

MICHIGAN MILLERS

Backing the Best in Business Written

Respiratory Protection – Who Needs a Written Program?

SAFETY TALKS TOOLKIT

Respirators are devices that are worn to protect workers from inhaling harmful air contaminants. They come in many shapes and sizes – from the filtering face-piece respirator (also known as a disposable particulate respirator or dust mask) to the self-contained breathing apparatus (SCBA) worn by firefighters. For certain types and uses of respirators, Cal/OSHA requires employers to develop and implement a written respiratory protection program.

Mandatory use of respirators

Whenever employees are required to wear a respirator, a written respiratory protection program is needed. This applies to all types of respirators, including filtering facepiece respirators (FFRs). In some cases, respirator use may be mandated because of overexposure to an air contaminant or some other regulatory requirement. In other cases, the employer may require the use of a respirator even if regulations do not require it. Regardless of the reason, anytime the employee does not have a choice and must wear a respirator, a written program is needed.

Voluntary use of filtering face-piece respirators

If employee use of FFRs is strictly voluntary on the part of the employee, no written program is needed. In such cases the employer need only provide the employee with a copy of Appendix D of the Cal/OSHA respiratory protection regulation, Information for Employees Using Respirators When Not Required Under the Standard.

Voluntary use of other types of respirators

The voluntary use of any type of respirator other than an FFR requires a written respiratory protection program. This is true even if the employee provides his or her own respirator. The program for voluntary use only needs to include those elements that could affect the health of the employee, such as medical evaluations, cleaning, disinfecting, storage, and maintenance.

Masks that are not respirators

All respirators must be certified by the National Institute for Occupational Safety and Health (NIOSH). This certification will be indicated by a "TC number" located on the respirator, packaging, or written material that comes with the respirator. Masks that are not NIOSH certified are not considered respirators. If the mask is not a respirator, it does not fall within the scope of the Cal/ OSHA regulation for respiratory protection and no written program is needed.

Some manufacturers sell masks that look like FFRs but are not NIOSH certified. These masks are sometimes referred to as "comfort masks." They are designed to keep large particles out of the nose and mouth but do not protect the lungs.



Healthcare workers sometimes wear surgical-type masks to protect a patient's health or to prevent exposure to bloodborne pathogens. These typically are not NIOSH certified. However, there are other masks, certified by NIOSH, which protect healthcare workers from tuberculosis or other infectious aerosols.

No matter what type of mask employees wear, make sure that it is the right one for the job and employees know the purpose and limitations of the mask.

IMPORTANT NOTICE - The information and suggestions presented by Michigan Millers Mutual Insurance Company in this Safety Talks Toolkit Bulletin are for your consideration in your loss prevention efforts. They are not intended to be complete or definitive in identifying all hazards associated with your business, preventing workplace accidents, or complying with any safety related, or other, laws or regulations. You are encouraged to alter them to fit the specific hazards of your business and to have your legal counsel review all of your plans and company policies.