

# RISK CONTROL CONSULTING

## Establishing a Respirator Program

As an employer, you may find that even after implementing effective engineering and administrative controls, respirators are still necessary to protect employees from contact with hazardous atmospheres. To assure that employees using respirators are properly protected, a carefully planned and well executed respiratory protection program must be implemented. OSHA requires that companies providing workers with respiratory protection have a written program (29 CFR 1910.134 and 29 CFR 1926.103).

To help you prepare your program we developed these simple guidelines. You may use them as a basis for a program tailored to your company's unique requirements. In addition to these basic guidelines, you should address special requirements such as respirator use during emergencies where unusual hazards may be encountered.

### **SAMPLE POLICY STATEMENT**

"It is our goal to provide a safe and healthful workplace for all employees. Our respirator guidelines are designed to help reduce employee exposure to airborne contaminants. Whenever exposures cannot be eliminated through engineering controls, use of personal respiratory protective equipment may be required to achieve this goal.

"The objective of this document is to provide information and guidance on the use, selection and maintenance of respiratory protective equipment, and the administration of the respiratory protection program, including employee instruction and training."

### **RESPONSIBILITIES**

Note, this section may vary greatly depending upon the size and organization of your company.

MANAGEMENT is responsible for:

1. Determining what specific applications require use of respiratory protective equipment

2. Providing proper respiratory protective equipment to meet the needs of each specific application
3. Ensuring that employees are provided with adequate training and instruction on all equipment used

SUPERVISORS are responsible for:

1. Ensuring the respirators are available as needed
2. Ensuring that employees properly wear respirators where required
3. Providing a clean and secure place for storage of respirators which are issued to their employees
4. Ensuring that their subordinates comply with all facets of this respiratory protection program, including respirator inspection and maintenance

EMPLOYEES are responsible for:

1. Wearing the respirators supplied to them in accordance with instruction and training
2. Cleaning, disinfecting, inspecting and storing their respirators as specified
3. Immediately reporting any observed or suspected respirator malfunction to their supervisor
4. Informing their supervisor of any personal health problems that could be aggravated by the use of respirators

The RESPIRATOR PROGRAM COORDINATOR is responsible for administering the overall program. This includes the following elements:

1. Contaminant identification and measurement -- includes obtaining technical support for air sampling and laboratory analysis
2. Selecting and issuing the correct respirators
3. Implementing training programs and providing fit testing for employees who are provided respirators
4. Maintaining all records required by the respiratory protection program
5. Ensuring that employees assigned to tasks requiring use of respirators are physically and psychologically capable of wearing those respirators under the given work condition

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## SELECTING & ISSUING RESPIRATORS

Select only NIOSH/MSHA approved respirators for your program. The choice of respirators for a given work assignment depends on the airborne contaminant present, the operation to be performed, and the comfort and ease of obtaining a proper fit. Respirators, other than those for emergency use, should be used only by the employees to whom they have been issued. Each assigned respirator should be identified in a manner that does not interfere with its performance. The date of issuance should be recorded by the respirator program coordinator. Respirators should not be issued until fit testing, training and medical evaluations are completed.

## TRAINING EMPLOYEES

Employees should become familiar with the details of your program. Post copies of the program in appropriate locations, keep a copy on file in the main office, and give one to each respirator user. Train every employee who will use a respirator as well as supervisors and managers. This training should include:

1. Description of the respirators.
2. The intended use and limitations of the respirator.
3. Proper wearing, adjustment and testing for fit.
4. Cleaning and storage methods.
5. Inspection and maintenance procedures.

This training must be provided prior to initial respirator issuance, repeated as necessary and at least annually to ensure that employees remain familiar with the proper use of their respirators.

## RESPIRATOR FIT TESTING

Employees required to wear a respirator must initially be tested for proper fit. The respirator program coordinator should assure that the appropriate respirator fit test is used to determine the ability of each individual respirator user to obtain a satisfactory fit with the respirator prior to issuance.

Prior to each use, the user must check the seal of the respirator face piece (positive and negative pressure checks) to assure proper protection. If the employee is unable to obtain the proper fit with the type of respirator furnished, the company must correct the problem. It is the employee's responsibility to be

clean shaven, as any facial hair will prevent a proper fit.

