

SAFETY & HEALTH NOTE

Assistant Secretary for Environment, Safety & Health • U.S. Department of Energy • Washington, D.C. 20585

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OSHA Revises Respirator Standard

Overview

The Occupational Safety and Health Administration (OSHA) has revised the respiratory protection standard. The final standard, Title 29 Code of Federal Regulations Part 1910.134 (29 CFR 1910.134), goes into effect on April 8, 1998, with full compliance required by October 5, 1998. This standard requires selection of National Institute for Occupational Safety and Health (NIOSH)-certified respirators (42 CFR 84), specifies that these respirators be used based on NIOSH certification conditions, and requires administration of an effective respiratory protection program.

Department of Energy (DOE) sites are presently required by DOE Order 440.1, *Worker Protection Management for DOE Federal and Contractor Employees*, September 30, 1995, to implement the OSHA respirator standard and American National Standards Institute (ANSI) Z88.2, *Practices for Respiratory Protection*. ANSI Z88.2 is more protective and up-to-date on respiratory protection technologies than the former OSHA respiratory standard. The newly revised standard, 29 CFR 1910.134, incorporates many requirements from the ANSI standard. DOE Federal Employee Occupational Safety and Health (FEOSH) programs should incorporate the new respirator standard requirements to ensure the protection of Federal employees.

Requirements

Requirements in the revised OSHA standard include program administration; worksite-specific procedures; respirator selection; employee training; fit testing; medical evaluation; respirator use; respirator cleaning, maintenance, and repair; and other provisions. Current respirator technology, simplification of respirator requirements by deleting duplicative provisions in OSHA substance-specific standards, and consistency for all other respirator-related provisions are addressed in the standard.

For DOE, the revised OSHA standard reduces the number of semi-annual fit tests administered, since several substance-specific health standards

previously required semi-annual fit testing. Now, all negative pressure and tight-fitting positive pressure respirators must be fit tested before use, and annually thereafter. The revised respirator standard also permits the use of one valid quantitative fit test, instead of three tests, as previously required under the OSHA lead and asbestos standards.

The required use of disposable dust masks may be affected by the requirement for effective user seal checks to be performed every time a mask is put on. The installation of an end-of-service life indicator (ESLI) or the implementation of a change schedule lets the user know when it is time to change cartridges or canisters. If use of respirators is required, including use of disposable respirators, then employers are to implement a full respirator program, including employee fit testing and medical evaluation. Also, disposable respirators may be reused, as long as the required level of protection is provided.

Omitted from the revised standard is a listing of assigned protection factors (APF). This deficiency will be corrected in future OSHA rulemaking. DOE currently uses the APFs listed in ANSI Z88.2, as a minimum.

Impact

Issuance of the revised OSHA standard results in minimal impact to DOE sites. DOE has always required and continues to require the most protective standards for the safety and health of its Federal and contractor employees and keeps abreast of respirator protection changes. Following are the salient impacts.

- 1) In interior structural firefighting, there must be a minimum of two rescuers outside the area.** Firefighters will go in as a "buddy pair," and another "buddy pair" will remain outside as potential rescuers. In the OSHA revised respirator standard, this is a "new" Immediately Dangerous to Life and Health (IDLH) requirement.

2) Employees voluntarily using “dust masks” are not automatically covered by the employers’ respirator program, but must be provided an information sheet, e.g., Appendix D of the standard, that describes the uses and limitations of voluntary respirators. However, employees voluntarily using tight-fitting respirators must be medically evaluated and held accountable for cleaning and disinfecting those respirators per the employers’ respirator program.

3) Using portable quantitative fit testing devices is now permissible. Although this type of equipment has long been in use, it had not been recognized in the standard as an approved means of conducting required fit testing. Several previous OSHA interpretations address the use of portable quantitative fit testers, also known as portacounts, and may be accessed at http://www.osha-slc.gov/OshDoc/toc_interps.html.

4) A qualified person(s) at large companies or multiple worksites may be delegated responsibility for site-specific or day-to-day operations by the Program Administrator. However, the Program Administrator is responsible for overall program operations.

To provide comments on how the new standard will impact your site or to obtain more information on the revised OSHA respirator standard, electronically submit a question via the web site at <http://tis-nt.eh.doe.gov/whs/policy/> or contact Dan Marsick at (301) 903-3954 or e-mail at dan.marsick@eh.doe.gov.

NOTE: This publication is a partial review of the new respirator standard. Please refer to the January 8, 1998, Federal Register for complete information on the new respiratory protection requirements.



This Safety & Health Note is one in a series of publications issued by EH to share occupational safety and health information throughout the DOE complex. To be added to the Distribution List or to obtain copies of the publication, call **1-800-473-4375** or **(301) 903-0449**. For additional information regarding the publications, call Mary Cunningham at **(301) 903-2072**.