

RESPIRATORY PROTECTION PROGRAM

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I. PURPOSE

- A. This Respiratory Protection Program specifies standard operating procedures to protect all employees from respiratory hazards. In the control of those occupational diseases caused by breathing air contaminated with harmful dusts, fogs, mists, sprays, fumes, gases, smokes or vapors, the primary objective shall be to prevent atmospheric contamination. Management must establish work-site specific procedures and elements for required respirator use according to the requirements of 29 CFR 1910.134 (OSHA). Respirators are to be used only where engineering controls of respiratory hazards is not feasible, while engineering controls are being installed or in emergencies. The following program applies to the use of all respirators beyond a dust mask that would be used for voluntary use.
- B. It shall be noted that GTC does not currently perform any activities requiring respiratory protection. Should there be circumstances requiring their use, the following policy has been established.

II. ADMINISTRATIVE DUTIES

Management shall assign a Respiratory Protection Program Administrator. The Program Administrator shall manage each of the basic elements in this program and is authorized to amend these instructions. The Program Administrator shall be qualified by appropriate training and experience that is commensurate with the complexity of the program and reviews this program annually to ensure its effectiveness.

III. RESPIRATOR SELECTION

Respirators shall be selected on the basis of respiratory hazards to which the worker is exposed and workplace factors that affect respirator performance and reliability. A work-site specific hazard assessment shall be conducted to identify contaminants and the potential for employee exposure. Manufacturer's assistance, MSDS's, atmospheric sampling and other recognized data are consulted if there is any question regarding proper selection.

IV. RESPIRATOR TYPES AND USES

The following types of respirators are in use in this facility for the following uses:

V. MEDICAL EVALUATIONS

- A. A medical evaluation to determine whether an employee is able to use a given respirator is an important element of the Respiratory Protection Program and is necessary to prevent injuries, illnesses, and even, in rare cases, death from the physiological burden imposed by respirator use.
- B. Employees will not be assigned to tasks requiring use of respirators nor fit tested unless it has been determined that they are physically able to perform the assigned work and use the respirator. (Please see Appendix A Procedures for Qualification for Respiratory Protection.)
- C. Management shall utilize a private practice physician and/or licensed respiratory therapist as their (PLHCP) to perform medical evaluations using the medical questionnaire found in Appendix B.
- D. All medical questionnaires and examinations are confidential and handled during the employee's normal working hours or at a time and place convenient to the employee. The medical questionnaire is administered so that the employee understands its content. All employees are provided an opportunity to discuss the questionnaire and examination results with the PLHCP.
- E. The PLHCP shall be supplied with the following information so that he/she can make an accurate recommendation concerning an employee's ability to use a respirator:
 - 1. Type and weight of the respirator to be used by the employee;
 - 2. Duration and frequency of respirator use (including use for rescue and escape);
 - 3. Expected physical work effort;
 - 4. Additional protective clothing and equipment to be worn;
 - 5. Temperature and humidity extremes that may be encountered.
- F. The PLHCP will submit written documentation of the recommendation regarding the employee's ability to wear the respirator. This recommendation will be submitted to Management only and detail the following:
 - 1. Limitations or restrictions on respirator use related to the medical condition of the employee or relating to the workplace conditions in which the respirator will be used, including whether or not the employee is medically able to use the respirator;
 - 2. The need, if any, for follow-up medical evaluations; and

3. A statement that the PLHCP has provided the employee with a copy of the PLHCP's written recommendation.

VI. FOLLOW-UP MEDICAL EXAMINATION:

A follow-up medical examination will be provided if a positive response is given to any questions 1 through 8 in Section 2, Part A of Appendix B or if an employee's initial medical examination demonstrates the need for a follow-up medical examination. Follow-up medical examinations may include tests, consultations, or diagnostic procedures that the PLHCP deems necessary to make a final determination.

VII. ADDITIONAL MEDICAL EXAMINATIONS:

Management shall provide additional medical evaluations if:

- A. An employee reports medical signs or symptoms that are related to the ability to use a respirator;
- B. A PLHCP, Supervisor, or the Respiratory Protection Program Administrator informs the employer that an employee needs to be reevaluated;
- C. Information from the respiratory protection program, including observations made during fit testing and program evaluation, indicates a need for employee reevaluation; or
- D. A change occurs in workplace conditions (e.g., physical work effort, protective clothing, temperature) that may result in an increase in the physiological burden placed on an employee.

An employee may obtain a copy of the confidential medical evaluation or questionnaire by contacting the PLHCP.

VII. FIT TESTING PROCEDURES

- A. It is axiomatic that respirators must fit properly to provide protection. If a tight seal is not maintained between the face piece and the employee's face, contaminated air will be drawn into the face piece and be breathed by the employee. Fit testing seeks to protect the employee against breathing contaminated ambient air and is one of the core provisions of the Respiratory Protection Program.
- B. In general, fit testing may be either qualitative or quantitative. Qualitative fit testing (QLFT) involves the introduction of a gas, vapor or aerosol test agent into an area around the head of the respirator user. If the user can detect the presence of the test agent through subjective means, such as odor, taste or irritation, the respirator fit is inadequate.

