Respiratory Protection Program Review

March 10, 2020
Personal Protective Equipment
Standard Number 1910.134
Respiratory Protection

Regulations (Standards - 29 CFR) - Table of Contents

• Part Number: 1910
• Part Title: Occupational Safety and Health Standards
• Subpart: I
• Subpart Title: Personal Protective Equipment
• Standard Number: 1910.134
• Title: Respiratory Protection.
• Appendix: A, B-1, B-2, C, D
A respirator shall be provided to each employee when such equipment is necessary to protect the health of such employee. The employer shall provide the respirators which are applicable and suitable for the purpose intended. The employer shall be responsible for the establishment and maintenance of a respiratory protection program, which shall include the requirements outlined in paragraph (c) of this section. The program shall cover each employee required by this section to use a respirator.
1910.134(c)(2)
Where respirator use is not required

1910.134(c)(2)(i)
An employer may provide respirators at the request of employees or permit employees to use their own respirators, if the employer determines that such respirator use will not in itself create a hazard. If the employer determines that any voluntary respirator use is permissible, the employer shall provide the respirator users with the information contained in Appendix D to this section ("Information for Employees Using Respirators When Not Required Under the Standard"); and
1910.134(c)(2)(ii)

In addition, the employer must establish and implement those elements of a written respiratory protection program necessary to ensure that any employee using a respirator voluntarily is medically able to use that respirator, and that the respirator is cleaned, stored, and maintained so that its use does not present a health hazard to the user.

Exception: Employers are not required to include in a written respiratory protection program those employees whose only use of respirators involves the voluntary use of filtering facepieces (dust masks).
WHY – WHO – WHEN - WHAT IF?

In establishing a Respirator Program, the employer MUST determine…

1) WHY a respirator is needed. The WHY is:
   a) Identifying the contaminant – a dust, fume, mist, smoke, gas or vapor- different forms of air contaminants may require different types of protection.
   b) Determining the level of contamination against the allowable exposure limits since respirators are rated as 5 times, 10 times, etc. the PEL
In establishing a Respirator Program, the employer MUST determine…

2) **WHO must wear a respirator.** This is usually determined by air sampling the occupation.
   
   a) The results that indicate exposures above the OSHA Permissible Exposure Limit will require Respiratory Protection until the exposures are brought below the PEL for ALL persons doing the tasks sampled.
b) Testing can identify SPECIFIC tasks done for part of the work shift or done on some but not all days.

c) Unusual conditions may lead employers to require respirators or they may be required when new chemicals are brought into the workplace and protection is provided until air sampling is completed and shows exposures below the PEL.
WHAT IF the respirators that are normally used are NOT available? For example, in the current situation where it is nearly impossible for facilities to obtain N95 respirators?

Will hospitals and government emergency response agencies get priority? We don’t have that answer.

Is there a “dispensation” for the scarcity of respirators? No.
What to DO...

1) Be certain that those workers REQUIRED to wear respiratory protection do wear adequate protection.

2) If you allow VOLUNTARY protection, it needs to be adequate for the hazard presented. Employees may “smell” an odor – the N95 is NOT protection against gases and vapors.

3) One strap masks are NOT acceptable protection in the industrial workplace!
February 6, 2006
Mr. Gordon C. Miller
Lawrence Livermore Laboratory
P.O. Box 808 (L-379)
Livermore, California 94550

Dear Mr. Miller:

Thank you for your March 29, 2004 letter to the Occupational Safety and Health Administration (OSHA), Directorate of Enforcement Programs, concerning the voluntary use of filtering facepiece respirators. This letter constitutes OSHA's interpretation only of the requirements discussed and may not be applicable to any questions or situations not delineated within your original correspondence. Your questions are repeated below along with our response.
Proper Use

Question #2: Does an employer have an obligation to ensure that a voluntarily used filtering facepiece is properly donned in accordance with manufacturer's instructions and worn properly (e.g., can the employer prohibit using a filtering facepiece if the user cuts off one of the straps)? Does an employer have an obligation to ensure that a voluntarily used filtering facepiece of a contractor employees working on the principal employer's premises is properly donned in accordance with manufacturer's instructions and worn properly (e.g., can the employer prohibit using a filtering facepiece if the user cuts off one of the straps)?

Response: The standard does not require employers to ensure that workers, voluntarily using filtering facepiece respirators in atmospheres which are not hazardous, wear these respirators according to the manufacturers' instructions, as long as the use of the mask itself is not creating a hazard. Employers may, however, prohibit such misuse as part of their respirator program.
Question #3: If an industrial hygienist specifies or suggests using a filtering facepiece respirator for situations where exposures above a permissible exposure limit (PEL) will not occur, is this considered a voluntary use of a respirator?

Response: If an industrial hygienist responsible for the safety and health of employees in a company requires a respirator to be worn in a particular area, even when airborne contaminants are determined to be below all PELs or other recognized exposure limits, any respirator use would not be considered voluntary.
Question #4: If the industrial hygienist allows or agrees to the use of a filtering facepiece, is this a voluntary use of a respirator?

