



NC Sturgeon Safety Management System			Doc No:	RESPO
			Initial Issue Date:	02/2016
RESPIRATORY PROTECTION			Revision Date:	Initial Version
			Revision No.:	0
			Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 1 of 19

Purpose

It is the intention of **NC Sturgeon** to provide a respirator protection program that meets or exceeds all federal standards. **NC Sturgeon** will attempt to engineer potential harmful vapors and oxygen deficient atmosphere exposure hazards out of the work environment. If engineering control measures are not feasible or during emergency situations with high exposure then respirators shall be provided which are applicable and suitable for purpose intended.

Scope

This program applies to all **NC Sturgeon** projects and operations.

Respiratory Program Administrator

Overall responsibility for the respiratory protection program is assigned to the **NC Sturgeon** Safety Manager in order to ensure that specific requirements are followed.

The Administrator must be knowledgeable of the complexity of the program, able to conduct evaluations and have the proper training.

This assignment is made, however, with the understanding that individual supervisors will have to implement and enforce major portions of the program. It is understood that the Program Administrator will report performance problems to the appropriate manager for resolution. The person who will have responsibility for administering all the aspects of this program will be the Project Manager or their designee.

The responsibilities of the Program Administrator will include, but are not limited to:

- Conducting an annual written evaluation of the program. The program evaluation should be completed no later than December, 31, of each year.
- Ensuring an adequate supply of respirators, cartridges, and repair/replacement parts. The Program Administrator may delegate this duty but will retain overall responsibility. The person(s) to whom this duty has been delegated is the Project Manager and/or Field Supervisor.
- Identifying hazards and ensuring only NIOSH certified respirators must be selected and provided based on those hazards and factors affecting performance.
- Ensuring that all respirator users have been trained in the use, selection and limitations of the type of respirators they will be using prior to the first time the respirator must be used. While the duty of conducting the training may be delegated, the Program Administrator retains final responsibility for seeing that all employees are appropriately trained.
- Ensuring that all respirator users have been medically evaluated and found fit to use the type of respirators that will be required in their job. The medical evaluation must be completed prior to assigning any employee to a task that requires use of a respirator.
- Ensuring that all respirator users are fit-tested at least annually and more often if other federal requirements apply.



NC Sturgeon Safety Management System		Doc No:	RESPO	
		Initial Issue Date	02/2016	
RESPIRATORY PROTECTION		Revision Date:	Initial Version	
		Revision No.	0	
		Next Revision Date:	TBD	
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 2 of 19

- Ensuring that respirators are individually issued, are cleaned and sanitized on a regular basis, and respirators are stored in a clean and accessible location. This duty may also be delegated but the Program Administrator retains final responsibility for seeing that it is done.
- Ensuring that respirators are selected based on the hazard that will be encountered. This program describes the basic respirators that will be used at this site and the tasks for which they will be required. In special circumstances, the Program Administrator will contact the corporate health and safety staff for guidance in selecting the correct respirator.
- Ensuring that employee exposure is monitored to assure correct respirator type is used. Exposure monitoring may be delegated to others; however, the Program Administrator has final responsibility of monitoring completion and to request assistance when necessary.
- Ensuring surveillance of employees who wear respirators shall leave the area to wash, change cartridges or if they detect break through or resistance.
- Ensuring that the elements of the Respiratory Protection Program for the selection, use, cleaning/maintenance, storage and fit-testing of respirators are followed.
- Ensuring that respirator parts are not exchanged between brands of respirators.
- Ensuring medical evaluations, respirators and required training are provided at no cost to the employee.

Medical Requirements

General

NC Sturgeon shall provide a medical evaluation to determine the employee's ability to use a respirator, *before* the employee is fit tested or required to use the respirator in the workplace. **NC Sturgeon** may discontinue an employee's medical evaluations when the employee is no longer required to use a respirator.

Medical Evaluation Procedures

NC Sturgeon shall identify a physician or other licensed health care professional (PLHCP) to perform medical evaluations using a medical questionnaire or an initial medical examination that obtains the same information as the medical questionnaire. The medical evaluation shall obtain the information requested by the Medical Questionnaire in Forms section (or equivalent).

The medical evaluation prior to fit-testing will be confidential, conducted during normal working hours, be at a convenient time and location, be understandable and the employee will be given a chance to discuss the results with the PLHCP.

Supplemental Information for the PLHCP

The following information must be provided to the PLHCP before the PLHCP makes a recommendation concerning an employee's ability to use a respirator:

- The type and weight of the respirator to be used by the employee;
- The duration and frequency of respirator use (including use for rescue and escape);
- The expected physical work effort;
- Additional protective clothing and equipment to be worn; and
- Temperature and humidity extremes that may be encountered.



NC Sturgeon Safety Management System			Doc No:	RESPO
			Initial Issue Date	02/2016
RESPIRATORY PROTECTION			Revision Date:	Initial Version
			Revision No.	0
			Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 3 of 19

NC Sturgeon shall provide the PLHCP with a copy of the **NC Sturgeon** Respiratory Protection Program.

Note: When **NC Sturgeon** replaces a PLHCP, **NC Sturgeon** must ensure that the new PLHCP obtains this information, either by providing the documents directly to the PLHCP or having the documents transferred from the former PLHCP to the new PLHCP. However, OSHA does not expect employers to have employees medically re-evaluated solely because a new PLHCP has been selected.

