

RESPIRATORY PROGRAM EVALUATION

“I have had my Written Respiratory Protection Program implemented for one year, what do I need to do now?” An annual Program Evaluation must be performed pursuant to California Code of Regulations, section 6739(n).

- ✓ Program Evaluation – CCR 6739(n)
 - The employer shall annually consult with each employee required to use a respirator to assess the employee’s views on the program’s effectiveness and identify any possible problems with the implemented program.
 - Document your findings...
 - If findings are positive (e.g., employee states there is no problem with how the program is working for them) document that for your records.
 - If findings are negative (e.g., employee states they had trouble with their respirator and/or its use) document that for your records. Any finding from the annual employee consultation (or your evaluation of the program) that necessitates modification of your Written Respiratory Protection Program shall be implemented within 30 days of the Program Evaluation / employee consultation.
- ✓ Fit Testing – A Cal OSHA qualified respirator “fit test” must be performed annually pursuant to CCR 6739(e).
- ✓ Make sure the respirator selected for the employee is still appropriate for the pesticides that they will be using in the upcoming year.
 - If respirator currently being used is no longer appropriate, another Medical Recommendation from your Physician or other Licensed Health Care Provider (PLHCP) must be obtained before the employee is allowed to use any new type of respirator.
 - If the employee’s respirator is still appropriate for use, then there is no need for another Medical Recommendation. Keep in mind that should any operational change affecting the efficacy of your Written Respiratory Protection Program (or an individual employee’s respirator use) occur at any time during the year, then you must address the change(s) at that time and make any necessary program adjustment(s).
- ✓ Check to see that the employee’s work environment has not changed, i.e., make sure the respirator being used is appropriate for that work environment.
- ✓ Train employees annually on respirator use. Training must include proper respirator use, fit, inspection, maintenance, cleaning, storage, possible malfunction, medical signs and symptoms that may limit or prevent effective use of respirators, and what the limitations and capabilities of the respirator are. During a Pesticide Use Monitoring Inspection the county Inspector will interview employees on these topics. Let your employees know they will be questioned regarding their respiratory protection training.

CALIFORNIA CODE of REGULATIONS

6739(n) Program Evaluation.

(1) The employer 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 as required by this section.

(2) The employer shall annually consult employees required to use respirators to assess the employees' views on program effectiveness and to identify any problems. Any problems that are identified during this assessment shall be corrected. Factors to be assessed include, but are not limited to:

(A) Respirator fit (including the ability to use the respirator without interfering with effective workplace performance);

(B) Appropriate respirator selection for the pesticides to which the employee is exposed;

(C) Proper respirator use under the workplace conditions the employee encounters; and

(D) Proper respirator maintenance.

(3) A written record of these evaluations and consultations shall be documented and at least contain:

(A) Name of workers consulted.

(B) Date of evaluation/consultation.

(C) Description of any finding from the evaluation or consultation requiring modification of written respiratory protection program or a declaration of no findings.

(4) Any findings from either the employer evaluation or the employee consultation that necessitate the modification to the written respiratory protection program shall be implemented within 30 days from the date of the evaluation/consultation.