- C. In a quantitative respirator fit test (QNFT), the adequacy of respirator fit is assessed by measuring the amount of leakage into the respirator, either by generating a test aerosol as a test atmosphere, using ambient aerosol as a test agent or using controlled negative pressure to measure the volumetric leak rate. Appropriate instrumentation is required to quantify respirator fit in QNFT.
- D. Management ensures that employees are fit tested at the following times with the same make, model, style and size of respirator that will be used:
1. Before an employee is assigned to a task requiring the use of a respirator with a negative or positive pressure tight-fitting face piece;
 2. Whenever a different respirator face piece (size, style, model, or make) is used;
 3. At least annually;
 4. Whenever the employee reports, the company, PLHCP, Supervisor or Program Administrator makes visual observations of changes in the employee's physical condition that could affect respirator fit. Such conditions include, but are not limited to, facial scarring, dental changes, cosmetic surgery or an obvious change in body weight; and
 5. When the employee, subsequently after passing a QLFT or QNFT, notifies the company, Program Administrator, Supervisor, or PLHCP that the fit of the respirator is unacceptable. That employee will be re-tested with a different respirator face piece.
- E. An employee must pass the necessary fit test as required for the specific respirator and as outlined in the protocol and procedures contained in 29 CFR 1910.134 Appendix A:
1. QLFT (Only used to fit test negative pressure air-purifying respirators that must achieve a fit factor of 100 or less. May be used to test tight-fitting atmosphere-supplying respirators and tight-fitting powered air-purifying respirators if tested in the negative pressure mode); or
 2. QNFT (May be used to fit test a tight-fitting half face piece respirator that must achieve a fit factor of 100 or greater OR a tight-fitting full face piece respirator that must achieve a fit factor of 500 or greater OR tight-fitting atmosphere-supplying respirators and tight-fitting powered air-purifying respirators if tested in the negative pressure mode).

Please see Appendix C Respirator Fit-Test Procedures for a copy of the workplace specific fit testing procedures/protocol.

VIII. PROPER USE PROCEDURES

- A. Once the respirator has been properly selected and fitted, its protection efficiency must be maintained by proper use in accordance with 29 CFR 1910.134(g). Policies, procedures, training and observation ensure that respirators are used properly in the workplace.
- B. Management utilizes the following checklist to ensure that proper use procedures include coverage of OSHA requirements:
 - 1. Face piece seal protection
 - Do not permit respirators with tight-fitting face pieces to be worn by employees who have:
 - a. Facial hair that comes between the sealing surface of the face piece and the face or that interferes with valve function; or
 - b. Any condition that interferes with the face-to-face piece seal or valve function.
 - 2. If an employee wears corrective glasses or goggles or other personal protective equipment, ensure that such equipment is worn in a manner that does not interfere with the seal of the face piece to the face of the user.
 - 3. For all tight-fitting respirators, ensure that employees perform a user seal check each time they put on the respirator using the procedures detailed in respirator training.
- C. Continuing Respirator Effectiveness
 - 1. Management will be responsible for appropriate surveillance of work area conditions and degree of employee exposure or stress. When there is a change in work area conditions or degree of employee exposure or stress that may affect respirator effectiveness, the respirator shall be reevaluated.
 - 2. Ensure that employees leave the respirator use area:
 - 3. If the employee detects vapor or gas breakthrough, changes in breathing resistance or leakage of the face piece, the employee must leave the area to replace or repair the respirator before allowing the employee to return to the work area.
- D. Procedures for IDLH Atmospheres
 - 1. The ONLY time an employee may be required to enter an IDLH atmosphere wearing a supplied air respirator would be in the unlikely

event that an emergency rescue becomes necessary requiring their use. Note: Under normal operating conditions, employees work activities would not require them to work in IDLH environments.

2. If, in the unlikely event that an emergency rescue is identified as IDLH requiring the use of a supplied air respirator, a qualified Rescue Team member will ensure that:
 - a. At least one employee or, when needed, more than one employee is located outside the IDLH atmosphere;
 - b. Visual, voice, or signal line communication is maintained between the employee(s) in the IDLH atmosphere and the employee(s) located outside the IDLH atmosphere;
 - c. The employee(s) located outside the IDLH atmosphere are trained and equipped to provide effective emergency rescue;
 - d. Management is notified before the employee(s) located outside the IDLH atmosphere enter the IDLH atmosphere to provide emergency rescue;

IX. MAINTENANCE AND CARE PROCEDURES

A. Management shall maintain company-owned equipment. If it were required to be onsite for a potential hazard, equipment may be purchased or rented from a credible certified source specializing in this field.

B. Cleaning & disinfecting

Management relies on only qualified individuals to maintain respirators while in their possession. Other than general cleaning and disinfecting the face piece, all other maintenance would be the responsibility of the manufacturer. Management would ensure that respirators are cleaned and disinfected using the following procedures:

The respirators are cleaned and disinfected at the following intervals:

Respirator type:	Interval for cleaning and disinfecting:

C. Storage

1. Storage of respirators must be done properly to ensure that the equipment is protected and not subject to environmental conditions that may cause deterioration or deformity. Management ensures that