## CARE AND MAINTENANCE

Respirators should be cleaned after each day's use and stored in a clean, secure location to protect against dust, sunlight, extreme temperatures, excessive moisture or damaging chemicals. Respirators must not be hung from nails, hooks, or stored in any manner which might damage or deform them.

Each worker assigned a respirator should be required to maintain it in good condition and to routinely inspect before and after each use and after cleaning. Check the condition of the face piece, head band, valves and hoses; and assure proper fit of the canister, filter or cartridge. Worn or defective parts must be replaced immediately. Respirator repair, other than changing canisters, cartridges, filters and headstraps, should be performed by a person certified in the repair of the model of respirator used.

The useful life of a respirator depends on the concentration of the contaminant, conditions of use and the respirator itself. The disposable respirator, cartridge or filter must be replaced immediately:

1. If any leakage is detected by smell, taste, eyes, nose or throat irritation,
2. If it becomes difficult to breathe,
3. When the specified service or shelf life is exceeded.

Individually assigned respirators should be cleaned and disinfected as frequently as necessary to ensure that proper protection is provided for the wearer. The following procedure is used for cleaning and disinfecting respirators:

1. Filters, cartridges or canisters are removed before washing the respirator and discarded as necessary.
2. Respirators are washed in a detergent solution, sanitized, rinsed in clean water and allowed to dry in a clean area. A soft bristle brush is used to scrub the respirator to remove dirt.

(Specially formulated cleaning/sanitizing compounds are available. Check with the respirator manufacturer.)

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## EMERGENCY RESPIRATORS

Self-contained breathing apparatus may be required for emergency use. This equipment must be used only by trained personnel. The following points should be considered:

1. All potential users must be fully trained in the use of this equipment.
2. When the equipment is used, it must be tested in an uncontaminated atmosphere prior to entering the hazardous area.
3. An employee must not work alone with such an apparatus in a hazardous atmosphere. At least one additional employee, suitably equipped with a similar breathing apparatus, must be in contact with the first employee and must be available to assist if necessary.
4. This equipment must be inspected monthly by trained personnel. Inspection and maintenance information should be noted in a log book, and a record kept with the respirator.

## RECORD KEEPING

The following records should be maintained by the respirator program coordinator:

1. A record for each respirator issued to an employee (including fit testing).
2. A record of employee training programs.
3. Inspection and maintenance reports.
4. Medical certification that each employee is capable of wearing a respirator under his/her given work conditions.

## SPECIAL CONDITIONS

1. Facial hair: Facial hair that lies along the sealing area of the respirator, such as beards, sideburns, mustaches or even a few days' growth of stubble, is not permitted on employees who are required to wear respirators that rely on a tight face piece fit to achieve maximum protection.
2. Eye glasses: Ordinary eye glasses should not be used with full-face piece respirators. Eye glasses

with temple bars or straps that pass between the sealing surface of a full-face piece and the worker's face will prevent a good seal, and should not be used.



Special corrective lenses can be mounted inside a full-face piece respirator and are available from all manufacturers of full-face piece respirators.

3. Facial features: Facial features, such as scars, deep skin creases, prominent cheek bones, severe acne and the lack of teeth or dentures can prevent a respirator from sealing properly.
4. Communications: Talking while wearing a respirator equipped with a face piece may break the seal of the face piece. When communication is necessary within a contaminated area, it should be done with the help of special communicating equipment obtained from the manufacturer of the respirator.

## RESPIRATOR PROGRAM EVALUATION

You should continually review the effectiveness of your respiratory protection program. Frequent, unscheduled observations of employee activities can be made to confirm the proper use of respirators. Hold discussions with supervisors and employees during scheduled meetings. Evaluate the training program at least annually to determine its continued effectiveness.

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This Tribal First Risk Control Consulting fact sheet is not intended to be exhaustive. The discussion and best practices suggested herein should not be regarded as legal advice. Readers should pursue legal counsel or contact their insurance providers to gain more exhaustive advice. For more information on this topic, please contact Tribal First Risk Control Consulting at (888) 737-4752 or [riskcontrol@tribalfirst.com](mailto:riskcontrol@tribalfirst.com).