



SIMMONS

SIMMONS COLLEGE
RESPIRATOR PROTECTION PROGRAM

Original Date: May 2016

**RESPIRATOR PROTECTION PROGRAM
REVIEW SUMMARY**

<i>Revision(s)</i>	<i>By</i>	<i>Affiliation</i>	<i>Date</i>	<i>Changes</i>

Table of Contents

1.0	INTRODUCTION	1
2.0	SCOPE AND APPLICATION	1
3.0	ROLES AND RESPONSIBILITIES.....	2
3.1	Program Administrator.....	2
3.2	Department Chairs, Department Heads, Supervisors	2
3.3	Employees and Students	3
4.0	TYPES OF RESPIRATORS.....	3
4.1	Dust Masks (filtering face pieces).....	3
4.2	Half-Face Air-Purifying Respirator.....	4
4.3	Full-Face Air-Purifying Respirator.....	5
4.4	Powered Air Purifying Respirator (PAPR)	5
4.5	Supplied Air Respirators and Self-Contained Breathing Apparatus	6
5.0	PROGRAM ELEMENTS	7
5.1	Selection Procedures.....	7
5.2	Updating the Hazard Assessment	8
5.3	Medical Evaluation	9
5.4	Fit Testing	10
5.5	Respirator Use	10
5.6	Respirator Malfunction	11
5.6.1	APR Respirator Malfunction	11
5.6.2	Atmosphere-Supplying Respirator Malfunction.....	11
5.7	IDLH Procedures	11
5.8	Air Quality.....	11
5.9	Cleaning.....	11
5.10	Maintenance	12
5.11	Change Schedules.....	13
5.12	Storage	13
5.13	Defective Respirators	13
6.0	TRAINING	14
7.0	PROGRAM EVALUATION	15

8.0 DOCUMENTATION AND RECORDKEEPING 15

FIGURES

Figure 1 – Dust Masks

Figure 2 – Half-Face Air-Purifying Respirator

Figure 3 – Full-Face Air-Purifying Respirator

Figure 4 – Powered Air Purifying Respirator

Figure 5 - Supplied Air Respirators and Self-Contained Breathing Apparatus

TABLES – None

APPENDICES

Appendix A – Work processes requiring respirator use

Appendix B – Hazard assessments

1.0 INTRODUCTION

Simmons College (Simmons) has prepared this Respiratory Protection Program (RPP) to ensure compliance with Occupational Safety and Health Administration's (OSHA) Respirator Protection Standard, 29 Code of Federal Regulations 1910.134. A copy of the regulation is available at their [Respirator Protection webpage](#). Simmons has chosen to include students in this RPP even though this regulation only applies to employees.

The Director of Environmental Health and Safety (EH&S) has determined that the following departments may be exposed to respiratory hazards during routine operations. Respirator use will be required if an assessment determines that a respirator is required for an activity and/or if a medical provider indicates that a respirator is required for a person.

- Biology
- Buildings and Grounds
- Chemistry and Physics
- Psychology

These hazards include wood dust, particulates, aerosols, and vapors, in some cases represent Immediately Dangerous to Life or Health (IDLH). The purpose of this RPP is to ensure that all Simmons' employees and students are protected from the exposure to these respiratory hazards.

Engineering controls, such as ventilation and substitution of less toxic materials, are the first line of defense at Simmons; however, engineering controls have not always been feasible for some of our operations, or have not always completely controlled the identified hazards. In these situations, respirators and other protective equipment must be used. Respirators are also needed to protect employees' health during emergencies. The work processes requiring respirator use at Simmons are provided in Appendix A of this RPP.

In addition, some employees have expressed a desire to wear respirators during certain operations that do not require respiratory protection. As a general policy, Simmons will review each of these requests on a case-by-case basis. If the use of respiratory protection in a specific case will not jeopardize the health or safety of the employee(s), the Director of EH&S will provide respirators for voluntary use. As outlined in the Scope and Application section of this program, voluntary respirator use is subject to certain requirements of this program.

