



Respiratory Protection Administrator

Overlooked Responsibilities
Presented by Bruce Donato
of K&A First Aid and Safety

**The Tidewater Business meeting starts at 11:45 Eastern
We will be starting the technical seminar on the hour
Please mute yourself upon entry**

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Calendar

Fleet Safety (Joint Meeting with WMACSA)

11/10/2021 - 5:00pm to 11/10/2021 - 6:30pm

Philip Thomas the director of the Eastern Service Center of the Federal Motor Carrier Safety Administration (FMCSA) will discuss applicability of regulations, commercial zones, drug and alcohol testing, hours of service, and vehicle maintenance and more.

Animal Containment (Joint meeting with ChABSA)

11/16/2021 - 5:00pm to 11/16/2021 - 6:30pm

Crisis Management - Joint Meeting ASSP NOVA Chapter

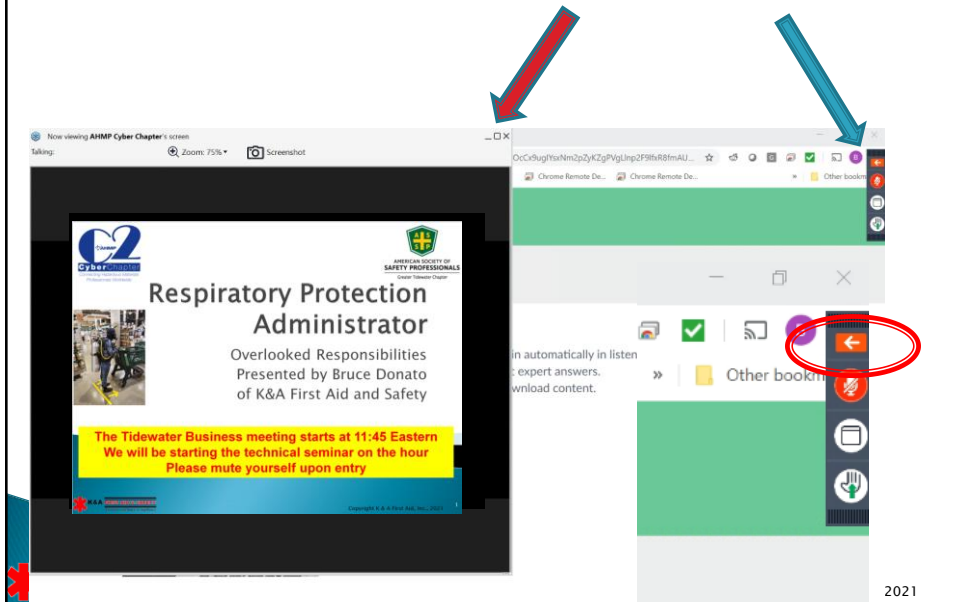
11/18/2021 - 12:00pm to 11/18/2021 - 1:30pm

Andrew Geisert of HITT Construction will review how to plan for "crisis"



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How to use dashboard



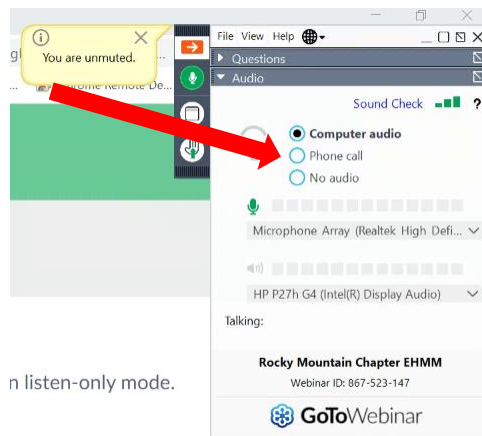
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If your microphone you can do the same thing. This may reset it.

