

2 Common Mistakes You're Making With OSHA's Respiratory Protection Standard

INTRODUCTION: OSHA consistently ranks respiratory protection in the Top 5 most frequently cited standards on worksites. This year, the respiratory protection standard had more than 2,800 violations across the nation. As nearly five million Americans work in harmful dust, gas and smoke each year, the importance of respiratory protection cannot be overstated. Respiratory protection violations are particularly present in industries such as mining, quarrying, oil and gas extraction, chemical manufacturing, transportation and warehousing.

The expression “the devil is in the details” may have been made for OSHA requirements. The Respiratory Protection standard *29 CFR 1910.134*, like most OSHA regulations, has many sections. With sections running from *(a)* to *(m)*, there are 13 sections to follow. No wonder there are thousands of violations annually.

Looking deeper into the violations, several sections are tripping up employers. Read on and discover which two sections are the most frequently violated and how Examinetics can help.

MEDICAL EVALUATION



Too often, employees unfit to wear facepieces are on the job, leading to potential sickness, health risks and OSHA 300 recordables. To avoid this, it is imperative to carefully follow *29 CFR 1910.134 section (e)* regarding medical evaluations. In short, all employees who wear a respirator must receive a medical evaluation and get cleared before fit testing and use. This is the most cited section within the standard.

As an employer, there is a constant struggle to find time to release your employees for a clinical checkup. Sending employees to clinics all over town can disrupt productivity, reduce efficiency and drag on your budget. However, there is a convenient and less time-consuming option available - online respirator clearance evaluations via questionnaire.

Through easy online access, the respirator questionnaire is simple and convenient for your entire workforce, while keeping them healthy, safe and compliant with mandatory workplace laws. This clearance process eliminates offsite clinic visits minimizing lost productivity. For example, the Examinetics clearance process is three simple steps:

1. Examinetics sends a **link** to you providing access to the medical questionnaire. You simply distribute the link to all respirator-wearing employees to access the test.
2. Employees reply to the **questionnaire** through a series of “yes” and “no” questions. The evaluations take approximately 15-20 minutes to complete.
3. After completion, employees immediately receive clearance **results**, while you receive notification of your employees' status. You have instant access to evaluation results through XM Solutions, our secure data management platform.

FIT TESTING

Many times, employees wear ill-fitting respirators on the job causing a myriad of health issues. Respirators are never a “one size fits all” scenario, due to an employee’s physical condition and other factors such as weight, facial scarring and dental procedures.



That’s why employers are running afoul of *29 CFR 1910.134 section (f)*, which says the employer shall ensure that an employee using a tight-fitting facepiece respirator is fit tested prior to initial use of the respirator, whenever a different respirator facepiece (size, style, model or make) is used, and at least annually thereafter.

As mentioned previously, meeting your mandates can be a burden when you have to send employees to clinics. The logistics can be a drain on your safety team. Look for a partner such as Examinetics, who can come onsite to all your locations and provide compliance solutions that come to you.

We deliver qualitative and quantitative fit testing directly to your front door, reducing the costs and lost work time with offsite exams. With flexible scheduling options and a fleet of more than 130 mobile units, we keep your workforces healthy and OSHA/MSHA/FRA compliant. If pulmonary function test is a requirement in your medical surveillance program, we can provide those services. Examinetics operates cutting-edge, NIOSH approved spirometry technology and software.

BONUS

STAY COMPLIANT **AND** HEALTHY

Not only is compliance imperative for your business, it is also ultimately best for the health of your employees. With decades of respiratory protection experience, we've accumulated a wealth of knowledge on respiratory health in the workplace. Below is helpful information - reminders, advice and tips - to consider as you build the framework for your respiratory protection program.

> **Stay up-to-date with industry and state regulations:** Staying up-to-date with specific industry and state regulations is important as each holds its own set of rules. For instance, those in the mining industry adhere to the Mine Safety and Health Administration (MSHA) to minimize hazards and promote safety and health conditions in the nation’s mines. Likewise, the Federal Motor Carrier and Safety Administration (FMCSA) regulates the trucking industry to reduce injuries and fatalities involving large vehicles. Employers should also be aware of their state regulations, not just national standards. For example, the California Division of Occupational Safety and Health adopted an emergency regulation to protect outdoor employees from hazards associated with the increase of wildfire smoke. These local regulations can impact your respiratory protection program.

> **Grooming is essential:** Facial hair must be an acceptable length at all times on the job, not just for testing day. We often see employees who have to shave when we come onsite to perform respirator fit testing. This means that the employee has been potentially wearing an ill-fitting facepiece. *Section (g)* of the standard has more clarifying information on seal protection and facial hair.

Proper grooming is one key to success. For a comfortable fit with a protective seal, employees must ensure their whiskers are well trimmed or clean-shaven. Rogue facial hairs cause an ill-fitting seal, allowing dusty air particles, gases or other unwanted materials to enter an employee's mouth and nose.

A simple way to remind your staff to remain clean-shaven is to use charts from OSHA depicting the types of acceptable and unacceptable facial hair. As an OSHA regulation, appropriate shaving is necessary for employees.

- > **Options for glasses-wearers:** Employees who wear glasses may struggle to wear both their glasses and a respirator. In particular, this affects employees requiring a full-face respirator or SCBA. However, OSHA requires employers to provide employees who wear respirators with an optical corrective lens when necessary.
- > **Awareness of employees with hearing aid needs:** Employees who wear hearing aids may need special attention. Too often, the Examinetics nursing staff has seen employees in need of hearing aids that do not wear them while wearing SCBA. Although a pair of hearing aids fit within a mask, they often are not worn. This issue is often found with firefighters and fire companies. Employees take out their hearing aids during the job, which is ultimately detrimental to their health and hinders their ability to perform on the job. For those with troubled hearing, wearing hearing aids while in SCBA gear avoids further damage.

RESPIRATORY PROTECTION SERVICES DELIVERED AT YOUR LOCATION

As the leading provider of occupational compliance services, Examinetics offers comprehensive respiratory protection services. We provide online medical clearances – which are required to determine an employee's ability to use a respirator – and respirator fit testing.



Examinetics is the nation's leading provider of Workforce Health Solutions through mobile, onsite and technology platforms. Our comprehensive suite of occupational health services delivers strategic value to more than 3,000 clients in over 18,000 locations annually. Leading companies partner with Examinetics to achieve regulatory compliance, minimize productivity loss and acquire vital data required for optimal health outcomes.

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(800) 946-7228