2.0 SCOPE AND APPLICATION

This program applies to all employees and students who are required to wear respirators during normal work operations, and during some non-routine operations. Simmons does not permit employees or students to wear respiratory protection when responding to an emergency. All employees or students working in these areas and engaged in certain processes or tasks (as outlined in Appendix A) must be

enrolled in Simmons' RPP. In addition, any employee who voluntarily wears a respirator when a respirator is not required (i.e., in certain maintenance and coating operations) is subject to the medical evaluation, cleaning, maintenance, and storage elements of this program, and must be provided with certain information specified in this section of the program.

3.0 ROLES AND RESPONSIBILITIES

3.1 Program Administrator

The Program Administrator is responsible for administering the respiratory protection program. Duties of the program administrator include:

- Identifying work areas, processes or tasks that require workers to wear respirators, and evaluating hazards.
- Ensuring adequate air quantity, quality, and flow of breathing air for atmosphere-supplying respirators.
- Selection of respiratory protection options.
- Monitoring respirator use to ensure that respirators are used in accord with their certifications.
- Arranging for and/or conducting training.
- Ensuring proper storage, cleaning, inspections, and maintenance of respiratory protection equipment.
- Ensuring employees have been administered a qualitative fit testing by a contractor.
- Administering the medical surveillance program.
- Maintaining records required by the program.
- Evaluating the program.
- Updating written program, as needed.

The Program Administrator for Simmons is the Director of EH&S.

3.2 Department Chairs, Department Heads, Supervisors

Department chairs, department heads, and supervisors (Supervisors) are responsible for ensuring that the respiratory protection program is implemented in their particular areas. In addition to being knowledgeable about the program requirements for their own protection, they must also ensure that the program is understood and followed by the workers and students under their charge.

NOTE: Workers participating in the respiratory protection program do so at no cost to themselves.

Duties include:

- Ensuring that employees and students under their supervision (including new hires) have received appropriate training, fit testing, and annual medical evaluation.
- Ensuring the availability of appropriate respirators and accessories.

- Being aware of tasks requiring the use of respiratory protection.
- Enforcing the proper use of respiratory protection when necessary.
- Ensuring that respirators are properly cleaned, maintained, inspected, and stored according to the respiratory protection plan.
- Ensuring that respirators fit well and do not cause discomfort.
- Continually monitoring work areas and operations to identify respiratory hazards.
- Coordinating with the Program Administrator on how to address respiratory hazards or other concerns regarding the program.
- Ensuring adequate air quantity, quality, and flow of breathing air for atmosphere-supplying respirators.

3.3 Employees and Students

Each employee and student has the responsibility:

- To wear his or her respirator when and where required and in the manner in which they were trained.
- Care for and maintain their respirators as instructed, and store them in a clean, sanitary location.
- Inform their supervisor if the respirator no longer fits well, and request a new one that fits properly.
- Inform their supervisor or the Program Administrator of any respiratory hazards that they feel are not adequately addressed in the workplace and of any other concerns that they have regarding the program.
- Inform their supervisor of need for a medical reevaluation.

4.0 TYPES OF RESPIRATORS

The type and brands of respirators vary widely ranging from simple dust masks to supplied air respirators like the kind firemen wear. Following is description of the main types of respirators. Emergency escape respirators are not permitted at Simmons.

4.1 Dust Masks (filtering face pieces)



Figure 1 – Dust Masks

These simple, two-strap disposable dust masks are designed only for dusts. They are not as protective as other respirators, but do an adequate job in many cases, unless the dust is really toxic or copious. Don't confuse these two-strap masks with the less protective one-strap dust mask designed only for pollen or non-toxic dust.