1. Click on "phone call"
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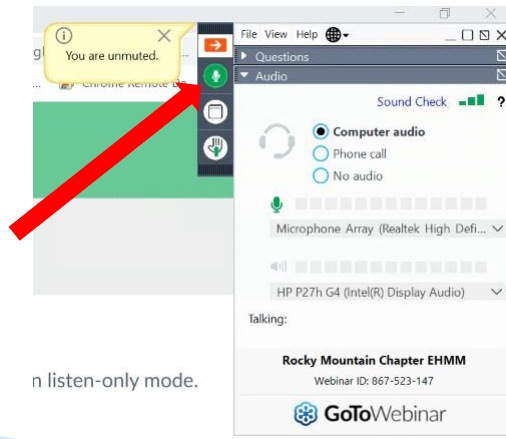


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How to self-mute

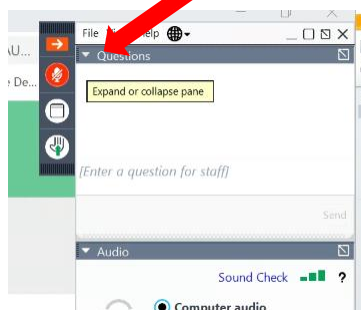


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How to ask questions



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Continuing Education

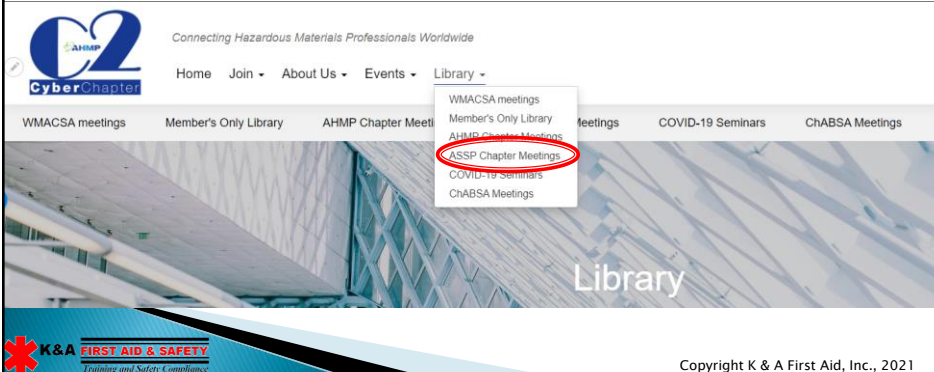
- ▶ The Cyber Chapter offers a free service to anyone who registers on the website to track attendance at events and allows participants to download a transcript.
- ▶ Transcripts are updated at least quarterly.



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Slide Deck & Recording

- ▶ Go to www.ahmpcyber.org
- ▶ Library Tab, drop down menu e.g. "ASSP"



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Ground Rules/ Webinar Directions

- ▶ All attendees will be muted. Feel free to come off mute to ask a question.
- ▶ During the presentation you will also be able to raise your hand to request to be recognized.
- ▶ Questions can also be posed using the “question/chat” function in your dashboard and Bruce will answer as appropriate.



Respiratory Protection Administrator

Overlooked Responsibilities
Presented by Bruce Donato
of K&A First Aid and Safety

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TRAINING DISCLAIMER

These materials were developed by K & A First Aid, Inc. and are intended to assist employers, workers, and others as they strive to improve workplace health and safety. While we attempt to thoroughly address specific topics, it is not possible to include discussion of everything necessary to ensure a healthy and safe working environment in a presentation of this nature. Thus, this information must be understood as a tool for addressing workplace hazards, rather than an exhaustive statement of an employer's legal obligations, which are defined by statute, regulations, and standards. Likewise, to the extent that this information references practices or procedures that may enhance health or safety, but which are not required by a statute, regulation, or standard, it cannot, and does not, create additional legal obligations. Finally, over time, regulators may modify rules and interpretations in light of new technology, information, or circumstances; to keep apprised of such developments, or to review information on a wide range of occupational safety and health topics, you can visit regulatory web sites such as the Department of Transportation at www.dot.gov or OSHA's website at www.osha.gov.



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Agenda

- ▶ Respiratory Protection
 - What do you know?
- ▶ The Administrator
 - What do they *need* to know?
 - What are their actual duties?
- ▶ How to achieve this

The Administrator of a Respiratory Protection Program does not need to understand respirator use.

- ▶ True
- ▶ False

The administrator “is qualified by appropriate training or experience that is commensurate with the complexity of the program to administer or oversee the respiratory protection program and conduct the required evaluations of program effectiveness.”

Depending upon the complexity of the program, the answer may be false

The Administrator of a Respiratory Protection Program needs to be able to recognize respiratory hazards in the workplace.

