

ECOSHIELD PEST SOLUTIONS
RESPIRATORY PROTECTION PROGRAM

I. PURPOSE

The purpose of this program is to establish procedures for protecting employees from identified respiratory hazards when the implementation of alternative control measures is not feasible.

II. SCOPE

This program applies to all employees of EcoShield Pest Solutions (“EcoShield”) in the State of Washington who may be exposed to airborne hazards that require respiratory protection.

III. RESPONSIBILITIES

a. Environmental, Health, and Safety Manager

As the assigned program administrator, the EHS Manager is responsible for the development, implementation, and oversight of this program.

Specifically, the EHS Manager shall:

1. Develop and provide overall administrative support for this program, including interpretation of applicable regulations;
2. Ensure the requirements of this program are properly followed and appropriate;
3. Conduct analyses of work-related respiratory hazards;
4. Identify job classifications that may require respiratory protection;
5. Select appropriate respiratory protection equipment to adequately protect employees from associated hazards;
6. Provide guidance and training to employees regarding the need, selection, use, limitations, maintenance, and storage of respirators;
7. Ensure selected respirators continue to provide effective protection by monitoring for changes in work area conditions, level of employee exposure, and employee workload or medical conditions;
8. Direct supervisors to periodically monitor employees to ensure proper respirator usage; and
9. Regularly communicate with employees required to use respirators in order to collect feedback regarding the program’s effectiveness, as well as whether they encounter issues with any of the following:
 - a. Respirator fit during use;
 - b. Any effects of respirator use on work performance;
 - c. Respirators being appropriate for the hazards encountered;
 - d. Proper use under current worksite conditions; or

- e. Proper maintenance.
- 10. Maintain all documentation required by this program.

b. Supervisors

Supervisors shall:

1. Ensure that the requirements of this program are implemented and followed by employees under their control;
2. Identify respiratory hazards and direct concerns to the EHS Manager;
3. Schedule medical evaluations and fit testing for employees required to wear respirators;
4. Ensure respiratory protection recommended by the EHS Manager is purchased, properly used, cleaned, stored, and maintained;
5. Maintain an inventory of spare parts, filters, and new respirators as necessary to ensure employee access to properly functioning equipment;
6. Ensure that defective respiratory protection equipment is immediately removed from service and properly disposed or repaired; and
7. Notify the EHS Manager of any problems with respirator use, or any changes in work processes, employee exposure levels, employee workload, or employee medical conditions that would impact respirator usage.

c. Employees

Employees shall:

1. Comply with all required components of this program;
2. Properly use, store, clean, inspect, and maintain all assigned respiratory protection equipment;
3. Report any respirator deficiencies or malfunctions to their supervisor;
4. Inform their supervisor of new situations that may require a change in the use of respiratory protection or if airborne contaminant levels are expected to increase; and
5. Inform their supervisor of any change in their medical condition that may impact the safe use of respiratory protection equipment.

IV. PROCEDURE

a. Selection of Respirators

At this time, the following respiratory protection shall be worn while performing the tasks identified below:

Employee Task	Products Used	NIOSH Approved Respirator/Filters
Application of pesticides in poorly ventilated areas	Deltadust Insecticide	Half-mask equipped with P100 filters
Application of pesticides in poorly ventilated areas	Niban Granular Bait	Half-mask equipped with P100 filters
Application of pesticides in poorly ventilated areas	Advion WDG	Half-mask equipped with P100 filters
Application of pesticides in poorly ventilated areas	Bifen L/P	Half-mask equipped with P100 filters
Handling rodents	N/A	Half-mask equipped with P100 filters
Handling insulation	N/A	Half-mask equipped with P100 filters
Application of pesticides in poorly ventilated areas	PT 565 Plus	Half-mask equipped with P100/OV cartridges
Application of pesticides in poorly ventilated areas	PT Phantom II	Half-mask equipped with P100/OV cartridges
Application of pesticides in poorly ventilated areas	Advion Cockroach Gel Bait	Half-mask equipped with P100/OV cartridges
Application of pesticides in poorly ventilated areas	Onslaught	Half-mask equipped with P100/OV cartridges

All filters and cartridges used must be equipped with end of service life indicators.

The selection of respirators will be based upon a review of the applicable safety data sheet, chemical label, available air monitoring results, the NIOSH Guide to Industrial Respiratory Protection, the requirements of WAC 296-842-13005, or a combination thereof.

Specifically, the following factors will be considered when selecting appropriate respiratory protection:

1. The nature of the respiratory hazard;
2. The extent or concentration of the hazard;
3. Work requirements and conditions;
4. Characteristics and limitations of available respirators; and
5. Minimum equipment requirements established by regulation.

Employees assigned to any of the tasks identified above shall be issued a respirator selected for the particular task in the appropriate size as determined by the employee's fit-test.

b. Medical Evaluations

Every employee required to conduct a task that requires respiratory protection shall be provided with a medical evaluation prior to performing such task, being issued a respirator, being fit-tested, or being permitted to use a respirator. Employees shall be required to complete the medical questionnaire provided in WAC 296-842-22005. Such questionnaire shall be completed in private during the employee's normal working hours and submitted to the employee's supervisor. If any employee needs help completing the questionnaire, the employee is permitted to ask for assistance. Completed questionnaires shall remain confidential and will be sent directly to the licensed health care professional ("LHCP") without review by management. Moreover, employees shall be afforded an opportunity to discuss the questionnaire or exam results with the LHCP.