Medical Determination

In determining the employee's ability to use a respirator, **NC Sturgeon** shall obtain a written recommendation regarding the employee's ability to use the respirator from the PLHCP. The recommendation shall provide only the following information:

- Any limitations on respirator use related to the medical condition of the employee, or relating to the workplace conditions in which the respirator will be used, including whether or not the employee is medically able to use the respirator;
- The need, if any, for follow-up medical evaluations; and
- A statement that the PLHCP has provided the employee with a copy of the PLHCP's written recommendation.

All recommendations are to be sent to **NC Sturgeon's** Safety Manager.

Additional Medical Evaluations

At a minimum, **NC Sturgeon** shall provide additional medical evaluations that comply with the requirements of this program if:

- An employee reports medical signs or symptoms that are related to ability to use a respirator;
- A PLHCP, supervisor, or the respirator Program Administrator informs **NC Sturgeon** that an employee needs to be re-evaluated;
- Information from the respiratory protection program, including observations made during fit testing and program evaluation, indicates a need for employee re-evaluation; or
- A change occurs in workplace conditions (e.g., physical work effort, protective clothing, and temperature) that may result in a substantial increase in the physiological burden placed on an employee.

Work Site Procedures

Each work site where respirators are required to protect the health of the worker shall have work site procedures that follow the guidelines of this program. Specific procedures may also be required by our client which will be followed. The following areas shall be included:

- Identification of specific hazard requiring respiratory protection
- The selection of the appropriate respiratory protection equipment based on the specific hazard and concentration levels, characteristics, etc. Specific brand and models of respiratory equipment to be used shall be identified in the procedures.



NC Sturgeon Safety Management System			Doc No:	RESPO
			Initial Issue Date	02/2016
RESPIRATORY PROTECTION			Revision Date:	Initial Version
			Revision No.	0
			Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 4 of 19

- Verification that each user of respiratory protection is qualified (medical approval, current fit test, annual training and demonstrates competency).

Respirator Selection Criteria

The selection of the respiratory equipment is based on the hazards the employee is exposed to. **NC Sturgeon** shall:

- Perform hazard identification,
- Select and provide respirators based on those hazards and factors affecting performance,
- Establish brands and models to be used, and
- Estimate exposures and contaminant information.

Hazard Identification

Due to the many varied work locations **NC Sturgeon's** identification of respiratory hazards will be contained in the various work site specific safety plans. However, common respiratory hazards that will be encountered include:

- Dust
- Fumes
- Gases
- Chemical particles
- Oxygen Deficiency

Characteristics of Hazardous Operation or Process

- Hot operations: welding, chemical reactions, soldering, melting, melding and burning
- Liquid operations: painting, degreasing, dipping, spraying, brushing, coating, etching, cleaning, pickling, plating, mixing, galvanizing and chemical reactions
- Solid operations: pouring, mixing, separations, extraction, crushing, conveying, loading, bagging and demolition.
- Pressurized spraying: cleaning parts, applying pesticides, degreasing, sand blasting and painting
- Shaping operations: cutting, grinding, filing, milling, melding, sawing and drilling

Gaseous Contaminants

- Inert gases (helium, argon, etc.), which do not metabolize in the body but displace air to produce an oxygen deficiency.
- Acid gases (SO₂, H₂S, HCl, etc.) which are acids or produce acids by reaction with water.
- Alkaline gases (NH₃, etc.), which are alkalies or produce alkalies by reaction with water.
- Organic gases (butane, acetone, etc.), which exist as true gases or vapours from organic liquids.
- Organometallic gases (tetraethyl lead, organo-phosphates, etc.), which have metals attached to organic groups.

Particulate contaminants

- Dusts are mechanically generated solid particulates (0.5 to 10µm)



NC Sturgeon Safety Management System			Doc No:	RESPO
			Initial Issue Date	02/2016
RESPIRATORY PROTECTION			Revision Date:	Initial Version
			Revision No.	0
			Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 5 of 19

- Fumes are solid condensation particles of small diameter (0.1 to 1.0 µm)
- Mists are liquid particulate matter (5 to 100 µm)
- Smoke is chemically generated particulates (solid and liquid) of organic origins (0.01 to 0.3 µm)

Selection of Respirator

The following factors shall be taken into account when selecting the proper respirator:

Concentration and Type of Contaminant

The concentration and type of contaminant will determine the model and type of respirator and cartridges/filters or filters to be used. The concentration is based on a sampling of the atmosphere.

Location of Hazardous Area

(Confined Space, nearby contaminants, etc)

Worker Activity

(Extreme heat, cold, welding hood requirement, etc.)

Types of Respirators

Air-purifying respirators can be either full-face or half masks with mechanical or chemical cartridges to filter dusts, mists, fumes, vapours or gases.

Powered air-purifying respirators use a blower to pass the contaminated air through a filter. The purified air is then delivered into a mask or hood. They filter dusts, mists, fumes, vapours and gases, just like ordinary air-purifying respirators.