4.2 Half-Face Air-Purifying Respirator



Figure 2 – Half-Face Air-Purifying Respirator

These respirators are sometimes called “half-face” or “half-mask” respirators since they cover just the nose and mouth. They have removable cartridges that filter out either dust, chemicals or both. Selecting the correct cartridges is essential since they are designed for particular types of chemicals or dust. A reputable respirator vendor can assist you in selecting the correct cartridges. These cartridges are typically removable and sometimes interchangeable. Cartridges are available for solvents, ammonia, chlorine, acids and other chemicals. The cartridges must be changed out or replaced periodically, especially for chemicals, since they can absorb only so much contaminant before breakthrough occurs. A few cartridges are equipped with end-of-service indicators that show when a cartridge should be replaced. Most cartridges don't have this indicator and you must develop a change-out schedule to prevent breakthrough. The change-out schedule is based on the chemical concentration, physical work effort, temperature and humidity. Many respirator manufacturers have cartridge change schedule calculators available on the Internet.

4.3 Full-Face Air-Purifying Respirator



Figure 3 – Full-Face Air-Purifying Respirator

In some situations, the employee or student may need or want to use full-face respirators. This type of respirator is used when the air contaminant irritates the eyes. They also provide somewhat higher protection to the lungs since they tend to fit tighter and are less prone to leaking. These respirators also have replaceable cartridges that must be changed on a regular basis as described above for half-face respirators.

4.4 Powered Air Purifying Respirator (PAPR)



Figure 4 – Powered Air Purifying Respirator

Powered Air Purifying Respirators have a battery pack that draws air through replaceable cartridges and blows into a full facepiece, helmet or hood. These respirators are often more comfortable in hot weather and some can provide more protection, depending on the type. The cartridges must be changed regularly as describe for half-face respirators above.

4.5 Supplied Air Respirators and Self-Contained Breathing Apparatus



Figure 5 - Supplied Air Respirators and Self-Contained Breathing Apparatus

In a few situations, you may need to provide a supplied air respirator to your employees. These situations include large chemical spills or leaks, entering a confined space where there is lack of oxygen or high levels of air contaminants, or working around extremely toxic chemicals. They may also be necessary working at hazardous waste sites, during sandblasting or in some spray painting operations. “Supplied air,” means that clean air is provided by means of an air hose from a compressor or a pressurized air tank.

Supplied air respirators are required when a respiratory hazard is considered “immediately dangerous to life or health” (also called “IDLH”). Respiratory hazards are classified as IDLH as follows:

- There is a lack of oxygen (less than 19.5% oxygen)
- There is too much oxygen (more than 23.5% - a fire hazard)
- You know there are toxic chemicals in the air, but you don’t know how much
- The amount of chemical in the air is known or expected to be above the IDLH level for that chemical. See the [NIOSH Pocket Guide to Chemical Hazards](#) for chemical IDLH levels.

Levels of chemicals above IDLH can occur in confined spaces, or enclosed spaces where there is little or no ventilation.

5.0 PROGRAM ELEMENTS

No one at Simmons is permitted to wear a respirator for emergency response. Below are figures demonstrating the different types of respirators.

5.1 Selection Procedures

The Program Administrator:

- Will select respirators to be used on site, based on the hazards to which workers are exposed and in accord with all applicable OSHA standards.
- Will conduct a hazard evaluation for each operation, process, or work area where airborne contaminants may be present in routine operations or during an emergency.
- Monitoring can be contracted out.
- The hazard evaluation will include:
 - Identification and development of a list of hazardous substances used in the workplace, by department or work process.
 - Review of work processes to determine where potential exposures to these hazardous substances may occur. This review is to be conducted by surveying the workplace, reviewing process records, and talking with employees and supervisors.
 - Exposure monitoring to quantify potential hazardous exposures.
 - If worker exposures have not been, or cannot be, evaluated they must be considered IDLH.
 - Respirators are selected based on the workplace hazards evaluated, and workplace and user factors affecting respirator performance and reliability.
- Respirators are selected based on the Assigned Protection Factors (APFs) and calculated Maximum Use Concentrations (MUCs).
- A sufficient number of respirator sizes and models must be provided to the employee during fit testing to identify the acceptable respirator that correctly fits the users.
- For IDLH atmospheres:
 - Full facepiece pressure demand Supplied-Air Respirators (SARs) with auxiliary Self-contained Breathing Apparatus (SCBA) unit or full facepiece pressure demand SCBAs, with a minimum service life of 30 minutes, must be provided.
 - Respirators used for escape only are NIOSH-certified for the atmosphere in which they will be used.
 - Oxygen deficient atmospheres are considered IDLH.
- For Non-IDLH atmospheres, respirators are:
 - Selected as appropriate for the APFs and MUCs.
 - Selected as appropriate for the chemical nature and physical form of the contaminant.
 - Equipped with end-of-service-life indicators (ESLIs) if the respirators (APRs) are used for protection against gases and vapors. If there is no ESLI, then a change schedule must be implemented.

