RPP

RESPIRATORY PROTECTION PROGRAM

February 2017
RESPIRATOR PROTECTION PROGRAM (RPP)

Section 1. Introduction

All NHED campuses are committed to maintaining a safe and healthy work environment. When employees are exposed or potentially exposed to hazardous air contaminants, the primary method of protecting employees is to prevent exposures through the use of accepted engineering controls, such as elimination of the hazardous substance or isolation of the process. However, when engineering controls are not feasible, when they are incapable of reducing the contaminant to acceptable levels, or during periods when they are being implemented, respiratory protection must be provided to and worn by employees that may be subject to the inhalation of hazardous airborne contaminants such as gases, vapors, or particulates.

This program is intended to conform to state and federal laws and specifically comply with the OSHA requirements in accordance with 29 CFR 1910.134.

Section 2. Purpose

The purpose of this program is to ensure that all employees are protected from overexposure to potential respiratory hazards. This is to be accomplished by providing employees with knowledge of job hazards, what protective measures are required, and any necessary personal protective equipment (PPE).

Section 3. Roles and Responsibilities

Specific responsibilities for carrying out this program are identified by position below.

Provosts:
- Support and provide resources for the overall program.

Campus Safety Officers:
- Review the written program annually and recommend necessary updates.
- Inform the Respiratory Protection Program Administrator (RPPA) about changes in the workplace that may affect the overall program.
- Assist the RPPA in ensuring program elements are implemented across the campus.
- Coordinate medical evaluations and fit testing services for respirator users.
- Maintain campus records on respiratory protective equipment assignments, medical clearances, fit testing, and training.
- Assist with evaluating respiratory hazards in the work areas.
- Assist with periodic monitoring to assess concentrations of airborne contaminants.
- Conduct periodic inspections of respirator storage and use.
- Assist with evaluating the overall effectiveness of the program.
NHED Safety Administrator:
- Act as the RPPA.
- Ensure annual reviews and necessary updates to the program.
- Assist with coordinating medical evaluations and fit testing services for respirator users.
- Maintain records on respiratory protective equipment assignments, medical clearances, fit testing, and training.
- Evaluate respiratory hazards in the work areas.
- Provide guidance for selecting and purchasing approved respirators.
- Provide training (including refresher sessions) on the proper use, maintenance, and storage of respirators to all respirator users.
- Conduct periodic monitoring to assess concentrations of airborne contaminants.
- Conduct periodic inspections of respirator storage and use.
- Evaluate the overall effectiveness of the program.

Deans/Supervisors:
- Oversee the program for their departments/work areas.
- Ensure that respirator users, under their supervision (including new hires), receive appropriate training, medical evaluation, and annual fit testing.
- Enforce the proper use of respiratory protection equipment.
- Ensure that respirators are properly cleaned, maintained, and stored according to this program.
- Communicate with campus Safety Officer and RPPA when changes occur that may affect the overall program.

Respirator Users:
- Use the respirator in accordance with the manufacturer’s instructions and the training received.
- Inspect the respirator before each use.
- Store, clean, maintain, and guard against damage to the respirator.
- Report any malfunction of the respirator to their supervisor, campus Safety Officer, or RPPA.
- Promptly report to their supervisor, campus Safety Officer, or RPPA any symptoms of illness that may be related to respirator usage or exposure to hazardous atmospheres.
- Inform their supervisor, campus Safety Officer, or RPPA of operation changes or health status changes that could affect the safe use of the equipment.

Section 4. Respirator Selection and Use

Selection of a respirator for a specific operation and/or contaminant is to be made by the RPPA in consultation with occupational health experts, industrial hygienists, etc., as appropriate. Selection is to be made from a sufficient number of models and sizes to allow proper fit.
The selection of a proper respirator, for any given situation, must require evaluation of workplace respiratory hazards, including identification of the following:

- A reasonable estimate of the employee exposures to respiratory hazard(s).
- The contaminant’s chemical state and physical form (gas, vapor, particulate, etc.).

Sampling is to be conducted periodically and as the result of changing conditions to determine hazardous airborne contaminant levels.

There are no known areas where self-contained breathing apparatus (SCBA) or supplied-air respirators (SAR) are necessary within NHED.

Any respirator usage must be pre-approved by the RPPA. Affected employees are to only wear the specific respirator-type(s) for which they were approved.

Section 5. Medical Evaluations

Medical evaluations must be performed for all employees required to wear a respirator. For the initial evaluation, prior to use, a Physician or Other Licensed Health Care Professional (PLHCP) must perform a medical evaluation using a medical questionnaire or an initial medical examination that obtains the same information as the medical questionnaire found in Appendix C of 29 CFR 1910.134. A follow-up medical examination may be needed based on results of the medical questionnaire and/or the initial medical examination. In addition to the questionnaire, supplemental information required by regulations for the job task and a copy of the RPP are to be provided.

Thereafter, an abbreviated medical questionnaire which indicates any changes in the employee’s ability to use a respirator may be used. All questionnaires are to be reviewed by a PLHCP.

