I. **Purpose**

II. **Scope**

III. **Applicability**

IV. **Regulatory Requirements**

V. **Definitions**

VI. **Responsibilities**

VII. **Procedures/ Implementation**

VIII. **Training**

IX. **Record Keeping**

X. **References/ Definitions**

XI. **Appendices/ Forms**
I. **Purpose- 29CFR1910.134(c)**

SUNY Oswego has determined that staff members on the Asbestos Team and those in the Building Trades Construction Shop, Building Trades Finishes Shop and the Furniture Shop are exposed to respiratory hazards during routine operations. These hazards include wood dust, particulates, and vapors. It has also been determined that staff members of CHP are also exposed to dust particles once a year when they clean out the soot in the firebox. The purpose of this program is to ensure that all staff are protected from exposure to these respiratory hazards. It is policy of SUNY Oswego to utilize engineering controls as the primary means to protect employees from hazardous conditions or dangerous atmospheres that may be encountered in routine operations or during Minor Emergency Maintenance Repairs/Evaluation. Respirators are considered an acceptable method of protection for the health of employees only under the following circumstances:

1. When it has been determined to the satisfaction of the Environmental Health and Safety Department that there are no feasible engineering controls that can be used to adequately control the hazard.
2. During the interim periods when engineering controls are being designed, used and/or installed.
3. Use as required for the Asbestos Team

This policy will provide the guidance necessary to implement the provisions of the Occupational Safety and Health Administration (OSHA) standard 29 CFR 1910.134 as adopted by the New York State Department of Labor.

II. **Scope:**

This program applies to all staff required to wear respirators during normal work operations, and during some non-routine task. Respirators may also be used for minor emergency maintenance repairs/evaluations such as during a minor chemical spill in which the chemical is known, employees have had training to clean up chemical spills and the employee assigned has the appropriate respirator assigned to them for other non-emergency type duties. This includes staff members on the Asbestos Team and those in the Building Trades Construction Shop, Building Trades Finishes Shop and the Furniture Shop. Disposable hoods with supplied airline are limited in use to the annual cleaning of the firebox in CHP and are not to be used for any other purpose.

As SUNY Oswego does not have any Self Contained Breathing Apparatus (SCBA) type of respiratory protection at no time will staff be assigned to enter an IDLH Atmosphere.
III. **Applicability:**

This program applies to all staff required to use respiratory protection at SUNY Oswego or who oversee/supervise staff that are required to use respiratory protection.

IV. **Regulatory Requirements:**

This program is required under **29 CFR 1910.134 Respiratory Protection.** This OSHA Regulation can be found in Appendix A and at **29 CFR 1910.134.**

V. **Definitions**

For the purpose of this program the definitions as found in **29CFR 1910.134(b)** will be used. This OSHA Regulation can be found in Appendix A and at **29 CFR 1910.134.** For convenience the definitions have also been separated out and can be found in Appendix B of this program.

VI. **Responsibilities:**

The Environmental Health and Safety Department will have overall responsibility of the program to ensure that: authorized employees receive adequate training and information, that annual requirements are met, the procedures of this program are being followed and that the program is evaluated at least every three years. The Facilities Maintenance Operations Department will have the responsibility to insure that respective shops are complying with this program.

For this program to be effective various divisions and departments in Facilities Services will have responsibilities as follows:

1. **ENVIRONMENTAL HEALTH AND SAFETY (EH&S)**
   a. Having a working knowledge of 29 CFR 1910.134 in order to provide guidance and direction for compliance with the Respiratory Protection Standard
   b. Arranges for Medical Evaluations
   c. Maintains Record of staff who have been cleared for respirator use
   d. Maintain records of all employees who have been trained, fit-tested and the types of respirators authorized
   e. Establish a written respiratory protection program
   f. Issue guidelines for and updates to the program
   g. Recommend appropriate respiratory protective equipment
   h. Fit-test all potential users
   i. Provide training on the proper use and care of respirators
j. Conduct periodic exposure monitoring and surveillance of workplace hazards
k. Perform Periodic Reviews of the Program
l. Designate a Program Administrator

