

INTRACOMPANY CORRESPONDENCE

R-9b (Rev. 1-68)



FROM: Ronald E. Benton - Industrial Hygiene, GOB

TO: ERNIE SWEET - SHERWIN ALUMINA PLANT

COPY: David V. Hopkins - Sherwin;
Dr. E. C. Irby - Med., EXO

DATE &
SUBJECT: April 4, 1985

RESPIRATORY PROTECTION



Enclosed is a Mine Safety and Health Administration (MSHA) policy memorandum dated March 4, 1985, setting forth guidelines to be used by inspectors in conducting the effectiveness of an operator's respiratory protection program.

MSHA's memo stresses the importance of proper selection and fit testing, and instructs the inspector to issue a "significant and substantial" violation when an operator's program fails to properly include these elements.

In order to determine the current status of your Respiratory Protection Program, please provide to me a list of all respirators used at your facility and indicate where they are used. In addition, please indicate whether or not the employees have been trained or fit-tested with their respirators. If you have a written Respiratory Protection Program, please send a copy to me.

Once I have received and reviewed this information, I will develop a compliance strategy for your location.

If you have any questions, please contact me.

Ronald E. Benton
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REB/mjm

Enc.

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U.S. Department of Labor

Mine Safety and Health Administration
4015 Wilson Boulevard
Arlington, Virginia 22203

MAR 22 1985



March 4, 1985

MSHA POLICY MEMORANDUM NO. 84-5MM

SUBJECT: Respiratory Protection

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Standard 55/56/57.5-1(a) requires that a miner's exposure shall not exceed the permissible limit of any substance on the TLV list. When the Threshold Limit Value (TLV) is exceeded, standard 55/56/57.5-5 mandates that operators must install all feasible engineering controls to reduce a miner's exposure to the TLV. Respiratory protection is required while establishing controls, when controls are not feasible, and during occasional entry into hazardous atmospheres to perform short-term maintenance or investigations. Whenever respirators are required, operators must establish a respirator program containing all elements of the standard, which incorporates American National Standards Institute (ANSI) Z88.2-1969.

The inspector must evaluate the effectiveness of the respiratory protection in order to determine whether miners are protected from overexposure. If the operator's respiratory protection program fails to include proper selection and fit testing, the 55/56/57.5-1(a)/-5 violation should be significant and substantial ("S and S").

Respirator selection directly affects the efficiency of the respirator. Respirators are designed to protect wearers from inhalation of hazardous atmospheres. There are many different types of respirators but each is limited in protection and application. A respirator can only protect against atmospheres for which it is designed. Without proper selection a serious health hazard may occur.

A serious hazard may also occur if the respirator, even though properly selected, is not fitted as required by the standard. Fit testing is essential in order to assign the correct model and size respirator to a miner. Otherwise, it is likely that the respirator will leak and the miner will be overexposed to the toxic substance.

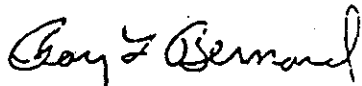
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There are other factors that should be considered by the inspector on a case by case basis when determining whether the violation should be "S and S" with regard to an operator's ~~respiratory protection~~ program. These factors include training, cleaning and sanitizing, and maintenance of respirators.

With regard to listed nuisance particulates, operators must use engineering controls to reduce exposure to the permissible limit and comply with the respiratory protection requirements of standard 55/56/57.5-5. However, the 55/56/57.5-1(a)/-5 citation for overexposure to nuisance particulates should not be "S and S".



Roy L. Bernard
Administrator for Metal and
Nonmetal Mine Safety and Health