

WPS REQUIREMENTS FOR RESPIRATOR USER

Whenever pesticide product labeling requires the use of a respirator, handlers, agricultural establishment owners and members of their immediate family **MUST FOLLOW** WPS requirements for respirator training, medical evaluation, fit testing, and recordkeeping.

The WPS does **NOT** include the following elements of OSHA's respirator program:

- Written respiratory protection program
- Program evaluation
- Air monitoring

Prior to using a respirator during a pesticide application, the agricultural employer must select the correct respirator specified by the label and provide the handler with:

- Medical evaluation by a physician or other licensed health care professional to ensure the handler's physical ability to safely wear the respirator
- Fit testing
- Training in the use, maintenance, cleaning and storage of the respirator

The following respirator records must be kept for 2 years from the date conducted:

- Copy of the medical recommendation (proof of medical evaluation)
- Results of respirator fit test
- Documentation of respirator training
- Daily inspection and seal check
- Respirator cleaning and storage
- Respirator maintenance according to manufacturer's recommendations, including replacement of canisters/ filters/ cartridges following recommended schedule

1. Medical Evaluation

A list of companies that provide fit testing services in Iowa can be found in the document:

[Respiratory Protection Medical Evaluation & Fit Testing Providers.pdf](#)

<http://www.iowaagriculture.gov/Pesticide/WPS/Respiratory%20Protection/Respiratory%20Protection%20Medical%20Evaluation%20&%20Fit%20Testing%20Providers.pdf>

While companies may use online respirator medical evaluation resources at their discretion, employers still need to ensure that employees receive proper follow-up visits and in-person examinations, as needed. Additionally, employers need to ensure that employees have adequate computer skills to complete all online forms on their own. Some online services include:

- 3M Online Respirator Medical Evaluation: <https://www.respexam.com/>
- Video: <https://www.respexam.com/media/default.asp>
- Honeywell OSHA MedCert Program: http://www.honeywellsafety.com/Products/Respiratory_Protection/OSHA_MedCert_Respiratory_Medical_Evaluation_Program.aspx?site=/usa
- RespClearance Online Respiratory Protection Certifications: <https://www.respclearance.com/>

2. Respirator Fit Testing

The person that performs respirator fit testing should be familiar with the OSHA Respiratory Protection Standard 1910.134. An overview of the fit testing process can be found here:

https://www.osha.gov/video/respiratory_protection/fittesting.html

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While the law allows companies to perform in-house respirator fit testing, please be aware that the person performing the fit testing needs to receive adequate training. According to the WPS, the person administering this test must be able to prepare test solutions, calibrate equipment, perform test properly, recognize invalid tests and ensure test equipment is in proper working order (How-to Comply Manual, page 71).

There are different **qualitative** fit testing kits in the market and they are not all the same. The person performing the test needs to know the appropriate testing kit for each pesticide hazard, since pesticide formulations have a diverse range of chemical formulations. This person also needs to recognize when a **quantitative** fit testing is needed. There is a good explanation of qualitative and quantitative fit testing in the publication “Small Entity Compliance Guide for the Respiratory Protection Standard”, pages 33-34 (see link below).

If you determine that the best option for your organization is to do in-house fit testing, there are a variety of online vendor that sell kits to perform respirator fit testing.

3. Respirator Training

Annual respirator training can be done by developing your own training, purchasing training products, or using the resources that OSHA has created. If you develop your own training, you must include all the topics required by OSHA.

Resources:

- The publication “Small Entity Compliance Guide for the Respiratory Protection Standard” is a good resource developed by OSHA to guide employers:
<https://www.osha.gov/Publications/3384small-entity-for-respiratory-protection-standard-rev.pdf>
- OSHA has also produced several videos to help employers understand and comply with respiratory protection training requirements:
https://www.osha.gov/SLTC/respiratoryprotection/training_videos.html
- Compliance Solutions Respiratory Protection Online Course: This course covers types of respirators and when to use them, including the capabilities and limitations of respirators, the medical requirements for using respirators, how to fit-test and leak-test respirators, the care

and maintenance of respirators, and the typical contents of a written respiratory protection program. <http://ecom.csregs.com/products/Respiratory-Protection-Training-Online>

- Cintas Hearing and Respiratory Testing: On-site, online and DVD compliance programs. <http://www.cintas.com/compliance-training/training-courses/respiratory-hearing-protection-training/>

4. Partial Exception for Family Farms

Family farms were granted a **partial exemption** on respiratory program requirements. This exemption is only applicable to family farms that do not employ any non-family individuals. The definition of family and other relevant exemptions can be found in the How-to Comply Manual pages 88-91. The WPS states that family farms do not need to comply with respiratory protection **recordkeeping** requirements to document:

- Daily inspection and seal check
- Respirator cleaning and storage
- Respirator maintenance according to manufacturer's recommendations, including replacement of canisters/ filters/ cartridges following recommended schedule

(Inspecting, cleaning, storing and maintaining the respirator, How-to Comply Manual page 90)

Family farms are **required to comply** with the sections of **medical examination, fit testing, and training**. Nobody is except from these requirements when the label of an agricultural use pesticide specifies that using a respirator is mandatory.

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