Should the LHCP reviewing the medical questionnaire determine that a follow-up evaluation is required, such evaluation will be provided at no cost to our employees. Following review of the medical questionnaire or completion of the follow-up evaluation, EcoShield will obtain a written recommendation from the LHCP that is limited to the following information:

1. Whether or not the employee is medically able to use the respirator;
2. Any limitations of respirator use for the employee;
3. What future medical evaluations, if any, are needed; and
4. A statement that the employee has been provided a copy of the written recommendation.

Additional medical evaluations shall be administered in the following situations:

1. The LHCP recommends it;
2. The EHS Manager determines it is necessary;
3. The employee exhibits signs of breathing difficulties; or
4. Changes in worksite conditions occur, such as physical work effort, PPE, or temperature that could substantially increase the employee's physiological stress.

c. Fit Testing

Respirator fit testing shall be provided, at no cost to the employee, for all tight-fitting respirators on the following schedule:

1. Before employees are assigned a task that may require the use of a respirator;
2. At least every twelve months after initial testing; and
3. Whenever any of the follow occurs:
 - a. A different respirator facepiece is chosen such as a different type, model, style, or size;
 - b. EcoShield becomes aware of a physical change in an employee that could affect respirator fit; or

- c. An employee notifies EcoShield, or the LHCP, that the respirator fit is unacceptable. During the retest, the employee shall be given reasonable opportunity to select a different respirator facepiece.

The procedures in WAC 296-842-22010 will be followed when choosing a respirator for fit testing and when administering qualitative or quantitative fit tests.

d. Respirator Use Procedures

Prior to conducting a routine task that requires respiratory protection, the employee shall don the required respirator and perform a user seal check to ensure the facepiece is appropriately seated. Respirators shall be properly worn at all times while conducting such tasks and shall not be removed or altered until the employee is no longer exposed to the respiratory hazard.

Employees are not permitted to use respirators with tight-fitting facepieces if they have facial hair that interferes with the seal or valve function, or have experienced any of the following since last passing a fit test:

1. Significant weight change;
2. Significant facial scarring in areas of the seal;
3. Dental changes that alter the shape of the face;
4. Reconstructive or cosmetic surgery of the head/face; or
5. Any other condition suspected to affect the seal or valve function of the respirator.

In addition, jewelry, headgear, etc., that interferes with the seal of the respirator is not permitted.

Prior to performing a non-routine task that may expose an employee to a respiratory hazard, the EHS Manager shall evaluate the activity and possible hazards to determine whether respiratory protection is required. If the EHS Manager determines that respiratory protection is required, the employee shall use the respirator selected by the EHS Manager at all times while performing such task.

Employees are not permitted to enter an IDLH atmosphere. Employees shall immediately leave an area where respirators are required for any of the following reasons:

1. To replace filters or cartridges;
2. To make adjustments to their respirator;
3. When they smell or taste a chemical inside the respirator;
4. When they notice a change in breathing resistance;
5. If they become ill; or

6. If they experience dizziness, nausea, weakness, breathing difficulty, coughing, sneezing, vomiting, fever, chills, etc.

e. Maintenance

Respirators shall be cleaned and disinfected in accordance with the following schedule:

1. If the respirator will be used exclusively by one employee, it shall be cleaned and disinfected as often as needed to keep it clean and functional; and to prevent health hazards, such as skin irritation.
2. If the respirator will be shared for nonemergency use, or used for fit testing or training, it shall be cleaned and disinfected before it is worn by another employee.

Upon cleaning and disinfecting a respirator, it shall be properly reassembled.

Respirators shall be stored to protect them from all of the following:

1. Deformation of the facepiece or exhalation valve;
2. Sunlight or extreme temperatures or other conditions;
3. Contamination such as dust or damaging chemical; and
4. Excessive moisture.

If the respirator is used for non-emergencies, including day-to-day or infrequent use, it shall be inspected before each use and during cleaning.

Respirators shall be inspected for the following:

1. Respirator function;
2. Tightness of connections;
3. The condition of the facepiece, head straps, valves, cartridges, canisters, or filters; and
4. Pliability and deterioration of elastomeric parts.

Any respirator that is not functioning properly shall either be repaired or replaced prior to the user performing a task that requires respiratory protection.

f. Training

Training shall be provided to each employee required to wear respiratory protection prior to being permitted to use the same and annually thereafter (within twelve months of the previous training). Training shall also be provided when the following occur:

1. The employee has not retained knowledge or skills; or

2. Changes in the worksite, or type of respirator make previous training incomplete or obsolete.

At a minimum, training shall cover the following topics:

1. Why respirators are necessary;
2. The respirator's capabilities and limitations;
3. How improper fit, use or maintenance can make the respirator ineffective;
4. How to properly inspect, don, seal check, use, and doff the respirator;
5. How to clean, repair, and store the respirator;
6. How to use a respirator in an emergency situation;
7. Medical symptoms that may limit or prevent effective respirator use; and
8. EcoShield's general obligations under the respirator standard.

g. Recordkeeping

In addition to maintaining a written copy of this program, EcoShield shall maintain the following:

1. Each employee's current fit test record until the next fit test is administered.
Fit test records must include:
 - a. Employee name;
 - b. Test date;
 - c. Type of fit test performed;
 - d. Description of the respirator tested; and
 - e. Results of fit tests.
2. Training records that include employees' names and the dates trained; and
3. Written recommendations from the LHCP.

h. Program Evaluation

The EHS Manager shall evaluate the effectiveness of this program by carrying out his or her designated responsibilities, as outlined above, on a regular basis.