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| Owner EH&S | DOC. NO. ENV-RPP | REV. 05 | DATE 08/16/2020 |
| DOC. TITLE Respirator Protection Program | | | |

Respirator Protection Program

Plan Review Required – Annual - August 16, 2020

Regulatory Authority(s): Occupation Safety and Health Administration (OSHA)

Regulations Applicable: 29 CFR 1910.132, 29 CFR 1910.134

Noncompliance Enforcement

- 29 CFR 1903.15 allows OSHA to issue a citation with a proposed penalty up to \$124,709 per violation

Responsibility(s)

- The overall responsibility for compliance with OSHA standards rests with the President of Amherst College and the Board of Trustees of Amherst College.
- For this plan, the following departments and positions within the College shall assume responsibilities applicable to them.
 - Dean of Faculty
 - Chief of Campus Operations
 - Director of Facilities
 - Department of Environmental Health and Safety

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Purpose

Amherst College Office of Environmental Health & Safety has determined that select employees in the Faculty, Custodial, Health Services, Environmental Health and Safety, and Facilities Departments are exposed to respiratory hazards during routine operations. These hazards include chemical gases, lead dust, asbestos fibers, organic vapors, and communicable diseases. The purpose of this program is to ensure that all Faculty and Staff who are required to perform tasks where a respirator must be worn are protected from exposure to the respiratory hazards.

Engineering controls, such as ventilation and substitution of less toxic materials, are the first line of defense to limit or eliminate exposure to hazards; however, engineering controls have not always been feasible for some of our operations, or have not always completely controlled the identified hazards. In these situations, respirators and other protective equipment must be used. Respirators are also needed to protect employees' health during emergencies. The work processes requiring respirator use at the Amherst College Campus are outlined in Table 1 in the Scope and Application section of this program.

In addition, some employees have expressed a desire to wear respirators during certain operations that do not require respiratory protection. As a general policy the Respirator Protection Program Administrator, Richard A. Mears, Environmental Health and Safety Director, will review each of these requests on a case-by-case basis. If the use of respiratory protection in a specific case will not jeopardize the health or safety of the employee(s), Environmental Health and Safety will provide respirators for voluntary use. As outlined in the Scope and Application section of this program, voluntary respirator use is subject to certain requirements of this program.

Scope and Application

This program applies to all employees who are required to wear respirators during normal work operations, and during some non-routine or emergency operations such as a spill of a hazardous substance. This includes workers in the Environmental Health and Safety, Health Services, Custodial, Facilities, and Faculty departments. Select employees working in these areas and engaged in certain processes or tasks (as outlined in the table below) must be enrolled in the college's respiratory protection program.

In addition, any employee who voluntarily wears a respirator when a respirator is not required is subject to the medical evaluation, cleaning, maintenance, and storage elements of this program, and must be provided with certain information specified in this section of the program.



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Table 1: Voluntary and Required Respirator Use at Amherst College

| Type of Respirator | Employee Work Area | Conditions of Use |
|----------------------------------|--|-------------------|
| Full Face APR | New Science Center B010c while compositing waste chemicals | Mandatory |
| Full Face APR | Any regulated area or containment used for the abatement of asbestos or testing for asbestos | Mandatory |
| Full Face APR | Pratt Pool Basement while handling chlorine | Mandatory |
| Filtering Face Piece | Keefe Health Center communicable diseases | Mandatory |
| Filtering Face Piece | Keefe Health Center | Voluntary |
| Filtering Face Piece (dust mask) | Exterior Grounds work | Voluntary |
| Filtering Face Piece | Amherst College Emergency Medical Services while responding to medical emergencies to protect against direct fluid contact | Voluntary |
| Filtering Face Piece | Amherst College Police while responding to medical emergencies | Voluntary |
| Filtering Face Piece (dust mask) | Power Plant Personnel while cleaning interior of boiler | Voluntary |
| Filtering Face Piece (dust mask) | Carpentry while performing wood work | Voluntary |



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Responsibilities

Program Administrator: the Program administrator is responsible for administering the respiratory protection program. Duties of the program administrator include:

- Identifying work areas, processes or tasks that require workers to wear respirators, and evaluating hazards.
- Ensuring adequate air quantity, quality, and flow of breathing air for atmosphere-supplying respirators.
- Selection of respiratory protection options.
- Monitoring respirator use to ensure that respirators are used in accord with their certifications.
- Arranging for and/or conducting training.
- Ensuring proper storage, cleaning, inspections, and maintenance of respiratory protection equipment.
- Conducting qualitative fit testing with Saccharin.
- Administering the medical surveillance program.
- Maintaining records required by the program.
- Evaluating the program.
- Updating written program as needed.
- The Program Administrator for Amherst College is Richard A. Mears.

