

U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration
WASHINGTON, D.C. 20210



JAN 19 1979

Mr. Joseph Michael Sullivan
Industrial Hygiene Engineer
Armo Incorporated
Middletown Works
Middletown, Ohio 45043

PLAINTIFF'S EXHIBIT

MON-2557

Dear Mr. Sullivan:

This is in reply to your letter of November 15, 1978, regarding respirator face seal. You are seeking clarification of 29 CFR 1910.134 (e) (5):

"Respirators shall not be worn when conditions prevent a good face seal. Such conditions may be a growth of beard, sideburns, a skull cap that projects under the facepiece or temple pieces on glasses."

Facial hair which lies between the respirator sealing surface and the skin can cause leakage around the facepiece and reduce the effectiveness of the respirator in providing the necessary protection from airborne contaminants. Since proper facepiece fit is basic to an effective respiratory protective program, it is the employer's responsibility to assure that each employee is properly fitted and an adequate seal is maintained. In almost all circumstances this will require the wearer's face to be clean-shaven where the respirator seals against it. The specific necessities of shaving or trimming facial hair will vary from individual to individual. However, if the extent of the beard growth of an employee would impair a proper respirator seal, the employer would be in violation of this OSHA regulation. The standard was designed to protect the health and safety of workers to the greatest possible extent.

I hope this will clarify our position. If I can be of further assistance feel free to contact me.

Sincerely,

R. Hays Bell, Ph.D.
Director of Technical Support

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