- Equipped with National Institute for Occupational Safety and Health (NIOSH)-certified High Efficiency Particulate Air (HEPA) filters (or other filters certified by NIOSH for particulates under 42 CFR part 84) if the respirators (APRs) are to be used for protection against particulates.
- When monitoring is contracted out, the contractor will provide a statement indicating when and during which operation(s) a respirator is required to be worn by an employee or student unless it has already been determined by the Department. Appendix B provides a table outlining the hazard assessments performed at Simmons.

5.2 Updating the Hazard Assessment

The Program Administrator:

- Must revise and update the hazard assessment as needed (i.e., any time work process changes may potentially affect exposure). If an employee feels that respiratory protection is needed during a particular activity, he/she is to contact his or her supervisor or the Program Administrator. The Program Administrator then:
 - Will evaluate the potential hazard, arranging for outside assistance as necessary.
 - Will then communicate the results of that assessment back to the employees. If it is determined that respiratory protection is necessary, all other elements of this program will be in effect for those tasks, and this program will be updated accordingly.
 - Will ensure that all respirators are certified by the NIOSH and are used in accord with the terms of that certification.
 - Will also ensure that all filters, cartridges, and canisters must be labeled with the appropriate NIOSH certification label. The label must not be removed or defaced while it is in use.
 - Regarding Voluntary Respirator Use, the following statement is needed: Simmons will provide respirators at no charge to employees for voluntary use.

The Program Administrator will also:

- Provide all employees who voluntarily choose to wear either of the above respirators with a copy of Appendix D of the standard specified by the Respiratory Protection standard (29 CFR 1910.134). (Appendix D details the requirements for voluntary use of respirators by workers.) Workers choosing to wear a half facepiece APR must comply with the procedures for medical evaluation, respirator use, and cleaning, maintenance and storage.
- Authorize voluntary use of respiratory protective equipment as requested by all other workers on a case-by-case basis, depending on specific workplace conditions and the results of the medical evaluations. Voluntary use does not require compliance with these specific provisions of the standard.

5.3 Medical Evaluation

Employees and students, who are either required to wear respirators, or who choose to wear an APR voluntarily, must pass a medical exam before being permitted to wear a respirator on the job. Employees and students are not permitted to wear respirators until a Physician or Other Licensed Healthcare Professional (PLHCP) has determined that they are medically able to do so. Any employee refusing the medical evaluation will not be allowed to work in an area requiring respirator use. A PLHCP is available at New England Baptiste (NEB), where occupational medical services and medical evaluations are provided.

Medical evaluation procedures are as follows:

- The medical evaluation will be conducted using the questionnaire provided in Appendix C of the OSHA Respiratory Protection standard.
- The Program Administrator will provide a copy of this questionnaire to all employees requiring medical evaluations.
- To the extent feasible, Simmons will assist employees who are unable to read the questionnaire (by providing help in reading the questionnaire). When this is not possible, the employee will be sent directly to the physician for medical evaluation.
- All affected employees and students will be given a copy of the medical questionnaire to fill out, along with a stamped and addressed envelope for mailing the questionnaire to the Simmons physician.

