to fill out the questionnaire on company time.
  - The medical evaluator will provide follow-up medical exams to employees as required and/or as deemed necessary.
  - We will give all employees the opportunity to speak with the medical evaluator if they request to do so.
  - We will not allow any employee to work in an area requiring respirators if the employee refuses to complete the medical evaluation.
  - We will provide a powered air purifying respirator for any employee required for medical reasons to wear a positive pressure air purifying respirator.
  - We will provide additional medical evaluations under the following circumstances:
    - Employee reports signs and/or symptoms related to their ability to use a respirator, such as shortness of breath, dizziness, chest pains or wheezing.
    - The medical evaluator or supervisor informs the Program Administrator that the employee needs reevaluation.
    - Information from this program, including observations made during fit testing and program evaluation, shows a need for reevaluation.
    - A change occurs in workplace conditions that may result in an increased physiological burden on the employee.
6. Fit Testing. We require qualitative fit testing for employees wearing half-facepiece or full-facepiece APR for exposure to: (identify contaminants). (Loose fitting respirators such as those required for sandblasting operations are not required to be fit tested). Employees voluntarily wearing half-facepiece APRs may also be fit-tested upon request. Employees will be fit tested:
- Before being allowed to wear any respirator with a tight fitting facepiece.
  - Annually.
  - When changes in the employee's physical condition could affect fit (e.g., obvious change in body weight, facial scarring, etc.).

Employees will be fit tested with the make, model and size of the respirator they will actually wear. We will give employees several models and sizes of respirators so that they may find an optimal fit.

The Program Administrator will conduct qualitative fit tests (QLFT) following OSHA's approved protocol (see Appendix A of OSHA's Respiratory Protection Standard). The Program Administrator has determined that we do not require the quantitative fit test (QNFT) for respirators used under current conditions. If conditions change, the program administrator will evaluate on a case-by-case basis whether we require QNFT.

7. **Respirator Use.** Employees will use their respirators under conditions specified and according to the training received. The respirator will not be used in a way that NIOSH or the manufacturer has not certified.

Employees will conduct user seal checks each time that they wear their respirator. Employees can use either the positive or negative pressure check (depending on which test works best for them).

We permit employees to leave the work area to maintain their respirator for the following reasons: to clean their respirator if the respirator is impeding their ability to work, change filters or cartridges, replace parts or to inspect a respirator if it stops functioning as intended. Employees must notify their supervisor before leaving the area.

We do not permit employees to wear tight-fitting respirators if they have any condition, such as facial scars, facial hair or missing dentures, that prevents them from achieving a good face-to-facepiece seal. We do not permit employees to wear headphones, jewelry or other articles that may interfere with the facepiece-to-face seal.

In case of a respirator malfunction (e.g., such as a breakthrough, facepiece leakage, or improperly working valve), the employee should inform the supervisor and go to the designated safe area to maintain the respirator. Supervisors must ensure that the employee receives the needed parts to repair the respirator or give the employee a new respirator.

8. **Cleaning, Maintenance.** Disposable respirators are to be discarded at the end of the work shift. Reusable respirators are to be regularly cleaned and disinfected at the designated respirator cleaning station found insert information as to where employees are expected to clean respirators. Respirators issued for the exclusive use of an employee are to be cleaned as often as necessary, but at least once a day at the end of the work shift. Cleaning procedures are described in the Appendix B-2 of OSHA's Respiratory Protection Standard.

The Program Administrator will ensure an adequate supply of cleaning and disinfection materials. If supplies are low, employees should contact their supervisor or Program Administrator.

Employees will properly maintain respirators always to ensure that they function properly and adequately protect the employee. Maintenance involves a thorough visual inspection for cleanliness and defects. Replace worn or deteriorated parts before use. No components will be replaced or repairs made beyond those recommended by the manufacturer.

We permit employees to leave their work area to do limited maintenance on their respirator. Situations when we permit this include:

- Washing their face and respirator facepiece to prevent any eye or skin irritation.
  - Replacing the filter or cartridge.
  - If they detect vapor or gas breakthrough or leakage in the facepiece.
  - If they detect any other damage to the respirator or its components.
9. Change Schedules. Employees who use particulate filters (designated as 95, 99 or 100 {N, R, P}) will be instructed to discard and change the filter when they have difficulty breathing due to lack of air being drawn through the filter.

This change schedule is based on discussions with our respirator distributor about our workplace exposure conditions to ensure the continued effectiveness of the respirators.

