



CHEMICAL MANUFACTURERS ASSOCIATION

MEMORANDUM

January 27, 1983

JJA
FBA

TO: CMA OSHA Contacts

FROM: Timothy O'Leary *TFO*

SUBJECT: OSHA Revision of Occupational Exposure to Lead Respirator Testing

On November 12, 1982 OSHA published a significant revision of its rules on Respirator Fit Testing to allow the use of relatively simple and inexpensive Qualitative Fit Testing (QLFT) procedures. The old regulation had mandated initial and periodic (6 month) Quantitative Fit Testing (QNFT) for employees exposed to less than 500 ug/m³ of airborne lead. The new rules demand the same frequency of fit testing, but allow the employer a much wider choice of methods to demonstrate compliance. The employer can now select either QNFT or any one of three different QLFT procedures:

1. Isoamyl Acetate Protocol
2. Saccharin Solution Aerosol Protocol
3. Irritant Fume Protocol

QNFT and the three QLFT protocols have very similar requirements for selection of respirators by the employee. Whereas the QNFT requires expensive and sophisticated equipment to measure particulate concentrations quantitatively and assure a good fit, the QLFT require only low cost, easily obtainable and portable testing equipment. The essential feature of all fit testing is to demonstrate that a protection factor of at least 10 can be obtained when the employee has been given assistance in respirator selection and has been properly trained in its use and care. In all cases the employer has the responsibility to assure that the respirator is properly maintained and used for protection against moderate (<10 X PEL) airborne concentrations of lead.

While none of the other current OSHA regulations mandate respirator fit testing, it may be in the employer's best interest to adapt similar criteria for all their respiratory protection programs.

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