Employees will:

- Be permitted to fill out the questionnaire on Simmons' time.
- Be granted follow-up medical exams as required by the Respiratory Protection standard, and/or as deemed necessary by the NEB PLHCP.
- Be granted the opportunity to speak with the physician about their medical evaluation, if they so request.

The Program Administrator has provided NEB with:

- A copy of this program, and a copy of the Respiratory Protection standard.
- The list of hazardous substances by work area, and for each employee requiring evaluation, his or her work area or job.
- The employee's title or student's role, proposed respirator type and weight, length of time required to wear the respirator, expected physical work load (light, moderate, or heavy), potential temperature and humidity extremes, and any additional protective clothing required.

Any employee or student required for medical reasons to wear a positive pressure air purifying respirator will be provided with a powered air purifying respirator.

After an employee or student has received clearance and begun to wear his or her respirator, additional medical evaluations will be provided if:

- The employee or student reports signs and/or symptoms related to their ability to use a respirator, such as shortness of breath, dizziness, chest pains, or wheezing.
- The PLHCP or supervisor informs the Program Administrator that the employee needs to be reevaluated, additional medical evaluation will be provided.
- Information from this program, including observations made during fit testing and program evaluation, indicates a need for reevaluation.

5.4 Fit Testing

Fit testing is required for employees or students wearing respirators prior to being allowed to wear any respirator, on an annual basis, when there are changes in the employee's or student's physical condition that could affect respiratory fit (e.g., obvious change in body weight, facial scarring, etc.).

Employees or students will be fit tested with the make, model, and size of respirator that they will actually wear. Employees or students will be provided with several models and sizes of respirators so that they may find an optimal fit.

Fit testing of PAPRs is to be conducted in the negative pressure mode. The Program Administrator or contractor will conduct fit tests following the OSHA approved Bitrex Solution Aerosol QLFT Protocol in Appendix A of the Respiratory Protection standard. If conditions affecting respirator use change, the Program Administrator will evaluate on a case-by-case basis whether QNFT is required.

5.5 Respirator Use

Employees and students are required that they:

- Will use their respirators under conditions specified by this program, and in accord with the training they receive on the use of each particular model. In addition, the respirator must not be used in a manner for which it is not certified by NIOSH or by its manufacturer.
- Must conduct user seal checks each time that they wear their respirator.
- Must use either the positive or negative pressure check (depending on which test works best for them) specified in Appendix B-1 of the Respiratory Protection standard.
- Must leave the work area to go to the locker room or another area where there are no air contaminants to maintain their respirator for the following reasons:
 - To clean their respirator if the respirator is impeding their ability to work;
 - To change filters or cartridges, or replace parts; or
 - To inspect the respirator if it stops functioning as intended.
- Should notify their supervisor before leaving the area.
- Not wear tight-fitting respirators if they have any condition, such as facial scars, facial hair, or missing dentures, that prevents them from achieving a good seal.
- Not wear headphones, jewelry, or other articles that may interfere with the facepiece-to-face seal.

5.6 Respirator Malfunction

5.6.1 APR Respirator Malfunction

For any malfunction of an APR (e.g., breakthrough, facepiece leakage, or improperly working valve), the respirator wearer must inform his or her supervisor that the respirator no longer functions, and go to the designated safe area to maintain the respirator. The supervisor must ensure that the employee receives the needed parts to repair the respirator, or is provided with a new respirator.

5.6.2 Atmosphere-Supplying Respirator Malfunction

All workers wearing atmosphere-supplying respirators will work with a buddy. Buddies should assist workers who experience an SAR malfunction as follows:

- If a worker experiences a malfunction of an SAR, he or she should signal to the buddy that he or she has had a respirator malfunction.
- The buddy shall don an emergency escape respirator and aid the worker in immediately exiting the work area.

5.7 IDLH Procedures

At this time, no SIMMONS employees or students are permitted to enter IDLH conditions.

