

SAFETY POLICY

Respiratory Protection Policy

Approval Authority: Workplace Safety Committee Originally issued:

April 28, 2019

Responsible Administrator: Tamara Cooley

Responsible Office: Workplace Safety Office Current version effective as of:

April 28, 2019

Policy Contact: Tamara Cooley

POLICY STATEMENT/REASON FOR POLICY

Respirators are devices that protect employees from inhaling harmful substances, including chemical, biological, and radiological agents. These substances can be in the form of airborne vapors, gases, dust, fogs, fumes, mists, smokes, or sprays. Some respirators also ensure that employees do not breathe air that contains dangerously low levels of oxygen or that is otherwise immediately dangerous to life or health. Respirators may be used to provide protection during routine operations where engineering controls and work practices are not able to provide sufficient protection from these hazards, or in emergencies.

This policy establishes guidelines in the proper selection, use, and care of respirators when job duties require the use of respiratory protection.

Voluntary respirator use, as deemed appropriate by the Workplace Safety Office, is subject to certain requirements of this policy.

POLICY SCOPE

This policy applies to all university faculty, staff and students.

University faculty, staff, and students that provide services at Vanderbilt University Medical Center (VUMC) are subject to the respiratory protection program maintained by Vanderbilt Environmental Health and Safety (VEHS).

POLICY

Faculty, staff, and students using respiratory protection follow the regulatory requirements set forth in the VU Respiratory Protection Policy.

PROCEDURES

- 1. Selection of Respirators
 - Respirator usage has significant limitations that can affect the health and safety of the wearer. Respirators are therefore selected with the approval of the Workplace Safety Office.
 - b. Only respirators approved by NIOSH (National Institute of Occupational Safety and Health) will be used.

2. Responsibilities

- a. Workplace Safety Office is responsible for the administration of the Respiratory Protection Policy at VU, which includes:
 - i. Determining the need for respiratory protection;
 - ii. Assisting Departments with a written site-specific program defining the required worksite-specific procedures for respirators used in each application;
 - iii. Respirator selection;
 - iv. Training:
 - v. Fit testing;
 - vi. Maintaining non-medical records pertaining to this policy; and
 - vii. Evaluating effectiveness of this policy and departmental written programs.

b. Medical Evaluations

- i. Medical evaluations for Vanderbilt employees are provided and maintained by Vanderbilt Occupational Health Clinic (VOHC).
- ii. Medical evaluations for students are provided and maintained by Vanderbilt Student Health.

c. Departments

- i. Develop (with the help of the Workplace Safety Office) and implement a written site-specific program defining the required worksite-specific procedures for respirators used in each application;
- ii. Assist the Workplace Safety Office in identifying employees required to wear a respirator by:
 - Keeping the Workplace Safety Office apprised of new potential hazards introduced into the work area or process changes that may result in inhalational exposures; and
 - 2. Identifying employees who may be exposed to inhalational hazards.
- iii. Verify that their employees participate in medical surveillance and annual training/fit testing as required.
- d. Employees required to wear a respirator for the performance of job duties at VU are responsible for:
 - i. Obtaining medical clearance to wear a respirator;
 - ii. Participating in annual fit testing and training;
 - iii. Using the respirator when required for the specific work activity; and
 - iv. Verifying that the respirator is cleaned, stored, and maintained according to the manufacturer recommendations.

3. Training of Employees

- a. Is provided for respirator wearers prior to use of the respirator and annually thereafter:
- b. Is provided if workplace conditions associated with inhalational hazards change or new types of respirators are used; and
- c. Includes information about respirators:
 - i. Usage/maintenance;
 - ii. Storage;
 - ii. Limitations;

- iii. Donning/removal; and,
- iv. Medical signs and symptoms that may limit or prevent effective use.

4. Respirator Fit Testing

- a. Is required for all tight-fitting respirators prior to initial use and annually thereafter.
- b. Is not performed for individuals who have facial hair that comes between the sealing surface of the face piece and the face.
- c. Is not performed when the fit tester deems that the individual requires re-evaluation by VOHC
- d. Is performed by the Workplace Safety Office or VEHS, as appropriate.
- e. Is performed in accordance to approved methods as found in Appendix A of OSHA's Respiratory Protection Standard.

5. Special Provisions for Voluntary Use of Respirators

- a. Employees can request to wear respirators in situations where respirator use is not required by regulatory requirements.
- b. Before the employee can voluntarily use a respirator, contact the Workplace Safety Office to ensure that the respirator does not present a hazard to the employee.
- c. Employees approved to wear a voluntary use respirator must undergo a medical evaluation to determine that the employee is medically able to use the respirator.
- d. The Workplace Safety Office will also review Appendix D of OSHA's Respiratory Protection Standard.

FREQUENTLY ASKED QUESTIONS

What if I need respiratory protection due to an animal allergen?

 Contact VEHS (615-322-2057) if you have a question about the Animal Allergy respirator program.

What if I am not sure if I need respiratory protection?

 Contact your supervisor. If your supervisor is unsure if your job duties require the use of respiratory protection, have your supervisor contact the Workplace Safety Office for more information.

ADDITIONAL CONTACTS

Subject	Contact/Position	Office	Phone
Policy Issuance	Compliance Officer	Department	(615) XXX-XXXX
Respiratory Protection Policy	Tamara Cooley	Workplace Safety Office	(615) 566-9158
Medical Surveillance	Sherry Spray	Occupational Health Clinic	(615) 936-0955

RELATED POLICIES/DOCUMENTS

Occupational Safety and Health Administration, CFR 1910.123 Respiratory Protection

Vanderbilt Environmental Health and Safety, Respiratory Protection Program

HISTORY

Issued: 04/26/2019

Reviewed: 04/26/2019

Comment

Amended: N/A

Comment

Disclaimer: The policies and procedures that guide employment practices are intended to assist in consistent administration and compliance. Vanderbilt reserves the right to modify its policies and practices, in whole or in part, at any time. Revisions to existing policies and procedures, and the development of new policies and procedures, will be made from time to time at the discretion of the University. When new policies are implemented or existing policies are revised, the University will notify members of the University community as soon as practicable. However, where differences occur, the most recent policy as reviewed and approved by the University will take precedence. The policies and procedures do not create a contract, implied or expressed, with at will employees at Vanderbilt.