Additional medical evaluations must be provided when:

- An employee reports medical signs or symptoms that are related to their ability to use a respirator.
- A PLHCP, supervisor, or the RPPA determine that an employee needs to be re-evaluated.
- Information from the RPP, including observations made during fit testing and program evaluation, indicates a need for employee re-evaluation.
- A change occurs in workplace conditions (e.g. physical work effort, protective clothing, temperature, etc.) that may result in a substantial increase in the physiological burden placed on an employee.
Section 6. Fit Testing

A qualitative or quantitative fit test must be performed on all employees required to wear respirators with a tight-fitting facepiece prior to initial use. Qualitative fit tests are done using a saccharin solution, a Bitrix TM solution, or an irritant smoke. The testing must be performed in accordance with Appendix A of 29 CFR 1910.134.

In addition, employees required to wear a tight-fitting facepiece respirator must receive fit tests whenever a different respirator facepiece (size, style, model, or make) is used and at least annually.

Section 7. Procedures for Routine and Emergency Use of Respirators

Procedures for the proper use of respirators in routine and reasonably foreseeable emergency situations include:

1. Facial hair is not allowed between the face and the sealing surface of the respirator facepiece.
2. Protective eye wear or corrective lenses must not interfere with the seal between the face and the sealing surface of the facepiece.
3. Cartridges and canisters are replaced after each use, when odor is detected, changes in breathing resistance, or per manufacturer’s guidelines.

Section 8. Respirator Inspection, Cleaning, Maintenance, and Storage

All respirators are to be cared for, cleaned, maintained, stored, and repaired as directed by the manufacturer.

- Respirators must be inspected prior to use for respirator function, tightness of connections, and the condition of the various parts including, but not limited to, the facepiece, head straps, valves, connecting tube, cartridges, canisters or filters, and the elastomeric parts for pliability and signs of deterioration.
- They must be cleaned after use or as often as necessary to be maintained in a sanitary condition.
- They must be properly stored to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture, and damaging chemicals.
- They must be packed or stored in a way to prevent deformation of the facepiece and exhalation valve.

Section 9. Adequate Air Quality

There are no known areas where self-contained breathing apparatus (SCBA) or supplied-air respirators (SAR) are necessary. Therefore, there is no anticipated need for supplied air respirators.
**Section 10. Training**

Employee training is to be conducted prior to issuing a respirator to an employee, annually, and when applicable changes occur in the workplace. The training is to include hazards that the employee may be exposed to during routine and emergency situations.

Training is to consist of, and employees are to be able to demonstrate knowledge of, at least the following:

1. Why the use of the respirator is necessary.
2. Proper fitting, use, and maintenance of respirators to prevent improper use.
3. Respirator limitations and capabilities.
4. Inspection, fitting procedure, use, and seal check.
5. Use in emergency situations.
6. Medical signs and symptoms that may limit or prevent effective use of a respirator.

**Section 11. Recordkeeping**

Records of training, fit testing, and medical determinations are documented and retained to assist in ensuring the adequacy of the RPP, facilitate employee involvement, and allow regulatory agencies to inspect records and make compliance determinations.

Records of medical evaluations must be retained and made available to the employees in accord with OSHA’s Access to Employee Exposure and Medical Records standard, 29 CFR 1910.1020.

Respirator fit testing records must include the qualitative and quantitative fit tests administered to employees. A record of each fit test is to be maintained until the next fit test is required, and must include at least:

- The name or identification of the employee tested.
- Type of fit test performed (e.g. qualitative or quantitative, challenge media, etc.).
- Specific make, model, style, and size of respirator tested.
- Date of test.
- The pass/fail results of qualitative fit tests, or the fit factor and strip chart recording or other recording of the test results for quantitative fit tests.

A written copy of the current RPP must be made available upon request to the affected employees, their designated representatives, and to regulatory agencies.
Section 12. Program Review

Annual reviews of the RPP program are to be conducted and documented, including any changes or additions to the program or other related documents. Evaluations of the workplace are to be conducted, as necessary, to ensure the RPP is effective. In addition, evaluation of respirator use must be conducted to ensure that all elements of the RPP are being effectively implemented.

Ensure regular consultation with employees required to wear respirators to assess their views on the effectiveness of the RPP and to identify any issues with respirator use. Identified issues are to be promptly addressed and corrective actions applied, if necessary.
Respiratory Management for Voluntary Respirator Usage

Employees that voluntarily use respirators are to be trained in information provided in 29 CFR 1910.134 Appendix D (Refer to NHED RPP Appendix 1). A record of the training is to be retained.

NHED RPP Appendix 1
Information for Employees Using Respirators When Not Required

Reference: 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 exposures 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 respirators 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.

I have read the above information and understand my rights and responsibilities in regards to voluntary respirator usage.

Signature: ______________________________        Date: ______________

Printed Name: ______________________________  Employee ID#: __________________