5.8 Air Quality

For supplied-air respirators, only Grade D breathing air is to be used in the cylinders. The Program Administrator will coordinate deliveries of compressed air with the Simmons' vendor and require that the vendor to certify that the air in the cylinders meets the specifications of Grade D breathing air. The Program Administrator will maintain a minimum air supply of one fully charged replacement cylinder for each SAR unit. In addition, cylinders may be recharged as necessary from the breathing air cascade system located near the respirator storage area.

The air for this system is provided by Simmons' supplier, and deliveries of new air are coordinated by the Program Administrator.

5.9 Cleaning

Respirators are to be regularly cleaned and disinfected at the designated respirator cleaning station located in the employee locker room. Respirators issued for the exclusive use of an employee or student are to be cleaned as often as necessary, but at least once a day. Atmosphere-supplying respirators are to be cleaned and disinfected after each use. The following procedure is to be used when cleaning and disinfecting respirators:

- Disassemble respirator, removing any filters, canisters, or cartridges.
- Wash the facepiece and associated parts in a mild detergent with warm water. Do not use organic solvents.

- Rinse completely in clean warm water.
- Wipe the respirator with disinfectant wipes (70% Isopropyl Alcohol) to kill germs.
- Air dry in a clean area.
- Reassemble the respirator and replace any defective parts.
- Place in a clean, dry plastic bag or other airtight container.

NOTE: The Program Administrator will ensure an adequate supply of appropriate cleaning and disinfection material at the cleaning station. If supplies are low, employees should contact their supervisor, who will inform the Program Administrator.

5.10 Maintenance

Respirators are to be properly maintained at all times to ensure that they function properly and adequately protect the employee or student. Maintenance involves a thorough visual inspection for cleanliness and defects. Worn or deteriorated parts will be replaced prior to use. No components will be replaced or repairs made beyond those recommended by the manufacturer. Repairs to regulators or alarms of atmosphere supplying respirators will be conducted by the manufacturer.

The following checklist will be used when inspecting respirators:

- Facepiece:
 - No cracks, tears, or holes
 - No facemask distortion
 - No cracked or loose lenses/face shield
- Valves:
 - No residue or dirt
 - No cracks or tears in valve material
- Head straps:
 - No breaks or tears
 - No broken buckles
- Filters/Cartridges:
 - Approval designation
 - Gaskets
 - No cracks or dents in housing
 - Proper cartridge for hazard
- Air Supply Systems:
 - Breathing air quality/grade
 - Condition of supply hoses
 - Hose connections
 - Settings on regulators and valves

Employees and students are permitted to leave their work area and go to a designated area that is free of respiratory hazards when they need to wash their face and respirator facepiece to prevent any eye or skin

irritation, or to replace the filter, cartridge or canister, or when they detect vapor or gas breakthrough or leakage in the facepiece or detect any other damage to the respirator or its components.

5.11 Change Schedules

Employees and students wearing APRs or PAPRs with P100 filters for protection against wood dust and other particulates need to change the cartridges on their respirators when they first begin to experience difficulty breathing (i.e., resistance) while wearing their masks.

5.12 Storage

Respirators must be stored in a clean, dry area, and in accord with the manufacturer's recommendations. Each employee or student will clean and inspect their own air purifying respirator in accord with the provisions of this program, and will store their respirator in a plastic bag in their own locker or desk. Each employee will have his/her name on the bag, and that bag will only be used to store that employee's respirator. Atmosphere-supplying respirators will be stored in the storage cabinet outside of the Program Administrator's office. The Program Administrator will store Simmons' supply of respirators and respirator components in their original manufacturer's packaging in her office.

5.13 Defective Respirators

Respirators that are defective or have defective parts must be taken out of service immediately. If, during an inspection, an employee or student discovers a defect in a respirator, he/she is to bring the defect to the attention of his or her supervisor. Supervisors will give all defective respirators to the Program Administrator. The Program Administrator will decide whether to:

- Temporarily take the respirator out of service until it can be repaired.
- Perform a simple fix on the spot such as replacing a head strap.
- Dispose of the respirator due to an irreparable problem or defect.
- When a respirator is taken out of service, the respirator will be tagged out of service, and the employee or student will be given a replacement of the same make, model and size.
- If the employee or student is not given a replacement of the same make, model and size, then the employee or student must be fit tested.
- All tagged out-of-service respirators will be kept in the storage cabinet inside the Program Administrator's office.