Supervisors: supervisors are responsible for ensuring that the respiratory protection program is implemented in their particular areas. In addition to being knowledgeable about the program requirements for their own protection, supervisors must also ensure that the program is understood and followed by the workers under their charge. *Note: Workers participating in the respiratory protection program do so at no cost to themselves.*

Duties of the supervisor include:

- Ensuring that employees under their supervision (including new hires) have received appropriate training, fit testing, initial medical evaluation, and receive future medical evaluations when appropriate
- Ensuring the availability of appropriate respirators and accessories.
- Being aware of tasks requiring the use of respiratory protection
- Enforcing the proper use of respiratory protection when necessary.
- Ensuring that respirators are properly cleaned, maintained, inspected, and stored according to the respiratory protection plan.
- Ensuring that respirators fit well and do not cause discomfort.
- Continually monitoring work areas and operations to identify respiratory hazards.
- Coordinating with the Program Administrator on how to address respiratory hazards or other concerns regarding the program.
- Ensuring adequate air quantity, quality, and flow of breathing air for atmosphere-supplying respirators.

Employees: each employee has the responsibility:

- To wear his or her respirator when and where required and in the manner in which they were trained.
- Care for and maintain their respirators as instructed, and store them in a clean, sanitary location.



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- Inform their supervisor if the respirator no longer fits well, and request a new one that fits properly.
- Inform their supervisor or the Program Administrator of any respiratory hazards that they feel are not adequately addressed in the workplace and any other concerns that they have regarding the program.
- Inform their supervisor of need for a medical reevaluation.

Program Elements

Selection Procedures – The Program Administrator:

- Will select respirators to be used on site, based on the hazards to which workers are exposed and in accordance with all applicable OSHA standards.
- 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.
- Monitoring can be contracted out.
- The hazard evaluation will include:
 - Identification and development of a list of hazardous substances used in the workplace, by department or work process.
 - Review of work processes to determine where potential exposures to these hazardous substances may occur. This review is to be conducted by surveying the workplace, reviewing process records, and talking with employees and supervisors.
 - Exposure monitoring to quantify potential hazardous exposures.
 - If worker exposures have not been, or cannot be, evaluated they must be considered IDLH.
 - Respirators are selected based on the workplace hazards evaluated, and workplace and user factors affecting respirator performance and reliability.
- Respirators are selected based on the Assigned Protection Factors (APFs) and calculated Maximum Use Concentrations (MUCs).
- *Please note that a K95 respirator is not NIOSH (National Institute for Occupational Safety and Health) approved and cannot be worn in place of N95 respirator.*
- 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 users.
- For IDLH (immediately dangerous to life or health) atmospheres:
 - Full facepiece pressure demand SARs with auxiliary SCBA unit or full facepiece pressure demand SCBAs, with a minimum service life of 30 minutes, must be provided.
 - Respirators used for escape only are NIOSH-certified for the atmosphere in which they will be used.
 - Oxygen deficient atmospheres are considered IDLH.
- For Non-IDLH atmospheres, respirators are:
 - Selected as appropriate for the APFs and MUCs.
 - Selected as appropriate for the chemical nature and physical form of the contaminant.
 - Equipped with end-of-service-life indicators (ESLIs) if the respirators (APRs) are used for protection against gases and vapors. If there is no ESLI, then a change schedule must be implemented.



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- Equipped with NIOSH-certified HEPA filters (or other filters certified by NIOSH for particulates under 42 CFR part 84) if the respirators (APRs) are to be used for protection against particulates.
- Table 2 at the end of this program contains the sampling data on which this section was based. The results of the current hazard evaluation are the following:
 - Chlorine handling – 2 ppm
 - Hazardous waste compositing – various chemicals, controlled by ventilation
 - Asbestos – Personal monitoring provided by contractor and historical data
 - Dust – Voluntary use of negative pressure respirator

