

COLCHESTER POLICE DEPARTMENT

SUBJECT Respirator Protection Program

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Purpose

The Colchester Police Department has determined that employees in the department may be exposed to harmful airborne substances during certain operations. These hazards include riot control agents and other hazardous substances. The purpose of this program is to ensure that all Colchester Police Department employees are protected from exposure to these respiratory hazards.

Engineering controls, such as ventilation and substitution of less toxic materials, are the first line of defense at the Colchester Police Department; 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. The work processes requiring respirator use at The Colchest4er Police Department are outlined in Table 1 in the Scope and Application section of this document.

In addition, some employees have expressed a desire to wear respirators during certain operations that do not require respiratory protection. As a general policy, The Colchester Police Department 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 worker(s), The Colchester Police Department will provide single use filtering facepiece respirators for voluntary use. As outlined in the Scope and Application section below, voluntary respirator use is subject to certain requirements of this program.

Scope and Application

This program applies to all employees who are required to wear respirators during normal work operations and during emergency situations. Participation in this program is mandatory for all sworn officers.

In addition, any employee who voluntarily wears a respirator when a respirator is not required 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. Employees participating in the respiratory protection program do so at no cost to them. The expense associated with training, medical evaluations, and respiratory protection equipment will be borne by the municipality.

Table 1: Respirator Use at Colchester Police Department

Respirator Type	Department/Process Voluntary use for employees with nuisance-level dust exposure		
Filtering face piece (dust mask)			
N-95 particulate respirator	Respiratory illness (TB, SARS, COVID, etc.)		

Responsibilities

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.
- Selection of respiratory protection options.
- Monitoring respirator use to ensure that respirators are used in accordance with their certifications.
- Arranging for and/or conducting training.
- Ensuring proper storage and maintenance of respiratory protection equipment.
- Conducting, or having conducted, qualitative fit testing, on an annual basis, using an accepted OSHA protocol.
- Administering the medical surveillance program.
- Maintaining records required by the program.
- Evaluating the program.
- Updating the written program as needed.

The Program Administrator for The Colchester Police Department is: Deputy Chief Jeffrey Barton

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, supervisors must also ensure that the program is understood and followed by the employees under their charge. Duties of the supervisor include:

- Ensuring that employees 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, 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.

Employees

Each employee has the responsibility to wear his or her respirator when and where required and in the manner in which they were trained. Employees must also:

- 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.

Program Elements

Selection Procedures

The Program Administrator will select respirators to be used on site, based on the hazards to which workers are exposed and in accordance with all OSHA standards.

The Program Administrator 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. The hazard evaluation will include:

- 1. Identification and development of a list of hazardous substances used in the workplace, organized by department or work process.
- Review of work processes to determine where potential exposures to these hazardous substances may occur. This review will be conducted by surveying the workplace, reviewing process records, and talking with employees and supervisors.

There is one piece of equipment that fall under the category of respirators that The Colchester Police Department sworn officers shall be provided:

Half mask N95 respirator: This respirator supplied to sworn officers is the one half mask N95 respirator. The respirator resembles a mesh surgical mask or dust mask and is intended to protect the employee against Tuberculosis (TB), SARS and COVID-19. The one-half mask N95 respirator will be the 3M respirator or similar product. The one-half mask respirator is not designed to protect the wearer against chemical agents but rather is useful in protecting the wearer from contracting TB, SARS, or COVID-19 from a person infected with TB, SARS or COVID-19. These one-half mask respirators shall be kept in the supply room located across from the training room, as well as in the squad room. A field employee may retain extra one-half facemasks if they desire. The N95 filters exhale air outside the mask so logically the mask would not be appropriate to place on a TB, SARS or COVID-19 victim. The mask is instead only for use by the employee.

Updating the Hazard Assessment

Any time work process changes may potentially affect exposure, the Program Administrator must review, update, and redistribute the hazard assessment. 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 will evaluate the potential hazard, arranging for outside assistance as necessary. The Program Administrator 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.

NIOSH Certification

All respirators must be certified by the National Institute for Occupational Safety and Health (NIOSH) and shall be used in accordance with the terms of that certification. Also, all filters, cartridges, and canisters must be labeled with the appropriate NIOSH approval label. The label must not be removed or defaced while it is in use.

Requirements

Sworn officers may be issued air-purifying respirators. Officers are required to have their respirators available in the field when working assignments that may necessitate their use. Officers should make every effort to wear their respirators in situations involving potential exposures.

It is recognized that in emergency situations, employees may be unable to obtain and don a respirator prior to deploying agents such as CN, CS and OC. Officers must take appropriate action to avoid exposure. Respirators must be obtained and worn as soon as practical.