6.0 TRAINING

The Program Administrator, the Human Resource Department, or contractor will provide training to respirator users and their supervisors on the contents of the Simmons' RPP and their responsibilities under it, and on the OSHA Respiratory Protection standard. Workers and students will be trained prior to using a respirator at Simmons. The training must be comprehensive, understandable and recur annually, and more often if necessary.

As with any employee or student, supervisors must be trained prior to using a respirator in the workplace; they also should be trained prior to supervising workers or students who must wear respirators if the supervisors themselves do not use a respirator. Supervisors will provide the basic information on respirators in Appendix D of the Respiratory Protection standard to employees and students who wear respirators when not required by Simmons to do so. Supervisors will ensure that each employee and student can demonstrate knowledge of at least the following:

- Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator;
- What the limitations and capabilities of the respirator are;
- How to use the respirator effectively in emergency situations, including situations in which the respirator malfunctions;
- How to inspect, put on and remove, use, and check the seals of the respirator;
- What the procedures are for maintenance and storage of the respirator;
- How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators; and
- The general requirements of the Respiratory Protection standard.

Supervisors will ensure that employees and students will be retrained annually or as needed (e.g., if they change departments and need to use a different respirator). An employee or student, who is able to demonstrate that a new employee or student has received training within the last 12 months that addresses the elements specified in OSHA's Respiratory Protection Standard is not required to repeat such training provided that, as required by OSHA's Respiratory Protection Standard, the employee or student can demonstrate knowledge of those element(s). Previous training not repeated initially by the employee or student must be provided no later than 12 months from the date of the previous training. Retraining shall be administered annually, and when the following situations occur:

- Changes in the workplace or the type of respirator render previous training obsolete;
- Inadequacies in the employee's or student's knowledge or use of the respirator indicate that the worker has not retained the requisite understanding or skill; or
- Any other situation arises in which retraining appears necessary to ensure safe respirator use. The basic advisory information on respirators, as presented in Appendix D of the OSHA's Respiratory Protection Standard, shall be provided by the Talent and Human Capital Strategy (THCS), which is

the Human Resources Department for Simmons, in any written or oral format to employees or students who wear respirators when such use is not required by this section or by the Simmons.

7.0 PROGRAM EVALUATION

The Program Administrator will conduct periodic evaluations of the workplace to ensure that the provisions of this program are being implemented. The evaluations will include regular consultations with employees and students who use respirators and their supervisors, site inspections, air monitoring and a review of records. Problems identified will be noted in an inspection log and corrected by the Program Administrator. These findings will be reported to THCS Department, and the report will list plans to correct deficiencies in the respirator program and target dates for implementing those corrections.

This RPP will be revised, as necessary. Revisions will be documented in the revisions table at the beginning of this document.

8.0 DOCUMENTATION AND RECORDKEEPING

A written copy of this program and the OSHA standard is kept in the THCS office and is available to all employees and students who wish to review it. Also maintained in the THCS office are:

- Copies of training materials.
- Copies of fit test records. These records will be updated as new fit tests are conducted.
- These records will be updated as new employees and students are trained and as existing employees and students receive refresher training.

The THCS will also maintain copies of the records for all employees covered under the respirator program (except medical records). The completed medical questionnaire and the PLHCP's documented findings are confidential and will remain within the THCS Office. Simmons will only retain the physician's written recommendation regarding each employee's or student's ability to wear a respirator.

APPENDIX A – WORK PROCESSES REQUIRING RESPIRATOR USE

TYPE OF RESPIRATOR	DEPARTMENT/ACTIVITY	CONDITION OF USE
Filtering facepiece (Dust Mask)	Psychology – Working with animals	Voluntary