2. PROGRAM ADMINISTRATOR- 29CFR1910.134(c)
   a. The current Program Administrator for SUNY Oswego is Christine Body
   b. Identifying work areas, processes or tasks that require workers to wear
      respirators, and evaluating hazards.
   c. Selection of respiratory protection options.
   d. Monitoring respirator use to ensure that respirators are used in accord with their
      certifications.
   e. Arranging for and/or conducting training.
   f. Evaluation of the program.
   g. Periodically evaluate the effectiveness of the program to ensure that:
      i. Proper types of respirators are selected
      ii. Wearers are properly trained and fit-tested
      iii. Correct respirators are used
      iv. Correct respirators are worn properly
      v. Respirators are properly cleaned and maintained
      vi. Respirators are properly stored
   h. Updating written program, as needed.
   i. Ensures all responsibilities assigned under the program are met

3. FACILITIES MAINTENANCE AND OPERATIONS DEPARTMENT DIRECTOR AND
   ASSOCIATE DIRECTORS AND MANAGERS
   a. Ensure adequate funding is available to purchase and maintain equipment
      needed under this program
   b. Overseeing responsibilities assigned under this program to respective Shop
      Supervisors.

4. SHOP SUPERVISORS
   a. Purchase only respiratory equipment approved by EH&S
   b. Ensuring the availability of appropriate respirators and accessories.
   c. Being aware of tasks requiring the use of respiratory protection.
   d. Enforcing the proper use of respiratory protection when necessary.
   e. Ensure the availability of sufficient quantities of filters and cartridges for specific
      containment
   f. Assume responsibility for the program in the department
      i. Ensure respirators are properly cleaned, maintained, inspected and stored
         according to the respiratory protection plan.
      ii. Monitoring work areas and operations to identify respiratory hazards.
      iii. Arrange medical examinations through EH&S for each user.
      iv. Ensure that authorized staff under their supervision attends annual
          training.
v. Ensure that authorized staff under their supervision participate in the required medical evaluations and fit test

5. EMPLOYEES USING RESPIRATORY PROTECTION
   a. Will use their respirators under conditions specified by this program, and in accord with the instruction and training they receive on the use of each particular model.
   b. Perform positive and negative pressure fit test to ensure satisfactory fit and valve functions each time respirators is donned *
   c. Clean, disinfect, and properly store the respirator assigned for personal use*
   d. Inspect the respirator for defects or missing parts and report defect to the supervisor
   e. Guard against damage to the respirators during use or cleaning
   f. Comply with fit-test requirements and all other provisions of the program
   g. Attend Annual Training
   h. Report for Quantitative Fit Test annually*
   i. Complete Medical Questionnaire for PLHCP
   j. Report for Medical Evaluations
   k. Notify their Shop Supervisor if they need additional equipment
   l. The respirator must not be used in a manner for which it is not certified by NIOSH or by its manufacturer.
   m. Must leave the work area and inspect the respirator if it stops functioning as intended
   n. Will not wear headphones, jewelry or other articles that may interfere with the facepiece-to-face seal*

* These items are not required for the disposable hood and supplied air line

6. HUMAN RESOURCES DEPARTMENT
   a. Make provisions for qualified medical surveillance
   b. Maintain records of all medical records in employee personnel files
   c. Allow employees access to their medical and exposure records as required under 29CFR1910.1020
   d. Write respiratory protection requirements into position descriptions for positions, which may require respirator use

VII. Procedures/Implementation

Where respirators are used, SUNY Oswego will select and provide, at no cost to the employee, the appropriate respirator. Respirators will be selected based on hazard assessments. Employees in the respiratory protection program are required to wear respirators when performing tasks indicated by the hazard assessments.

Respirators shall be available to all employees who are required to wear them. They shall be worn whenever required by their supervisor or whenever there is a probability that the worker will be exposed to a known contaminant above the Permissible Exposure Limit (PEL) or the
threshold limit value (TLV). A sufficient number of respirator sizes and models must be provided to the employee during fit testing to identify the acceptable respirator that correctly fits the user.

