

07-03; Controlled Negative Pressure REDON Fit Testing Protocol - Proposed Rule

Pacific Maritime Association
Accident Prevention Department
550 California Street, P. O. Box 7861
San Francisco, California 94120-7861

SAFETY BULLETIN #7-03
June 12, 2003
Controlled Negative Pressure
REDON Fit Testing Protocol - Proposed Rule

29 CFR Part 1910 - [Docket No. H-049D]

INFORMATION

OSHA is proposing to approve an additional controlled negative pressure (CNP) fit testing protocol for its Respiratory Protection Standard. The proposed protocol would affect OSHA respiratory protection standards for shipyard employment and construction. The proposed protocol is referred to as the CNP REDON fit testing protocol. Provisions contained in OSHA's current Respiratory Protection Standard allow individuals to propose additional fit testing protocols. This proposed revision is based on a new quantitative fit testing protocol submitted to OSHA for addition to the standard.

The proposed protocol requires three different test exercises followed by two redonnings of the respirator, while the currently approved CNP protocol specifies eight test exercises, including one redonning of the respirator. In addition to amending the Respiratory Protection Standard to include the proposed protocol, this rulemaking is proposing to make several editorial and non-substantive technical revisions to this standard associated with the proposed protocol and the approved CNP protocol.

Two peer-reviewed journal articles that provided information on the accuracy and reliability of the proposed CNP REDON fit testing protocol stated; In the first of these articles, the most important conclusion made by the authors is that the proposed CNP REDON fit testing protocol results in substantially lower respirator fit factors overall than the most commonly used ambient aerosol (AA) fit testing protocol. Accordingly, lower fit factors indicate that the proposed protocol would detect more respirator leaks than the AA protocol, thereby providing employees with an increased margin of safety when they select respirators. The main conclusion reached by the authors in the second article is that the overall fit factors obtained from the three exercises and two redonnings required by the proposed protocol are the same as the overall fit factors found when using the eight-exercise CNP protocol described in the Respiratory Protection Standard. Therefore, compared to the eight-exercise CNP protocol, the same overall fit factors can be obtained in less time using the proposed protocol.

ACTION

All Employers should make themselves familiar with the above proposed changes and be prepared to Submit written comments regarding this proposal, including comments on the information-collection determination described in section IV.C (Paperwork Reduction Act) of this notice, by the following dates:

Comments must be submitted (postmarked or sent) by September 4, 2003 (either by Facsimile and electronic transmission).