

Adopting Some of the OSHA Requirements for Respirators

**Western Region Pesticides Meeting
May 17, 2016**



Outline

- OSHA requirements adopted by WPS
 - Medical evaluation
 - Fit testing
 - Training
- OSHA requirements not included in WPS
- Respirator change-out schedule
- Label statements regarding respirators

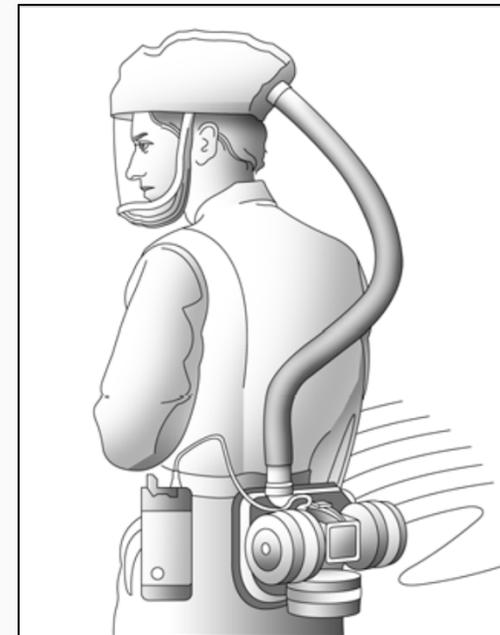


OSHA Requirements Adopted by WPS



Tight-fitting half mask
elastomeric respirator

OSHA Small Entity Compliance Guide, 2011

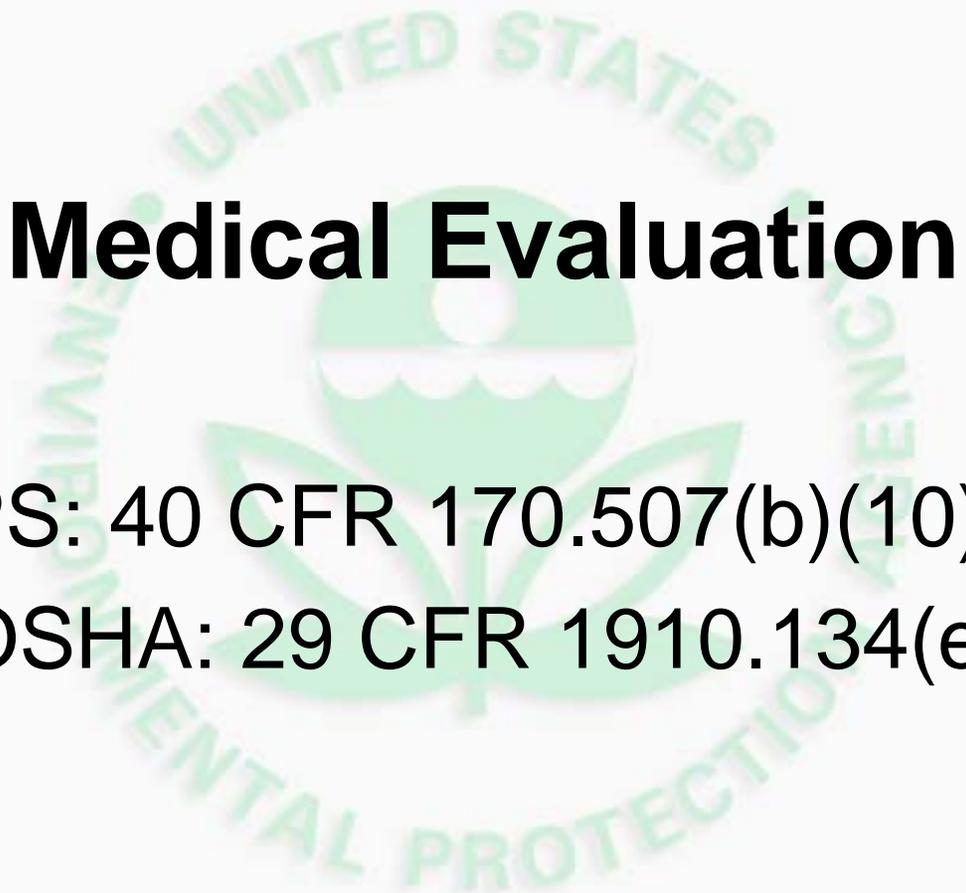


Loose-fitting Powered
Air-Purifying Respirator
(PAPR)



Respirator Requirements in Revised Rule: 170.507(b)(10)

- When a respirator is required by the labeling, handler employer must provide handlers with the following before the handler performs any activity requiring the respirator:
 - Medical evaluation
 - Fit test
 - Respirator training
- Handler employer must maintain records for 2 years documenting completion of these.