Air-purifying respirators cannot be used in oxygen-deficient atmospheres, which can result when another gas displaces the oxygen or consumption of oxygen by a chemical reaction occurs. Oxygen levels below 19.5% require either a source of supplied air or supplied-air respirator protection. Levels below 16% are considered to be unsafe and could cause death. To determine the proper cartridge for air-purifying respirators contact the COMPANY Safety Manager or a qualified on-site safety representative of the client. You should also consult the Material Safety Data Sheet of the substance that needs to be filtered.

All cartridges are assigned a color designating the type of contaminant they will filter:

White:	Acid gas
Black:	Organic vapours
Green:	Ammonia gas
Yellow:	Acid gas and organic vapours
Purple:	Radioactive materials
Orange:	Dust, fumes and mists
Olive:	Other gases and vapours

Once the wearer of the respirator can detect an odour, irritation, or taste of the contaminant, the cartridge should be replaced. All cartridges and/or filters shall be changed at the beginning of each shift.



NC Sturgeon Safety Management System			Doc No:	RESPO
			Initial Issue Date:	02/2016
RESPIRATORY PROTECTION			Revision Date:	Initial Version
			Revision No.:	0
			Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 6 of 19

Supplied-air respirators provide the highest level of protection against highly toxic and unknown materials. Supplied air refers to self-contained breathing apparatuses (SCBAs) and air-line respirators. SCBAs have a limited air supply that is carried by the user, allowing for good mobility and fewer restrictions than air-line respirators.

Air-line respirators have an air hose that is connected to a fresh air supply from a central source. The source can be from a compressed air cylinder or air compressor that provides at least Grade D breathing air.

Emergency Escape Breathing Apparatuses (EEBAs) provide oxygen for 5, 10 or 15 minutes depending on the unit. These are for emergency situations in which an employee must escape from environments immediately dangerous to life or health (IDLH).

SCBA (Self Contained Breathing Apparatus)

NC Sturgeon does NOT allow employees to work in an Immediately Dangerous to Life and Health (IDLH) environment.

In order to maintain the NIOSH/MSHA approval of any respirator, mixing parts from other respirator manufacturers is prohibited. This includes airline hoses, valves, gaskets, cartridges, etc. For example, do not use North cartridges or valve gaskets with an MSA product.

Brand and Models

NC Sturgeon has selected North Safety as its NIOSH-certified respirator. Only this brand of respirator shall be used in compliance with the conditions of the certification of its Respiratory Protection Program (fit testing model, no mixing of different manufacturer parts, cartridges, filters, etc.).

The specific model will be based on the hazard, concentration of contaminant, oxygen level, work environment and type of work being performed. To aid in the selection process the following will be used to identify the proper North respiratory equipment for the work being performed and hazard that is present.

- NIOSH Pocket Guide to Chemicals
- North Cartridge Selection Guide
- North Respirator Selection Guide

Estimate of Exposures and Contaminant Information

- No employee shall enter an IDLH environment.
- Normal oxygen levels shall be maintained.
- No employee shall be exposed to an atmosphere containing concentrations that would exceed the STEL or PEL for the identified atmospheric hazard.

Respirator Fit Testing

Before an employee may be required to use any respirator with a negative or positive pressure tight-fitting face piece, the employee must be fit tested with the same make, model, style, and size of respirator that will be used.



NC Sturgeon Safety Management System		Doc No:	RESPO
		Initial Issue Date	02/2016
RESPIRATORY PROTECTION		Revision Date:	Initial Version
		Revision No.	0
		Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page: Page 7 of 19

This section specifies the kinds of fit tests allowed, the procedures for conducting them, and how the results of the fit tests must be used.

All respirator users are fit-tested at least annually and more often if other federal requirements apply.

Supplied Air Respirators are required to be fit tested as well.

NC Sturgeon shall ensure that employees using a tight-fitting face piece respirator pass an appropriate qualitative fit test (QLFT) or quantitative fit test (QNFT) as stated in this program.

NC Sturgeon shall ensure that an employee using a tight-fitting face piece respirator is fit tested prior to initial use of the respirator, whenever a different respirator face piece (size, style, model or make) is used, and at least annually thereafter.

NC Sturgeon shall conduct an additional fit test whenever the employee reports, or **NC Sturgeon's** PLHCP, supervisor, or Program Administrator makes visual observations of, changes in the employee's physical condition that could affect respirator fit. Such conditions include, but are not limited to, facial scarring, dental changes, cosmetic surgery, or an obvious change in body weight.

If after passing a QLFT or QNFT, the employee subsequently notifies **NC Sturgeon**, Program Administrator, supervisor, or PLHCP that the fit of the respirator is unacceptable, the employee shall be given a reasonable opportunity to select a different respirator face piece and to be retested.

The fit test shall be administered using an OSHA-accepted QLFT or QNFT protocol. The OSHA-accepted QLFT and QNFT protocols and procedures are contained in this section.

QLFT may only be used to fit test negative pressure air-purifying respirators that must achieve a fit factor of 100 or less. Half face air filtering respirators may be fit tested with irritant smoke while full face air filtering respirators require Portacount fit testing.

If the fit factor, as determined through an OSHA-accepted QNFT protocol, is equal to or greater than 100 for tight-fitting half face pieces, or equal to or greater than 500 for tight-fitting full face pieces, the QNFT has been passed with that respirator.

