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John Glass

FROM (NAME & LOCATION)

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DATE

July 20, 1977

cc: OSHA Coordinating Committee
Dr. A. Munn - 5040, Brussels
S&PP Staff

SUBJECT

OSHA MEMO #39
RESPIRATOR SELECTION AND USE

REFERENCE

TO

Location Safety Engineers - U.S.

PLAINTIFF'S EXHIBIT

MOI 599

OSHA has recently issued a chapter on Respiratory Protective Equipment for inclusion in their Hygiene Manual which may affect your location. The new publication includes a directive to field personnel to cite as serious violations the improper selection of respirators, if exposure to toxic air contaminants is involved.

An "acceptable" respirator program, according to the directive, should include 11 requirements. All of these requirements should be considered in inspection of a workplace "where air quality is a potential hazard."

These requirements are:

1. The employer should have a written standard operating procedure for the selection and use of respirators during routine operations and in emergencies.
2. Respirator selection should be based on the hazards to which the employee is exposed.
3. The user should be instructed in the proper use and limitation of respirators.
4. The respirator must be properly fitted.
5. The respirator must be approved by "authorities recognized by OSHA."
6. The respirator should be used at all times when respiratory protection is required.
7. Respirators should be cleaned and disinfected as frequently as necessary to ensure the protection of the wearer.
8. Respirators should be stored in a convenient, clean, and sanitary location.
9. Respirators used routinely should be inspected during cleaning.
10. Defective respirators should be repaired by experienced individuals before use.

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11. There should be regular inspection and evaluation to determine the continued effectiveness of the respiratory protection program.

According to the directive, employers should consider American National Standards Institute standard ANSI Z88.2 in choosing respirators. In addition, it stated that chemical cartridge respirators should not be used for protection against gaseous material that is extremely toxic in very small concentrations, as the "toxicity is entirely too great to chance the minimum protection afforded by chemical cartridge respirators."

Nor should chemical cartridge respirators be used for exposure to harmful gaseous matter that cannot be detected clearly by odor, the directive explained. The directive further asserted that chemical cartridge respirators should not be used for protection against a substance that fails to meet penetration requirements prescribed in 30 CFR 11.162-8.

Quarter or half-mask chemical cartridge respirators, according to the document, should not be used to protect against any gaseous material in concentrations highly irritating to the eyes.

Other serious citations should be issued if:

1. Employees are exposed to atmospheres immediately dangerous to life or health through lack of training in respirator use.
2. Employees enter a dangerous atmosphere wearing improperly fitted respirators.
3. Employees involved in a serious exposure are wearing unapproved or unaccepted respirators.

Generally violations of respirator inspection requirements will be cited as other than serious, except where emergency equipment is involved.

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