Response: If an industrial hygienist allows the voluntary use of a respirator to be worn in the workplace and all airborne contaminants are below OSHA PELs or other recognized exposure limits, the respirator use would still be considered voluntary.
November 22, 2011

Mr. Edwin G. Foulke  
Fisher & Phillips LLP  
1075 Peachtree Street, NE  
Suite 3500  
Atlanta, GA 30309

Dear Mr. Foulke:
Thank you for your letter of April 11, 2011, to the Occupational Safety and Health Administration (OSHA) requesting clarification on several provisions in OSHA's respiratory protection standard. Each of your questions has been paraphrased below, followed by our response. This letter constitutes OSHA's interpretation only of the requirements discussed, and may not be applicable to any question not delineated in your original correspondence.
Question 1: How does OSHA define a filtering facepiece/dust mask?

Response: A filtering facepiece respirator is defined in 29 CFR 1910.134(b) as "a negative pressure particulate respirator with a filter as an integral part of the facepiece or with the entire facepiece composed of the filtering medium."

Question 2: How does OSHA differentiate between a filtering facepiece and a respirator?

Response: As stated above, a filtering facepiece is a negative pressure respirator. It is considered to be in the same category as an elastomeric half-mask respirator, and both respirators have an assigned protection factor (APF) of 10.
MINOR Exposures

**Question 5:** In a situation where an employee is working in an area with minor dust exposure, where no respiratory hazards exist, and where an employee is voluntarily using an N95 filtering facepiece respirator, does this use fall within the scope of the exception provided in paragraph 1910.134(c)(2)(ii)?

**Response:** Yes; according to the exception, if the employer allows N95 filtering facepiece respirators to be voluntarily used by employees in areas that have no respiratory hazards, the employer is not required to include these employees in a written respiratory protection program.
What MUST be provided to Voluntary Users of Respirators?

**Question 6:** Which provisions of the respiratory protection standard must be followed when an N95 filtering facepiece respirator is voluntarily used?

Response: If the employer allows employees to voluntarily use filtering facepiece respirators, the employer must follow the appropriate provisions in (c)(2). The employer must determine that such respirator use will not in itself create a hazard (i.e., by ensuring that masks are not used if dirty or contaminated, and that their use does not interfere with the employee's ability to work safely). The employer also must provide the information in Appendix D to each voluntary wearer.
Maintenance of Disposable Respirators

Question 7: If OSHA considers the N95 filtering facepiece a respirator covered by the respiratory protection standard, what parts of paragraph (h) involving "maintenance and care of respirators" are applicable? Does the employer have to comply with Appendix B-2 involving "Respirator Cleaning Procedures"?

Response: The N95 filtering facepiece respirator is a "disposable respirator." It must be discarded after use, or when it becomes damaged or soiled. It cannot be cleaned and disinfected according to the method described in Appendix B-2. OSHA is presently not aware of any alternate procedures provided by respirator manufacturers in their user instructions that would allow for cleaning and disinfecting their filtering facepiece respirators.
Disposable Respirator Use Requirements

Many requirements in paragraph (h), however, would still be applicable to N95 filtering facepiece respirators. For example, employers must provide respirators that are clean, sanitary, and in good working order [(h)(1)]. If a respirator cannot be cleaned and disinfected, it may not be used by more than one user [(h)(1)(ii)], and, once soiled or contaminated, it can no longer be maintained in a sanitary condition [(h)(1)(i)] and must be discarded. If respirators are to be reused, they must be stored to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture, and damaging chemicals; and they must be stored to prevent deformation of the facepiece or exhalation valve [(h)(2)(i)]. Employers must also ensure the respirators are inspected before each use [(h)(3)(i)(A) and (ii)]. Respirators that fail an inspection, or are otherwise found to be defective, must be removed from service [(h)(4)].
NIOSH-Approved N95 Particulate Filtering Facepiece Respirators

From the CDC Website:

NIOSH-Approved Particulate Filtering Facepiece Respirators

This site provides a listing of NIOSH-approved particulate filtering facepiece respirators. This type of air-purifying respirators protects by filtering particles out of the air the user is breathing. There are seven classes of filters for NIOSH-approved filtering facepiece respirators available at this time. Ninety-five percent is the minimal level of filtration that will be approved by NIOSH. The N, R and P designations refer to the filter's oil resistance as described below.

http://www.cdc.gov/niosh/npptl/topics/respirators/disp_part/default.html#labels
N95 vs N100 Respirators

N95 - Filters at least 95% of airborne particles. Not resistant to oil.
Surgical N95 - A NIOSH-approved N95 respirator that has also been cleared by the Food and Drug Administration (FDA) as a surgical mask.
N99 - Filters at least 99% of airborne particles. Not resistant to oil.
N100 - Filters at least 99.97% of airborne particles. Not resistant to oil.
R95 - Filters at least 95% of airborne particles. Somewhat resistant to oil.
P95 - Filters at least 95% of airborne particles. Strongly resistant to oil.
P99 - Filters at least 99% of airborne particles. Strongly resistant to oil.
P100 - Filters at least 99.97% of airborne particles. Strongly resistant to oil.
Filtering Facepiece Respirator (FFR)

LABELS

Individual filtering facepiece respirators are required to have the following markings:

1. Name of Approval holder/manufacturer business name, a registered trademark, or an easily understood abbreviation of the applicant/approval holder’s business name as recognized by NIOSH. When applicable, the name of the entity to which the FFR has been private labeled by the approval holder may replace the approval holder business name, registered trademark, or abbreviation of the approval holder business name as recognized by NIOSH.

