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Interoffice Communication

To CONOCO FIELD OPERATIONS REQUIRING THE USE OF RESPIRATORS
From Charles L. Whetstone, M.D. - Ponca City
Date May 26, 1978
Subject OSHA STANDARD 1910.134 RESPIRATORY PROTECTION

Jim Hall
new file
under health hazard

OSHA in the past year has increased its efforts relative to the respirator standard and has consistently been issuing citations in this area. Among the issues being addressed are not only those that were outlined to you November 8, 1977, by Oran D. Steffey, Ph.D., Industrial Hygienist, this office, subject, "OSHA STANDARD METHOD FOR DETERMINATION OF RESPIRATORY PROTECTIVE PROGRAM ACCEPTABILITY," but specifically under 1910.134b (10) The Physical Capability of the Worker states, "Persons should not be assigned to tasks requiring use of respirators unless it has been determined that they are physically able to perform the work and use the equipment. The local physician shall determine what health and physical conditions are pertinent. The respirator users' medical status should be reviewed periodically (for instance, annually).

The purpose of the requirement is to protect the health of the workers who might have to use respirators. The use of the respirator imposes particular physiologic demands on the wearer. These demands could jeopardize the health and even the life of the user who has special medical problems. A medical determination identifies these special problems so that they can be taken into account in providing proper respiratory protection for a worker without endangering his health or life. For some medical problems the kinds of respirators that may be used might have to be limited. For more serious problems such as those that might lead to inability to breathe, the use of respirators might be precluded entirely. It is becoming quite apparent that the only practice acceptable to OSHA is to make a determination prior to assignment of any employee to tasks requiring the use of respirators that such an individual is physically able to perform the work while using the respiratory protective equipment.

This then means that a minimum of a chest x-ray, pulmonary function study, medical history, evaluating the cardio-pulmonary function, and physical examination of the chest by a physician is mandatory. Anything short of such recorded information does not give proper documentation for issuance of a certification to use a respirator. The medical status of these respirator users is to be reviewed at least annually.

Each operation must keep an accurate ongoing list of all employees required to use respirators and be certain we are in compliance in all parameters.

cc of 1-77
55-85
550/20/26
490
Charles L. Whetstone

Charles L. Whetstone, M.D.
Assistant Medical Director

bjc

Don Butcher
1130 Rm 2434

SAL 000057391

WIC
B.11 Burns
2432

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