- ▶ True
- ▶ False

This training or experience is appropriate if it enables the program administrator to fulfill the minimum requirements of recognizing, evaluating, and controlling the hazards in your workplace.*

*Small Entity Guide

A compliance safety health officer (CSHO) can interview the program administrator for competence.

- ▶ True
- ▶ False

Usually, the OSHA compliance officer will review the written program and interview the respiratory protection program administrator.*

*Small Entity Guide

You can have multiple Administrators of a Respiratory Protection Program.

- ▶ True
- ▶ False

Only one person can fulfill the primary responsibilities of running the program, unless your company has more than one worksite.*

***Small Entity Guide**

The Administrator of a Respiratory Protection Program needs to be able to conduct fit testing.

- ▶ True
- ▶ False

... the administrator may rely on other employees to help run parts of the respiratory protection program (e.g., fit testing, medical evaluations).*

***Small Entity Guide**

The Administrator of a Respiratory Protection Program needs to be able to understand how to conduct fit testing.

- ▶ True
- ▶ False

It is implied that the administrator will understand all components of the program

The main responsibility of Administrator of a Respiratory Protection Program is recordkeeping.

- ▶ True
- ▶ False

This is only one responsibility

The Administrator of a Respiratory Protection Program needs to be certified.

- ▶ True
- ▶ False

A designated program administrator who is qualified to administer the program.*

***Small Entity Guide**

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- ▶ False

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The Administrator of a Respiratory Protection Program needs to be able to recognize respiratory hazards in the workplace.

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- ▶ False

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***Small Entity Guide**

Administration of a Respiratory Protection Program

Someone in Charge

- ▶ Written program must be implemented by a trained program administrator.
 - Must be qualified.
 - Know the hazards in the workplace and if engineering controls can be applied.
 - Identify types of respirators to be used if engineering controls will not work.
- ▶ Update the program as necessary.



Program Administrator

- ▶ Who must conduct evaluations of the workplace to ensure effective implementation of the program?
 - By Management
 - By User
- ▶ When:
As necessary; at least **annually**

Program Evaluation

- ▶ Conduct workplace evaluations
- ▶ Consult employees concerning:
 - Respirator fit
 - Appropriate respirator selection
 - Proper respirator use
 - Proper respirator maintenance



Recordkeeping

- Written program
- Medical evaluations
- Fit test records
- Emergency use respirator inspection

When do you need a Written program?

- ▶ Whenever the hazards **requires** employees to wear respirators; when it necessary to protect the health of employees due to:
 - Insufficient amounts of oxygen
 - Exposed to harmful levels of gases or vapor
 - Exposure to respiratory hazards like dusts, mists, fumes, sprays, and other airborne particles
 - Any voluntary use of a non disposable fitted respirator for nuisance hazards



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Who doesn't need a program?

- ▶ Hazard is **below** Permissible Exposure Limits (PEL)
- ▶ Employer determines respirator does **not create** a hazard
- ▶ Only voluntary use of a disposable dust mask respirators exempts you from a written program.



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Voluntary User must:

- ▶ Read and follow manufacturer's instructions on:
 - Use
 - Maintenance
 - Cleaning & Care
 - Warning & limitations of respirators
- ▶ Choose correct respirators
- ▶ Do not use respirators in a manner they are not intended to be used.
- ▶ Keep track of your respirator

Overview of Duties of the Administrator

- ▶ The following slides are excerpts from an administrator training program.
- ▶ They are not to be considered a full training.

Written Respiratory Protection Program

- ▶ 1. Selection
- ▶ 2. Medical evaluation
- ▶ 3. Fit testing
- ▶ 4. Use
- ▶ 5. Maintenance and care
- ▶ 6. Breathing air quality and use
- ▶ 7. Training
- ▶ 8. Program evaluation

Respirator Selection

Types of Respirators

Air-purifying respirators – filters air through cartridges or filtering face pieces (dust masks)

Powered air-purifying respirators – filters air through cartridges with assistance of a blower.

Supplied air line respirators (SAR) – provides unlimited clean air from a compressor.

Self-contained breathing apparatus (SCBA) – provides 30- 60 minutes of clean air from a tank.

Escape respirators – provides air for escape only from a small bottle.