Medical Evaluation

WPS: 40 CFR 170.507(b)(10)(iii)

OSHA: 29 CFR 1910.134(e)



Medical Evaluation: WPS

- Must provide handlers with a medical evaluation ... that conforms to 29 CFR 1910.134. (Paragraph (e))
 - Must provide = employer must pay for it
- To ensure the handler's physical ability to safely wear the respirator
- Medical evaluation to wear a respirator is different than medical monitoring!



Medical Evaluation: Basic Information

- When: Before the employee is fit tested and uses the respirator for the first time
- Required for all types of respirators (if respirator use is required)
- Employer must identify a physician or another licensed health care professional (PLHCP)
 - PLHCPs in area: see if respirator medical evaluation is within scope of their license
 - Check with state licensing board
 - Online services (respirator medical evaluation online service)



Medical Evaluation: Questionnaire

- Medical questionnaire in OSHA standard; can use that or an exam that obtains same info.
- Must be administered confidentially during employee's normal working hours (or convenient time/place) and in a manner employee understands
 - Employer cannot review employee's responses; questionnaire provided directly to physician or licensed health care professional
- See handout with questionnaire



Medical Evaluation: Employer Requirements

- Employer must inform employees that a PLHCP is available to discuss the questionnaire and allow employees to discuss the results with the PLHCP.
- PLHCP may include any tests, consultations or diagnostic procedures needed to determine employee's ability to use a respirator.



Medical Recommendation from PLHCP

- PLHCP must provide only this info to employer in writing:
 - Determination of whether or not the employee is medically able to use a respirator
 - Any limitations on respirator use related to the medical conditions of the employee or the workplace conditions
 - Need, if any, for follow-up medical evaluations
 - Statement that PLCHP provided employee with written recommendation
- This recommendation is the record - 2 years



Need for Additional Medical Evaluation

- Employee reports symptoms related to ability to use a respirator
- PLHCP, program administrator or supervisor determine a medical re-eval is necessary
- Workplace conditions (PPE, temp, work effort) have changed to increase burden
- Results of the medical exam reveal that additional medical evals are needed



Fit Test

WPS: 40 CFR 170.507(b)(10)(i)

OSHA: 29 CFR 1910.134(f)



Fit Test: WPS

- Must provide handlers with fit testing using the respirator specified on the labeling in a manner... that conforms to 29 CFR 1910.134. (Paragraph (f))
- To ensure the respirator forms an adequate seal on the user's face. If seal is not good, won't provide expected protection.



When is a Fit Test Required?

- Before initial use
- At least annually after that
- If handler changes to a different respirator
- If change in handler's physical condition that could affect the seal:
 - Obvious change in body weight, facial scarring, extensive dental work, cosmetic surgery



When is a Fit Test Required?

- Which respirators? Any respirator with a tight-fitting facepiece
 - Form a complete seal with wearer's face
 - Includes negative pressure (air-purifying) and positive pressure (air-supplying) respirators
- If different products require different respirators, must fit test for each one
- Fit test must be conducted with same make, model, style and size respirator



