



Regulatory Compliance

Respirators Technical Bulletin: OSHA Written Respiratory Program Overview

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Introduction: OSHA Written Respiratory Program Overview

It is the employer's responsibility to identify workplace hazards, establish a written respiratory program and provide employees with appropriate respiratory protection.

The intent of this technical bulletin is to understand the Basics of Setting up a Written Respiratory Protection Program.

Always refer to the published *Occupational Safety and Health Administration (OSHA) CFR 10910.134* and any local guidance.

OSHA Workplace Violations

Did you know Respiratory protection in general industry is the 5th highest in frequent OSHA citations? Many of these citations were lacking a written respiratory protection program.

The following were the *top 5 most frequently cited standards by Federal OSHA in fiscal year 2019* (October 1, 2018, through September 30, 2019):

1. Fall protection, construction (*29 CFR 1926.501*) [*related OSHA Safety and Health Topics page*]
2. Hazard communication standard, general industry (*29 CFR 1910.1200*) [*related OSHA Safety and Health Topics page*]
3. Scaffolding, general requirements, construction (*29 CFR 1926.451*) [*related OSHA Safety and Health Topics page*]
4. Control of hazardous energy (lockout/tagout), general industry (*29 CFR 1910.147*) [*related OSHA Safety and Health Topics page*]
5. Respiratory protection, general industry (*29 CFR 1910.134*) [*related OSHA Safety and Health Topics page*]

What is a Respiratory protection program?

An OSHA (Occupational Safety and Health Administration) written respiratory protection program is an integral component of ensuring safety and compliance within an occupational setting. A respiratory program is required by OSHA in occupational settings and important to employers for many reasons:

1. A respiratory program is used as a guide to respiratory protection policies and procedures for safety managers and workers to reference.
2. A respiratory program is a one source location for keeping records such as trainings and fit testing documentation.
3. Helps reduce liability to ensure compliance is being met to the highest of standards in the workplace.

Note: When an employee uses respiratory protection for voluntary use, OSHA does not require employee to be included in a written respiratory protection program. They must conform to Appendix D in 29 CFR 1910.134.

The Components of a *Written Respiratory Program*

1. **Written policies, procedures,** and a list of who's responsible for what parts of the program.
2. **Selection of Respirators**

You must know the following and document each finding:

- The name of the contaminant present in the workplace
- The concentration and form of the contaminant
- Relevant Permissible Exposure Limits (PEL)
- Work Environment, Operation and Process
- Time period of exposure
- Function and limitations of the respirator

3. **Medical Evaluations**

- Before an employee is fit tested or required to use the respirator, a medical evaluation must be conducted to determine the employee's ability to use a respirator and no health conditions deemed unsafe for respiratory protection use in occupational settings. This can be done by many workplace medical clinics, physicians or online with medical respiratory certification organizations.

4. **Fit-Testing:** Required by OSHA 29 CFR 1910.134

- Must be done for all positive and negative pressure tight-fitting respirators
- Must be conducted before the respirator is used in the workplace
- Must be conducted at least once a year or when a user has had a significant change in weight, dental procedures, facial reconstruction, etc.
- Qualitative (QLFT) Fit testing: Uses chemical agents to challenge respirator fit.
- Quantitative (QNFT) Fit testing: Objective test results using an instrument that provides quantitative results. (i.e. Porta Count machine)

5. **Proper Use of Respirators**

Be sure to review application and manufacturer's instruction manual.

6. **Care & Maintenance Review**

Be sure to review application and manufacturer's instruction manual.

7. **Monitor Air Quality**

Develop a monitoring plan (when and how) and factor in work process.

8. **Employee Training/Information**

Be sure to schedule and document user respiratory protection training and use.

9. **Program Evaluation** – Verify the effectiveness of the plan.

Education & Support Resources/Links

MSDS sheets are a great reference tool to help you determine some of the above.

- OSHA: www.osha.gov
- NIOSH: www.cdc.gov/niosh

Respiratory Protection – OSHA Standards & Enforcement 1910.134 Respiratory Standard *Respiratory Protection. - 1910.134 | Occupational Safety and Health Administration (osha.gov)*

eTools | Respiratory Protection eTool - Respirator Basics | Occupational Safety and Health Administration (osha.gov)

OSHA Technical Manual – Respiratory Protection
OSHA Technical Manual (OTM) | Occupational Safety and Health Administration

Small Entity Compliance Guide – Sample Respiratory Program
Small Entity Compliance Guide for the Respiratory Protection Standard (osha.gov)

www.mscdirect.com/betterMRO

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