Air Purifying Respirators

Air Purifying Respirators

- ▶ Have filters, cartridges, or canisters that remove contaminants from the air by passing the ambient air through the air-purifying element before it reaches the user.
- ▶ These units have a **service life** –must be changed according to manufacturer's recommendations.

Air-Purifying Respirators (APR)

**Filtering
Facepiece**



**Gas and Vapor
Respirator**



**Combination
Respirator**

**Powered Air-
Purifying Respirator
(PAPR)**



Air purifying respirators remove harmful substance(s) from the air.

Half-Face APR

- Maximum APF of 10
- No protection for the face or eyes
- Sight is not impaired, and no need for corrective lenses
- Not as heavy as full face respirator



Full-Face APR

- Maximum APF of 50
- Protects the face and eyes
- Difficult to see when the facepiece fogs up
- Difficult to speak
- Requires lens correction



Powered Air Purifying Respirators (PAPR)

Powered-Air Purifying Respirator (PAPR)

- ▶ Air-purifying respirator that uses a blower to force the ambient air through air-purifying elements to the inlet covering.
- ▶ Can be a full and half-mask facepiece, helmet or hood.
- ▶ Use is restricted to battery life and the fan and battery pack must be carried by the wearer at all times.
- ▶ Cannot be used in atmospheres deficient in oxygen or other IDLH atmospheres.



Powered-air Purifying Respirator



Supplied Air & SCBA Respirators

Supplied-Air Respirators (SAR)



**Self-Contained
Breathing Apparatus
(SCBA)**



**Air-Supplied
Respirator (Airline)**



**Combination
Respirator**

These respirators provide clean air from outside the contaminated work area.

Supplied Airline Respirators



Self-Contained Breathing Apparatus



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Breathing Air Quality

- ▶ **Compressed and liquid O₂**
 - Must meet United States Pharmacopoeia requirements
- ▶ **Compressed breathing air**
 - Must meet Grade D breathing air requirements
 - Oxygen: 19.5–23.5%
 - Hydrocarbon: 5 mg/m³ or less
 - Carbon monoxide: 10 ppm or less
 - Carbon dioxide: 1,000 ppm or less
 - Lack of noticeable odor



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Breathing Air Use

► Compressors

- If oil lubricated:
 - CO alarm, high temperature alarm or both
 - If only high temperature alarm, must monitor for CO at sufficient intervals
- If non-oil lubricated:
 - Employer shall ensure that the CO level is < 10 ppm.
- Breathing air couplings must be incompatible with those for non-respirable air or other gas systems



Escape Respirators

Escape Respirators



Escape-Only

- It is intended only for emergency exit
- Used mainly for IDLH atmospheres

Filtering Facepiece

Dust mask

Dust Mask (Filtering Facepiece)

- Negative pressure
- Filter removes particulates (dust)
 - The filter is an integral part of the mask
 - The entire mask is composed of the filter material
- Hazard protection is very limited



Image Credit: OSHA

Filtering Facepiece (Dust Mask)

- ▶ Negative pressure particulate respirator composed of a filtering medium.
- ▶ Captures particles in the air, such as dusts, aerosols, mists, and fumes.
- ▶ Filters will be labeled with a letter N, R or P and a number representing the efficiency: 95, 99 or 100.
- ▶ Does not protect against gases or vapors.
- ▶ Filters should be replaced when user finds it difficult to breath through them.

Example: N 95



NIOSH-Approved Dust Masks

Dust masks come in variety of styles and brands.



Not all dust masks provide adequate protection for workplace Not NIOSH-approved dust.

Only NIOSH-approved dust masks can be used for protection against dust levels that exceed the PEL.



NIOSH-approved

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Classes of Nonpowered Air-Purifying Particulate Filters

Nine classes: three levels of filter efficiency, each with three categories of resistance to filter efficiency degradation due to the presence of oil aerosols

<u>N</u>	<u>R</u>	<u>P</u>
100	100	100
99	99	99
95	95	95

N for **Not** resistant to oil

R for **Resistant** to oil

P for oil **Proof**

Where Dust Masks Can't Be Used

Dust masks will not provide adequate protection in the following situations:

- ✓ Exposure to chemical gases or vapors
- ✓ Dust levels more than 10 times the permissible exposure limit (PEL)
- ✓ Oxygen deficiency



Respirator Selection

One of the most important task is selecting the correct respirator for the hazard.

