

## RESPIRATORY PROTECTION PROGRAM

### *Program Element*

#### R2-10-207(10)(I)

Each agency shall develop, implement, and monitor an Industrial Hygiene Program, which shall include a Respiratory Protection Program element when applicable.

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Use of a respirator is the least preferred method for protecting an employee's respiratory system because the actual airborne contaminant(s) is/are still present in the employee(s) 'breathing zone.' Use of a 'respirator' to protect an employee from breathing contaminated air should only be undertaken when the use of product substitution, administrative, and engineering controls are not possible or feasible. If a respirator is required, the agency must develop and implement a respiratory protection program including providing respiratory protection equipment, and medical evaluation and fit testing at no cost to the employee(s). The agency shall designate a program administrator who is qualified by appropriate training or experience to administer or oversee the Program as defined in [OSHA 29 CFR 1910.134 \(c\) \(3\)](#).

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**Definition:**

Employee Exposure: exposure to a concentration of an airborne contaminant that would occur if the employee were not using respiratory protection.

Respirator: a protective apparatus that is worn over the breathing zone to prevent the wearer from inhaling contaminated air. There are two (2) classifications of respirators:

- An Air-Purifying respirator contains an air-purifying filter, canister, or cartridge that will remove specific air contaminants from the ambient air.
- Atmosphere supplying respirator provides clean air to the employee from an uncontaminated non-ambient air source.

Program Administrator Person: a qualified individual with sufficient knowledge of respiratory protection, such as a Certified Industrial Hygienist (CIH) or a person who has completed a NIOSH sponsored course in respiratory protection.

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<p><b>Why do I need this program?</b></p>	<p>The employer/agency shall be responsible for a respiratory protection program when effective hazard control methods are not feasible to protect the employee from dusts, mists, vapors, fogs, fumes, gases, or sprays that affect or may affect the health of an employee.</p>
<p><b>How do I know if this program applies to my agency and my specific job hazards?</b></p>	<p>Respiratory protection is required when air contaminants exist in excess of an exposure limit, and other engineering and administrative controls do not effectively mitigate the exposure.</p> <p><b>Dust Mask Exemption:</b> OSHA exempts employees who voluntarily use a filtering facepiece (dust mask) from the written Respiratory Protection Program. However, if a filtering facepiece (dust mask) containing an N95 filter is voluntarily used in the workplace, then the following OSHA requirements will apply:</p> <ul style="list-style-type: none"> <li>● The employer must provide the employee with a copy of Appendix D from the OSHA Respiratory Protection Standard 29 CFR 1910</li> <li>● The requirements listed in 29 CFR 1910.134 h (1-4) Maintenance and care of respirators, must be satisfied</li> </ul>
<p><b>What are the minimum required elements and/or best practices for a Respiratory Protection Program?</b></p>	<p>The agency's responsible person shall select and provide an appropriate respirator based on the results of a hazard assessment and control evaluation. Furthermore, all workplace respirators must be NIOSH certified.</p> <p>The written Respiratory Protection Program must contain supplemental site-specific policies outlining the agency procedures for respirator use. The program must be updated when changes in workplace conditions affect respirator use.</p> <p>The following elements must be included in the written Respiratory Protection Program:</p> <p><b>Procedures for:</b></p> <ul style="list-style-type: none"> <li>● Selecting respirators for use in the workplace;</li> <li>● Use of respirators in routine and reasonably foreseeable emergency situations;</li> </ul>

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- Cleaning, disinfecting;
  - Storing, inspecting, repairing, discarding, and otherwise maintaining respirators;
  - Adequate air quality, quantity, and flow of clean-breathing air for atmosphere-supplying respirators; and
  - Evaluating the effectiveness of the program

**Medical evaluations** are required prior to fit testing and respirator use. The agency will be required to fund medical evaluations for employees required to wear respirators. Employees that are included in the Respiratory Protection Program must complete the OSHA required medical evaluation form. This evaluation is used to determine the employee's ability to use a respirator before a fit test is conducted. This evaluation can be done in two ways:

1. Medical Questionnaire – the questionnaire appears in Appendix C of OSHA Standard 1910.134 (answers obtained from the medical questionnaire may result in the requirement for a medical examination)
2. Medical Examination – the medical examination will obtain the same information as the medical questionnaire. The examination must be conducted by a physician or licensed healthcare professional (PLHCP) and must be repeated in the following situations:
  - When an employee reports medical symptoms related to the ability to use a respirator;
  - If a PLHCP or the respiratory program administrator indicates an employee needs to be re-evaluated;
  - When a change in workplace conditions, such as temperature, physical work effort, or the use of protective clothing may result in an increase of an employee's physiological burden; or
  - A medical evaluation would be required annually if your licensed healthcare professional indicates that the employee needs an annual evaluation

	<p>Qualified human resource personnel or a PLHCP should review employee medical questionnaires on an annual basis to determine if a follow-up examination will be necessary.</p> <p><b>Fit-testing</b> must be done prior to the employee using the respirator for the first time and whenever a different make, model, size or style of respirator will be used. Specific fit-testing procedures are contained in Appendix A of OSHA Standard 29 CFR 1910.134.</p>
<p><b>Are there any mandatory training requirements or best practices that must be developed by the agency?</b></p>	<p><b>Yes.</b> Employees who wear a respirator must be trained in:</p> <ul style="list-style-type: none"> <li>● the site-specific respiratory hazards to which they are potentially exposed to during routine and emergency situations; and</li> <li>● the proper use of respirators, including putting on and removing them, any limitations on their use, and their maintenance</li> </ul> <p>Training and fit testing must be conducted annually.</p>
<p><b>Are there specific requirements for documenting the program, training, etc...?</b></p>	<p><b>Yes.</b> Training and fit test records must be kept for three (3) years. These records must be updated when:</p> <ul style="list-style-type: none"> <li>● new employees are trained or new Fit tests are conducted</li> <li>● existing employees receive refresher training</li> </ul> <p>Medical records (questioners and exam information) for all employees covered under the respirator program must be kept for the duration of employment plus 30 years. All medical records must be maintained in a location that is separate from the employee's personnel file.</p>

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**Are there any resources available that can assist me in putting together a Respiratory Protection Program?**

**Yes.** A State Risk Management Loss Prevention Consultant can assist in making determinations regarding respiratory protection requirements that may be specific to your agency.

Following are some additional resources:

- The standard at [OSHA 29CFR 1910.134 Standard](#)
- Example Respiratory Protection Program: [University of Arizona Respiratory Protection Program](#)
- [OSHA Respiratory Protection eTool](#)
  - [The Advisor Genius: Selecting an Appropriate Respirator](#). This selection tool will ask you a series of questions and assist you in determining your respiratory protection needs.
- [OSHA Quick Card: Protect Yourself Respirators](#)
- [NIOSH Respirator Selection Guide](#)
- [Respiratory Exposure Assessment \(3M.com\)](#)