Weber State University Respiratory Protection Program

29 CFR 1910.134 Respiratory Protection Standard.



Published by the Safety and Risk Committee and the Environmental Health and Safety Office

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Revision Date: March 2023

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Purpose

The purpose of the Weber State University (WSU) Respiratory Protection Program is to ensure that all employees are protected from exposure to respiratory hazards. While personal protective equipment (PPE) is the last line of defense, other controls may not always be feasible or be successful in mitigating the hazards entirely. In these situations, respirators and other protective equipment need to be used.

Respirators are also used to protect employee health during emergencies. Processes requiring respirator use are outlined in Appendix F: Respiratory Protection Program Application

In addition, some employees may express a desire to wear respirators while performing assigned tasks that do not require mandatory respiratory protection. Each of these requests will be reviewed on a case-by-case basis. If respiratory protection will not jeopardize the health or safety of the worker, employees will be allowed to use respirators on a voluntary basis.

Scope and Application

This program applies to all who are required to wear respirators during work operations, and during non-routine or emergency operations such as a spill of a hazardous substance. All employees working in hazardous areas (as outlined in Table 1) must be enrolled in the Respiratory Protection Program.

Employees who voluntarily wear a respirator when a respirator is not required are subject to the medical evaluation, cleaning, maintenance, and storage elements of this program, and must be provided with information specified in these sections.

Employees in the respiratory protection program do so at no cost to them. Any expense in training, medical evaluations, and respiratory equipment will be the responsibility of the department to which the employee belongs.

Responsibility

Environmental Health and Safety

The Environmental Health and Safety (EHS) Office is responsible for the application and implementation of the Respiratory Protection Program. Responsibilities include:

- · Identify areas, processes or tasks that require respirators, and evaluating hazards
- Selection of respiratory protection options and arranging for and/or conducting training
- Monitoring respirator use to ensure respirators are used in accordance with their specifications
- Ensuring proper storage and maintenance of respiratory protection equipment
- Ensure training of employees and availability of appropriate respirators and accessories

- Coordinate qualitative fit testing through WorkMed
- Assist Human Resources (HR) in administering the medical surveillance program
- Maintaining records required by the program
- · Evaluating the program and updating written program, as needed

Employees

Employees are responsible to wear their respirator when and where required. Employees must also:

- Clean and maintain their respirators as instructed, and store them in a sanitary location
- Inform their supervisors if the respirator doesn't fit well, and request one that fits properly
- Inform their supervisors of any respiratory hazards that they feel are not adequately addressed, and of any concerns that they have regarding the program

If the employee feels the conditions are unsafe, hazardous, or they lack the necessary training for the task, the employee may refuse the assignment if the following conditions are met:

- Where possible, you have asked the employer to eliminate the danger, and your employer failed to do so; and
- You refused to work in "good faith." This means that you must genuinely believe that an imminent danger exists; and
- A reasonable person would agree that there is a real danger of death or serious injury; and
- There isn't enough time, due to the urgency of the hazard, to get it corrected.

Program Elements

Selection Procedures

The Environmental Health and Safety Office will assist supervisors in selecting respirators to be used on site, based on hazards workers are exposed to, and in accordance with OSHA standards. Hazard evaluations will be conducted for each operation, process, or area where airborne contaminants may be present in routine operations or during an emergency. The hazard evaluation will include:

- List of hazardous substances used in the workplace, by department, or work process (Appendix A: Table 3).
- Review of work processes to determine where potential exposures to these hazardous substances occur. The review is conducted by surveying the workplace, reviewing process records, and talking with employees and supervisors.
- Exposure monitoring to quantify hazard exposures. Monitoring will be contracted out (if outside the scope of the EHS Office).

Updating the Hazard Assessment

The hazard assessment must be revised and updated as needed (i.e., when changes in work processes may affect exposure). If an employee feels that respiratory protection is needed, they are to contact their supervisor. The Environmental Health and Safety Office will evaluate the potential hazard, arranging for outside assistance as necessary. The results will then be communicated back to the employees within 15 business days of receipt of results. If it is determined that respiratory protection is necessary, all elements of this program will be in effect for those tasks.

NIOSH Certification

Respirators must be certified by the National Institute for Occupational Safety and Health (NIOSH) and used in accordance with the terms, and certification. Filters, cartridges, and canisters must be labeled with the appropriate NIOSH approval label. The label must not be removed or defaced while in use.

