

RESPIRATORY PROTECTION PROGRAM



Stony Creek Services Inc.

749 Manufacturers Dr.

Westland, Michigan. 48186

02/26/2026

Purpose and Scope

The purpose of this program is to protect all employees of **Stony Creek Services Inc.** from respiratory hazards and to ensure that the company complies with OSHA's Respiratory Protection Program Standard 29 CFR§1910.134. Engineering controls, such as ventilation and substitution of less toxic materials, may not be completely effective in controlling airborne hazards. Routine operations and reasonably foreseeable emergencies associated with the operations are considered when assessing respirator protection and other types of personal protective equipment (PPE) used to safeguard employees' health.

Mandatory Use of Respirators.

“In any workplace where respirators are necessary to protect the health of the employee or whenever respirators are required by the employer, the employer shall establish and implement a written respiratory protection program with worksite-specific procedures. The program shall be updated as necessary to reflect those changes in workplace conditions that affect respirator use. The employer shall include in the program the following provisions of this section, as applicable:” (29 CFR § 1910.134(c)(1)) **Stony Creek Services Inc.** has determined that some employees in

Stony Creek Services Inc. Certain work tasks are exposed to respiratory hazards. All employees performing these tasks must wear the designated equipment or equipment providing greater or equivalent protection. Additionally, **Stony Creek Services Inc.** requires these employees to participate in the company's respiratory protection program as a condition of continued employment. An employee's failure to do so

- I. may result in disciplinary action, up to and including termination for serious or repeated infractions.
- II. Employees of **Stony Creek Services Inc.** are required to wear respirators or personal protective equipment (PPE) when the following situations exist:
 - a. • There is exposure to air contaminants above a specific exposure limit.
 - b. • If respirators or PPE are necessary to protect employee health;
 - c. • During specific routine work practices, processes, or tasks identified by **Stony Creek Services Inc.** as requiring use of a respirator or PPE.
- III. In all cases, employees participating in this program do so at no cost to themselves. The expenses associated with training, medical evaluations, and equipment are the sole responsibility of **Stony Creek Services Inc.**

Voluntary Use of Respirators.

If an employee desires to wear a respirator during certain operations in non-hazardous areas, **Stony Creek Services Inc.** will review each such request on a case-by-case basis. An employee may use the respirator provided or may provide his/her own for voluntary use, if

- Doing so does not jeopardize the employee's health or safety, or that of his/her co-workers,
- The equipment itself does not create a workplace hazard and
- **John R Powell** (EHS Manager) has approved the use.

All employees voluntarily wearing respirators are required to receive a copy of "Information for Employees Using Respirators When Not Required Under the Standard." See Resources in Section VI of this document.

Stony Creek Services Inc. must review this OSHA information with each employee prior to their voluntary use of respiratory protective equipment.

In addition, employees voluntarily using tight-fitting respirators must follow the medical surveillance, cleaning, maintenance, and storage procedures in this program.

Stony Creek Services Inc. may assign additional program requirements for those voluntarily wearing respirators or other PPE.

Employees voluntarily wearing dust masks (filtering facepiece) are not subject to the program’s medical evaluation. However, their equipment must be clean and free of contamination and not interfere with the employee’s ability to work safely. These employees are also provided with a copy of Appendix II, and the information is reviewed with them before their use of dust masks.

Table 1 is to be completed to communicate where respirators are required in the operations of **Stony Creek Services Inc.**

TABLE 1: VOLUNTARY AND REQUIRED RESPIRATOR USE		
Respirator	Required OR Voluntary (circle one)	Department/Process
Filtering face-piece (disposable dust mask)	required OR voluntary	Job description + contaminant (i.e., Maintenance – light end of shift sweeping activities)
Half-face (elastomeric) air purifying respirator (APR) with N100 filters (i.e., 99.97% efficient)	required OR voluntary	Job description + contaminant (i.e., asbestos, lead, arsenic, cadmium)
Half-face (elastomeric) air purifying respirator (APR) with N95 filters (i.e. 95% efficient)	required OR voluntary	Job description + contaminant (i.e., welding fume, wood dust, crystalline silica (could also use a N100))
Half-face (elastomeric) respirator with organic vapor (OV) cartridges	required OR voluntary	Job description + contaminant (i.e., solvents, paint thinner, xylene, glutaraldehyde)
Supplied-air respirator (SAR)	required OR voluntary	Job description + contaminant (i.e., carbon monoxide, cyanides, spraying isocyanate containing coatings)
Self-contained breathing apparatus (SCBA) or Escape SCBA	required OR voluntary	Job description + contaminant (i.e., fire-fighting, emergency response, emergency escape)
	required OR voluntary	Job description + contaminant (i.e.,
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Program Administration

“The employer shall designate a program administrator who is qualified by appropriate training or experience that is commensurate with the complexity of the program to

administer or oversee the respiratory protection program and conduct the required evaluations of program effectiveness.” (29 CFR § 1910.134(c)(3))

A. Program Administrator Responsibilities **John R Powell** is responsible for administering the Respiratory Protection Program.

B. The Program Administrator’s duties may include the following:

- Identifying work areas, processes, or tasks that require workers to wear respirators, and evaluating hazards.
- Selecting appropriate approved respiratory protection options. Monitoring respirators are used in accordance with their certifications.
- Arranging for and or conducting training.
- Ensuring proper storage, cleaning, inspection, and maintenance of respiratory protection equipment.
 - Assign a cartridge replacement schedule as appropriate.
 - Conducting qualitative and/or quantitative fit testing.
 - Administering the medical surveillance program.
 - Maintaining required program records.
 - Evaluating the respiratory protection program.
 - Updating the written program, as necessary.