**Note: Each employer must contact his supplier to obtain change schedules for the types of respirators used and the concentration of air contaminants. Enter that information in this section.**

10. Storage. Employees must store respirators in a clean, dry area and following the manufacturer's recommendations. Each employee will clean and inspect their own air-purifying respirator following the provisions of this program and will store their respirator in a plastic bag in their own locker, to prevent deformation of the facepiece and exhalation valve.
11. Defective Respirators. Take respirators that are defective or have defective parts out of service immediately. If, during an inspection, an employee discovers a defect in a respirator, report the defect to the supervisor or Program Administrator. The Program Administrator will decide whether we can repair or replace the respirator.
12. Air Supplied Respirators (i.e. loose hood for sand blasting operations). The Program Administrator will ensure that the breathing gas for all atmosphere supplying respirators (from the compressor) is of the highest quality and all other provisions indicated in this section are complied with. Specific procedures for the use of supplied air respirators, and for the maintenance of air compressors and the associated safety equipment are included in this program.

Compressed breathing air will be supplied from an independent ambient air pump. This ambient air pump will be inspected on a regular basis by the Program Administrator to ensure that it is situated and operated to prevent entry of contaminated air into the air-supply stream.

OR

Compressed breathing air supplied directly from an air compressor will comply with the following minimum specifications:

- Air will at least meet the requirements for Type 1 - Grade D breathing air described in ANSI / Compressed Gas Association Commodity Specification for Air, G-7.1-1989 or more recent.
- The oxygen content (v/v) must be between 19.5% and 23.5%;
- The hydrocarbon (condensed) content must be 5 milligrams per cubic meter of air (mg/m<sup>3</sup>) or less;
- The carbon monoxide (CO) content must be 10 ppm or less;
- The carbon dioxide (CO<sub>2</sub>) content must be 1,000 ppm or less;
- There must be no noticeable odor.

Compressed oxygen will not be used in any systems. All atmosphere supplying respirators will be marked and used in accordance with the NIOSH respirator certification standard 42 *CFR* part 84. All breathing air couplings will be incompatible with outlets for non-respirable worksite air or other gas systems. No asphyxiating substance will be introduced into breathing air lines.

Compressors used to supply breathing air will be inspected on a regular basis by the Program Administrator to ensure that they are constructed, situated and operated so as to:

- Prevent entry of contaminated air into the air-supply stream;
- Minimize moisture content so that the dew point at 1 atmosphere pressure is 10EF (5.56EC) below the ambient temperature.
- Have suitable in-line air-purifying sorbent beds and filters to further ensure breathing air quality. Sorbent beds and filters will be maintained and replaced or refurbished periodically following the manufacturer's instructions. The respirator program administrator will maintain a record of maintenance and changeover.
- A tag will be maintained on the compressor indicating the most recent change date and the signature of the person authorized by the employer to perform the change.
- Carbon monoxide (CO) levels will not exceed 10 ppm.
- For compressors that are not oil lubricated: The program administrator will ensure that the carbon monoxide (CO) levels in the breathing air do not exceed 10 ppm;
- For compressors that are oil lubricated: the compressor will have a high-

temperature alarm, a carbon monoxide (CO) alarm or both. If only a high-temperature alarm is used, the air supply will be monitored at intervals sufficient to prevent carbon monoxide (CO) in the breathing air from exceeding 10 ppm.

Note: If air supplied respirators, other than loose hoods, are used for emergency situations; for entry into immediately dangerous-to-life-or-health (IDLH) atmospheres; or for interior structural firefighting, additional requirements will apply

13. Training. The Program Administrator will train respirator users and supervisors on the contents of this program and their responsibilities. We will train employees before they use a respirator. Supervisors will be trained before supervising employees that must wear respirators or before using one themselves. Training will cover the following:

- Why the respirator is necessary.
- How improper fit, usage or maintenance can compromise the protective effect of the respirator.
- The limitations and capabilities of the respirator.
- How to use the respirator effectively in emergencies including situations in which the respirator malfunctions.
- How to inspect, put on and remove, use and check the seals of the respirator.
- The procedures for maintenance and storage of the respirator.
- How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators.
- The requirements of this program and the OSHA's respiratory protection standard, 29 CFR 1910.134.

We will retrain employees annually and as needed (e.g., if an employee changes departments and needs to use a different type of respirator). The Program Administrator will document respirator training. The documentation will include the type, model, and size of respirator for which each employee has been trained and fit tested.

### **Program Evaluation**

The Program Administrator will conduct periodic evaluations of the workplace to ensure that we are carrying out the program. The evaluation will include regular consultations with employees who use respirators, and their supervisors, site inspections, air monitoring and a review of the records.

The Program Administrator will report problems identified to management and the report will list plans to correct deficiencies in the program and correction dates.

**Recordkeeping**

The Program Administrator is responsible for maintaining the following:

1. A current copy of this written program. We will provide this program to the U.S. Department of Labor (OSHA) for examination and copying at their request or for any employee who wants to review it.
2. Training and fit test records (name, date, type, make, model and size of respirator). We will update these records as new employees are trained, as existing employees receive refresher training and as new fit tests are conducted.
3. Copies of the medical records of all employees covered under the respirator program. The completed medical questionnaire and the physician's documented findings are confidential and will remain with the PLHCP. The company will only retain the PLHCP's written recommendations regarding each employee's ability to wear a respirator.