

Dust mask respirators: Are you in compliance?

You've got employees who wear disposable dust masks, but you're just not sure if that means you need to have a full-blown respirator program. Well, according to OSHA, you need to do something, but what that "something" is depends on whether the dust masks are worn voluntarily or of necessity.

OSHA considers single-use dust masks, such as N-95s, to be air-purifying respirators (APRs). The Respiratory Protection standard at 1910.134(b) refers to these dust masks as "filtering facepieces" and defines them as negative pressure particulate respirators with a filter that is an integral part of the facepiece, or with the entire facepiece composed of the filter medium. These masks must be NIOSH-certified to be acceptable by OSHA as respirators under the standard. Look on the packaging (or on the dust mask) for the NIOSH mark.

Voluntary use

Medical evaluations, fit tests, and in-depth care training are not required for workers who voluntarily wear dust masks. However, OSHA does require that you provide the information contained in Appendix D of the Respiratory Protection standard to voluntary users.

How about mandatory use?

Because OSHA considers NIOSH-approved disposable dust masks to be air-purifying respirators, medical evaluations and fit testing are required prior to wearing mandatory-use dust mask respirators.

OSHA's medical requirements for wearing a respirator in the workplace are the same, whether the respirator is a mandatory-use dust mask or a SCBA. In the Respiratory Protection standard at 1910.134(e)(2), OSHA requires that a medical evaluation using a medical questionnaire or an initial medical examination that obtains the same information as the medical questionnaire has to be used. The medical evaluation must cover, at minimum, the information requested in Appendix C of the standard, Sections 1 and 2 of Part A.

Fit testing disposable respirators

In a letter dated March 4, 1996, OSHA explains that either a quantitative (QNFT) fit test or a qualitative (QLFT) fit test is an acceptable method to fit test an N-95 disposable respirator. A quantitative fit test is acceptable, provided the test is conducted according to the recommendations of the respirator manufacturer. Also, a fit factor of 100 should be used when conducting a quantitative fit test.

The generally accepted assigned protection factor (APF) is 10 for disposable respirators. When a quantitative fit test is conducted, the wearer of the mask is assigned a fit factor that is based upon the APF plus a safety factor of 10. The combination of the APF and the safety factor is the derivation of the fit factor (100).

OSHA also requires that wearers of respirators conduct a fit check each and every time they don a respirator. The fit check may be conducted according to the manufacturer's instructions. Some respirator manufacturers provide fit test kits for disposable respirators. You may want to contact the manufacturer of your respirators for a fit test kit.

Tip: What you need to do for voluntary-use tight-fitting respirators

Tight-fitting (elastomeric) respirators may be worn on a voluntary basis. For these users, you need to:

- Provide the information in Appendix D of the Respiratory Protection standard;
- Provide a medical evaluation;
- Provide training on procedures for cleaning, disinfecting, storing, repairing, removing from service or discarding, and otherwise maintaining respirators; and
- Set up schedules for these elements, according to the regulation.

Fit testing is not required for tight-fitting voluntary-use respirators.