Fit testing of tight-fitting atmosphere-supplying respirators and tight-fitting powered air-purifying respirators shall be accomplished by performing quantitative or qualitative fit testing in the negative pressure mode, regardless of the mode of operation (negative or positive pressure) that is used for respiratory protection.

Qualitative fit testing of these respirators shall be accomplished by temporarily converting the respirator user's actual face piece into a negative pressure respirator with appropriate filters, or by using an identical negative pressure air-purifying respirator face piece with the same sealing surfaces as a surrogate for the atmosphere-supplying or powered air-purifying respirator face piece.

Quantitative fit testing of these respirators shall be accomplished by modifying the face piece to allow sampling inside the face piece in the breathing zone of the user, midway between the nose and mouth. This requirement



NC Sturgeon Safety Management System			Doc No:	RESPO
			Initial Issue Date	02/2016
RESPIRATORY PROTECTION			Revision Date:	Initial Version
			Revision No.	0
			Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 8 of 19

shall be accomplished by installing a permanent sampling probe onto a surrogate face piece, or by using a sampling adapter designed to temporarily provide a means of sampling air from inside the face piece.

Any modifications to the respirator face piece for fit testing shall be completely removed, and the face piece restored to NIOSH-approved configuration, before that face piece can be used in the workplace.

Fit Test Procedures

The requirements in this section apply to all OSHA-accepted fit test methods, both QLFT and QNFT.

The test subject shall be allowed to pick the most acceptable respirator from a sufficient number of respirator sizes so that the respirator is acceptable to, and correctly fits, the user.

Prior to the selection process, the test subject shall be shown how to put on a respirator, how it should be positioned on the face, how to set strap tension and how to determine an acceptable fit. A mirror shall be available to assist the subject in evaluating the fit and positioning of the respirator. This instruction may not constitute the subject's formal training on respirator use, because it is only a review.

The test subject shall be informed that he/she is being asked to select the respirator that provides the most acceptable fit. Each respirator represents a different size and shape, and if fitted and used properly, will provide adequate protection.

The test subject shall be instructed to hold each chosen face piece up to the face and eliminate those that obviously do not give an acceptable fit.

The more acceptable face pieces are noted in case the one selected proves unacceptable; the most comfortable mask is donned and worn at least five minutes to assess comfort. Assistance in assessing comfort can be given by discussing the following points:

- If the test subject is not familiar with using a particular respirator, the test subject shall be directed to don the mask several times and to adjust the straps each time to become adept at setting proper tension on the straps.
- Position of the mask on the nose
- Room for eye protection
- Room to talk
- Position of mask on face and cheeks

The following criteria shall be used to help determine the adequacy of the respirator fit:

- Chin properly placed;
- Adequate strap tension, not overly tightened;
- Fit across nose bridge;
- Respirator of proper size to span distance from nose to chin;
- Tendency of respirator to slip;
- Self-observation in mirror to evaluate fit and respirator position.

Use the Fit Test form.



NC Sturgeon Safety Management System			Doc No:	RESPO
			Initial Issue Date	02/2016
RESPIRATORY PROTECTION			Revision Date:	Initial Version
			Revision No.	0
			Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 9 of 19

User Seal Check

Before conducting the negative and positive pressure checks, the subject shall be told to seat the mask on the face by moving the head from side-to-side and up and down slowly while taking in a few slow deep breaths. The test subject shall conduct a user seal check, either the negative or positive pressure seal checks described below:

Positive Pressure Check

Close off the exhalation valve and exhale gently into the face piece. The face fit is considered satisfactory if a slight positive pressure can be built up inside the face piece without any evidence of outward leakage of air at the seal. For most respirators this method of leak testing requires the wearer to first remove the exhalation valve cover before closing off the exhalation valve and then carefully replacing it after the test.

Negative Pressure Check

Close off the inlet opening of the canister or cartridge(s) by covering with the palm of the hand(s) or by replacing the filter seal(s), inhale gently so that the face piece collapses slightly, and hold the breath for ten seconds. The design of the inlet opening of some cartridges cannot be effectively covered with the palm of the hand. The test can be performed by covering the inlet opening of the cartridge with a thin latex or nitrile glove. If the face piece remains in its slightly collapsed condition and no inward leakage of air is detected, the tightness of the respirator is considered satisfactory.

The test shall not be conducted if there is any hair growth between the skin and the face piece sealing surface, such as stubble beard growth, beard, moustache or sideburns which cross the respirator sealing surface. Any type of apparel which interferes with a satisfactory fit shall be altered or removed, including glasses.

If a test subject exhibits difficulty in breathing during the tests, she or he shall be referred to a physician or other licensed health care professional, as appropriate, to determine whether the test subject can wear a respirator while performing her or his duties. If the employee finds the fit of the respirator unacceptable, the test subject shall be given the opportunity to select a different respirator and to be retested.

Prior to the commencement of the fit test, the test subject shall be given a description of the fit test and the test subject's responsibilities during the test procedure. The description of the process shall include a description of the test exercises that the subject will be performing. The respirator to be tested shall be worn for at least 5 minutes before the start of the fit test.

The fit test shall be performed while the test subject is wearing any applicable safety equipment that may be worn during actual respirator use which could interfere with respirator fit.

