

Chapter 17 IMPLEMENTING A RESPIRATORY PROTECTION PROGRAM

At best, airborne hazards in the workplace can cause discomfort. At worst, they can cause long-term injury or even death. It's important to properly evaluate the airborne hazards in your workplace so you can take steps to adequately protect your employees. One way to do that is to implement a respiratory protection program.

Implementing a respiratory protection program is more involved than running out to the hardware store, buying some respirators and cartridges off the shelf, and handing them out. It involves going through a thoughtful process to ensure that the right type of respiratory protection is selected for the hazards and work done and that employees know how to use the protection provided. It includes:

- **Evaluating whether you actually need respirators.** Whenever there is an airborne hazard in the workplace, the knee-jerk reaction is often to first look to respirators as a solution. However, instituting a respiratory protection program means entering into an ongoing process that can be very expensive and involved, with training, materials, testing, etc. It's usually better for both workers and the bottom line if you can find a way to eliminate the respiratory hazard through material and process changes or engineering controls such as improved ventilation.
- **Taking the time to plan your program.** Planning your respiratory protection program includes clearly identifying the hazard (what the contaminant is, your employees' exposure levels, the regulatory requirements with respect to that contaminant) and determining what type or types of respirators will provide adequate protection from the hazard.
- **Developing a written program.** Your written respiratory protection program needs to describe how you will select respirators, the medical evaluations you will perform, what fit testing you will be doing and when it will be done, when and how respirators will be used, maintenance and care of respirators, training of employees who will use respirators (including the limitations of respirators, what to do in an emergency situation like a respirator malfunction, and how to don and doff respirators), and how ongoing evaluation of the program will be conducted.
- **Performing ongoing evaluation.** How often you evaluate your program will depend on how complex it is and the hazards in your workplace. Evaluation of the program should include verifying that there are no feasible alternatives to respirators (for example, has a new product that doesn't cause the airborne hazard come on the market that you might be able to substitute in your process?), conducting an evaluation of the respiratory hazards in the workplace (for example, resampling to verify contaminant levels), involving employees in the review and evaluation of the respiratory protection program, and making adjustments to the program based on the findings.

Respirator Program Training Checklist

Workers who are required to wear respirators on the job must be trained annually in the proper use, care, maintenance and storage of their respirators. According to Cal/OSHA, the training must be comprehensive, understandable, and effective--in other words, a record that employees sat through a class is not enough. If workers are not correctly using, maintaining, and storing their respirators, a Cal/OSHA inspector can cite you for inadequate training.

Employee Knowledge

Employees must be able to demonstrate, at a minimum, that they know:

- Why they have to wear a respirator.
- How poor fit, inadequate maintenance, or incorrect use can affect the protective value of the respirator.
- What the respirator can do--for example, can the respirator remove volatile organic chemicals from the air? Can it remove welding fumes? Does it provide clean breathing air from an uncontaminated source?
- The respirator's limitations--for example, air-purifying respirators cannot protect against oxygen-deficient air, or they may not be effective if contaminant concentrations become extremely high, as they might in the event of an accidental chemical release.
- How to use the respirator in an emergency situation--for example, if there is a chemical release, or if the respirator malfunctions.
- How to inspect the respirator for damage or signs of wear.
- How to put on and remove ("don" and "doff") the respirator, including how to perform a user seal check.
- How to maintain and store the respirator.
- Medical signs and symptoms that may affect the worker's ability to use a respirator, including temporary problems like lung infections or swelling from dental procedures, and chronic ones like lung disease or heart conditions.
- The requirements of Cal/OSHA's respiratory protection standard.

When to Provide Training.

Employers must provide training or retraining:

- Before an employee is required to wear a respirator in the workplace
- Annually thereafter
- Whenever changes in the workplace make previous training inadequate or out of date
- Whenever the respirators that workers are using change
- Whenever workers appear not to know or understand the essential elements of their training--for example, if workers are observed using respirators incorrectly, or failing to perform user seal checks
- At any other time that retraining is needed to ensure safe respirator use.

Training for Workers Not Required to Wear Respirators

Some workers choose to wear respirators for comfort reasons, even when the employer does not require them. For example, custodial or maintenance workers may wish to wear dust masks in order to reduce their exposure to mildly irritating dusts or mists. In these cases, employers are not required to implement a full respiratory protection program or training as described above; however, employers are required to provide some information to employees in this situation. The respiratory protection standard includes an appendix, Appendix D, with advisory information that must be presented either orally or in writing to these workers.

