

### Respiratory Protection Program

### Rev 1

### 1. Purpose:

- 1.1 DeLong's, Inc. has determined that employees in the Prep, Fabrication, Blast, Paint, and Maintenance departments are exposed to respiratory hazards during routine operations. These hazards include dust, particulates, and vapors. The purpose of this program is to ensure that all DeLong's, Inc. employees are protected from exposure to these respiratory hazards.
- 1.2 Engineering controls, such as ventilation and substitution of less toxic materials, are the first line of defense at DeLong's, Inc.; 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 must be used. The work processes requiring respirator use at DeLong's, Inc. are outlined in Table 1 in the Scope and Application section of this program.
- 1.3 In addition, some employees have expressed a desire to wear respirators during certain operations that do not require respiratory protection. As a general policy DeLong's, Inc 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), DeLong's, Inc. 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.

### 2. References:

**2.1** 29 CFR 1910.134

## 3. Scope and Application:

- 3.1 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 Prep, Fabrication, Blast, Paint, and Maintenance departments. All employees working in these areas and engaged in certain processes or tasks (as outlined in the Table 1) must be enrolled in the company's respiratory protection program.
- **3.2** 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

Written By:		Approved By:	Page 1 of 6
BJJ			



## Respiratory Protection Program

### Rev 1

elements of this program, and must be provided with certain information specified in this section of the program.

Table1: Voluntary and Required Respirator Use at DeLong's, Inc.

Type of Respirator	Employee Work Area	<b>Conditions of Use</b>
	and/or Job Task	
Filtering facepiece	Welding, grinding, or cutting.	Voluntary
	Protection from general	Mandatory if working with
	nuisance dust.	galvanized or stainless steel
Half facepiece air purifying	Painting	Mandatory
respirator (APR) with organic		
vapor and particulate cartridge		
Half facepiece APR with organic	Mixing paint or cleaning	Voluntary
vapor and particulate cartridge	painting equipment.	
Full facepiece APR with	Emptying dust collector,	Mandatory
particulate cartridge	working in wheelabrator,	
	working in wheelabrator pit.	
Abrasive blast hood supplied air	Hand abrasive blasting	Mandatory
respirator		

## 4. Responsibilities:

- **4.1** The Environmental Health and Safety (EHS) Specialist is the Program Administrator and 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.

Page 2 of 6	Approved By:		Written By:
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## Respiratory Protection Program

#### Rev 1

- Ensuring proper storage, cleaning, inspections, and maintenance of respiratory protection equipment.
- Conducting qualitative fit testing with Bitrex.
- Administering the medical surveillance program.
- Maintaining records required by the program.
- Evaluating the program.
- Updating written program, as needed.
- Ensuring that employees (including new hires) have received appropriate training, fit testing, and medical evaluation.
- Continually monitoring work areas and operations to identify respiratory hazards.
- Ensuring adequate air quantity, quality, and flow of breathing air for atmosphere-supplying respirators.
- **4.2** 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. Duties of the supervisor include:
  - Ensuring the availability of appropriate respirators and accessories.
  - Enforcing the proper use of respiratory protection when necessary.
  - Ensuring respirators are properly cleaned, maintained, inspected, and stored according to the respiratory protection plan.
  - Ensuring 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.

Written By:		Approved By:	Page 3 of 6
BJJ			



## Respiratory Protection Program

#### Rev 1

- **4.3** 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.
  - 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 of any other concerns that they have regarding the program.
  - Inform their supervisor of need for a medical reevaluation.
  - Ensure facial hair does not disrupt the seal of the respirator by remaining clean shaven.

### 5. Program Elements:

- **5.1** 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.
    - o Exposure monitoring to quantify potential hazardous exposures.
    - o If worker exposures have not been, or cannot be, evaluated they must be considered IDLH.

Written By:		Approved By:	Page 4 of 6
BJJ			



## Respiratory Protection Program

#### Rev 1

- 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).
- 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.
- 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.
- Monitoring can be contracted out.

#### **5.2** 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 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.

Written By:		Approved By:	Page 5 of 6
BJJ			



## Respiratory Protection Program

### Rev 1

 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.

### **5.3** Voluntary Respirator Use

- DeLong's, INC. will provide respirators at no charge to employees for voluntary use for the following work processes/areas:
  - o Welding, grinding, or cutting. Protection from general nuisance dust.
- EHS Specialist will ensure the respirator will not create a health hazard to the employee.

Written By:		Approved By:	Page 6 of 6
BJJ			