

Interoffice Memorandum

TO (Name and Location) * LISTED BELOW	DATE 5/7/82
FROM (Name and Location) G. Ille, S.H.E. Department	REFERENCE NO. GI-241-82

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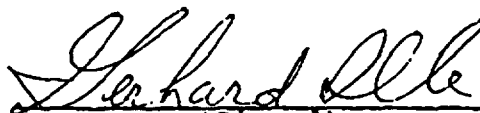
SUBJECT: Draft Bishop AP for Comment/Approval - "Respirator Protection Program"

☐ Approved

☐ Approved with Comments

☐ Not Approved

Please comment by: May 14, 1982


(Signed)

attachment

009864

RESPIRATORY PROTECTION PROGRAM

May 7, 1982

Please review the final draft of the proposed respiratory policy. Although most of you have already approved the policy, some additional changes were made as described below:

1. Facial hair interfering with the respirator seal - The Corporate guideline states that every reasonable effort should be made to fit employees with a type of respirator that provides a good seal allowing for personal preferences such as facial hair. Although a request was made to put that statement into the policy, I thought that it might later get us into trouble. The following statements were made:
 - a. Under employee responsibility: "Work with S.H.E. Department to obtain proper fit test. This may require that an employee trim or shave facial hair when a respirator cannot be properly fitted to ensure a proper fit."
 - b. Under S.H.E. Department responsibility: "Work with employee to obtain a proper fit test. This may require that the S.H.E. Department look for respirators of a new design that will allow an employee to achieve a proper fit test."

I would like the policy to reflect that obtaining a proper fit test is a joint S.H.E. Department/employee responsibility. If an employee with facial hair fails to achieve a proper fit, an airline supplied respirator will probably provide the protection required. If a positive pressure air supplied respirator is satisfactory, the superintendent will be informed. It is the superintendent's ultimate responsibility to determine whether an air supplied respirator is functional for the work and operating condition that exist in his unit, realizing that bottled air is the only approved breathing source.

2. Attachments 1 and 2 lists areas where respiratory protection is required. This listing is NOT all inclusive and will change as engineering controls are installed and new processes built. The policy specifies under supervisor responsibility that supervision shall identify new plant operating conditions that may require respiratory protection and notify the plant industrial hygienist for assessment.
3. The superintendent has the responsibility of identifying all employees required to wear a respirator. Although Attachments 1 and 2 provide some guidelines as to who these people are, respirators may also be required during unit upset conditions, tank overflows, spills, equipment leaks, etc. The superintendent should have an excellent feel for the frequency that these situations occur which require respiratory protection. Other tasks, such as strapping tanks may also require a respirator. Any questions, regarding the requirement for a respirator should be referred to the S.H.E. Department.

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4. The superintendent will be informed of the results of the fit test and must insure that his employees wear the respirator type and size that is approved. Based on the experience of other companies, we hope to fit 98% of the employees requiring a respirator with the MSA respirator that comes in three sizes (small, medium and large) for both the half-face and full-face respirator. When necessary, we can also fit employees with Wilson and Scott respirators.
5. A 6-minute slide/cassette presentation is being prepared. This will be shown in the trailer, prior to an employee being tested. The slide presentation will explain the fit testing system being used, how to put on the respirator and the test protocol being used. The objective of the presentation is to minimize the amount of repetitive instruction required by the test instructor.

Your comments and suggestions in formulating this policy have been appreciated.

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SECTION

SAFETY PROCEDURE

BISHOP NO.

RESPIRATORY PROTECTION PROGRAM

EFFECTIVE

DRAFT REVIEW (5/6/82)

POLICY

Employees will wear respiratory protective equipment in designated respiratory use areas and a proper face seal must be achieved.

All employees identified to wear respirators will be given annual instruction in the proper use and care of a respirator and will be fit tested to insure effective use.

PROCEDURE

A. Hazard Assessment

The Plant Industrial Hygienist is responsible for identifying areas in the plant or particular tasks where respiratory protection is necessary to protect the health of employees.

The superintendent will identify all employees required to wear a respirator. Attachments 1 & 2 list those activities that require the use of a respirator either because of the chemical involved or because the exposure potential is high. Supervision shall also require employees to wear a respirator when excessive vapor concentrations, unit upsets or equipment leaks occur. The industrial hygienist will advise superintendents of new areas where there is a potential for excessive exposure and at least annually update the list of areas requiring respiratory protection.

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B. Selection of the Protective Devices

1. The Plant Industrial Hygienist is responsible for respirator selection.
2. The Plant Industrial Hygienist will prepare a list of approved respirators/cartridges for each operating unit.

C. Training

The supervisor will not assign an employee to a job requiring the use of the respirator until the employee has been trained in respirator use and maintenance.

The S.H.E. Department will instruct the identified employees in the use, maintenance and limitations of respirators; provide each employee an opportunity to handle the respirator, to have it fitted properly, and to wear a respirator in a test atmosphere.

D. Medical Assessment

A medical assessment will be provided to determine if an employee, required to wear a respirator will suffer ill-effects while using it.

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E. Storage, Inspection, Maintenance and Care

1. Employee responsibility.

The employee is responsible for the daily care of his respiratory equipment:

- a. Inspect equipment for defects before use.
- b. Clean respirator after each use.
- c. Replace the cartridge or canister as needed.
- d. Place the respirator in sanitary storage.
- e. Work with S.H.E. Department to obtain proper fit test. This may require that an employee trim or shave facial hair when a respirator cannot be properly fitted to ensure a proper fit.
- f. Check respirator seal prior to entry into contaminated area using positive or negative pressure sealing test.
- g. Return respirator to S.H.E. for repair if employee cannot make proper repair.
- h. Use only the specific make and model of respirator for which employee obtained a satisfactory fit.

2. Supervisor responsibility:

- a. Schedule the training of each employee in the proper use of respiratory protective devices.
- b. Arrange for proper sanitary storage of respirators.
- c. Post barricades to warn of air contamination from leaks or spills.

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- d. Monitor each employee's respirator maintenance program to assure proper respirator care and use.
- e. Identify new plant operating conditions that may require respiratory protection and notify the plant Industrial Hygienist for assessment.

3. S.H.E. Department responsibility:

- a. Arrange for a medical evaluation for all employees required to use a respirator.
- b. Provide employee training in the use, maintenance and limitations of respirators.
- c. Provide employees an opportunity to wear a respirator in a test atmosphere to evaluate the respirator fit.
- d. Work with employee to obtain a proper fit test.
This may require that the S.H.E. Department look for respirators of a new design that will allow an employee to achieve a proper fit test.
- e. Provide inspection, cleaning and maintenance for all respirators.
- f. Maintain records of inspection and repair for all emergency respirators.

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