1. SELECTION PROCEDURES
   a. The Program Administrator will select respirators to be used onsite, based on the hazards to which workers are exposed and in accord with all applicable OSHA standards.
   b. The Program Administrator will conduct a hazard evaluation for each operation, process, or work area where airborne contaminants may be present in routine operations or during an emergency.
   c. The hazard evaluation will include:
      i. Identification and a development of a list of hazardous substances used in the workplace, by department, title or task. (Provided on the Respirator Program Use and Fit Test form in Appendix C of this program)
      ii. Review of work processes to determine where potential exposure to these hazardous substances may occur. This review is to be conducted by surveying the workplace, by department, as needed for job assignments and by talking with employees and supervisors.
      iii. Exposure Monitoring may also be conducted in cases where the potential for over exposure exist – in such cases monitoring may be contracted out, or for asbestos exposure done by Asbestos Team Members.
      iv. The Program Administrator will revise and update the hazard assessment any time there are changes in the workplace that may affect exposure. Employees who feel that respiratory protection is necessary must contact their supervisor or the Program Administrator. The Program Administrator will evaluate the hazards and inform the employees about the evaluation results. If respiratory protection is necessary all elements of this program will apply and this program will be updated.
   d. Respirators are selected based on the workplace hazards evaluated, and workplace and user factors affecting respirator performance and reliability.
   e. Respirators are selected based on the Assigned Protection Factors (APF’s) and calculated Maximum Use Concentrations (MUC’s).
   f. SUNY Oswego does not allow any of its employees to enter into IDLH atmospheres.
   g. Respirators are selected as appropriate for the APF’s and MUC’s and as appropriate for the chemical nature and physical form of the contaminant.

2. MEDICAL EVALUATIONS
   a. Employees who are required to wear respirators must pass a medical exam before being permitted to wear a respirator on the job.
   b. Employees are not permitted to wear respirators until a PLHCP has determined that they are medically able to do so.
   c. Any employee refusing the medical evaluation will not be allowed to work in an area requiring respirator use.
d. A PLHCP at Oswego Hospital, where all SUNY Oswego medical services are provided, will provide the medical evaluations.

e. The medical evaluation will be conducted using the questionnaire provided in Appendix C of the Respiratory Protection Standard.

f. The Program Administrator will provide a copy of the questionnaire to all employees requiring medical evaluations.

g. To the extent feasible, the company will assist employees who are unable to read the questionnaire (by providing help in reading the questionnaire). When this is not possible, the employee will be sent directly to the physician for medical evaluation.

h. All affected employees will be given a copy of the medical questionnaire to fill out, along with a stamped and addressed envelope for mailing the questionnaire to Oswego Hospital.

i. Employees will
   i. Be permitted to fill out the questionnaire on company time.
   ii. Be granted follow-up medical exams as required by the Respiratory Protection standard, and/or as deemed necessary by the PLHCP.
   iii. Be granted the opportunity to speak with the physician about their medical evaluation, if they so request.

j. The Program Administrator has provided Oswego Hospital the physician with:
   i. A copy of this program, and a copy of the Respiratory Protection Standard
   ii. The list of hazardous substances by work area, and for each employee requiring evaluation, his or her work area or job.
   iii. The employee's title, proposed respirator type and weight, length of time required to wear the respirator, expected physical work load (light, moderate or heavy), potential temperature and humidity extremes, and any additional protective clothing required.

k. Any employee required for medical reasons to wear a positive pressure air purifying respirator will be provided with one.

l. After an employee has received clearance and begun to wear his or her respirator, additional medical evaluations will be provided annually and if:
   i. The employee reports signs and /or symptoms related to their ability to use a respirator, such as shortness of breath, dizziness, chest pains, or wheezing.
   ii. The PLHCP or supervisor informs the Program Administrator that the employee needs to be reevaluated, additional medical evaluation will be provided.
   iii. Information from this program, including observations made during fit testing and program evaluation, indicates a need for reevaluation.
   iv. An example of the PLHCP’s or the supervisor’s observations that additional medical evaluation is needed could be that there has been a change in workplace conditions that may result in an increased physiological burden on the employee.

m. A list of SUNY Oswego employees currently included in the medical surveillance for this program is provided in Appendix C of this program. All examinations and
questionnaires are to remain confidential between the employee and the physician.

3. FIT TESTING - 29CFR1910.134(f)
   a. Fit testing is required for all employees who wear APRs under this program.
   b. Employees who are required to wear APRs will be fit tested:
      i. Prior to being allowed to wear any respirator with a tight fitting facepiece.
      ii. Annually
      iii. When there are changes in the employee’s physical condition that could affect respiratory fit (e.g., obvious change in body weight, facial scarring, etc.).
   c. Employees will be fit tested with the make, model, and size of respirator that they will actually wear.
   d. Employees will be provided with several models and sizes of respirators so that they may find an optimal fit.
   e. Employees will be fit tested using a Quantitative Method.

