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USE OF ANY RESPIRATOR FOR ANY REASON IS REGULATED

The OSHA respiratory protection standard applies whenever a respirator is donned at work, regardless of the circumstances. The extent of the regulatory requirements is a function of the type of respirator and the purpose of use. Nevertheless, in all cases, respirator use triggers some or all of the OSHA respiratory protection standard provisions. Respirators in our operations span from paper masks to full-face elastomeric cartridge respirators. Yes, paper masks are respirators. They are referred to as filtering facepieces in the OSHA standard.

(Just to be complete and to avoid possible confusion, OSHA has both a General Industry respiratory protection standard (29 CFR 1910.134) and a Construction respiratory protection standard (1926.103). We are treating them as one standard since they are identical.)

The most fundamental employer obligation is to identify the actual respiratory hazards that exist. This is the first cut, since it separates mandatory respirator use to protect against real hazards from voluntary employee use for personal comfort.

Determination of *mandatory* respirator use involves an industrial hygiene evaluation. This often includes measuring airborne chemical or contaminant exposures to assess the health hazards.

All of the provisions of the OSHA respiratory protection standard apply whenever the exposure conditions mandate respirator use. In this situation, the regulations require:

- A written respirator program document that spells out details on all of the program elements from hazard assessment to respirator selection to care and maintenance, etc.
- Designation of a program manager – who is the respirator program go to person at the location
- Respirator selection – what respirator(s) to use when and where
- Employee training – content and administration
- Respirator cleaning, sanitation, storage and maintenance – how are these done
- Medical evaluation of each respirator wearer – makes sure they are medically able to use the assigned respirator(s). We often use a service from 3M for this purpose.
- Fit testing – at least annually personally fit test each respirator wearer with each of the respirators they are assigned. We have several quantitative fit testing units for elastomeric (non-paper) respirators. A qualitative method would be used for filtering (paper) facepieces. Use to calculate maximum use concentration based on assigned protection factor and occupational exposure level.

For voluntary use, the rules are much simpler. After determining that voluntary use is appropriate, and if a filtering facepiece is being used, then the only requirement is to provide the employee a copy of Appendix D of the OSHA standard. However, voluntary use of an elastomeric respirator, in addition to Appendix D, also requires the medical qualification and respirator cleaning, sanitation, storage and maintenance provisions.

Please contact David Templeman at david.templeman@cbs.com for assistance or additional information.