Test Exercises

Each test exercise shall be performed for one minute except for the grimace exercise which shall be performed for 15 seconds. The test subject shall be questioned by the test conductor regarding the comfort of the respirator upon completion of the protocol. If it has become unacceptable, another model of respirator shall be tried. If due to medical or health conditions the employee cannot perform the test exercises the fit test shall not be performed and the employee not allowed to use a respirator until all elements of the fit test can be achieved.

The respirator shall not be adjusted once the fit test exercises begin. Any adjustment voids the test, and the fit test must be repeated.



NC Sturgeon Safety Management System			Doc No:	RESPO
			Initial Issue Date	02/2016
RESPIRATORY PROTECTION			Revision Date:	Initial Version
			Revision No.	0
			Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 10 of 19

The following test exercises are to be performed for all fit testing methods prescribed in this procedure:

- Normal breathing. In a normal standing position, without talking, the subject shall breathe normally.
- Deep breathing. In a normal standing position, the subject shall breathe slowly and deeply, taking caution so as not to hyperventilate.
- Turning head side to side. Standing in place, the subject shall slowly turn his/her head from side to side between the extreme positions on each side. The head shall be held at each extreme momentarily so the subject can inhale at each side.
- Moving head up and down. Standing in place, the subject shall slowly move his/her head up and down. The subject shall be instructed to inhale in the up position (i.e., when looking toward the ceiling).
- Talking. The subject shall talk out loud slowly and loud enough so as to be heard clearly by the test conductor. The subject shall read from the Rainbow Passage

Rainbow Passage

“When the sunlight strikes raindrops in the air, they act like a prism and form a rainbow. The rainbow is a division of white light into many beautiful colors. These take the shape of a long round arch, with its path high above, and its two ends apparently beyond the horizon. There is, according to legend, a boiling pot of gold at one end. People look, but no one ever finds it. When a man looks for something beyond reach, his friends say he is looking for the pot of gold at the end of the rainbow.” Continue to read for one minute.

- Grimace. The test subject shall grimace by smiling or frowning. (This applies only to QNFT testing; it is not performed for QLFT)
- Jogging in place. The test subject shall jog in place being careful to be aware of their surroundings.
- Normal breathing. Same as exercise (1).

Qualitative Fit Test (QLFT) Protocols

General

NC Sturgeon shall ensure that persons administering QLFT are able to prepare test solutions, calibrate equipment and perform tests properly, recognize invalid tests, and ensure that test equipment is in proper working order. **NC Sturgeon** shall ensure that QLFT equipment is kept clean and well maintained so as to operate within the parameters for which it was designed.

Irritant Smoke (Stannic Chloride) Protocol

This qualitative fit test uses a person's response to the irritating chemicals released in the “smoke” produced by a stannic chloride ventilation smoke tube to detect leakage into the respirator.

General Requirements and Precautions. The respirator to be tested shall be equipped with high efficiency particulate air (HEPA) or P100 series filter(s).



NC Sturgeon Safety Management System			Doc No:	RESPO
			Initial Issue Date	02/2016
RESPIRATORY PROTECTION			Revision Date:	Initial Version
			Revision No.	0
			Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 11 of 19

Only stannic chloride smoke tubes shall be used for this protocol. No form of test enclosure or hood for the test subject shall be used.

The smoke can be irritating to the eyes, lungs, and nasal passages. The test conductor shall take precautions to minimize the test subject's exposure to irritant smoke. Sensitivity varies, and certain individuals may respond to a greater degree to irritant smoke. Care shall be taken when performing the sensitivity screening checks that determine whether the test subject can detect irritant smoke to use only the minimum amount of smoke necessary to elicit a response from the test subject.

The fit test shall be performed in an area with adequate ventilation to prevent exposure of the person conducting the fit test or the build-up of irritant smoke in the general atmosphere.

The person to be tested must demonstrate his or her ability to detect a weak concentration of the irritant smoke.

- The test operator shall break both ends of a ventilation smoke tube containing stannic chloride, and attach one end of the smoke tube to a low flow air pump set to deliver 200 millilitres per minute, or an aspirator squeeze bulb. The test operator shall cover the other end of the smoke tube with a short piece of tubing to prevent potential injury from the jagged end of the smoke tube.
- The test operator shall advise the test subject that the smoke can be irritating to the eyes, lungs, and nasal passages and instruct the subject to keep his/her eyes closed while the test is performed.
- The test subject shall be allowed to smell a weak concentration of the irritant smoke before the respirator is donned to become familiar with its irritating properties and to determine if he/she can detect the irritating properties of the smoke. The test operator shall carefully direct a small amount of the irritant smoke in the test subject's direction to determine that he/she can detect it.

