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I. Introduction to Respiratory Protection

A. Purpose

This document serves as the written guide for Gettysburg College compliance to 29 CFR 1910.134, titled, “Respiratory Protection” and the Respiratory Protection Program requirements contained therein.

This document will hereafter be known as the Gettysburg College Respiratory Protection Plan (GCRPP).

B. Scope

Respirators are to be used only when engineering controls (e.g. – enclosure or confinement of the operation, general and local ventilation, and substitution of less toxic materials) are not feasible, while these controls are being installed or repaired, or in emergencies.

II. Responsibility

In compliance with 29 CFR 1910.134, titled “Respiratory Protection”, Gettysburg College realizes our responsibility for the protection of our employees. We hereby institute the enclosed respiratory protection program to assist us in our safety program.

A. The Associate Director of Environmental and Safety Services will be responsible for administering the Gettysburg College Respiratory Protection Program. This includes

1. Working with administrators and other employees to develop and implement the appropriate respiratory protection policies and practices.
2. Evaluating respiratory hazards in the work environment.
3. Educating supervisors and employees.
4. Advising on administrative and engineering controls that reduce exposure.
5. Recommending proper personal protective equipment
6. Scheduling medical evaluations and fit test services
7. Scheduling training for exposed employees and their supervisors.
8. Maintaining exposure measurements, test records, and training records.
9. Evaluating the effectiveness of the respiratory protection program

B. The Supervisor has a primary responsibility for implementing the Gettysburg College Respiratory Protection Program in the workplace. This includes:
   1. Identifying and reporting job areas and personnel that require or may require respiratory protective equipment.
   2. Ensuring that employees wearing respirators voluntarily do not wear a respirator in a required use situation.
   3. Ensuring that workers know and follow the respiratory protection program.
   4. Implementing administrative and engineering controls where possible to reduce exposure.
   5. Ensuring that the required level of respiratory protection is available, in working order, and that specific training in its use has been provided.
   6. Maintaining records of respirator inspections, training, and fit testing at the department level.
   7. Notifying the Associate Director of Environmental and Safety Services of changes in the workplace that affect exposure levels.
   8. Enforcing the use of proper respiratory protection.
   9. Ensuring that employees attend required annual respiratory protection program training.
  10. Ensuring that employees attend required annual fit testing.
  11. Providing for the safety of visitors in the workplace.

C. The Employee will be responsible for maintaining a thorough understanding of the Gettysburg College Respiratory Protection Program and conducting each operation in accordance with the program. This includes:
   1. Following safe work practices to eliminate or reduce exposure.
   2. Completing medical questionnaires.
   3. Attending required annual respiratory protection program training.
   4. Attending required annual fit testing.
   5. Wearing the required level of protection.
   6. Storing, cleaning, and maintaining respiratory equipment.
   7. Reporting changes in the workplace that affect exposure levels to their supervisor.
III. Respirator Selection

Gettysburg College shall, at no cost to its employees, provide a sufficient number of respirator models and sizes so that the respirators are acceptable to, and correctly fit, the users. To date, the only approved respirators to be used by college employees are N95 masks used for particulate exposure. Currently, this is limited to the ceramics studio and Public Safety Officers.

All respirators and respirator parts used on campus must be certified by the National Institute of Occupational Safety and Health (NIOSH). Respirator use shall be in compliance with the conditions of certification.

An appropriate respirator based on the respiratory hazard(s) to which the worker is exposed and workplace and user factors that affect respirator performance and reliability, including but not limited to:

1. the physical and chemical properties of the air contaminant (dusts, fumes, mists, vapors, or gases)
2. warning properties of the hazardous chemical
3. the adverse health effects of the respiratory hazard (IDLH)
4. the relevant hazard exposure levels (PEL, TLV, STEL)
5. the results of workplace sampling of airborne concentrations of contaminants
6. the period of time in which respiratory protection will be worn by employees during the work shift
7. the work activities of the employees and the physiological burden these work conditions place on employees wearing the respirators
8. medical evaluations
9. fit-test results
10. the physical characteristics, functional capabilities, and limitations of various types of respirators, including assigned protection factors

Gettysburg College shall select a respirator for employee use that maintains the employee’s exposure to the hazardous substance, when measured outside the respirator, at or below the maximum use concentration (MUC).

