

Written Respiratory Protection Program

OSHA Requires every employer who allows or requires employees to use a respirator to develop and implement a written Respiratory Protection Program. It must be work-site specific and include the following elements:

1. Identify the company and its address, and contact information.
2. Name the person and title of the Program Administrator. This person must be suitably trained and familiar with respirators, be able to determine if respirators are required, able to select appropriate respirators, and knowledgeable to train employees and answer their questions about respirator use.
3. Name the person and title of the preparer of the written Respiratory Protection Program.
4. Include a statement that only NIOSH approved respirators will be purchased for employee use.
5. Before any employee wears a respirator, they will complete a medical questionnaire and it will be reviewed and approved by a Physician or other Licensed Health Care Provider (PLHC). Only if the PLHCP clears the employee for respirator use may they proceed to the Fit Testing.
6. Appropriate selection of respirators will be made to protect employees from all regulated pollutants above the OSHA Permissible Exposure Level (PEL). This could include use of a disposable dust mask for particulates, or it could include a half-mask or full mask with filtering cartridges to filter out vapors, mists, particulates, or other contaminants. In some cases, a pre-filter will be required on a cartridge. Air supplied respirators may also be used. Some air supplied hoods are not close fitting and therefore do not require fit-testing. If an air supplied mask or hood is used, the quality of the supplied air (tank or ambient) must be tested. Finally, there are also escape packs with short-term air supplies to be used to evacuate in cases of a sudden and unexpected leak.
7. Where air contaminants exceed the Permissible Exposure Limit for a contaminant, respiratory protection must be required.
8. If nuisance dusts or contaminants are present below the Permissible Exposure Limit, respiratory protection may be allowed or provided to workers on a voluntary basis. There are fewer requirements to administer a voluntary program, but the OSHA Appendix D must be provided to, explained to, and signed by each employee using a respirator (even disposable dust masks) on a voluntary basis. OSHA Appendix D can be found at https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9784
9. Specify the criteria used to select respirators for use in your workplace.
10. Describe the medical evaluation process used to confirm employees are healthy enough to use a respirator. Medical Evaluation forms are confidential and protected by HIPPA. The form can be completed in the work place and kept in a sealed envelope until the day of appointment, but usually the forms are filled out at the office of the PLHCP. OSHA provides a Respirator Medical Evaluation Questionnaire in Appendix C at https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9783
11. Describe the Fit Testing procedures you or your clinic use and whether they are qualitative (pass/fail) or quantitative (result in a numerical measurement of the amount of leakage into the respirator, if any). Fit Testing should result in a document with the employee's name, the date, the brand, model, and size of the respirator they wore when they passed the test. Fit testing must be repeated annually or any time an employee's face may have changed significantly

(broken jaw, major dental work, significant weight loss, etc.) Fit testing may only be performed when the employee's face is clean shaven in all areas where the respirator touches the face. Fit Testing procedures are described in Appendix A at

https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9780

12. Cleaning supplies and procedures must be provided to employees (unless they use a disposable dust mask) to keep their respirator sanitary and free from contamination. If respirators are shared, there must be procedures established to sanitize them between uses. It is important that a clean space be provided for respirators to air dry. They may not be hung by the straps. When dry, the respirators must be stored in a clean and protective environment. A sealable bag or box is adequate. OSHA describes cleaning procedures in Appendix B-2 at https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9782
13. Once an employee has been given medical clearance and a fit test they must be taught to inspect their equipment and conduct a daily positive and negative fit test themselves. User Seal Check Procedures are available in Appendix B-1 at https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9781
14. Employees must be trained to know how often to change respirators or cartridges. A changeout schedule should be provided and a sheet to record the hours the current respirator or cartridges have been in use. Employees should be trained to change disposables or cartridges when it becomes difficult to breath (the filter is full) and how to recognize "break-through". Employees should not be using break-through to know when to change their filters. If break-through occurs (taste or smell of chemical) the employee needs to shorten the time of use between changes.
15. Identify all the tasks or areas where respirators are required.
16. Maintain a list of all employees who wear respirators. Remember to include those who rotate into jobs occasionally, fork lift drivers and maintenance employees who work in contaminated areas. Document each employee's training, medical evaluation, fit test, and the equipment issued to them.
17. Contract workers who work in potentially contaminated areas of your facility or perform tasks that expose them to chemicals above the PEL must be notified and their employer should train them and provide the necessary respiratory protection equipment.
18. Every year re-assess your Respiratory Protection Program. Observe employees using, inspecting, cleaning and storing their equipment. Review the chemicals in use and the selection of respiratory equipment to ensure it is meeting employees' needs. Interview employees as to their use of respirators and whether the Respiratory Protection Program is meeting their needs. Maintain a tracking sheet to document your program evaluation and the date of any changes you make to the program.
19. Make sure employees have access to the Respiratory Protection Program and that they know who to take their questions to if they have concerns.