

Voluntary Respirator Use

A complete respiratory protection program is required when respirators are used to protect employees from air contaminant exposures above occupational exposure limits. However, respirators often are used in situations in which these levels are not exceeded. In these cases, it can be limited to include certain applicable elements.

What is meant by “voluntary use”?

Voluntary use is when an employee chooses to wear a respirator, even though the use of a respirator is not required by either the employer or by any regulatory requirement. Use can be considered voluntary if all of the following conditions are met:

- An exposure assessment has been conducted.
- No occupational exposure limits are exceeded.
- There are no regulatory requirements that the employer provide respirators (For example, respirators must be provided to employees exposed to any concentration of lead if the employee requests it).
- The employer does not believe it is necessary to reduce exposures below their current levels due to either a real or perceived hazard.
- The employer does not require, recommend, encourage or suggest that respirators be used.

- Workers ask to wear respirators.
- Respirators will not be used for emergency response or escape.

Respiratory Protection Program

Employers who allow their employees to wear respirators on a voluntary basis must implement limited provisions of a respiratory protection program. The program must be in writing, and provisions vary based on the type of respirator used.

If **tight fitting rubber masks** (elastomeric facepieces) with cartridges or filters are used, the program should include:

- Provisions for medical evaluation of employees.
- Procedures for cleaning, disinfecting, storing, inspecting, repairing, removing from service or discarding, and otherwise maintaining respirators.
- Providing employee training.

If these provisions are not implemented, potential hazards or problems could result:

- A respirator wearer’s health could be jeopardized due to an undetected medical condition. Breathing resistance associated with respirators may be intolerable to some individuals, (e.g., asthma, heart condition).
- A dirty respirator contaminated by improper storage or cleaning, could promote skin irritation or dermatitis. An employee could ingest the contaminants on the surface of the respirator.

The Experienced
Workers’
Compensation
Specialist

Dust masks (filtering face pieces) are used, a written respiratory protection program is not required, as long as no other respirator types are used. Employee training must be provided. It is important to recognize that there is no difference in the risks whether the face piece is elastomeric or filtering. When filtering face pieces are used to protect against overexposure or when employer policy requires use, the use is treated in exactly the same manner as with any other respirator, and a complete respiratory protection program is required. For this reason, Zenith highly recommends addressing all of the elements of a respiratory protection program regardless of respirator type.

Training

Since employees who use respirators voluntarily do not face the risk of breathing unsafe levels of chemicals, the content of training is simpler than required use. A sample training program commonly known as "Appendix D", is contained in OSHA's respiratory protection standard, and informs the user of risks that could be posed by the respirator itself. Topics to be addressed include:

- Following all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirator's limitations.
- Choosing respirators certified for use to protect against the contaminant of concern.
- Not wearing a respirator into atmospheres containing contaminants for which your respirator is not designed to protect against.
- Keeping track of respirators to avoid mistakenly using someone else's respirator.

Additional Considerations

Without a formal, written respirator program, employers must decide whether these elements are sufficient to address the situations in their workplace. Following are two examples of situations to consider addressing in a limited respirator program:

- Beards and other facial hair. Since employees must be clean shaven when respirator use is required, employers should not permit respirator users to have facial hair.
- Fit testing. The employer should consider the reason for allowing respirator use when waiving fit testing. If the goal is to provide employee comfort and there is no real or potential hazard present, fit testing provides no added benefit. However, if the goal is to prevent breathing any concentration of the contaminant, use of an ill-fitting respirator provides a false sense of security and fit testing should be done.

For further information and assistance, contact your Zenith Safety and Health consultant.

Zenith provides workplace safety resources at: **TheZenith.com**

RM128AG 2