2. NIOSH in block letters or the NIOSH logo

3. NIOSH Testing and Certification approval number, e.g. TC-84A-XXXX.

4. NIOSH filter series and filter efficiency level, e.g. N95, N99, N100, R95, P95, P99, P100

5. Model Number or part number: The approval holder’s respirator model number or part number, represented by a series of numbers or alphanumeric markings, e.g. 8577 or 8577A.

NIOSH recommends the lot number and/or date of manufacture also be included, however, this is not required.
If You Have Voluntary Use of Respirators

• BE SURE you understand what is required and what is NOT

• BE SURE your Personal Protective Equipment Program clarifies that the use is VOLUNTARY and limits use to “dust masks”

• BE SURE supervisors and management does NOT enforce wearing of respirators as MANDATORY

• DO provide the required APPENDIX D
Where We Are Today
3M

Disposable Respirator, N95, Universal, PK20

Item # 3KP43  Mfr. Model # 8210  Catalog Page # 1759  UNSPSC # 46182002

Web Price $21.94 / pkg. of 20

Shipping Weight 0.56 lbs.

Country of Origin USA  |  Country of Origin is subject to change.

Note: Product availability is real-time updated and adjusted continuously. The product will be reserved for you when you complete your order. More

How can we improve our Product Images?

Compare

Product Details
General industrial respirator protects against certain non-oil-based particles and makes breathing easier and cooler with electrostatically charged...
Alternatives

Honeywell P100 Filter for Half Mask Full Face Mask Respirators (10 Each Per Box) by Honeywell

Currently unavailable.
We don't know when or if this item will be back in stock.
- Half mask
- APR Masks, Cartridges & Filters

Specifications for this item

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See more product details

Report incorrect product information.

Currently unavailable.
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Add to List

Have one to sell?
Sell on Amazon

3 PCS Unisex Face Mask
Face Mask Unisex Mouth Mask Dust Mask Anti Pollution Mask Reusable Cotton Face...
$14.99
3M 6200 HALF MASK RESPIRATOR WITH P100 FILTER Respiratory Reusable CARTRIDGES
Brand New

$39.90
Buy It Now
Free Shipping
Watch

Single P3 filter half-mask respirator SCOTT AVIVA 40 mm NEW USA seller in stock
Brand New

$94.99
Buy It Now
Free Shipping
Watch
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:
N P100 Particulate Filter Cartridge

by Honeywell

Price: $13.19 ($6.60 / Each Set) & FREE Shipping

New (3) from $13.19 + FREE Shipping

Specifications for this item

- Brand Name: Honeywell
- Height: 1.0 inches
- Included Components: Cartridges & Filters
- Length: 5.5 inches
- Measurement System: US
- Model Number: 7580P100
- Number of Items: 2

Deliver to MARTHA Green Lane 18054

In Stock.

$13.19 + Free Shipping

Add to Cart
Buy Now

Ships from and sold by RB SUPPLY.
Cover your bases - Utilize cartridges to help protect against certain gas and vapors, combined with filters for protection against particulates.

Fewer worries - Rugged, durable faceshield with premium visor helps protect against sparks and debris.

Feel heightened comfort - Heavy-duty belt designed with airflow channels, multiple size adjustments and belt extender options. More...
Powered Air Purifying Respirator Assembly Painters Kit, Universal, Belt-Mounted
Item # 475M27
Mfr. Model # 94248
Catalog Page # N/A
View Product Details

Powered Air Purifying Respirator Easy Clean Kit, Universal, Belt-Mounted
Item # 475M28
Mfr. Model # TR-800-ECK
Catalog Page # N/A
View Product Details
Try your REGULAR Supplier

Get on the waiting list if needed!
Evaluate WHO must wear WHAT and WHEN.
Be careful and conserve the respirators that you DO HAVE.
Be sure to meet the Respiratory Protection Program requirements.
PLEASE CALL US WITH ANY QUESTIONS ON THE USE OF RESPIRATORS OR YOUR RESPIRATORY PROTECTION PROGRAM!
Non-Ferrous Founders’ Society
Occupational Safety & Health Training

For further information about this or other training modules:

Non-Ferrous Founders’ Society
905 E. Chicago Road, Suite One
Sturgis, MI 49091
847-299-0950
www.nffs.org