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SAFETY MATTERS

Using Respirators or Dust Masks

Common respirator questions and violations

When employees must wear respirators, they must undergo a medical evaluation to ensure that they can safely use a respirator. Generally, the employer identifies a health care professional to use the OSHA regulation questionnaire, or to conduct an exam that obtains that same information.

Medical evaluations do not need to be repeated annually unless a healthcare provider prescribes annual tests. The OSHA regulation at 1910.134 notes that additional medical evaluations are necessary if:

- Employees report medical signs or symptoms related to their ability to use a respirator;
- The physician (or a supervisor) reports that the employee should be reevaluated;
- Information or observations during fit testing indicates a need for reevaluation; or
- A change in workplace conditions (e.g., physical work effort, protective clothing, temperature) may increase the physiological burden placed on an employee.

After the medical evaluation, the worker must be fit tested with the same make, model, style, and size of respirator that will be used. The fit test must be repeated annually because changes such as gaining or losing weight can affect how a respirator fits. In addition, fit testing is required if a different respirator is used.

Training and maintenance

Employees using respirators must be trained upon first use and annually thereafter. Changes in the workplace or the type of respirator may require additional training. Also, training must be delivered if situations arise when retraining appears necessary, such as when the employee's knowledge/understanding seems to be lacking.

Among other topics, training must cover cleaning and disinfecting procedures. OSHA frequently issues citations for failing to maintain respirators in a sanitary condition. Each employee's respirator must be cleaned "as often as necessary" but if a respirator is shared among workers, it must be cleaned and disinfected after each use.

Using dust masks

If employers require dust masks or N95s (called "filtering facepiece respirators"), the respiratory protection standard applies, including medical evaluations. However, if employees voluntarily use these devices, the employer must simply determine that such use will not create a hazard and provide the information from OSHA regulation 1910.134 Appendix D.

Cloth face coverings or surgical masks are not "respirators" and **do not** trigger these provisions, even if wearing them is mandatory. However, some employees might voluntarily wear dust masks or N95s instead, in which case the employer must verify that wearing the device will not create a hazard, and they must provide a copy of Appendix D to the employee. Employers should ask workers desiring to wear dust masks or N95s to report that use so the company can meet those obligations.

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This sheet is intended for reference only. For more exhaustive advice, please contact your California Schools JPA risk manager at 909-763-4900.