Voluntary Respirator Use

The Environmental Health and Safety Office will make available to employees who voluntarily choose to wear respirators with a copy of Appendix D of the OSHA Respiratory Protection Standard (See Appendix D in this document). Employees voluntarily choosing to wear a respirator must comply with the procedures for medical evaluation, respirator use, and cleaning, maintenance and storage.

Authorization for voluntary use of respiratory protective equipment will be on a case-bycase basis, depending on workplace conditions and results of the medical evaluations.

Medical Evaluation

Employees who are required to wear respirators, or who volunteer to wear a respirator, must pass a medical exam before being permitted to wear one on the job. Employees are not permitted to wear respirators until a physician has determined that they are able to do so. Employees refusing medical evaluation are not allowed to work in an area requiring respirators.

A licensed physician will provide the medical evaluations. Medical evaluation procedures are as follows:

- The evaluation will be conducted using the questionnaire provided in Appendix C (also in this document) of the OSHA Respiratory Protection Standard.
- If feasible, the university will assist employees who are unable to read the questionnaire. When this is not possible, the employee will be sent directly to the physician for medical evaluation.
- Affected employees will be given a copy of the medical questionnaire to fill out, along with a stamped and addressed envelope for mailing the questionnaire to the WorkMed physician. Employees will be permitted to fill out the questionnaire on company time.

- Follow-up medical exams will be granted to employees as required by OSHA, and/or as deemed necessary by the physician.
- Employees will be allowed to speak with the physician about their medical evaluation if requested.
- The Environmental Health and Safety Office will provide WorkMed with a copy of this
 program, a copy of the Respiratory Protection Standard, a list of hazardous
 substances by work area, and for each employee requiring evaluation: their work
 area or job title, proposed respirator type and weight, length of time required to wear
 respirator, expected physical workload, potential temperature and humidity
 extremes, and any protective clothing required.
- Any employee required for medical reasons to wear a positive pressure airpurifying respirator (PAPR) will be provided with such.
- After an employee has received clearance and begun to wear the respirator, additional medical evaluations will be provided when:
 - Employee reports symptoms related to their ability to use a respirator, such as shortness of breath, dizziness, chest pains, or wheezing.
 - A physician informs the administrator that the employee needs to be reevaluated;
 - Information from this program, including observations made during fit testing and program evaluation, indicates a need for reevaluation;
 - Change occurs in the workplace that may result in an increased physiological burden on the employee.

A list of employees currently included in medical surveillance is provided in Appendix A: Table 2. All examinations and questionnaires are to remain confidential between the employee and the physician.

Fit Testing (29 CFR 1910.134 App A)

Fit testing is required for employees wearing respirators to comply with OSHA standards. Employees voluntarily wearing respirators may also be fit tested upon request. Those who are required to wear respirators will be fit tested:

- Prior to being allowed to wear any respirator with a tight fitting facepiece.
- Annually.
- When there are changes in the employee's physical condition that could affect respiratory fit.

Employees will be fit tested with the make, model, and size of respirator that they will wear. Fit testing will be conducted following the OSHA 1910.134 Appendix A Respiratory Protection Standard.

Respirator Use

Personnel required to use respirators are outlined in Appendix A: Table 2 under the Respiratory Protection Plan Forms.

General Use Procedures

Employees will use respirators as specified by this program, and in accordance with training they receive on the use of each model. The respirator shall not be used in a manner not approved by NIOSH or the manufacturer.

Employees shall conduct seal checks each time that they wear their respirator. Employees shall use the positive or negative pressure check specified in Appendix B-1 of the Respiratory Protection Standard (also in this document).

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

Employees are not permitted 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 seal. Employees are not permitted to wear headphones, jewelry, or other articles that may impede the proper seal of the facepiece.

Respirator Malfunction

In the event of a malfunction of a respirator, the wearer should inform their supervisor that the respirator no longer functions as intended, and go to a safe area to perform maintenance on the respirator. The supervisor must ensure that the employee receives parts to repair the respirator, or is provided with a new respirator.

Cleaning (29 CFR 1910.134 App B-2)

Respirators are to be regularly cleaned and disinfected at a designated cleaning station. Respirators issued for use by an employee shall be cleaned as often as necessary, but at least once a day for workers in preparation and assembly departments. Atmosphere supplying and emergency use respirators are to be cleaned and disinfected after each use. This procedure is to be used when cleaning and disinfecting respirators:

- Disassemble respirator, removing any filters, canisters, or cartridges.
- Wash the facepiece in a mild detergent with warm water. Do not use organic solvents.
- Rinse completely in clean, warm water, then wipe with disinfectant wipes to kill germs.
- Air-dry in a clean area, then reassemble the respirator and replace any defective parts.
- Place in a clean, dry plastic bag or other airtight container.

