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Interoffice Communication

To CORPORATE SAFETY AND INDUSTRIAL HYGIENE
From Michele Malloy, Corporate Services - Houston
Date January 6, 1983
Subject RESPIRATORY PROTECTION PROGRAM PROCEDURES GUIDE

You have each received the final draft of the Respiratory Protection Program Procedures Guide. Page 5 of the Guide states the following:

8. Facial Hair, Contact Lenses and Eye and Face Protective Devices

A respirator equipped with a facepiece must not be worn if facial hair comes between the sealing surface of the facepiece and the face or if facial hair interferes with valve function.....

This is a new corporate-wide policy and necessitates that any facility employee who could be reasonably expected to make use of a respirator would need to be clean-shaven or be able to demonstrate that his facial hair does not affect the seal. Strict adherence to this policy, when it becomes final, is necessary to avoid legal liability. Deviation from any written corporate policy can be used to indicate gross negligence or an intentional tort. If the latter is proven, an employee can circumvent worker's compensation as his sole remedy and sue the employer directly.

Please advise of any questions.



Attorney

cc: Eric Ruehl
Joe Watson

SAL 000046582

CONOCO CHEMICALS: RESPIRATOR/FACIAL HAIR POLICY STATEMENT

PURPOSE

The purpose of this document is to clearly define the Chemicals Division's policy concerning respirator use with facial hair and to assist plants in developing respiratory protection procedures and policy. The principles outlined below are to be considered the minimum and individual plants may develop procedures that exceed these principles.

BACKGROUND

All respirators designed to achieve a tight face seal provide their maximum protection when no facial hair is in the seal area. However, certain respirators may provide adequate protection for bearded workers under some circumstances. No simple general rule is appropriate for all situations. Decisions on facial hair for specific respirator uses and conditions of use should be based on the following considerations.

A. Negative Pressure Respirators

1. Persons who wear face-fitting negative pressure respirators (including demand-type SCBA) during routine duties required for their job performance, or for purposes other than emergency egress, must be clean shaven. The one exception to this is outlined in A.2. below.

*Note 1

2. If respirators are provided at the desire of the worker when exposure levels are below permissible limits, facial hair will be allowed if the following conditions are met:
 - a. No reasonably anticipated condition could cause exposure limits to be exceeded.

- b. Optional use situations are clearly separated from areas where respirators are required.
- c. The workers are instructed in the specific limitations of facial hair and negative pressure respirators.
- d. The rationale and conditions of the exemption are documented.
- e. All other portions of the respirator program (inspection, cleaning, and storage, etc.) are followed.

B. Positive Pressure Respirators

- 1. Pressure demand respirators designed for a tight face seal shall not be used with facial hair in the seal area if:
 - a. the required protection factor might exceed 1,000 or is unknown (such as in fire-fighting).
 - b. in the case of SCBA's, the air volume remaining is a critical factor in the specific use (i.e., egress from confined space is necessary).
- 2. No planned entry of an IDLH atmosphere shall be made by persons with beards.

*Note 2

C. Continuous Flow Respirators

- 1. The same recommendations apply as for Positive Pressure Respirators provided:
 - a. a flow rate of at least 6 cfm is used.
 - b. the duration of air flow is not a consideration. (*Note 2)

NOTES

NOTE 1

If negative pressure respirator users choose to wear a neatly trimmed beard, to provide a proper sealing surface, (i.e. clean shaven in the seal area), it is recommended that some form of fit testing be used to demonstrate a proper fit.

NOTE 2

Actual fit testing data has shown that due to continual leakage, a beard may reduce the air supply duration of a SCBA with light exercise by as much as 20%. This consideration is especially important when the use of 5-minute emergency egress bottles is necessary.

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