Knowledge of chemical identity, extent of use, levels in the air and permissible limits is needed.

You must conduct a workplace hazard assessment – air sampling may be necessary.



Personal air sampler

Hazard Protection

- ▶ Respirators can control different hazards or a combination of hazards.
 - Particulate Respirators
 - Gas/vapor Respirators
 - Combination gas/vapor/particulate respirators.
- ▶ Depends on filtering medium–Check the respirator manufacturer’s information sheets enclosed with each respirator.



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Selection

- ▶ Evaluate workplace exposure.
 - Assume IDLH if not known?
- ▶ Select the appropriate respirator based on the hazard, workplace and user factors.
- ▶ Select only NIOSH–certified respirators.
- ▶ Provide sufficient number of respirator models and sizes to correctly fit user.



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Respirator Selection

- The physical state of the contaminants
- Contaminant concentration
- Oxygen deficiency
- Warning properties of the contaminant(s)
- Potential for an IDLH atmosphere
- Length of time of respirator use

Respirator Selection (cont.)

- The workload of the wearer
- The working environment
(e.g., temperature)
- The proper filter media for the given contaminant
- Potential hazard of skin contact with contaminants
- Potential hazard of eye contact with contaminants

Filters, Cartridges, and Canisters

- All must be labeled and color-coded with the NIOSH approval label
- The label must not be removed and must remain legible
- Marked with “NIOSH,” manufacturer’s name and part number, and cartridge or filter type
- Matrix approval label supplied

NOTE: For explanation of column headings and abbreviations, refer to Format Explanation starting on page 4.

Chemical Name CAS #	Synonym	IDLH (ppm)	OEL (ppm)	Odor Threshold (ppm)	Respirator (to 10x OEL)	Comments
Acetaldehyde 75-07-0	Acetic aldehyde, Ethanal	10000	TWA=200 (OSHA) C=25	0.186	(F)OV (F)MG	Multigas cartridge recommended for longer service life
Acetic acid 64-19-7	Ethanoic acid, Glacial acetic acid, Methane carboxylic acid, Vinegar acid	1000	TWA=10 STEL=15	0.016	(F)OV/AG	
Acetic anhydride 108-24-7	Acetic acid anhydride, Acetyl oxide, Ethanoic anhydride	1000	TWA=1 STEL=3	0.029	(F)OV	
Acetone 67-64-1	2-Propanone, Dimethyl ketone, Ketone propane	20000	TWA=250 STEL=500	4.58	OV	Short service life 3M 3530 Monitor
Acetone cyanohydrin 75-56-5	2-Cyano-2-propanol, 2-Hydroxy-2-methyl propanenitrile, 2-Methylactonile, 2-Propane cyanohydrin, α-Hydroxy isobutyronitrile	22000	TWA=2 (AIHA) STEL=6 (AIHA) C=5 mg/m ³ (as CN) -skin-	3	OV	

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Respirator Selection

Conditions

Type of Respirator

IDLH conditions or oxygen deficiency	SCBA or respirator with escape bottle
Dust/chemical levels up to 1000 times PEL	Respirator with full face piece or hood
Dust/chemical levels up to 100 times PEL	Air-purifying respirator with full face piece
Dust/chemical levels up to 50 times PEL	Powered air purifying respirator with half face piece
Dust/chemical levels up to 10 times PEL	Air-purifying respirator with half face piece

NIOSH Filter Efficiency Levels

Class	Description
<u>N95</u>	Filters at least 95% of airborne particles. Not resistant to oil.
<u>N99</u>	Filters at least 99% of airborne particles. Not resistant to oil.
<u>N100</u>	Filters at least 99.97% of airborne particles. Not resistant to oil.
<u>R95</u>	Filters at least 95% of airborne particles. Somewhat resistant to oil.
<u>P95</u>	Filters at least 95% of airborne particles. Strongly resistant to oil.
<u>P99</u>	Filters at least 99% of airborne particles. Strongly resistant to oil.
<u>P100</u>	Filters at least 99.97% of airborne particles. Strongly resistant to oil.

Medical Evaluations

Why Have Medical Evaluations?