Irritant Smoke Fit Test Procedure

- The person being fit tested shall don the respirator without assistance, and perform the required user seal check(s).
- The test subject shall be instructed to keep his/her eyes closed if wearing a half face respirator.
- The test operator shall direct the stream of irritant smoke from the smoke tube toward the face seal area of the test subject, using the low flow pump or the squeeze bulb. The test operator shall begin at least 12 inches from the face piece and move the smoke stream around the whole perimeter of the mask. The operator shall gradually make two more passes around the perimeter of the mask, moving to within six inches of the respirator.
- If the person being tested has not had an involuntary response and/or detected the irritant smoke, proceed with the test exercises.
- The exercises identified in the Test Exercises of this procedure shall be performed by the test subject while the respirator seal is being continually challenged by the smoke, directed around the perimeter of the respirator at a distance of six inches.
- If the person being fit tested reports detecting the irritant smoke at any time, the test is failed. The person being retested must repeat the entire sensitivity check and fit test procedure.
- Each test subject passing the irritant smoke test without evidence of a response (involuntary cough, irritation) shall be given a second sensitivity screening check, with the smoke from the same smoke tube used during the



NC Sturgeon Safety Management System		Doc No:	RESPO
		Initial Issue Date	02/2016
RESPIRATORY PROTECTION		Revision Date:	Initial Version
		Revision No.	0
		Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page: Page 12 of 19

fit test, once the respirator has been removed, to determine whether he/she still reacts to the smoke. Failure to evoke a response shall void the fit test.

- If a response is produced during this second sensitivity check, then the fit test is passed. The glass tube shall be disposed of properly.

Quantitative Fit Test (QNFT) Protocols

Using controlled negative pressure and appropriate instrumentation to measure the volumetric leak rate of a face piece to quantify the respirator have been demonstrated to be acceptable to OSHA.

NC Sturgeon shall ensure that persons administering QNFT are able to calibrate equipment and perform tests properly, recognize invalid tests, calculate fit factors properly and ensure that test equipment is in proper working order.

NC Sturgeon shall ensure that QNFT equipment is kept clean, and is maintained and calibrated according to the manufacturer's instructions so as to operate at the parameters for which it was designed.

Portacount Fit Test Requirements

- Check the respirator to make sure the respirator is fitted with a high-efficiency filter and that the sampling probe and line are properly attached to the face piece.
- Instruct the person to be tested to don the respirator for five minutes before the fit test starts. This purges the ambient particles trapped inside the respirator and permits the wearer to make certain the respirator is comfortable. This individual shall already have been trained on how to wear the respirator properly.
- Check the following conditions for the adequacy of the respirator fit: Chin properly placed; Adequate strap tension, not overly tightened; Fit across nose bridge; Respirator of proper size to span distance from nose to chin; Tendency of the respirator to slip; Self-observation in a mirror to evaluate fit and respirator position.
- Have the person wearing the respirator do a user seal check. If leakage is detected, determine the cause. If leakage is from a poorly fitting face piece, try another size of the same model respirator, or another model of respirator.
- Follow the manufacturer's instructions for operating the Portacount and proceed with the test.
- The test subject shall be instructed to perform the exercises in Test Exercises section of this procedure.
- After the test exercises, the test subject shall be questioned by the test conductor regarding the comfort of the respirator upon completion of the protocol. If it has become unacceptable, another model of respirator shall be tried.

Portacount Test Instrument

The Portacount will automatically stop and calculate the overall fit factor for the entire set of exercises. The overall fit factor is what counts. The Pass or Fail message will indicate whether or not the test was successful. If the test was a Pass, the fit test is over. Since the pass or fail criterion of the Portacount is user programmable, the test operator shall ensure that the pass or fail criterion meet the requirements for minimum respirator performance.

A record of the test needs to be sent to the Safety Manager and kept on file, assuming the fit test was successful. The record must contain the test subject's name; overall fit factor; make, model, style, and size of respirator used; and date tested.



NC Sturgeon Safety Management System			Doc No:	RESPO
			Initial Issue Date	02/2016
RESPIRATORY PROTECTION			Revision Date:	Initial Version
			Revision No.	0
			Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 13 of 19

Use, Maintenance and Care of Respirators

This section requires **NC Sturgeon** to provide for the use, cleaning and disinfecting, storage, inspection, and repair of respirators used by employees. Appendix B - Respirator Cleaning Procedures (Mandatory) shall be followed.

Use

- Items that can affect the face to mask seal are prohibited. This includes facial hair, glasses, clothing, etc.
- Each time a respirator is put on a positive and negative pressure check shall be performed.

Cleaning and Disinfecting Requirements

NC Sturgeon shall provide each respirator user with a respirator that is clean, sanitary, and in good working order. **NC Sturgeon** shall ensure that respirators are cleaned and disinfected using the procedures in this Respiratory Protection Program, or procedures recommended by the respirator manufacturer, provided that such procedures are of equivalent effectiveness. The respirators shall be cleaned and disinfected at the following intervals:

- Respirators issued for the exclusive use of an employee shall be cleaned and disinfected by the employee as often as necessary to be maintained in a sanitary condition,
- Respirators used in fit testing and training shall be cleaned and disinfected after each use by the Safety Manager or designated person.
- Each individual who is assigned a cartridge respirator is responsible for seeing that the respirator is cleaned, inspected and properly stored.

