OSHA Occupational Safety & Health Administration U.S. Department of Labor

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OSHA ISSUES DIRECTIVE THAT WILL HELP EMPLOYERS MEET NEW RESPIRATORY PROTECTION STANDARD

If you are an employer covered by the Occupational Safety and Health Administration's (OSHA) new respiratory protection standard, the agency has new information to help you.

OSHA's new enforcement directive to agency field personnel will also be useful to employers in meeting requirements of the standard, including the "two-in/two-out" provisions for firefighters' safety. The standard was published Jan. 8, 1998, and employers must be in compliance by Oct. 5, 1998.

Assistant Secretary of Labor for Occupational Safety and Health Charles N. Jeffress said, "This standard significantly improves worker protection. In addition to saving lives and preventing injuries and illnesses, employers will save up to \$94 million a year on injury and illness-related costs."

The new standard applies to all respirator use in general industry, shipyards, marine terminals, longshoring, and construction workplaces. It does not apply to agricultural operations or to occupational exposure to tuberculosis.

The use of respirators to protect against tuberculosis will continue to be enforced under the old standard, which will be redesignated 1910.139 on Oct. 5, 1998, and will apply only to tuberculosis until OSHA issues a final standard for occupational exposure to TB, which will contain TB respiratory protection provisions. Hearings have been held on the proposed TB standard in Los Angeles, Chicago, New York City, and Washington, D.C., and the testimony and comments are now being reviewed.

The new standard (1910.134) applies to respirators worn to protect employees from exposure to air contaminants above a specified exposure limit or otherwise necessary to protect employee health. It also covers situations where respirators are otherwise required to be worn by the employer, and where respirators are voluntarily worn by employees for comfort or other reasons.

The standard restates OSHA's longstanding policy that engineering and work practice controls should be the primary means to reduce employee exposure to toxic chemicals and that respirators should only be used if engineering or work practice controls are infeasible or while they are being put in place.

Among other things, the compliance directive (CPL 2-0.120) discusses definitions of terms used in the standard; requirements for a written respiratory protection program and respiratory protection program administrator; voluntary use of respirators; selection of respirators and hazard evaluation; the requirements for employers to develop chemical cartridge change schedules for the respirators worn in their workplaces; medical evaluation of an employee's fitness to wear a respirator; and fit testing for employees using negative or positive pressure tight-fitting respirators.

Also discussed are the proper use of respirators; employees working in conditions Immediately Dangerous to Life or Health (IDLH); and firefighters engaged in interior structural firefighting, i.e., "two-in/two-out" requirements.

The "two-in/two-out" firefighting procedures apply to private sector workers engaged in firefighting, including those working in industrial fire brigades and private incorporated fire companies, and to federal firefighters. These or equivalent provisions apply to state or local government firefighters only in the 25 states and territories that cover public employees under OSHA-approved state plans. These states are required to adopt an identical or "at least as effective" standard and extend its coverage to public employees. Coverage of volunteer firefighters in these states varies by state and depends on state law.

The directive also notes that at least two firefighters must be stationed outside during interior

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structural firefighting and they must be trained, equipped and prepared to enter if necessary to rescue firefighters inside. The incident commander has the responsibility and flexibility to determine when more than two outside firefighters are necessary.

The two firefighters (buddies) entering an IDLH atmosphere to perform interior structural firefighting must maintain visual or voice communication at all times. Electronic means of communication such as radios cannot be substituted for direct visual contact between the team members in the danger area. However, they can be used to communicate between the inside team members and outside standby personnel.

Life-saving activities in interior firefighting are not precluded by the standard. There is an explicit exemption in the standard that if life is in jeopardy, firefighters can perform the rescue without following the "two-in/two-out" requirement.

OSHA notes that the "two-in/two-out" provision is not intended as a staffing requirement, but is a requirement for worker safety in fighting interior structural fires.

The directive also discusses maintenance and care of respirators; training and information; evaluation of the effectiveness of the respirator program; recordkeeping; and how the respirator standard is linked to other OSHA standards.

The directive is effective Friday, Sept. 25, 1998.

The directive can be accessed through the OSHA Home Page on the Internet World Wide Web (http://www.osha.gov) under "Library/Reading Room" and then "Directives." A supplementary document, "Questions and Answers on the Respiratory Protection Standard," also can be accessed through the OSHA Home Page.

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