Table 2: Hazard Assessment – (8/16/20)

| Department | Contaminants | Assessment Date | Exposure Level | PEL | Controls |
|---------------------------------|--------------|-----------------|----------------|-----------------------------|---|
| Chemistry | | | | | Ventilation; Full face APR with multi-gas/vapor/P100 combination filter |
| Environmental Health and Safety | Asbestos | | | 1.0 f/cc EL 0.1 f/cc TWA | HEPA Negative filtration units; Full-face APR with P100 filter |
| Custodial | Chlorine | 3/23/17 | 2 ppm | 1 ppm | Full-face APR with gas/vapor/P100 combination filter |
| Rental Housing | Dust | | | | Wet Methods, ventilation, voluntary use |
| Health Center | Biological | | | | Protective measures for exposure to communicable diseases |

Updating the Hazard Assessment – The Program Administrator:

- Must revise and update the hazard assessment as needed (i.e., any time work process changes may potentially affect exposure). If an employee feels that respiratory protection is needed during a



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particular activity, he/she is to contact his or her supervisor or the Program Administrator. The Program Administrator then:

- Will evaluate the potential hazard, arranging for outside assistance as necessary.
- Will then communicate the results of that assessment back to the employees. If it is determined that respiratory protection is necessary, all other elements of this program will be in effect for those tasks, and this program will be updated accordingly.
- Will ensure that all respirators are certified by the National Institute for Occupational Safety and Health (NIOSH) and are used in accord with the terms of that certification.
- Will also ensure that all filters, cartridges, and canisters must be labeled with the appropriate NIOSH certification label. The label must not be removed or defaced while it is in use.
- Regarding **Voluntary Respirator Use**; Amherst College will provide respirators at no charge to employees for voluntary use for the following work processes/areas;
 - Grounds employees may wear filtering facepieces.
 - Custodial employees may wear filtering facepieces.
 - Health Center employees may wear filtering facepieces. Is this still considered voluntary?
 - Central Energy Plant employees may wear filtering facepieces while cleaning inside the boiler.
 - Facilities Department employees may wear filtering facepieces while performing light sanding/woodworking on non-lead paint coated surfaces.
 - Kitchen Employees may choose to wear filtering facepieces or half facepiece APR while cleaning the ovens. – Do we want this included or will dust mask be sufficient?
 - Rental Housing employees may wear filtering facepieces or half facepiece APR while performing cleaning or demolition of non-asbestos containing material and non-lead coated surfaces.

The Program Administrator will also:

- Provide all employees who voluntarily choose to wear either of the above respirators with a copy of Appendix D of the standard specified by the Respiratory Protection standard (29 CFR 1910.134). (Appendix D details the requirements for voluntary use of respirators by workers.) Workers choosing to wear a half facepiece APR must comply with the procedures for medical evaluation, respirator use, and cleaning, maintenance and storage.
- Authorize voluntary use of respiratory protective equipment as requested by all other workers on a case-by-case basis, depending on specific workplace conditions and the results of the medical evaluations. Voluntary use does not require compliance with these specific provisions of the standard.

Medical Evaluation: Employees who are either required to wear respirators, or who choose to wear an APR voluntarily, must pass a medical exam before being permitted to wear a respirator on the job. Employees are not permitted to wear respirators until a Physician or other Licensed Health Care Provider (PLHCP) has determined that they are medically able to do so. Any employee refusing the medical evaluation will not be allowed to work in an area requiring respirator use. A PLHCP from AEIOU Occupational and Urgent Healthcare, where all college medical services are provided, will provide the medical evaluations.

Medical evaluation procedures are as follows:



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- The medical evaluation will be conducted using the questionnaire provided in Appendix C of the Respiratory Protection standard.
- The Program Administrator will provide a copy of the questionnaire to all employees requiring medical evaluations.
- To the extent feasible, the college 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.
- 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 the college's physician.

Employees will:

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

The Program Administrator has provided the physician with:

- A copy of this program, and a copy of the Respiratory Protection standard.
- The list of hazardous substances by work area, and for each employee requiring evaluation, his or her work area or job.
- 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.

Any employee required for medical reasons to wear a positive pressure air purifying respirator will be provided with a powered air purifying respirator. After an employee has received clearance and begun to wear his or her respirator, additional medical evaluations will be provided if:

- 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.
- The PLHCP or supervisor informs the Program Administrator that the employee needs to be reevaluated, additional medical evaluation will be provided.
- Information from this program, including observations made during fit testing and program evaluation, indicates a need for reevaluation.
- 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.



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A list of Amherst College employees currently included in medical surveillance is provided in Table 3 of this program. All examinations and questionnaires are to remain confidential between the employee and the physician.