Cleaning Procedures

- Remove filters, cartridges, or canisters. Disassemble face pieces by removing speaking diaphragms, demand and pressure-demand valve assemblies, hoses, or any components recommended by the manufacturer. Discard or repair any defective parts.
- Wash components in warm water with a mild detergent or with a cleaner recommended by the manufacturer. A stiff bristle (not wire) brush may be used to facilitate the removal of dirt.
- Rinse components thoroughly in clean, warm, preferably running water. Drain.
- When the cleaner used does not contain a disinfecting agent, respirator components should be immersed for two minutes in commercially available cleansers of equivalent disinfectant quality. Another alternative is to use wipes containing alcohol that are intended for use with respirators.
- Rinse components thoroughly in clean, warm, preferably running water. Drain. The importance of thorough rinsing cannot be overemphasized. Detergents or disinfectants that dry on face pieces may result in dermatitis. In addition, some disinfectants may cause deterioration of rubber or corrosion of metal parts if not completely removed.
- Components should be hand-dried with a clean lint-free cloth or air dried. Reassemble face piece, replacing filters, cartridges, and canisters where necessary. Test the respirator to ensure that all components work properly.

Storage and Inspection

- Respiratory equipment shall be stored in a manner to protect it from damage, contamination, temperature extreme, etc.



NC Sturgeon Safety Management System			Doc No:	RESPO
			Initial Issue Date	02/2016
RESPIRATORY PROTECTION			Revision Date:	Initial Version
			Revision No.	0
			Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 14 of 19

- Respiratory equipment intended for emergency use shall be stored in an area that is readily accessible and be clearly marked.

NC Sturgeon shall ensure that respirators are inspected as follows:

- All respirators used in routine situations shall be inspected by the employee before each use and during cleaning;
- A check by the employee of respirator function, tightness of connections, and the condition of the various parts including, but not limited to, the face piece, head straps, valves, connecting tube, and cartridges, canisters or filters; and
- A check of elastomeric parts for pliability and signs of deterioration.
- Emergency respiratory equipment will be inspected at least monthly, and before and after each use.
- Escape only respiratory equipment will be inspected before being carried into workplace.

Breathing Air Quality and Use

NC Sturgeon shall ensure that compressed air accords with the following specifications:

- Compressed breathing air shall meet at least the requirements for Type 1-Grade D breathing air described in ANSI/Compressed Gas Association Commodity Specification for Air, G-7.1-1989, to include:
 - Oxygen content (v/v) of 19.5-23.5%;
 - Hydrocarbon (condensed) content of 5 milligrams per cubic meter of air or less;
 - Carbon monoxide (CO) content of 10 ppm or less;
 - Carbon dioxide content of 1,000 ppm or less; and
 - Lack of noticeable odour.
- **NC Sturgeon** shall ensure that oxygen is not used in compressed air units.
- **NC Sturgeon** shall ensure that oxygen concentrations greater than 23.5% are used only in equipment designed for oxygen service or distribution.
- **NC Sturgeon** shall ensure that cylinders used to supply breathing air to respirators meet DOT requirements and that:
 - Cylinders are tested and maintained as prescribed in the Shipping Container Specification Regulations of the Department of Transportation (49 CFR part 173 and part 178);
 - Cylinders of purchased breathing air have a certificate of analysis from the supplier that the breathing air meets the requirements for Type 1--Grade D breathing air; and
 - The moisture content in the cylinder does not exceed a dew point of -50 deg. F (-45.6 deg. C) at 1 atmosphere pressure.
- **NC Sturgeon** shall ensure that compressors used to supply breathing air to respirators are constructed and situated so as to:
 - Prevent entry of contaminated air into the air-supply system;



NC Sturgeon Safety Management System		Doc No:	RESPO
		Initial Issue Date	02/2016
RESPIRATORY PROTECTION		Revision Date:	Initial Version
		Revision No.	0
		Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page: Page 15 of 19

- Minimize moisture content so that the dew point at 1 atmosphere pressure is 10 degrees F (5.56 deg. C) below the ambient temperature;
 - Have suitable in-line air-purifying sorbent beds and filters to further ensure breathing air quality. Sorbent beds and filters shall be maintained and replaced or refurbished periodically following the manufacturer's instructions.
- Have a tag containing the most recent change date and the signature of the person authorized by **NC Sturgeon** to perform the change. The tag shall be maintained at the compressor.
 - For compressors that are not oil-lubricated, **NC Sturgeon** shall ensure that carbon monoxide levels in the breathing air do not exceed 10 ppm.
 - For oil-lubricated compressors, **NC Sturgeon** shall use a high-temperature or carbon monoxide alarm, or both, to monitor carbon monoxide levels. If only high-temperature alarms are used, the air supply shall be monitored at intervals sufficient to prevent carbon monoxide in the breathing air from exceeding 10 ppm.
 - **NC Sturgeon** shall ensure that breathing air couplings are incompatible with outlets for nonrespirable worksite air or other gas systems. No asphyxiating substance shall be introduced into breathing air lines.

Repairs

NC Sturgeon shall ensure that respirators that fail an inspection or are otherwise found to be defective are immediately removed from service, and are discarded or repaired or adjusted in accordance with the following procedures:

- Repairs or adjustments to respirators are to be made only by persons appropriately trained to perform such operations and shall use only the respirator manufacturer's NIOSH-approved parts designed for the respirator;
- Repairs shall be made according to the manufacturer's recommendations and specifications for the type and extent of repairs to be performed; and

Voluntary Use

If an employee chooses to voluntarily wear a respirator when not required by this Program (contaminants do not meet protection standards, odours, etc.) they will be advised of the following in their training:

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for employees.