Workers Who Have Been Trained Elsewhere.

If a new employee has received respirator training from another source within the last 12 months, and can demonstrate knowledge of the required elements above, the employer is not required to retrain that worker until the worker's annual retraining date arrives.

RESPIRATORY PROTECTION

Medical Evaluations

Who needs an initial medical evaluation

An initial medical evaluation is required for *all* employees who wear respirators. The *only exception* is for voluntary use of filtering facepiece respirators or FFRs (also known as disposable particulate respirators or dust masks). The evaluation must be conducted before the employee is fit tested or uses the respirator.

Purpose of the evaluation

Respirators can be heavy, difficult to breathe through, or otherwise place a burden on the worker's health. A medical evaluation determines whether the employee is able to wear the respirator and perform the required work without endangering his or her health.

Conducting the initial evaluation

You can choose to do the initial evaluation by having the employees complete a questionnaire, which is then sent to a physician or other licensed healthcare professional (PLHCP) for evaluation, or by sending the employees directly to the PLHCP for a medical examination that obtains the same information as the questionnaire. The questionnaire is found in Appendix C of the Cal/OSHA respiratory protection regulation.

In some cases, the PLHCP may be able to determine that the employee can wear a respirator while performing his or her assigned job duties based on the responses to the questionnaire alone. In other cases, the PLHCP may need to conduct a follow-up examination. The contents of the follow-up examination are determined by the PLHCP.

If a questionnaire is used, it must be administered in such a way that the employee understands the contents. The employee must be provided with the opportunity to discuss the questions with the PLHCP, and only the PLHCP may review the answers so as to maintain confidentiality.

Both the questionnaire and the examination must be administered at no cost to the employee and during normal working hours or at a time and place convenient to the employee.

Finding a PLHCP to conduct the medical evaluation

If you already have an occupational health clinic that you use for work-related issues, contact the clinic to discuss medical evaluations. You can also use State Fund's MEDFinder to locate a PLHCP near your facility. Even though workers' compensation does not pay for these medical evaluations, this tool can help you with your search. If you choose to use the MEDfinder, the best place to start is by selecting the occupational medicine specialty. Although the PLHCP is not required to be a specialist in occupational medicine, these healthcare professionals are typically already familiar with Cal/OSHA regulations and

factors that affect an employee's ability to use a respirator. There are also vendors that provide medical evaluations using an online questionnaire.

Information that must be provided to the PLHCP

The following information must be provided to the PLHCP:

- The type and weight of the respirator to be used by the employee
- The duration and frequency of respirator use (including use for rescue and escape)
- The expected physical effort
- Additional protective clothing and equipment to be worn
- Temperature and humidity extremes that may be encountered
- A copy of the employer's written respiratory protection program
- A copy of the Cal/OSHA respiratory protection regulation

Information that the PLHCP provides to the employer

The PLHCP provides the employer with the following information:

- Whether the employee is medically able to use the respirator
- Any limitations on respirator use
- A statement that the PLHCP has provided the employee with a copy of the PLHCP's written recommendation
- The need, if any, for a follow-up medical evaluation

In some cases, the PLHCP may determine that the employee cannot (for medical reasons) wear a negative pressure respirator but can wear a powered air-purifying respirator (PAPR). In such cases, the employer must provide a PAPR for the employee.

Additional medical evaluations

An annual medical evaluation is not required. However, once the initial medical determination has been made, additional medical evaluations are required in the following circumstances:

- The employee reports symptoms related to his or her ability to use a respirator
- The PLHCP, respiratory protection program administrator, or supervisor determines that a medical reevaluation is necessary
- Information from the respiratory protection program (such as observations made during fit testing or program evaluation) indicates a need for medical reevaluation
- A change occurs in workplace conditions (e.g., physical work effort, protective clothing, or temperature) that may substantially increase the physiological stress on the employee

Recordkeeping

Records of medical evaluations must be kept and made available to employees in accordance with *Title 8, California Code of Regulations, §3204, Access to Employee Exposure and Medical Records*.

Resources

The Cal/OSHA regulation for respiratory protection – www.dir.ca.gov/Title8/5144.html

05/31/2019

All Cal/OSHA regulations – <http://www.dir.ca.gov/samples/search/query.htm>

State Fund's MEDFinder – www.scif.com