Model Written Respirator Program

NOTE: The following sample safety and health programs are intended to provide examples of written programs on various workplace safety and health topics; they are not intended to supersede the requirements in OSHA standards. Employers should consult the applicable OSHA standards for the specific requirements applicable to their workplaces. Employers can use these sample programs as guidance when developing their own customized programs that are tailored to their specific workplaces.

Written Respirator Program for Deleading/Lead-Safe Renovator Contractors

PLEASE READ AND FILL OUT COMPLETELY

In order to comply with OSHA 29 CFR 1910.134, OSHA 20 CFR 1926.62 and DLWD 454 CMR 22.00, the following written respirator program has been established for ***[insert company name]***. The written program will be available for review at ***[insert address/location]***.

1) Purpose

[insert company name] has determined that its employees could be exposed to respiratory hazards during routine operations. These hazards include ***Lead Dust.*** The purpose of this program is to ensure that all employees are protected from exposure to these respiratory hazards.

The work processes requiring respirator use at ***[insert company name]*** *a*re outlined below in the Scope and Application section of this program.

2) Scope and Application

Employees participating in the respiratory protection program do so at no cost to them. The expense associated with training, medical evaluations and respiratory protection equipment will be paid by the company.

The following respirators will be used for the processes below:

Respirator Type	**Job Description/Process**
Half-face or Full-face air purifying respirator with HEPA filter (N100 or P100 filter)	Where lead containing coatings/paint is present or suspected: • manual demolition of structures • manual scraping • manual sanding • heat gun application • power tool cleaning with dust collection systems • chipping lead mortar
Loose fitting hood PAPR with HEPA filter (N100 or P100 filter)	Where lead containing coatings/paint is present or suspected • all of the above, plus: • lead burning • rivet busting

	• power tool cleaning without duct collection systems • cleanup work where dry expendable abrasives are used • abrasive blasting enclosure movement/removal
Supplied air respirator or Abrasive Blasting Hood respirator operated in positive pressure mode	Where lead containing coatings/paint is present: • All of the above, plus: • Abrasive blasting (ie. Bridge) • Welding, cutting torch burning on Paint with high percent of Lead

3) Responsibilities

Program Administrator

The program administrator for ***[insert company name]*** is ***[insert program administrator name]*** . The program administrator is responsible for administering the respiratory protection program, including the following duties:

- identifying work areas, processes or tasks that require workers to rear respirators
- selection of respiratory protection options
- monitoring respirator use to ensure that respirators are used in accordance with their certifications
- arranging for and/or conducting training
- ensuring proper storage and maintenance of respirator
- conducting or arranging for qualitative fit testing
- administering the medical surveillance program
- maintaining records required by the program
- evaluating the program
- updating the written program as needed

Supervisors

Supervisors are responsible for ensuring that the respiratory protection program is implemented in their particular areas. In addition to being knowledgeable about the program requirements for their own protection, supervisors must also ensure that the program is understood and followed by the employees under their charge. Duties of the supervisor include:

- ensuring that employees under their supervision (including new hires) have received appropriate training, fit testing, and annual medical evaluation
- ensuring the availability of respirators
- being aware of tasks requiring the use of respiratory protection
- enforcing the proper use of respiratory protection when necessary
- ensuring that respirators are properly cleaned, maintained, and stored according to the respiratory protection plan
- ensuring that respirators fit well and do not cause discomfort
- continually monitoring work areas and operations to identify respiratory hazards
- coordinating with the program administrator on how to address respiratory hazards or other concerns regarding the program

Employees

Each employee is responsible for wearing a respirator when and where required and in the manner in which they were trained. Employees must also:

- care for and maintain their respirators as instructed, and store them in a clean sanitary location
- inform their supervisor if the respirator no longer fits well, and request a new one that fits properly
- inform their supervisor or the program administrator of any respiratory hazards that they feel are not adequately addressed in the workplace and of any other concerns that they have regarding the program

4) Respirator Selection

The program administrator will select respirators to be used on site, based on the hazard to which workers are exposed and in accordance with all OSHA and state standards. The program administrator will conduct a hazard evaluation for each operation, work process, or work area where airborne contaminants may be present in routine operations or during an emergency. The hazard evaluation will include:

- Identification and development of a list of hazardous substances used in the work process
- Review the work processes to determine where potential exposures to these hazardous substances may occur. This review shall be conducted by surveying the work site, reviewing process records, and talking with employees and supervisors.
- Exposure assessment to quantify potential hazardous exposures. The assessment will be done by using an exposure history from NIOSH or OSHA, or will be done by air testing.

The program administrator will revise and update the hazard assessment as needed (i.e. change in work process, new procedure). If an employee feels that respiratory protection is needed during a particular activity, they are to contact their supervisor or the program administrator. If it is determined that respiratory protection is necessary, all other elements of this program will be in effect for those tasks and this program will be updated accordingly.