- ▶ A physiological burden is placed on an employee when wearing a respirator:
 - Type of respirator worn
 - Job and workplace conditions
 - Medical status of the employee



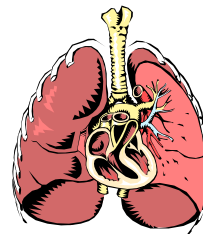
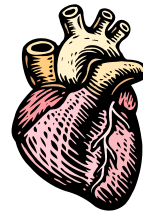
Respirators and Physical Fitness

Medical Evaluations

Medical evaluations are required for anyone required to wear respirators.

Breathing through a respirator is work for the body.

Respirators can be hazardous to people with heart or lung problems.



Medical Requirements

- ▶ No employee shall be assigned to tasks requiring the use of respirators unless it has been determined by a physician that they are physically able to perform the tasks assigned and use the respiratory equipment.
- ▶ The employee's medical status shall be evaluated and their ability to use respiratory protection shall be reviewed as required.



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Medical Evaluation

- ▶ Before the respirator is initially used.
- ▶ Must be conducted before fit testing and training.
- ▶ Establishes the medical condition of the wearer.
- ▶ Shall be performed by a physician or other licensed health care professional (PLHCP).
 - OSHA Respirator Medical Evaluation Questionnaire; Appendix C, *or*
 - Initial medical examination



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Additional Medical Evaluation

- ▶ **Annual review of medical status is not required**
- ▶ At a minimum, employer must provide additional medical evaluations if:
 - Employee reports medical signs or symptoms related to the ability to use a respirator
 - PLHCP, supervisor, or program administrator informs the employer that an employee needs to be reevaluated
 - Information from the respirator program, including observations made during fit testing and program evaluation, indicates a need
 - Change occurs in workplace conditions that may substantially increase the physiological burden on an employee

Voluntary Use

- ▶ Medical evaluation is not required for filtering facepieces
- ▶ Medical evaluation is required for elastomeric purifying respirators



Fit Testing

Fit Testing

Before an employee uses any respirator with a **negative or positive pressure tight-fitting face piece**, the employee must be fit tested with the same make, model, style, and size of respirator that will be used.



Fit Testing (cont'd)

- ▶ Employees using tight-fitting face piece respirators must pass an appropriate qualitative fit test (QLFT) or quantitative fit test (QNFT)
- ▶ Must conduct an additional fit test whenever the employee reports, or the employer or PLHCP makes visual observations of, changes in the employee's physical condition that could affect respirator fit



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Fit Testing

- ▶ When is fit testing required?
 - Before initial use
 - Yearly
 - When excessive weight gain or weight loss changes your facial features
 - Facial features change
- ▶ Why conduct fit testing?
 - To ensure maximum protection



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Fit Testing and Training Requirements

Minimum training to be provided shall include the following:

- Instruction in the nature of the hazard, whether acute, chronic, or both, and a frank appraisal of what may happen if the respirator is not used.
- A discussion of the construction, operating principles and limitations of the respirators, including single use disposables.
- Explanation on why more positive engineering or process oriented controls are not immediately feasible to reduce or eliminate the need for respirators.



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Fit Testing and Training Requirements

- Instruction on procedures for ensuring that the respirator is in proper working condition.
- Instruction on fitting the respirator properly and checking for fit and leakage.
- Detailed instruction on the proper cleaning and maintenance of the respirator.
- Instruction in emergency action to be taken in the event of malfunction.
- Training which provides the employees an opportunity to handle the respirator, wear the respirator in a normal atmosphere and to wear them in a test atmosphere



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Qualitative Fit Test (QLFT)

A pass/fail fit test to assess the adequacy of respirator fit that relies on the individual's response to the test agent.



Quantitative Fit Test (QNFT)

An assessment of the adequacy of respirator fit by numerically measuring the amount of leakage into the respirator.



Fit Testing (cont'd)

Fit Factor

A quantitative estimate of the fit of a particular respirator to a specific individual, and typically estimates the ratio:

$$\frac{\text{Concentration of a substance in ambient air}}{\text{Concentration inside the respirator when worn}}$$

Respirator Use

Use of Respirators

- ▶ Always don respirator in clean air environment.
- ▶ Always check the respirator seal to make sure proper fit has been achieved for tight-fitting respirators.
- ▶ For tight fitting respirators, the two types of user seal checks :
 - Negative pressure check
 - Positive pressure check



Respirator Usage

- ▶ Respirators shall be inspected by the wearer before and after each day's use. The inspection shall include negative and positive pressure checks for leakage.
- ▶ Respirators issued to one worker shall not be issued to another.
- ▶ Any worker who is not clean shaven shall not be allowed to wear a respirator.
- ▶ Glasses with standard temple bars shall not be worn with full face piece respirators. Glasses and goggles are permitted with half masks (air purifying) only if they do not interfere with the normal wearing and sealing of the mask.

