



INTEROFFICE MEMO

To: Division of Air Pollution Control District Offices and Local Air Agencies (DAPC-DO/LAA)
Respirator users and Supervisors.

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Subject: Standard Operating Guidance (SOG) for Respirator use in the Asbestos Program

Division of Air Pollution Control, Standard Operating Guidance (SOG) for use of Respiratory Protection Equipment in the Asbestos program

References:

- OSHA Regulation 29 CFR 1926.1101 - Asbestos
- OSHA Regulation 29 CFR 1910.134 - Respiratory Protection
- Ohio EPA Safety Policy No. OEPA-SM-06-002, Respiratory Protection
- Ohio EPA Safety Policy No. OEPA-SM-05-00, Occupational Medical Monitoring

Respiratory Protection Program Overview:

All of the Ohio EPA DAPC asbestos inspectors should continue to be enrolled in the Agency's Respiratory Protection Program.

This will require specific medical clearance for respirator use, initial and annual respirator fit testing (RespFIT) on each type of respirator being worn, and initial and annual refresher training.

Each inspector should be provided with both a full and half face air-purifying respirator (APR).

Each inspector must also have immediate access to a powered-air purifying respirator (PAPR), if there is the expectation that the inspectors need to enter containment or regulated areas while active abatement is in progress.

It should be noted that OSHA's Asbestos standard requires an employer to provide a PAPR to any employee who requests this type of respirator in lieu of a negative-pressure air-purifying respirator in a situations where a negative-pressure respirator is required.

It is acceptable practice to have the inspectors share PAPR units and/or face pieces. Face pieces can only be shared if it is the appropriate size for each of the intended users. If the units and/or

face pieces are to be shared there must be a standard operating procedure (SOP) developed which outlines the required cleaning and sanitizing after each use. It is recommended that each user be provided with their own face piece for personal comfort reasons.

An appropriate supply of high-efficiency particulate air (HEPA) filters for each type of respirator worn by the inspectors must also be available.

Each inspector must perform routine user maintenance and operational checks to ensure that the respirator is working properly. Training on what is required will be provided by the OHIO EPA Health and Safety Coordinator or their representative (Safety Rep) as part of the inspector's initial and annual respirator fit test. If the PAPR units are to be shared, each individual needs to be responsible for performing the required operational checks and maintenance.

Inspectors must be quantitatively fit tested on each type of respirator that they will be wearing. Fit testing is required initially to determine the appropriate face piece size and annually thereafter to verify proper fit. Initial and annual respirator fit testing is done on an appointment basis on selected dates throughout the year at the District offices and monthly at the Groveport Field Facility. The fit test schedule is published monthly in the Ohio EPA New(s) Source (E-version). Each asbestos inspector must schedule an appointment for RespFIT with the DAPC-Respirator Safety Representative to eliminate operating a respirator with an expired RespFIT.

Respirator Use Guidelines:

When to wear a respirator - When preparing to wear a respirator, each inspector will need to evaluate each situation and determine the appropriate level of respiratory protection based on the circumstance/Activity at that time. Information such as air sampling results, or other assessment data, may be available to assist the inspector in making a respirator selection decision. Inspectors should also make note of the type of respiratory protection being worn by the asbestos workers on site. Inspectors should never enter a containment site or regulated area in a lower level of protection than what is being worn by the workers.

- **Activity** - Initial walk-through of project area (no active abatement ongoing, no containment established):
 - *Respiratory protection normally not required. **An air-purifying respirator (half or full face) should be worn** if the area appears to be dusty or asbestos containing material (ACM) or presumed asbestos containing material (PACM) is to be disturbed, handled, or sampled.*
- **Activity** - Performing an inspection inside a “containment” or “regulated” area while active removal is in progress, unless air sampling data, or other assessment data indicates that a lower level of protection would be satisfactory:
 - **Powered air-purifying respirator (PAPR) should be worn**
- **Activity** – Performing inspection inside a “regulated” area at a landfill. The inspector should protect themselves from a possible exposure event.
 - **An air-purifying respirator (full-face) and protective clothing should be worn**

- **Activity** - Collecting bulk samples for analysis or observing bulk sampling (no active abatement ongoing, no containment established):
 - ***An air-purifying respirator should be worn if ACM or PACM is assumed to be handled. When work practices, such as wet methods or vacuuming are being applied, a half face or full face mask can be used at the discretion of the inspector.***
- **Activity** - Collecting air samples or observing air sampling:
 - ***Depending on the location and the purpose of the sampling an air- purifying respirator (half or full face) may be necessary. A respirator is normally not required during the observation of clearance sampling.***

Inspectors should always take immediate action to remove themselves from an area whenever they feel that the selected respirator is not providing adequate protection. As an example, if an area has so much airborne particulate contamination that visibility becomes difficult, a PAPR may not be providing sufficient protection. In such cases, do not enter, or leave immediately if already inside.

Respirators that are worn in a contaminated environment should be wiped clean after the inspector leaves the area to prevent cross-contamination. This should be followed up with a thorough soap and water cleaning as necessary.

OSHA Required Training:

OSHA requires that asbestos workers be trained prior to, or at the time of their initial assignment and at least annually thereafter. The type of training is dependent on what type of asbestos work will be performed (OSHA Class I, II, III, and IV). Our inspectors should receive training each year that is equivalent in curriculum, training method and length to the EPA Model Accreditation Plan (MAP) asbestos abatement workers training.

The annual training requirement for all of the DAPC inspectors should be recorded/tracked within the Safety Management System (SMS). Inspectors whose annual training has expired should not be allowed to perform any asbestos-related duties until they attend the necessary training.

Annual respiratory protection refresher training is also required. This will be conducted as part of the inspector's annual respirator fit testing.

