

DISPATCH



SCBA Use and Medical Requirements OSHA Respiratory Protection Regulations

In January 1998, the revised Standard for Respiratory Protection was signed as an OSHA regulation. The new federal standard replaces the respiratory protection standards adopted by federal OSHA in 1971. It is a revision and strengthening of the original standard that requires employers to establish and maintain a respiratory protection program to protect their respirator-wearing employees. Most importantly, the standard specifically addresses the use of respirators in immediately dangerous to life or health (IDLH) atmospheres, including interior structural fire fighting. It also simplifies respirator requirements for employers by deleting respirator requirements in other OSHA health standards that duplicate those in this new standard. The standard provides requirements for:

- program administration;
- worksite-specific procedures;
- respirator selection;
- employee training;
- fit testing;
- medical evaluation;
- respirator use (including the 2-in/2-out provisions); and
- respirator cleaning, maintenance and repair.

The following summarizes the requirements of the respiratory protection program and details the medical requirements. It is based on the text of the regulation itself (29 C.F.R. 1910.134) and an OSHA interpretation memorandum dated August 3, 1998.

- The employer must develop a written respiratory protection program. The program must include at least:
 - Procedures for selecting respirators.
 - Medical evaluation procedures of employees who will wear respirators.
 - Fit testing procedures for tight-fitting respirators (e.g. SCBA)
 - Procedures for the proper use of respirators.
 - Procedures and schedules for the cleaning, disinfecting, storing, inspecting, repairing, discarding, and otherwise maintaining respirators.
 - Procedures to ensure adequate air quality, quantity, and flow of breathing air for atmosphere supplying respirators (e.g. SCBA).
 - Training of employees in the respiratory hazards to which they will potentially be exposed.
 - Training of employees in proper use of respirators, including donning, doffing, limitations in use, and their maintenance.
 - Procedures for regularly evaluating the effectiveness of the respiratory protection program.
- The employer must identify a physician or other licensed health care professional (PLHCP) who will perform the medical evaluation. Licensed health care professionals may only perform medical evaluations for respirator use if it is within the scope of practice permitted by the state's licensing, registration, or certification agencies.

- The identified PLHCP must be provided with the following information prior to making recommendations regarding an employee's ability to use a respirator:
 - A copy of the employer's written respiratory protection program.
 - The type and weight of the respirator to be used by the employee.
 - The duration and frequency of the respirator use.
 - The expected physical work effort.
 - Additional protective clothing and equipment to be worn with the respirator.
 - Temperature or humidity extremes that may be encountered.
 - A copy of the respiratory protection standard (29 C.F.R. 1910.134).
- The employer must provide a medical evaluation to all employees required to use a respirator during their job. The employer must provide the medical evaluation prior to the fit testing of the employee and before the employee uses the respirator in the workplace.
- The medical evaluation must be administered by the PLHCP in order to obtain the information requested by the mandatory questionnaire in Sections 1 and 2, Part A of Appendix C of 29 C.F.R. 1910.134. Alternatively, the PLHCP may provide an initial medical examination that obtains, at a minimum, the same information requested by the questionnaire. The PLHCP may request additional information if, in their professional judgement, the information would assist in determining the employee's ability to use the respirator.
- The employer must ensure that a follow-up medical examination is provided to all employees whose questionnaire or initial medical evaluation indicates such a need. Follow-up medical examinations must include any medical tests, consultations, or diagnostic procedures deemed necessary by the PLHCP to make a final determination on an employee's ability to use a respirator.
- The employer must provide the employee with the opportunity to discuss the questionnaire and medical evaluation results with the PLHCP.
- The questionnaire and medical evaluations must be administered confidentially during the employee's normal working hours or at a time and place of convenience to the employee. The employer must pay for all costs associated with the administration of the questionnaire and the medical evaluation. These costs include related expenses incurred by the employee during the medical evaluation, including travel costs.
- The employer may not maintain a copy of the employee's completed medical evaluation questionnaire. The employer may only maintain the PLHCP's written recommendation on an employee's ability to wear a respirator. The completed questionnaire and the PLHCP's finding and diagnosis are strictly confidential and must not be maintained on file by the employer.

The sole exception to the above restriction is when the employer maintains a health (medical) office that is administratively separate from the employer's central administration offices. The handling of all medical documents by the health (medical) office must be in strict accordance with the medical confidentiality provisions of this regulation and the Americans with Disabilities Act.

- The employer is required to obtain a written recommendation from the PLHCP regarding and employee's ability to use the respirator. The PLHCP's written recommendation must only include:
 - A statement of the employee's ability to use the respirator.
 - Any limitations on respirator use related to either the medical condition of the employee or the workplace conditions in which the respirator will be used.
 - The need, if any, for follow-up medical evaluation of the employee.
 - A statement the PLHCP has provided the employee with a copy of his written recommendations.

- The employer must provide additional medical evaluations in the following circumstances:
 - The employee reports medical signs or symptoms that are related to their ability to use a respirator.
 - A PLHCP, supervisor, or the respiratory protection program administrator informs the employer that an employee needs to be reevaluated.
 - Information from the respiratory protection program, including observations made during fit testing, indicates an employee's need for reevaluation.
 - A change in the workplace, or protective clothing, increases the physiological burden placed upon employee.

The International Association of Fire Fighters believes that the unique nature of a fire fighter's work environment necessitates a thorough physical examination. The components addressed in the **IAFF/IAFC Fire Service Joint Labor Management Wellness-Fitness Initiative** should be implemented for the medical and fitness evaluation of fire fighters. The Initiative's requirements meet the provisions of the OSHA standard.