IV. Medical Certification

Due to the physiological burden created by its use, before wearing (including fit testing) a respirator (excluding voluntary use of filtering face pieces), employees must undergo a medical evaluation to determine their ability to use
that respirator. This evaluation by a physician or other licensed health care professional (PLHCP) may be obtained by using the medical questionnaire in Appendix C of the OSHA Respiratory Protection Standard or an initial medical examination that obtains the same information as the medical questionnaire.

The medical questionnaire and examinations shall be administered confidentially during the employee’s normal working hours or at a time and place convenient to the employee. The medical questionnaire shall be administered in a manner that ensures that the employee understands its content. Gettysburg College shall provide employees with an opportunity to discuss the questionnaire and examination results with the PLHCP.

When an employee gives a positive response to any question among questions 1 through 8 in Section 2, Part A, or when their initial medical examination demonstrates the need, they must have a follow-up medical examination, including any medical tests, consultations, or diagnostic procedures that the PLHCP deems necessary to make a final determination. This follow-up medical examination does not have to be performed face-to-face so long as the PLHCP can obtain the necessary information.

A. Information Provided to the Healthcare Professional

The healthcare professional evaluating an employee should be provided the following information:

1. a copy of the Respiratory Protection Standard (29 CFR 1910.134)
2. the type and weight of the respirator to be used by the employee
3. the duration and frequency of respirator use (including use for rescue and escape)
4. the expected physical work effort
5. additional protective clothing and equipment to be worn, and
6. temperature and humidity extremes that may be encountered

NOTE: If the College selects a new PLHCP, it must ensure that the above information is provided or transferred from the former PLHCP; however, the College is not expected to have employees medically reevaluated solely because a new PLHCP has been selected.

B. Healthcare Professional’s Written Recommendation
The College should obtain the evaluating healthcare professional’s written recommendation regarding the employee’s ability to use the respirator. The healthcare professional’s written recommendation shall be limited to limited to the following information:

1. any limitations on respirator use related to the medical condition of the employee, or relating to the workplace conditions in which the respirator will be used, including whether or not the employee is medically able to use the respirator
2. the need, if any, for follow-up medical evaluations, and
3. A statement that the PLHCP has provided the employee with a copy of the PLHCP’s written recommendation.

All other findings and diagnoses shall remain confidential and shall not be included in the written report.

NOTE: If the respirator is a negative pressure respirator and the PLHCP finds a medical condition that may place the employee’s health at increased risk if the respirator is used, the College shall provide a PAPR if the PLHCP’s medical evaluation finds that the employee can use such a respirator. If a subsequent medical evaluation finds that the employee is medically able to use a negative pressure respirator, then the College is no longer required to provide a PAPR.

C. Additional Medical Evaluations

The College shall provide additional medical evaluations, complying with the above requirements if:

1. An employee reports medical signs or symptoms that are related to their ability to use a respirator
2. A PLHCP, supervisor, or the respirator program administrator informs the employer that an employee needs to be reevaluated
3. information from the respiratory protection program, including observations made during fit testing and program evaluation, indicates a need for employee reevaluation, or
4. A change occurs in workplace conditions (e.g.—physical work effort, protective clothing, and temperature) that may result in substantial increase in the physiological burden placed on the employee.

V. Fit Testing and Use
A. Fit Testing

1. All employees **required** to use a tight-fitting face piece respirator pass an appropriate qualitative fit test (QLFT) or quantitative fit test (QNFT).

2. Employees are fit tested with the same make, model, style, and size of respirator that will be used.

3. Employees are fit tested prior to initial use of the respirator, whenever a different respirator face piece (size, style, model, or make) is used, and at least **annually** thereafter.