Maintenance

Maintain respirators at all times in order to ensure that they function and protect the employee. Maintenance involves a visual inspection for cleanliness and defects before each

use. Damaged or deteriorating parts will be replaced prior to use. No replacements or repairs will be made beyond those recommended by the manufacturer.

When inspecting respirators, use the checklist found in Appendix E: Respirator Inspection Checklist.

Employees are permitted to leave their work area to maintain their respirator in a designated area that is free of respiratory hazards. Employees are permitted to wash their face and respirator facepiece to prevent any eye or skin irritation, to replace the filter, cartridge or canister, and if they detect vapor or gas breakthrough or leakage in the facepiece, or any other damage to the respirator or its components.

Change Schedules

Upon entering the Respiratory Protection Program, and the issuance of a respirator, each employee/employer will establish a cartridge change-out schedule using the manufacturer guidelines, experimental tests, and/or mathematical models. This schedule will be posted in Appendix A Table 2 of this program.

Storage

Respirators must be stored in a clean, dry area, according to manufacturer recommendations. Employees will clean and inspect their respirator according to the provisions of this program. The administrator will store the supply of respirators and respirator components in a clean, dry plastic bag, or other airtight container, in an equipment storage room.

Defective Respirators

Respirators that have defective parts shall be taken out of service immediately and redtagged with the nature of the problem, contact person, and date. If during an inspection an employee discovers a defect in a respirator, they are to bring it to the attention of their supervisor. Supervisors can coordinate with the Environmental Health and Safety Office to determine whether to:

- Temporarily take the respirator out of service until it can be repaired.
- Perform a simple fix such as replacing a head strap.
- Dispose of the respirator due to an irreparable problem or defect.

Training

The Environmental Health and Safety Office will provide training to respirator users and their supervisors on the contents of the Respiratory Protection Program, and on the OSHA Respiratory Protection Standard. Workers will be trained prior to using a respirator. Supervisors will also be trained prior to using a respirator, or prior to supervising employees that must wear respirators.

The training course will cover the following topics:

- The Respiratory Protection Program and the OSHA Respiratory Protection Standard
- Respiratory hazards encountered and their health effects (See Appendix A: Table
 3)
- Proper selection and use of respirators and their limitations

- Respirator donning and user seal (fit) checks along with fit testing
- · Emergency use procedures
- · Maintenance and storage
- · Medical signs and symptoms limiting the effective use of respirators
- Employee responsibilities

Program Evaluation

The Environmental Health and Safety Office will evaluate the workplace periodically to ensure that the program is being implemented. Evaluations will include consultations with employees who use respirators and their supervisors, site inspections, air monitoring, and a review of records.

Factors to be assessed include:

- Respirator fit
- Appropriate respirator selection for the hazards present
- Proper respirator use for the workplace conditions encountered
- Proper respirator maintenance
- Proper procedures for handling defective respirators

Problems identified will be noted by the Environmental Health and Safety Office. The Environmental Health and Safety Office will consult with employees and supervisors to ensure the Respiratory Protection Plan is effective.

Documentation and Recordkeeping

A written copy of this program is kept by the Environmental Health and Safety Office and is available to employees who wish to review it. The OSHA Standard can be found on osha.gov under 29 CFR 1910.134.

The Environmental Health and Safety Office will maintain copies of training records. These records shall be updated as workers are trained, as existing employees receive retraining, and as fit tests are conducted.

Human Resources will maintain copies of the medical records for employees covered under the respirator program. The completed medical questionnaire and the physician's documented findings are confidential and will remain with the physician. Weber State University will only retain the physician's written recommendation regarding each employee's ability to wear a respirator.

Appendices:

(Refer to the Environmental Health and Safety Office for copies of the appendices)

Appendix A: Respirator Protection Forms

Appendix B: User Seal Check Procedures

Appendix C: OSHA Respirator Medical Evaluation Questionnaire

Appendix D: Information for Employees Using Respirators When Not

Required Under the Standard

Appendix E: Respirator Inspection Checklist

Appendix F: Respirator Protection Program Application