5) Medical Evaluation

Employees are not permitted to wear respirators until a physician or other licensed healthcare professional (PLHCP) has determined that they are medically able to do so. Any employee refusing the medical evaluation will not be allowed to work in an area requiring respirator use.

A licensed physician or other licensed healthcare professional at [***insert name of clinic conducting medical evaluation]*** will provide the medical evaluations.

All examinations and questionnaires are to remain confidential between the employee and the physician.

Medical evaluation procedures are as follows:

- The medical evaluation will be conducted using the questionnaire provided in Appendix C of the OSHA Respirator Standard. The program administrator will provide a copy of this questionnaire to all employees requiring medical evaluations.
- Follow up medical exam will be granted to employees as required by the standard, and/or as deemed necessary by the physician.
- All employees will be granted the opportunity to speak with the physician/PLHCP about their medical evaluation if they so request.

- The physician will be provided with a copy of this respirator program, a copy of the Respiratory Protection Standard, the list of hazardous substances by work area, and for each employee requiring evaluation: 1)their work area or job title; 2) proposed respirator type and weight; 3) length of time required to wear respirator; 4) expected physical work load (light, moderate, heavy); 5) potential temperature and humidity extremes, and 6)any additional protective clothing required.
- Any employee required for medical reasons to wear a positive pressure air purifying respirator, or who requests one, will be provided with a powered air purifying respirator (PAPR).
- After an employee has received medical clearance to wear a respirator, additional medical evaluations will be provided under the following circumstances:
- The employee reports signs and/or symptoms relating to their ability to use a respirator, such as shortness of breath, dizziness, chest pains, or wheezing
- The examining physician or supervisor informs the program 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
- A change occurs in workplace conditions that may result in an increased physiological burden on the employee

6) Fit Testing

Fit testing is required for employees wearing tight fitting half face or full face air purifying respirators (APRs) or PAPRs. Employees 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 respirator fit (e.g. significant change in body weight, facial scarring, dental conditions, etc.)

Employees will be fit tested with the make, model and size of respirator that they will actually wear. Employees will be provided with several models and sizes of respirators so they may find an optimal fit. Fit testing of PAPRs will be conducted in the negative pressure mode.

The Program Administrator will conduct fit tests following the OSHA approved protocol in Appendix B of the OSHA Respirator Standard.

7) Respirator Use

Employees will use their respirators under conditions specified by this program, and in accordance with the training they receive on the use of each particular model. In addition, the respirator shall not be used in a manner for which it is not certified by NIOSH or by its manufacturer.

All employees shall conduct user seal checks each time that they put on their respirator. Employees shall use either the positive and negative pressure check (depending on which test works best for them) specified in Appendix B-1 of the OSHA Respirator Standard.

Employees shall be permitted to leave the work area to maintain their respirator for the following reasons:

1) to clean their respirator if it is impeding their ability to work,
2) change filters or cartridges,
3) replace parts,
4) 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 hair, facial scars, or missing dentures, that prevents them from achieving a proper seal. Employees are not permitted to wear jewelry, headphones, or any other articles that may interfere with the face-to-facepiece seal.

Respirator Malfunction

For any malfunction of an air purifying respirator (e.g. such as breakthrough, facepiece leakage, or improperly working valve), the respirator wearer should inform his/her supervisor that the respirator no longer functions as intended, and go to the designated safe area to maintain the respirator. The supervisor must ensure that the employee receives the needed parts to repair the respirator, or is provided with a new respirator.

8) Air Quality for Supplied Air Respirators and Abrasive Blasting Hoods

*****For supplied air respirators connected to Compressed Air Cylinders, only Grade D breathing air shall be used in the cylinders.

- For supplied air respirators connected to a compressor pump, the compressor must be designed to provide clean breathing air, including but not limited to: flow rate must be adequate to provide enough air to each air line; oil filter; carbon monoxide detector if the compressor is oil lubricated; pull fresh air supply from a clean area outside the workzone. Air line couplings used to provide breathing air must be incompatible with couplings and and outlets for non-respirable compressed air used to power pneumatic equipment. Nitrogen can never be used to blow out air lines used for breathing air.

9) Cleaning, Maintenance, Change Schedules, and Storage

Cleaning

Respirators are to be regularly cleaned and disinfected at the designated respirator cleaning station located ***[indicate location]***. The company will supply cleaning supplies and allow an adequate amount of time to perform respirator cleaning and disinfection. Respirators issued for exclusive use of an employee shall be cleaned as often as necessary to maintain them in a sanitary and properly functioning condition.