4. Conduct an additional fit test whenever the employee reports, or the employer, PLHCP, supervisor, or program administrator makes visual observations of, changes in the employee’s physical condition that could affect respirator fit. Such conditions include, but are not limited to: facial scarring, dental changes, cosmetic surgery, or an obvious change in body weight.

5. If after passing a QLFT or QNFT, the employee subsequently notifies the College, program administrator, supervisor, or PLHCP that the fit of the respirator is unacceptable, the employee shall be given a reasonable opportunity to select a different respirator face piece and to be retested.

6. Fit tests shall be administered using the OSHA-accepted QLFT or QNFT protocols and procedures found in 29 CFR 1910.134 Appendix A.

7. QLFT may only be used to fit test negative pressure air-purifying respirators that must achieve a fit factor of 100 or less.

8. If the fit factor, as determined through an OSHA-accepted QNFT protocol, is equal to or greater than 100 for tight-fitting half face pieces, or equal to or greater than 500 for tight-fitting full face pieces, the QNFT has been passed with that respirator.

9. Fit testing of tight-fitting atmosphere-supplying respirators and tight-fitting powered air-purifying respirators shall be accomplished by performing quantitative or qualitative fit testing in the negative pressure mode, regardless of the mode of operation (negative or positive pressure) that is used for the respiratory protection.

10. Qualitative fit testing of these respirators shall be accomplished by temporarily converting the respirator user’s actual face piece into a negative pressure respirator with appropriate filters, or by using an identical negative pressure air-purifying respirator face piece with the same sealing surface as a surrogate for the atmosphere-supplying or powered air-purifying respirator face piece.
11. Quantitative fit testing of these respirators shall be accomplished by modifying the face piece to allow sampling inside the face piece in the breathing zone of the user, midway between the nose and mouth. This requirement shall be accomplished by installing a permanent sampling probe onto a surrogate face piece, or by using a sampling adapter designed to temporarily provide a means of sampling air from inside the face piece.

12. Any modifications to the respirator face piece for fit testing shall be completely removed, and the face piece restored to NIOSH-approved configuration, before that face piece can be used in the workplace.

B. Respirator Use

1. Seal Check

Employees are to perform a user seal check each time they put on the respirator, using the procedures in Appendix B-1 of 29 CFR 1910.134 or procedures recommended by the respirator manufacturer that the College demonstrates are as effective as those in Appendix B-1.

2. Seal Protection

Employees with facial hair (stubble, mustache, sideburns, beard, low hairline or bangs) that comes between the sealing surface of the face piece and the face or facial hair that interferes with valve function (mustache, beard) shall not be permitted to wear a respirator with a tight-fitting face piece. Employees shall be clean shaven within 24 hours of wearing a respirator.

Employees with any condition that interferes with the face-to-face piece seal or valve function shall not be permitted to wear a respirator with a tight-fitting face piece.

Employees who wear corrective glasses or goggles or other personal protective equipment shall ensure that such equipment is worn in a manner that does not interfere with the seal of the face piece to the face of the user. Spectacles with temple bars or straps that pass between the sealing surface of the face piece and the wearers face shall not be worn. If a full face piece respirator is used, special frames for mounting prescription glasses are available.

3. Respirator Effectiveness
Survey the work area conditions and degree of employee exposure or stress, and when changes occur, reevaluate the continued effectiveness of the respirator.

Employees leave the respirator use area:

a. To wash their faces and respirator face pieces as necessary to prevent eye or skin irritation associated with respirator use; or

b. If they detect vapor or gas breakthrough, changes in breathing resistance, or leakage of the face piece; or

c. To replace the respirator or the filter, cartridge, or canister elements.

If an employee detects vapor or gas breakthrough, changes in breathing resistance, or leakage of the face piece, the College must replace or repair the respirator before allowing the employee to return to the work area.