4. AIR PURIFYING RESPIRATOR MALFUNCTION
   a. For any malfunction of an APR (e.g., breakthrough, facepiece leakage, or improperly working valve), the respirator wearer must inform his or her supervisor that the respirator no longer functions, and go to the designated safe area to maintain the respirator. The supervisor must ensure that the employee receives the needed parts to repair the respirator, or is provided with a new respirator.

5. ATMOSPHERE-SUPPLYING RESPIRATOR MALFUNCTION
   a. All workers wearing atmosphere-supplying respirators will follow Confined Space Requirements and always have an attendant present.
   b. At the first sign the air supply is not correct, the employee will exit the fire box immediately.
   c. The attendant may assist as defined in the SUNY Oswego Confined Space Program

6. CLEANING- 29CFR1910.134(h)
   a. All employees who are required to wear a respirator will be issued their own respirators which are to be cleaned and disinfected as often as necessary.
   b. At a minimum employees will use disinfectant wipes on respirators after each use.
   c. Respirators will be cleaned thoroughly at annual training using the following procedure:
      i. Disassemble respirator, removing any filters, canisters or cartridges.
      ii. Wash the facepiece and associated parts in a mild detergent and water.
      iii. Rinse completely in warm water.
      iv. Wipe the respirator with a disinfectant wipe to kill germs.
      v. Air dry in a clean area.
 vi. Reassemble respirator and replace any defective parts.
 vii. Place in clean, dry plastic bag or other airtight container.

7. MAINTENANCE – 29CFR1910.134(h)
   a. Respirators are to be properly maintained at all times to ensure that they function properly and adequately protect the employee.
   b. Maintenance involves a through visual inspection for cleanliness and defects.
   c. Worn or deteriorated parts will be replaced prior to use.
   d. No components will be replaced or repairs made beyond those recommended by the manufacturer.
   e. Respirators will be inspected prior to each use and at a minimum during the annual training.
   f. The checklist found in Appendix C of this program will be used when inspecting respirators.
   g. Employees are permitted to leave their work area and go to a designated area that is free of respiratory hazards when they need to wash their face and respirator facepiece to prevent any eye or skin irritation, or replace the filter, cartridge or canister, or when they detect vapor or gas breakthrough or leakage in the facepiece or detect any other damage to the respirator or its components.
   h. Employees wearing APRs with HEPA filters need to change the cartridges on their respirators when they first begin to experience difficulty breathing while wearing their masks.
   i. Employees wearing cartridges to protect against Organic Vapors will change cartridges at the first sign of chemical breakthrough or when indicated by the EOLSI.
   j. Respirators that are defective or have defective parts must be taken out of service immediately and tagged out of service.
   k. If during an inspection, an employee discovers a defect in a respirator, he or she is to bring it to the attention of their supervisor who will arrange for replacement of the defective part or for a new respirator to be issued to the employee.
   l. In the event a new respirator is issued to an employee, a new fit test will be conducted prior to the employee using the respirator to perform any work that requires respiratory protection.
   m. All respirators that are damaged/defected beyond repair will be destroyed and discarded.

8. STORAGE- 29CFR1910.134(h)
   a. Respirators must be stored in a clean, dry area, and in accord with the manufacturer’s recommendations.
   b. Each employee will clean and inspect their own APR in accord with the provisions of this program, and will store their respirator in a plastic bag or other air tight container in their personal locker.
   c. Each employee will have their name on the bag/container and that bag/container will only be used to store their respirator.
9. EMERGENCY PROCEDURES
   a. SUNY Oswego does not have any SCBAs on site. We do not allow any staff to enter IDLH atmospheres – nor do we anticipate any emergencies where an IDLH situation will occur under normal work related maintenance activities. SUNY Oswego staff has access to and are required to use 4 gas meters to ensure their safety.
   b. The only foreseeable emergencies that would require respiratory protection at SUNY Oswego would involve either a chemical spill or an asbestos abatement. In such cases only staff trained to handle such emergencies who are already a part of the Respiratory Protection Program and who have been trained on and issued the appropriate respirator will be allowed to respond.
   c. In the event of a chemical spill if the chemical is unknown and air monitoring indicates an unsafe atmosphere the emergency will be beyond that which our staff can handle and the Oswego County Hazardous Material Team will be called.