*****Atmosphere supplying and emergency use respirators are to be cleaned and disinfected after each use.

The following procedure is to be used when cleaning and disinfecting respirators:

- Disassemble respirator, removing any filters, canisters, or cartridges.
- Wash the facepiece and associated parts in a mild detergent with warm water.
- Rinse completely in clean warm water.
- Wipe the respirator with disinfectant wipes (70% isopropyl alcohol) to kill germs.
- Air dry in a clean area.
- Reassemble the respirator and replace any defective parts.
- Place in a clean, dry plastic bag or other air tight container.

The Program Administrator will ensure an adequate supply of appropriate cleaning and disinfection material at the cleaning station. If supplies are low, employees should contact their supervisor, who will inform the Program Administrator.

Maintenance

Respirators are to be properly maintained at all times in order to ensure that they function properly and adequately protect the employee. Maintenance involves a thorough visual inspection for cleanliness and defects.

Worn or deteriorated parts will be replaced prior to use. No components will be replaced or repairs made beyond those recommended by the manufacturer.

*****Repairs to regulators or alarms of atmosphere supplying respirators will be conducted by the manufacturer. Arrangements for repairs will be made by the Program Administrator.

The following checklist will be used when inspecting respirators:

- Facepiece:
  - Cracks, tears, holes
  - Facemask distortion
  - Cracked or loose lenses/faceshield
- Headstrap
  - Breaks or tears
  - Broken buckles
- Valves
  - Residue or dirt
  - Cracks or tears in valve material
- Filters/Cartridges
  - Approval designation
  - Gaskets
  - Cracks or dents in housing
  - Proper cartridge for hazard
- Air supply systems
  - Breathing air quality/grade
  - Condition of supply hoses
  - Hose connections
  - Settings on regulators and valves

Employees are permitted to leave their work area to perform limited maintenance on their respirator in a designated area that is free of respirator hazards. Situations when this is permitted include 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 if they detect any other damage to the respirator or its components.

Change Schedules

<u>Lead Safe Renovators:</u>

Employees wearing respirators with HEPA/P100 filters shall change the filters on their respirators periodically to ensure the continued effectiveness of the respirators. Replace filters if breathing gets difficult, if the filter seems clogged, or if the filter gets damaged by water.

<u>Deleading Contractors:</u>

Deleading contractors may be exposed to higher amounts of Lead Dust because they are disturbing larger amounts of Lead Paint. Replace HEPA/P100 filters more frequently. Replace filters if breathing gets difficult, if the filter seems clogged, or if the filter gets damaged by water.

Bridge Deleaders

Bridge deleaders are exposed to higher amounts of Lead Dust than residential lead paint deleaders. Replace the respirator filters at the end of each shift.

Storage

Respirators must be stored in a clean, dry area, and in accordance with the manufacturer's recommendations. Each employee will clean and inspect their own air purifying respirator in accordance with the provisions of this program and will store their respirator in a manner that protects it from damage and contamination with Lead Dust.

Defective Respirators

Respirators that are defective or have defective parts shall be taken out of service immediately. If, during an inspection, an employee discovers a defect in a respirator, he/she is to bring the defect to the attention of the supervisor. Supervisors will give all defective respirators to the Program Administrator, who will decide whether to:

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

Only replacement parts from the manufacturer of the respirator will be used. There will be no interchanging of parts from different respirator manufacturers.

Training

The Program Administrator will provide training to respirator users and their supervisors on the contents of the Respiratory Protection Program and their responsibilities under it, and on the OSHA Respiratory Protection Standard. Workers will be trained ***prior to*** using a respirator in the workplace. Supervisors will also be trained ***prior to*** using a respirator in the workplace, or prior to supervising employees that must wear respirators.

The training course will cover the following topics:

- The ***[insert company name]*** Respiratory Protection Program
- The OSHA Respiratory Protection Standard
- Respiratory hazards encountered at ***[insert company name]*** and their health effects
- Proper selection and use of respirators
- Limitations of respirators
- Respirator donning
- Seal checks before each use
- Fit testing
- Emergency use procedures
- Maintenance, cleaning and storage
- Medical signs and symptoms limiting the effective use of respirators

Employees will be retrained annually, or earlier as needed (e.g. if they change work procedures and need to use a different respirator). Employees must demonstrate their understanding of the topics covered in the training through hands-on exercises and a written test. Respirator training will be documented by the Program Administrator and the documentation will include the type, model, and size of respirator for which each employee has been trained and fit tested.

10) Program Evaluation

The Program Administrator will conduct periodic evaluations of the workplace to ensure that the provisions of this program are being implemented. The evaluations will include regular consultations with employees who use respirators and their supervisors, site inspections, air monitoring and a review of records.

11) Record Keeping

A written copy of this program and the OSHA standard is kept in the following location and is available to all employees who wish to review it: ***[indicate where kept]***

Training records are kept: ***[indicate where kept]***

Medical Clearance records are kept: ***[indicate where kept]***

Fit Test records are kept: ***[indicate where kept]***