Respirator Use

- ▶ Remove yourself if one of the following occurs:
 - Smell or taste something out of the ordinary.
 - Feel your eyes or throat becoming irritated.
 - Observe a change in your breathing.
 - Notice the face piece is leaking or other parts of the respirator are broken.
 - Hear an alarm signaling equipment has failed.



Respirator Maintenance



All respirators must be cleaned, stored and inspected regularly. This is necessary to provide complete protection.

Storage

► Care:

◦ Respirators must be protected from:

- Dust
- Sunlight
- Heat
- Cold
- Moisture
- Chemicals



◦ Store in a sealed container or bag.

Storage

- Respirators must be stored to protect against dust, sunlight, temperature, moisture, and chemicals
- Not to be stored in lockers or tool boxes
- Stored so that facepiece and valves will rest in a normal position
- Respirators should not be stored by hanging them by the headband



Inspection

► Check for:

- Holes in the filters
- Loss of elasticity or tears in the head straps and hoses
- Broken or loose connectors and fittings
- Cracked or scratched face pieces
- Detergent residue
- Dirt in the valves
- General cleanliness



Cleaning and Disinfecting

- Respirators shall be clean, sanitary, and in good working order.
- Respirators shall be cleaned and disinfected using the procedures in Appendix B-2 or procedures recommended by the respirator manufacturer.
- Respirators cleaned and disinfected at the following intervals:
 - Exclusive use by employee
 - Shared by employees
 - Emergency use
 - Used for training and fit testing



Repairs

- ▶ Respirators that fail an inspection or are otherwise found to be defective are removed from service and discarded or repaired/adjusted.
 - Repairs made only by appropriately trained persons
 - Use only respirator manufacturer's NIOSH-approved parts



Air Quality

Breathing Air Quality

- ▶ **Compressed and liquid O₂**
 - Must meet United States Pharmacopoeia requirements
- ▶ **Compressed breathing air**
 - Must meet Grade D breathing air requirements
 - Oxygen: 19.5–23.5%
 - Hydrocarbon: 5 mg/m³ or less
 - Carbon monoxide: 10 ppm or less
 - Carbon dioxide: 1,000 ppm or less
 - Lack of noticeable odor



Employee Training

Training and Information

Employers must provide effective training to employees who are required to use respirators.



Training and Information

► Required:

- Prior to requiring the employee to use a respirator.
- Annually
- When changes in workplace render previous training obsolete.
- Employee use demonstrates inadequate training.
- Any other situation arises in which retraining appears necessary.

Training

- ▶ Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator.
- ▶ Limitations and capabilities of the respirator.
- ▶ How to effectively use the respirator in emergencies.
- ▶ How to inspect, don, doff, use, perform seal checks.
- ▶ Maintenance and storage procedures.
- ▶ How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators.
- ▶ General requirements of the standard.



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Training

- ▶ Appendix D for voluntary use (Mandatory)
 - Basic advisory information on respirators shall be provided by the employer in any written or oral format, to employees who wear respirators when such use is not required by this section or by the employer

Appendix D to Sec. 1910.134 (Mandatory) Information for Employees Using Respirators When Not Required Under the Standard

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposure to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirator limitations.
2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.
4. Keep track of your respirator so that you do not mistakenly use someone else's respirator.



, 2021

Program Evaluation

Program Evaluation

- ▶ Conduct workplace evaluations
- ▶ Consult employees concerning:
 - Respirator fit
 - Appropriate respirator selection
 - Proper respirator use
 - Proper respirator maintenance



Program Administrator

- ▶ Needs to be qualified
- ▶ Can delegate tasks but needs to understand the task
- ▶ Needs to do an evaluation of the program
- ▶ Needs to be able to answer technical questions
- ▶ **NOT a record keeper**

Questions/Discussion

Contact Information

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