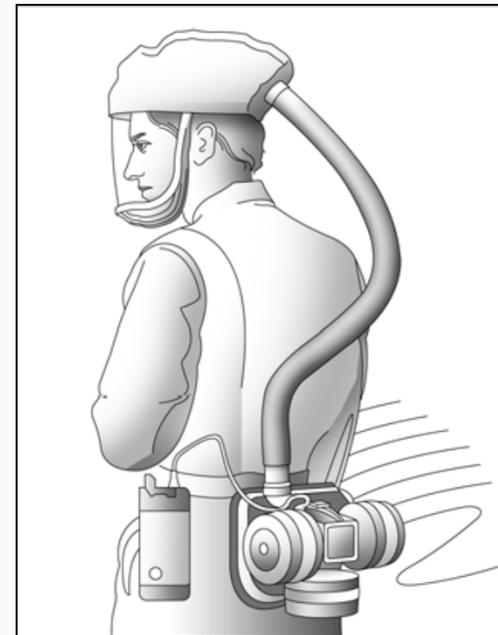
Fit test? Yes



Tight-fitting half mask elastomeric respirator

OSHA Small Entity Compliance Guide, 2011

Fit test? No



Loose-fitting Powered Air-Purifying Respirator (PAPR)



Fit Test Procedures

- A user seal check is NOT a fit test
- Procedures described in 29 CFR 1910.134, Appendix A
- Quantitative fit test
 - Measure leakage into the respirator
- Qualitative fit test
 - Pass/fail; relies on wearer's response to a substance (e.g., banana oil) introduced to a enclosure
 - Example fit test (3M, 2012):
<https://www.youtube.com/watch?v=XILjMeLEJEw>



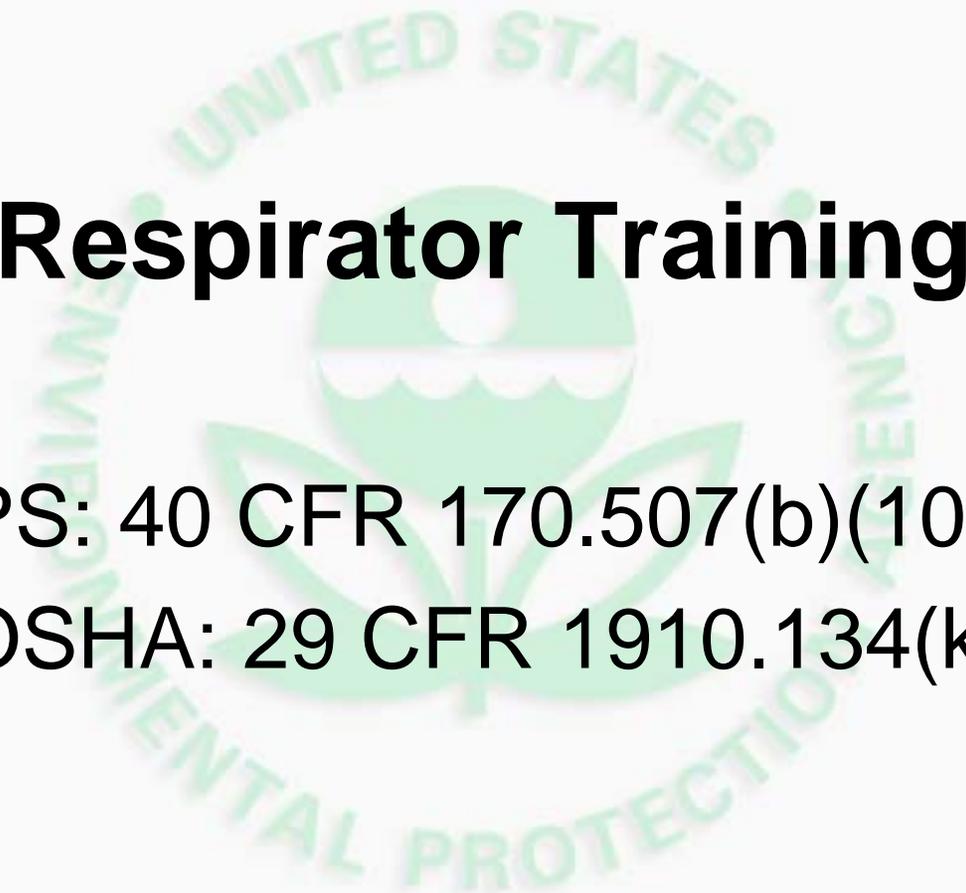
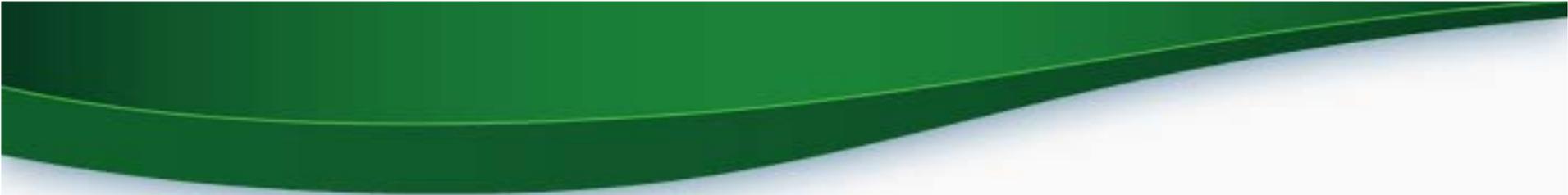
Fit Test Procedures