Fit Testing:

- Fit testing is required for employees wearing full facepiece APRs for exposure to asbestos, lead, organic vapors, and chlorine.
- Employees voluntarily wearing half face piece APRs may also be fit tested upon request.
- Employees who are required to wear Air Purifying Respirators will be fit tested:
 - Prior to being allowed to wear respirator with a tight fitting facepiece.
 - Annually.
 - When there are changes in the employee's physical condition that could affect the respiratory fit (e.g., obvious change in body weight, facial scarring, dental surgery, etc.).
- Employees will be fit tested with the make, model, and size of respirator that they will actually wear.
- Employees will be provided with several models and sizes of respirators so that they may find an optimal fit.
- Should the use of PAPRs be necessary, fit testing of PAPRs is to be conducted in the negative pressure mode. The **Program Administrator** will conduct fit tests following the OSHA approved Saccharin Solution Aerosol Qualitative Fit Test (QLFT) Protocol in Appendix A of the Respiratory Protection standard. The **Program Administrator** has determined that Quantitative Fit Test (QNFT) is not required for the respirators used under current conditions at Amherst College. If conditions affecting respirator use change, the **Program Administrator** will evaluate on a case-by-case basis whether QNFT is required.

Respiratory Use – Responsibilities for Employees are that they:

- Will use their respirators under conditions specified by this program, and in accord with the training they receive on the use of each particular model. In addition, the respirator must not be used in a manner for which it is not certified by NIOSH or by its manufacturer.
- Must conduct user seal checks each time that they wear their respirator.
- Must use either the positive or negative pressure check (depending on which test works best for them) specified in Appendix B-1 of the Respiratory Protection standard.
- Must leave the work area to go to a clean area to maintain their respirator for the following reasons:
 - to clean their respirator if the respirator is impeding their ability to work;
 - to change filters or cartridges, or replace parts; or
 - to inspect the respirator if it stops functioning as intended.
- Should notify their supervisor before leaving the area.
- Not wear tight-fitting respirators if they have any condition, such as facial scars, facial hair, or missing dentures, that prevents them from achieving a good seal.
- Not wear headphones, jewelry, or other articles that may interfere with the facepiece-to-face seal.



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Emergency Procedures:

- The following work areas have been identified as having foreseeable emergencies:
 - Ammonia Shed – South side of Central Energy Plant – Release of Anhydrous Ammonia Gas
 - Orr Rink Compressor Shed – Release of Anhydrous Ammonia Gas
- When the alarm sounds, employees in the affected department must immediately evacuate the building and notify the Amherst College Police Department.
- Respiratory protection in these instances is for escape purpose only. Amherst College employees are not trained as emergency responders, and are not authorized to act in such a manner.

Respirator Malfunction

- **APR Respirator Malfunction:**
 - 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.

IDLH (Immediately Dangerous to Life and Health) Procedures

- The **Program Administrator** has not identified any areas that present the potential for (IDLH) conditions. If such a condition exists, it is Amherst College policy that the area be made safe through engineering or administrative controls before work may take place. If the IDLH conditions cannot be corrected, then an outside contractor will be retained to perform the required work.

Cleaning, Maintenance and Change Schedules and Storage

- Respirators are to be regularly cleaned and disinfected in a clean area of the work place.
- Respirators issued for the exclusive use of an employee are to be cleaned as often as necessary, but at least once each week if the respirator is used.

The following procedure is to be used when cleaning and disinfecting respirators:

- Disassemble respirator, removing any filters, canisters, or cartridges.
- Wash the facepiece and associated parts in a mild detergent with warm water. Do not use organic solvents.
- Rinse completely in clean warm water.
- Wipe the respirator with disinfectant wipes (70% Isopropyl Alcohol) to kill germs.
- Air dry in a clean area.
- Reassemble the respirator and replace any defective parts.
- Place in a clean, dry plastic bag or other airtight container.



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- Note: The **Program Administrator** will ensure an adequate supply of appropriate cleaning and disinfection material at the cleaning station. If supplies are low, employees should contact their supervisor, who will inform the **Program Administrator**.

Maintenance

- Respirators are to be properly maintained at all times to ensure that they function properly and adequately protect the employee.
- Maintenance involves a thorough visual inspection for cleanliness and defects.
- Worn or deteriorated parts will be replaced prior to use.
- No components will be replaced or repairs made beyond those recommended by the manufacturer.
- The following checklist will be used when inspecting respirators:
 - Facepiece:
 - Cracks, tears, or holes
 - Facemask distortion
 - Cracked or loose lenses/face shield
 - Valves:
 - Residue or dirt
 - Cracks or tears in valve material
 - Head straps:
 - Breaks or tears
 - Broken buckles
 - Filters/Cartridges:
 - Approval designation (NIOSH)
 - Gaskets
 - Cracks or dents in housing
 - Proper cartridge for hazard
- 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 to 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.

