



Respirators in the Workplace – Mandatory vs. Voluntary

Respirators in the Workplace

According to the Occupational Health and Safety Administration (OSHA), an estimated 5 million workers are required to wear respirators in the United States. Respirators protect workers against insufficient oxygen environments, harmful dusts, fogs, smokes, mists, gases, vapors, and sprays. These hazards may cause cancer, lung impairment, diseases, or even death. In OSHA's list of 2017 Top Violations, respiratory protection ranked No. 4 with a total of 3,097 violations cited. It is more important than ever for employers to remain compliant with OSHA regulations to avoid costly fines and more importantly, protect the organization's most valuable asset, its employees.

OSHA standard 1910.134 lays out specific detailed respiratory protection requirements which apply depending on the following circumstances:

- **Mandatory or Emergency Use:** If a respirator is required to be worn as part of the job requirement or the use is required during an emergency, then the entire OSHA Standard 1910.134 applies. This consists of filtering facepiece respirators, including disposable dust masks. Along with the equipment, employers must establish and implement a written respirator program and specific workplace procedures. As seen in column one of the OSHA Regulations Section 1910.134 Summary Sheet, all program requirements apply except [Appendix D](#).
- **Voluntary Use—disposable dust mask:** Consists of a filtering facepiece, such as a disposable dust filtering facepiece respirator. In this case, the only requirements are that the respirator be stored and maintained so that its use does not present a health hazard to the user and that the employer provide employees with Appendix D. This can be seen in column three of the OSHA Regulations Section 1910.134 Summary Sheet.

- **Voluntary Use of a Respirator More than a Disposable Dust Mask -** Consists of a respirator other than that of a filtering facepiece, such as half masks or full face cartridge respirators. In this case, Appendix D still applies, but other specific program requirements listed in column two of the OSHA Regulations Section 1910.134 Summary Sheet apply. This includes medical evaluations, designating a program administrator, and developing procedures for cleaning and repairing respiratory equipment.

Whether it's for mandatory or voluntary respirator use, those responsible for safety in their organizations should know the difference and provide specific details to employees for proper protection. This avoids the "grab and go" mentality and ensures the health and wellness of workers.

OSHA's training provisions require the employer to ensure that each employee can demonstrate knowledge of 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
- How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators
- The general requirements of the respiratory protection regulation.

Training must be conducted prior to respirator use. Retraining is required annually, whenever changes in the workplace or type of respirator would make previous training obsolete, when

there are indications that the employee's knowledge is inadequate, and under any other circumstances where retraining would be necessary to ensure safe respirator use. The only exception is the voluntary use of filtering facepiece respirators (dust masks). Those individuals need only to be provided with Appendix D. When reviewing this with employees, it is recommended that two copies of Appendix D are given to each employee. The employees keep one copy and the other copy they sign, acknowledging it was reviewed with them, and management keeps this record for future reference.

Take the time to provide effective respirator trainings including educating workers on the difference between mandatory and voluntary respiratory use. Doing so can help protect your employees and your pocketbook. MedStat can provide respirator physicals and fit testing for your employees to help you stay in compliance. For questions on respirator use or to schedule your employees, contact **Tabitha McDonald** at **574-372-7639**.

<https://ohsonline.com/Articles/2017/02/01/Respirators-Mandatory-or-Voluntary.aspx?Page=1>
<https://www.osha.gov/SLTC/respiratoryprotection/>
<https://www.convergencetraining.com/blog/oshas-top-ten-citations-2017-extended-citation-violation-data-released>

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