10. PROGRAM EVALUATION- (29CFR1910.134(l))
   a. The Program Administrator will conduct periodic evaluations of the workplace as necessary to ensure that the provisions of the current written program are being effectively implemented and that it continues to be effective.
   b. A through periodic evaluation will be done at least every three years.
   c. The evaluations will include regular consultations with employees who use respirators and the supervisors, site inspections, air monitoring and a review of records.
   d. Staff required to wear respirators may make recommendations for changes to the Program Administrator at any time.
   e. Problems identified will be noted and corrected by the Program Administrator. This includes updates to the written program where applicable.
   f. The following factors will be evaluated:
      i. Respirator fit
      ii. Appropriate respirator selection for the hazards to which the employee encounters
      iii. Proper respirator use under the workplace conditions the employee encounters
      iv. Proper respiratory maintenance

VIII. Training- (29 CFR1910.134(k))

Training will be provided to ensure that the purpose and function of this procedure is understood by employees, and that the knowledge and skills required for the safe use of respirators. Training shall be given at least annually to all staff required to wear respiratory protection as part of their work assignments. Respirators will not be issued to any individuals who have not received appropriate respirator training and medical clearance.
1. The **Program Administrator** will provide training to respirator users and their supervisors on the contents of the Respiratory Protection Program and their responsibilities under it, and on the OSHA Respiratory Protection Standard.

2. Workers will be trained prior to using a respirator in the workplace.

3. The training must be comprehensive, understandable and recur annually and more often if necessary.

4. As with any employee, supervisors must be trained prior to using a respirator in the workplace; they also should be trained prior to supervising workers who must wear respirators if the supervisors themselves do not use a respirator.

5. Supervisors will provide the basic information on respirators in Appendix D of the Respiratory Protection standard to employees who wear respirators when not required by the employer to do so.

6. Supervisors will ensure that each employee can demonstrate knowledge of at least the following:
   a. Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator;
   b. What the limitations and capabilities of the respirator are;
   c. How to use the respirator effectively in emergency situations, including situations in which the respirator malfunctions;
   d. How to inspect, put on and remove, use, and check the seals of the respirator;
   e. How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators; and
   f. The general requirements of the Respiratory Protection Standard.

7. Supervisors will ensure that employees will be retrained annually or as needed (e.g., if they change departments and need to use a different respirator). Retraining shall be administered annually, and when the following situations occur:
   a. Changes in the workplace or the type of respirator render previous training obsolete;
   b. Inadequacies in the employee’s knowledge or use of the respirator indicate that the worker has not retained the requisite understanding or skill; or
   c. Any other situation arises in which retraining appears necessary to ensure safe respirator use.
8. The basic advisory information on respirators, as presented in Appendix D of the Respiratory Protection standard, shall be provided by the employer in any written or oral format to employees who wear respirators when such use is not required by this section or by the employer.

IX. Record Keeping/Documentation – 29CFR1910.134(m)

SUNY Oswego is subject to inspection from the NYS Public Employee Safety and Health Bureau (PESH), whom may ask to see documentation and records associated with this program. Such records will be maintained as follows:

1. Environmental Health and Safety (EHS)
   a. A hard copy of the Written Program, the OSHA Standard, and Training Materials.
   b. The written program and training materials will also be available on the EHS Website for staff to reference if they so desire.
   c. Copies of the records for all employees covered under the respirator program – except for medical records.
   d. A copy of the letter from the PLHCP that indicates an employee’s ability to wear a respirator.
   e. Documentation of employees last Quantitative Fit Test. These records will be updated as new fit tests are conducted. The fit test record will include:
      i. The name of the employee
      ii. The type of fit test performed
      iii. Specific make, mode style, and size of respirator tested
      iv. Date of fit test
      v. The fit factor and strip chart recording or other recording of the test results for the QNFT.
   f. Documentation of Training will be maintained for at least 3 years.
   g. List of Employees who are currently approved to wear respirators.

2. Human Resources Department
   a. The completed medical questionnaire and the PLHCP’s documented findings.
   b. These records are available to employees as required under 29CFR1910.1020

X. References/Definitions

The following References were used to create this document:

1. 29 CFR 1910.134 Respiratory Protection – Appendix A

2. Previous SUNY Oswego Respiratory Protection Program

XI. Appendices

The following is a list of appendices for the program:

1. 29 CFR 1910.134 Respiratory Protection Standard – Appendix A
2. Definitions from 29 CFR 1910.134(b) – Appendix B
3. Forms Used For This Program – Appendix C
   a) Respirator Program Use and Fit Test
   b) Respiratory Inspection Checklist
   c) Medical Release Form – Sample
   d) Medical Evaluation Questionnaire from 1910.134, Appendix C