Change Schedules

- Employees wearing APRs with P100 filters for protection against dust and other particulates need to change the cartridges on their respirators when they first begin to experience difficulty breathing (i.e., resistance) while wearing their masks.

Storage

- Respirators must be stored in a clean, dry area, and in accord with the manufacturer's recommendations.



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- Each employee will clean and inspect their own air-purifying respirator in accord with the provisions of this program, and will store their respirator in a plastic bag in a location of their choice where it will not be mistaken for another employee's.
- Each employee will have his/her name on the bag, and that bag will only be used to store that employee's respirator.
- The **Program Administrator** will store Amherst College's supply of respirators and respirator components in their original manufacturer's packaging in the equipment storage room in the Service Building.

Defective Respirators

- Respirators that are defective or have defective parts must be taken out of service immediately.
- If, during an inspection, an employee discovers a defect in a respirator, he/she is to bring the defect to the attention of his or her supervisor.
- Supervisors will give all defective respirators to the **Program Administrator**.
- The **Program Administrator** will decide whether to:
 - Temporarily take the respirator out of service until it can be repaired.
 - Perform a simple fix on the spot such as replacing a head strap.
 - Dispose of the respirator due to an irreparable problem or defect.
- When a respirator is taken out of service, the respirator will be tagged out of service, and the employee will be given a replacement of the same make, model and size.
- All tagged out-of-service respirators will be kept in the storage cabinet in the Environmental Health and Safety Manager's Office

Training

- The Program Administrator will provide training to respirator users and their supervisors on the contents of the Amherst College Respiratory Protection Program and their responsibilities under it, and on the OSHA Respiratory Protection standard.
- Workers will be trained prior to using a respirator in the workplace.
- The training must be comprehensive, understandable and recur annually, and more often if necessary.
- 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.
- 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.
- Supervisors will ensure that each employee can demonstrate knowledge of at least the following:
 - Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator;
 - What the limitations and capabilities of the respirator are;
 - How to use the respirator effectively in emergency situations, including situations in which the respirator malfunctions;
 - How to inspect, put on and remove, use, and check the seals of the respirator;
 - What the procedures are for maintenance and storage of the respirator;



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- How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators; and
- The general requirements of the Respiratory Protection standard.
- 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).
 - An employer who is able to demonstrate that a new employee has received training within the last 12 months that addresses the elements specified in paragraph (k)(1)(i) through (vii) is not required to repeat such training provided that, as required by paragraph (k)(1), the employee can demonstrate knowledge of those element(s).
 - Previous training not repeated initially by the employer must be provided no later than 12 months from the date of the previous training.
 - Retraining shall be administered annually, and when the following situations occur:
 - Changes in the workplace or the type of respirator render previous training obsolete;
 - Inadequacies in the employee's knowledge or use of the respirator indicate that the worker has not retained the requisite understanding or skill; or
 - Any other situation arises in which retraining appears necessary to ensure safe respirator use.
 - 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.

Program Evaluation

- The **Program Administrator** will conduct periodic evaluations of the workplace to ensure that the provisions of this program are being implemented.
- The evaluations will include regular consultations with employees who use respirators and their supervisors, site inspections, air monitoring and a review of records.
- List factors to be evaluated (see (l)(2).)
- Problems identified will be noted in an inspection log and corrected by the Program Administrator.
- These findings will be reported to the appropriate department's Director, and the report will list plans to correct deficiencies in the respirator program and target dates for implementing those corrections.

Documentation and Recordkeeping

- A written copy of this program and the OSHA standard is kept in the **Program Administrator's** office and is available to all employees who wish to review it
- This program will be available on the Amherst College Environmental Health and Safety Department's website under Occupational and Environmental Health section.
- Also maintained in the **Program Administrator's** office are copies of training materials.
- Copies of fit test records (*see (m)(2) of the standard*). These records will be updated as new fit tests are conducted.



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- These records will be updated as new employees are trained and as existing employees receive refresher training.
- The **Program Administrator** will also maintain copies of the records for all employees covered under the respirator program (except medical records).
- The completed medical questionnaire and the PLHCP's documented findings are confidential and will remain on file with the Department of Human Resources. The college will only retain the physician's written recommendation regarding each employee's ability to wear a respirator.