4. Procedures for IDLH atmospheres

For all IDLH atmospheres, college employees do not work in IDLH atmospheres and in cases of emergency would notify profession services to respond. College employees should evacuate any IDLH atmosphere immediately.

5. Procedures for Interior Structural Firefighting

Call 911 for emergency services to respond.

6. Voluntary Use of Respirators

When an employee chooses to use a respirator for comfort, and not for protection against levels of contaminants that would require respiratory protection, the employee does not need fit testing; however, they shall be provided with a copy of 29 CFR 1910.134 Appendix D “Mandatory Information for Employees Using Respirators When not Required Under Standard,” and in addition, employees must undergo a medical evaluation to determine their ability to use that respirator. (EXCEPTION: Gettysburg College is not required to include in its written respiratory protection program those employees whose only use of respirators involves the use of filtering face pieces.)

It is the responsibility of the supervisor to ensure that employees wearing respirators on a voluntary basis do not wear these
respirators in a situation that would require a respirator, such as exposure above permissible exposure limits or action levels.

VI. Respirator Maintenance

A. Cleaning and Disinfecting

Gettysburg College will provide each respirator user with a respirator that is clean, sanitary, and in good working order. Respirators shall be cleaned and disinfected using the procedures in Appendix B-2 of 29 CFR 1910.134, or using the procedures recommended by the respirator manufacturer, provided such procedures are of equivalent effectiveness.

Respirators shall be cleaned and disinfected when:

1. they become unsanitary
2. before use by a different individual
3. after each use if maintained for emergencies only
4. after each use of used for fit testing and training

B. Storage

Respirators shall be stored:

1. to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture, and damaging chemicals
2. to prevent deformation of the face piece and exhalation valve
3. accessible to the work area
4. according to applicable manufacturer’s instructions
5. In compartments or covers that are clearly marked as containing emergency respirators if used for emergency purposes.

C. Inspection

Respirators used routinely shall be inspected before each use and during cleanings.

Respirator inspections shall include the following:

1. a check of respirator function
2. tightness of connections
3. condition of the various parts, including but not limited to: the face piece, head straps, valves, connecting tube, cartridges, canisters, and filters
4. a check of the elastomeric parts for pliability and signs of deterioration

D. Repairs

Repairs or adjustments to respirators are to be made only by persons appropriately trained to perform such operations and shall be performed according to manufacturer’s recommendations or specifications, using only the respirator manufacturer’s NIOSH-approved parts designed for the respirator.

VII. Training

A. Requirements

1. Affected employees must participation in a training program.
2. The training program shall be provided prior to using a respirator and included in the respiratory protection program.
3. Training will occur during the annual fit testing of the employee.

B. Retraining

Retraining shall be provided during the annual fit testing, and when any of the following situations occur:

1. changes in the workplace or the type of respirator render previous training obsolete
2. inadequacies in the employee’s knowledge or use of the respirator indicate that the employee has not retained the requisite understanding or skill
3. any other situation arises in which retraining appears necessary to ensure safe respirator use
VIII. Program Evaluation

The Associate Director of Environmental and Safety Services reviews the Respiratory Protection Program to ensure that the provisions of the program are effectively implemented and it continues to be effective.

IX. Record Keeping

A. Medical Evaluations

Records of medical evaluations required shall be retained in accordance with 29 CFR 1910.1020.

B. Fit Tests

Records of Fit Tests shall be retained for a period of up to one year after an employee no longer uses a respirator or until the next fit test is administered. It is recommended that fit test records be maintained for the duration of employment plus 30 years.

Records of QLFT and QNFT shall include:

1. name or identification of the employee tested
2. type of fit test performed
3. specific make, model, style, and size of respirator tested
4. date of test, and
5. The pass/fail result for QLFTs or the fit factor and strip chart recording or other recording of the test results for QNFTs.

C. Training Records

Gettysburg College shall retain a record of each employee’s training required by the Respiratory Protection standard for the duration of the employee’s employment.