- Who can conduct qualitative test?
 - The employer must ensure that the person administering qualitative fit testing is able to prepare test solutions, calibrate equipment, perform test properly, recognize invalid tests and ensure test equipment is in proper working order
- Can purchase fit test kits



Fit Test Records

- 40 CFR 170.507(b)(10) & 29 CFR 1910.134(m)(2)
- Fit test records (qualitative or quantitative):
 - Name of handler tested
 - Type of fit test performed
 - Make, model and size of the respirator tested
 - Date of the fit test
 - Results of the fit test – pass/fail for qualitative
- Keep for 2 years



Respirator Training

WPS: 40 CFR 170.507(b)(10)(ii)

OSHA: 29 CFR 1910.134(k)



Respirator Training: WPS

- Employer must provide handler with training in the use of the labeling-required respirator in a manner that conforms to the provisions of 29 CFR 1910.134(k)(1)(i)-(vi)
- Ensure the handler knows how to use the respirator properly



Respirator Training Basic Information

- When?
 - Before the handler uses the respirator in the workplace and if knowledge/skill not retained by handler
- How?
 - In a manner that is understandable to the handler
 - No specific format
 - Employer must ensure that handler can demonstrate knowledge of the required points



Respirator Training Content

1. Why the respirator is necessary and how improper fit, usage and maintenance can make the respirator ineffective
2. The limitations and capabilities of the respirator
3. How to select cartridges and canisters and know the schedule for changing them out



Respirator Training Content

4. How to use the respirator effectively in emergency situations
5. How to inspect, put on and remove, use and check the seals of the respirator
6. Respirator maintenance and storage procedures
7. How to recognize medical signs and symptoms that may limit or prevent effective use of the respirator



Records: Respirator Training

- Must keep records documenting completion of the training (WPS: 170.507(b)(10))
- OSHA standard does not specify records for training
- Need to provide guidance on this:
 - Handler's printed name & signature
 - Date of training
 - Trainer's name
 - Description of materials used/information covered



OSHA Requirements NOT Adopted by WPS



OSHA Respiratory Protection Program: 29 CFR 1910.134

- Written respiratory protection program
- Respirator selection (assess hazards)
- Proper use of respirators
- Maintenance and care
- Program evaluation



Respirator Change-Out Schedule



Respirator Change-Out Schedule: 170.507(d)

Replace particulate filtering facepiece respirators or particulate filters:

- When breathing resistance becomes excessive;
- When the filter element has damage or tears;
- According to manufacturer's recommendations or product labeling (more frequent); or
- At the end of **8 hours of cumulative use**.
 - Current: end of each day's work period



Respirator Change-Out Schedule: 170.507(d)

Replace gas- or vapor-removing canisters and cartridges:

- At the first indication of odor, taste, or irritation;
- **When maximum use time is reached as determined by 29 CFR 1910.134(d)(3)(iii)(B)(2);**
- **When breathing resistance becomes excessive;**
- According to manufacturer's recommendations or product labeling (more frequent); or
- At the end of **8 hours of cumulative use.**



Label Statements Regarding Respirators



Respirator Label Statements

- Revised Label Review Manual (LRM) several years ago to address changes in respirator designations by NIOSH
- Not being incorporated onto labels
- At least 2,600 product labels
- Current work: confirm LRM statements are correct and educating registrants & OPP reviewers



Questions?

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