However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the employee. Sometimes, employees may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

- Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.



NC Sturgeon Safety Management System		Doc No:	RESPO
		Initial Issue Date	02/2016
		Revision Date:	Initial Version
		Revision No.	0
RESPIRATORY PROTECTION		Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page: Page 16 of 19

- Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
- Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapours, or very small solid particles of fumes or smoke.
- Keep track of your respirator so that you do not mistakenly use someone else's respirator.



NC Sturgeon Safety Management System			Doc No:	RESPO
			Initial Issue Date	02/2016
RESPIRATORY PROTECTION			Revision Date:	Initial Version
			Revision No.	0
			Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 17 of 19

Workplace Monitoring

A program of monitoring potential employee exposures has been implemented through the corporate health and safety department. Project personnel may also be assigned with the task of conducting air monitoring. Direct-reading instruments will also be used in the characterization of potential exposures. All the data collected is used to determine the appropriateness of the respiratory equipment.

Recordkeeping

NC Sturgeon will establish and retain written information regarding medical evaluations, fit testing and the respirator program. Records of medical evaluations required by this section must be retained and made available in accordance with 29 CFR 1910.1020. **NC Sturgeon** shall provide the employee with an opportunity to discuss the questionnaire and examination results with the PLHCP.

Records will be treated confidentially and maintained on file in the **NC Sturgeon** corporate office by the Safety Manager.

Program Evaluation

NC Sturgeon shall conduct evaluations of the workplace as necessary to ensure that the provisions of the current written program are being effectively implemented and that it continues to be effective.

NC Sturgeon shall regularly consult employees required to use respirators to assess the employees' views on this program's effectiveness and to identify any problems. Any problems that are identified during this assessment shall be corrected. Factors to be assessed and verified include, but are not limited to:

- Respirator fit (including the ability to use the respirator without interfering with effective workplace performance); Appropriate respirator selection for the hazards to which the employee is exposed;
- Proper respirator use under the workplace conditions the employee encounters; and
- Proper respirator maintenance.

Training

All employees will receive respirator training during their initial health and safety training class and on at least an annual basis, if required for their job classification. Training shall address employee knowledge of respirators, fit, use, limitations, emergency situations, wearing, fit checks, maintenance & storage, medical signs and symptoms of effective use and general requirements of the OSHA standard. The training must be provided before requiring the employee to use the respirator.

Retraining

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 knowledge or use of the respirator indicate that the employee has not retained the requisite understanding or skill; or



NC Sturgeon Safety Management System			Doc No:	RESPO
			Initial Issue Date:	02/2016
RESPIRATORY PROTECTION			Revision Date:	Initial Version
			Revision No.:	0
			Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 18 of 19

- Any other situation arises in which retraining appears necessary to ensure safe respirator use.



NC Sturgeon Safety Management System		Doc No:	RESPO
		Initial Issue Date	02/2016
RESPIRATORY PROTECTION		Revision Date:	Initial Version
		Revision No.	0
		Next Revision Date:	TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page: Page 19 of 19

COMPANY Qualitative Respiratory Fit Test Record Sheet

Note: Employee Must Have Completed Respiratory Protection Training and Passed Airway Exam Prior To Fit Testing

Test Date: _____

Employee Name: _____ **SS#** _____

Test Agent: Irritant Smoke (Stannic Chloride)

Respirator Identification:

Model: North 7700 Series Half Mask Size (circle one): Small Medium Large
 Manufacturer: North Safety Products Approval No: 42 CFR 84
 Additional Information: Respirator must be equipped with North HEPA filters

Fit Test Protocol (Test Subject Initials indicate steps were performed):

___ **TOLD TO KEEP EYES CLOSED DURING SMOKE EXPOSURE**

- | | |
|---|--|
| ___ Test subject smelled irritant smoke before fit test | ___ Wore respirator 5 minutes before fit test |
| ___ Protocol reviewed before fit test | ___ Test subject did not have hair in fitting area |
| ___ Shown how to wear respirator | ___ Performed positive pressure & negative fit check successfully after seating respirator |
| ___ Mirror available for use by subject | |
| ___ Must wear PPE (hard hat, etc.) if needed | |

Fit Test Steps (1 minute each except Grimace = 15 seconds)

- | | | |
|---------------------|------------------------------------|------------------------------|
| ___ Breath normally | ___ Breathe deeply | ___ Turned head side to side |
| ___ Nod up and down | ___ Talking (Read Rainbow Passage) | ___ Grimace |
| ___ Jog in place | ___ Breath normally | |

“When the sunlight strikes raindrops in the air, they act like a prism and form a rainbow. The rainbow is a division of white light into many beautiful colors. These take the shape of a long round arch, with its path high above, and its two ends apparently beyond the horizon. There is, according to legend, a boiling pot of gold at one end. People look, but no one ever finds it. When a man looks for something beyond his reach, his friends say he is looking for the pot of gold at the end of the rainbow”.

Fit Test Results: ___ Pass ___ Fail

Test Subject Signature: _____ Date: _____

Examiner's Name: _____ Examiner's Signature: _____ Date: _____

Distribution: Employee Local File - COMPANY Safety & Training Dept