Air-purifying respirators should not be used under the following conditions:

- (a) When contaminants have poor warning properties; that is, when the contaminant cannot be recognized by taste, smell or irritation at or below the permissible exposure limits;
- (b) In oxygen-deficient atmospheres (below 19.5%);
- (c) In atmospheres Immediately Dangerous to Life or Health (IDLH); and
- (d) Atmospheres in which short exposures would cause death, injury or delayed reaction;
- (e) When there is a respirator selection question remember to refer to the Material Safety Data Sheet for the appropriate personal protective equipment.

Medical Evaluation

Employees who are either required to wear respirators, or who choose to wear an APR (Air Purifying Respirator) voluntarily, must pass a medical evaluation before being permitted to wear a respirator on the job. Employees are not permitted to wear respirators until a physician 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 licensed healthcare provider selected by the municipality will provide the medical evaluations.

Medical evaluation procedures are as follows:

- The medical evaluation will be conducted using the questionnaire provided in Appendix C of 1910.134, the respiratory protection standard. The Program Administrator will provide a copy of this questionnaire to all employees requiring medical evaluations.
- All affected employees will complete the medical questionnaire on line, which is automatically submitted to the reviewing healthcare provider designated by the municipality.
- Follow-up medical exams will be granted to employees as required by the standard, and/or as deemed necessary by a Champlain Medical physician.
- All employees will be granted the opportunity to speak with the reviewing healthcare provider about their medical evaluation, if they so request.
- The Program Administrator must submit a copy of this program and a copy of the Respiratory Protection standard to the reviewing healthcare provider.

- Any employee required, for medical reasons, to wear a positive pressure air purifying respirator will be provided with a powered air purifying respirator.
- After an employee has received clearance and begun to wear his or her respirator, additional medical evaluations will be conducted under the following circumstances:
 - Employee reports signs and/or symptoms related to their ability to use a respirator, such as shortness of breath, dizziness, chest pains, or wheezing.
 - Information from this program, including observations made during fit testing and program evaluation, indicates a need for reevaluation.
 - A change occurs in workplace conditions that may result in an increased physiological burden on the employee.
 - Employee has significant changes in his/her physical condition, abilities, or fitness that could potentially impact his/her ability to safely use respiratory protection.

The employees currently subject to the medical evaluations are listed in Table 2 of this document [It is recommended, for larger departments, that you create a separate Table 2 and file with other Respiratory Protection Program records]. All examinations and questionnaires are to remain confidential between the employee and the physician.

Fit Testing

Fit testing is required for employees who are required to wear half-face piece APRs. Employees voluntarily wearing half-face piece APRs may also be fit tested upon request.

Employees who are required to wear half-face piece APRs will be fit tested as follows:

- Prior to being allowed to wear any respirator with a tight fitting face piece,
- When there are changes in the employee's physical condition that could affect respiratory fit (e.g., obvious change in body weight, facial scarring, etc.).

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

The Program Administrator will conduct, or have conducted by a qualified individual, fit tests following the OSHA approved Bitrex Solution Aerosol QLFT Protocol in Appendix B (B4) of the Respiratory Protection standard (29 CFR 1910.134).

Respirator Use

Respiratory protection is required for the personnel listed in Table 2 below.

NAME	Department	Job Description/Work Procedure	Respirator
Akerlind, Michael	Police	Police Officer	N95
Allen, Douglas	Police	Police Administrator	N95
Barriere, Jordon	Police	Police Officer	N95
Barton, Jeffrey	Police	Police Administrator	N95
Bitca, Victor	Police	Police Officer	N95
Bressler, Jaime	Police	Police Officer	N95
Czachor, Jennifer	Police	Police Officer	N95
Demar, Donald	Police	Police Officer	N95
Dengler, Alyson	Police	Police Officer	N95
Dewey, David	Police	Police Officer	N95
Duell, Meghan	Police	Police Officer	N95
Fell, Elizabeth	Police	Police Officer	N95
Fish, Michael	Police	Police Officer	N95
Fisher, Roger	Police	Police Officer	N95
Fitzpatrick, Emily	Police	Police Officer	N95
Giroux, Richard	Police	Police Officer	N95
Gonyaw, Francis	Police	Police Officer	N95
Gutierrez, Stephen	Police	Police Officer	N95
Hull, Peter	Police	Police Administrator	N95
Jacobs, Mark	Police	Police Officer	N95
Jones. Christopher	Police	Police Officer	N95
Mellen, Christian	Police	Police Officer	N95
Roy, James	Police	Police Administrator	N95
Roy, Zachary	Police	Police Officer	N95
Smith, Zachary	Police	Police Officer	N95
Talcott, Nicole	Police	Police Officer	N95
Treier, Jesse	Police	Police Officer	N95
West, Michael	Police	Police Officer	N95
Wyskiel, Jeremy	Police	Police Officer	N95

