

Respiratory Protection

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The following are some commonly asked questions and answers that might help you determine if you need a respirator program and what some of the basic requirements are for an effective program.

Q. Do I need a respirator program?

A. Before you can answer this question, you need to evaluate the contaminants that may be present in the workplace.

Q. What kind of contaminants should I be looking for?

A. You would be looking primarily for air contaminants such as gases, fogs, vapors, fumes, harmful dusts, mists, sprays and smoke.

Q. If I believe that employees may be exposed to harmful air contaminant, what should I do?

A. Consult with a certified industrial hygienist to evaluate employee exposure levels.

Q. How do I know what permissible employee exposure levels are?

A. Employee's permissible exposure levels of substances are limited in accordance to Tables Z-1, Z-2, or Z-3 of 1910 Subpart Z - Toxic and Hazardous Substances 1910.1000 and in separate sections for specific contaminants (i.e. CFR 1910.1025 for lead; CFR 1910.1026 for hexavalent chromium, etc.). If the employee exposure levels, as determined by the industrial hygienist sampling, exceeds the OSHA allowable exposure levels additional measures must be taken.

Q. Do I now require the affected employees to wear respirators?

A. Respirators are to be used as a last line of defense. Your first responsibility is to implement engineering controls to reduce the employee exposure to an acceptable level. Respirators are to be used only when engineering controls are not feasible or while controls are being installed or in emergencies.

Q. When do I have to implement a respiratory protection program?

A. When engineering controls are not feasible or not effective and the employee(s) are exposed to air contaminants above the permissible exposure limit (PEL).

Q. If I have to implement a respiratory program, do I just issue respirators to the affected employees?

A. No, you are required to develop and implement a written respiratory program with required worksite specific procedures and elements for required respirator use. The written program must include the following elements:

- Selection of Respirators - 1910.134(d)
- Medical Evaluation - 1910.134(e)
- Fit Testing - 1910.134(f)
- Use of Respirators - 1910.134(g)
- Maintenance and Care of Respirators - 1910.134(h)
- Breathing Air Quality and Use - 1910.134(i)

Q. What about employee training?

A. Supervisors and affected employees must receive comprehensive training in all aspects of the program. The training must be reviewed at least annually and more often if necessary. Complete training requirements are covered in 1910.134(k). Records of all training should be maintained.

Q. What records do I need to maintain?

A. You are required to maintain records of the written respirator program, medical evaluations, and fit testing records.

Q. Do I need a written respiratory program if employees choose to voluntarily use a single-use dust mask like the N-95s?

A. If the dust masks are worn strictly on a voluntary basis and are not required because the hazardous substance does not exceed the limits set by OSHA standards, then a written program is not required and medical evaluations, fit tests, and in-depth care training are not required, as well. However, OSHA does require that you provide the information contained in Appendix D of the standard to voluntary users.

Conclusion

The information provided is intended to help you determine if you need a respirator program and what some of the requirements are. It is nothing more than an overview of some of the standard requirements and elements. If you need to

implement a respirator program, be sure to review and become familiar with the complete standard 29 CFR 1910.134 Respiratory Protection.