- Employees will use their respirators under conditions specified by this program and in accordance with the training they receive on the use of each particular model. In addition, the respirator shall not be used in a manner for which it is not certified by NIOSH or by its manufacturer.
- All employees shall conduct user seal checks each time that they wear their respirator. Employees shall use either the positive or negative pressure check (depending on which test works best for them). User seal checks are not substitutes for fit tests.
- All employees shall be permitted to leave the work area to go 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, to replace parts, or to inspect respirator if it stops functioning as intended. Employees should notify their supervisor before leaving the area.
- Employees are not permitted to 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. Employees are not permitted to wear headphones, jewelry, or other articles that may interfere with the facepiece-to-face seal.

Care of Respirators When Not In Use

Cleaning

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 (110-degree F maximum) 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 (110-degree F maximum), preferably running water. Drain.

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.

Disinfecting

When the cleaner used does not contain a disinfecting agent, respirator components should be immersed for two minutes in one of the following:

- a) Hypochlorite solution (50 ppm of chlorine) made by adding approximately one milliliter of laundry bleach to one liter of water 110-degree F;
- b) Aqueous solution of iodine (50 ppm iodine) made by adding approximately 0.8 milliliters of tincture of iodine (6-8 grams ammonium and/or potassium iodine/100 cc of 45% alcohol) to one liter of water at 43 degrees C (110 degrees F);

c) Other commercially available cleansers of equivalent disinfectant quality when used as directed, if their use is recommended or approved by the respirator manufacturer.

Maintenance

Respirators are to be properly maintained at all times in order to ensure that they function properly and adequately protect the employee. 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.

The following checklist will be used when inspecting respirators:

- Face piece:
 - · cracks, tears, or holes
 - · facemask distortion
 - cracked or loose lenses/face shield
- Headstraps:
 - breaks or tears
 - broken buckles
- Filters/Cartridges:
 - approval designation
 - gaskets
 - · cracks or dents in housing
 - · proper cartridge for hazard

Employees are permitted to leave their work area to perform limited maintenance on their respirator in a designated area that is free of respiratory hazards. Situations when this is permitted include: to wash their face and respirator face piece to prevent any eye or skin irritation; to replace the filter, cartridge or canister; and if they detect vapor or gas breakthrough or leakage in the face piece or any other damage to the respirator or its components.

Cartridge Change Schedules

Employees wearing APRs with organic vapor cartridges shall change the cartridges on their respirators at the first detection of a solvent odor.

Storage

Respirators must be stored in a clean, dry area, and in accordance with the manufacturer's recommendations. Each employee will clean and inspect their own air-purifying respirator in accordance with the provisions of this program and will store their respirator in a plastic bag in their own locker or other designated area. Each employee will have his/her name on the bag and that bag will only be used to store that employee's respirator.

The Program Administrator will store the supply of respirators and respirator components in their original manufacturer's packaging in the first floor (basement) storage area.

Training

The Program Administrator will provide training to respirator users and their supervisors on the contents of the Colchester Police Department (CPD) Respiratory Protection Program and their responsibilities under it, and on the OSHA Respiratory Protection standard. Workers will be trained prior to using a respirator in the workplace. Supervisors will also be trained prior to using a respirator in the workplace or prior to supervising employees who must wear respirators. The training course will cover the following topics:

- The CPD Respiratory Protection Program
- OSHA Respiratory Protection standard
- respiratory hazards encountered at CPD and their health effects
- proper selection and use of respirators
- limitations of respirators
- respirator donning and user seal (fit) checks
- fit testing
- emergency use procedures
- maintenance and storage
- medical signs and symptoms limiting the effective use of respirators

Employees will be retrained as needed (e.g., if they change departments and need to use a different respirator). Respirator training will be documented by the Program Administrator. The documentation will include the type, model, and size of respirator for which each employee has been trained and fit tested.

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 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 addressed by the Program Administrator. These findings will be reported to CPD management, and the report will list plans to correct deficiencies in the respirator program and target dates for the implementation of those corrections.

Documentation and Recordkeeping

A written copy of this program and the OSHA standard is kept in the Program Administrator's office and is available to all employees who wish to review it.

Also maintained in the Program Administrator's office are copies of training and fit test records. These records will be updated as new employees are trained, as existing employees receive refresher training, and as new fit tests are conducted.

The Program Administrator will also maintain copies of the medical records for all employees covered under the respirator program. The completed medical questionnaire and the physician's documented findings are confidential and will remain with the medical provider that conducted the evaluation. The municipality will only retain the physician's written recommendation regarding each employee's ability to wear a respirator.