(There may be additional duties not set forth above.)

Supervisor Responsibilities

Supervisors are responsible for ensuring that the Respiratory Protection Program is implemented in their work areas in accordance with all OSHA standards. In addition to being knowledgeable about the program requirements for their own protection, supervisors also ensure that the program is understood and followed by the employees under their supervision.

Supervisory duties may include the following:

- Ensure supervised employees (including all new hires) receive appropriate training, fit testing, and annual medical evaluations.
- Ensure the availability of appropriate respirators and accessories.
- Be aware of tasks requiring the use of respiratory protection.
- Enforce the proper use of respiratory protection.

- Ensure that respirators are properly cleaned, maintained, inspected, and stored in accordance with the respiratory protection plan.
- Monitor work areas and operations with sufficient frequency to identify respiratory hazards and select proper equipment.
- Ensure respirators fit well and do not cause discomfort. Coordinate with the Program Administrator on how to address respiratory hazards or other concerns regarding the program.
- Ensure adequate air quantity, quality, and flow of breathing air for atmosphere-supplying respirators. (See (c)(1) of the standard.

Employee Responsibilities

Each employee must wear his or her respirator when and where required, under the conditions specified by this program. They are also obligated to use the equipment according to the training procedures for each model. Employees may be responsible for the following:

- Being familiar with this program.
- Caring for and maintaining the respirators as instructed and store them in a clean sanitary location.
- Performing positive and negative pressure respirator checks before each use.
 - Informing the supervisor if the respirator no longer fits well and request a new one that fits properly.
- Informing the supervisor or Program Administrator of any potential respiratory hazards or other concerns regarding the program.
- Informing the supervisor of need for a medical reevaluation.

Medical Provider Responsibilities

Medical Department Occupational Health (Concentra) is responsible for the medical evaluation of all employees in the program to assure that they are physically able to perform the work and wear the equipment (29 CFR § 1910.134(e))

Program Elements:

Medical Evaluation

Using a respirator may place a physiological burden on employees that varies with the type of respirator worn, the job and workplace conditions in which the respirator is used, and the medical status of the employee.” (29 CFR § 1910.134(e))

Accordingly, this paragraph specifies the minimum requirements for medical evaluation that employers must implement to determine the employee’s ability to use a respirator as set forth in 29 CFR § 1910.134(e).

Any employee who is required to wear a respirator or chooses to wear an air-purifying respirator (APR) voluntarily, must first pass a medical evaluation and have medical approval before wearing the equipment on the job. Voluntary use of filtering facepieces (i.e., dust masks) such as Dusk Mask are excluded from this requirement, as stated in 29 CFR § 1910.134(c)(2)(ii).

Employees are not permitted to wear respirators until a physician has determined that they are medically able to do so. Employees refusing the medical evaluation cannot work in areas requiring respirator use. The evaluation is conducted using the questionnaire provided in Attachment A, Appendix II, of this document, or an actual examination that obtains the same information. All examinations and questionnaires are to remain confidential between the employee and the physician or other licensed health care professional (PLHCP).

The medical evaluation will be conducted by: **Occupational Health Services/Concentra**.

Evaluation Procedures

- Every employee requiring medical evaluation is given a copy of the medical questionnaire in Appendix II3 along with a stamped envelope, addressed to the physician or other PLHCP. The employee is to complete the confidential questionnaire during his/her work shift and mail it in the envelope provided.
- To the extent feasible, **Stony Creek Services Inc** accommodates employees unable to read the questionnaire. At an employee’s request, someone other than **John R Powell** may be asked to assist in reading the document. If this is not possible, the employee will be sent to the PLHCP for a medical evaluation.
- Follow-up medical exams are given to employees as required by the OSHA standard, or as deemed necessary by the PLHCP. • All employees can speak with the PLHCP about their medical evaluation.

- Any employee required by medical reasons to wear a positive-pressure air purifying respirator is provided with a powered air purifying respirator.

After an employee has received approval and started using a respirator, an additional medical evaluation is conducted for the following reasons, according to 29 CFR § 1910.134(e)(7):

- The employee reports signs and/or symptoms related to his/her ability to use a respirator, such as shortness of breath, dizziness, chest pains, or wheezing.
- The PLHCP or supervisor informs the Program Administrator of a reevaluation need.
- Information from this program, including observations made during fit testing and program evaluation, indicates a need for reevaluation; or
- A change occurs in the workplace conditions that may result in an increased physiological burden on the employee.

Determination of Fitness

A physician or other licensed health care professional (PLHCP) at Occupational Health Services/ Concentra evaluates the completed health care questionnaire.

Before making a formal determination, **Stony Creek Services Inc.** provides the PLHCP with the following information on respirator usage in accordance with CFR § 1910.134(e)(5)(i):

- The type and weight of the respirator equipment.
- Use frequency and duration.
- Expected work effort.
- Additional personal protective clothing/equipment to be used; and
- Estimated temperature and humidity extremes expected in the work area where the respirator is to be used.

The PLHCP provides a recommendation of each employee's physical ability to wear a respirator and perform the assigned work. Such evaluations will be provided in writing and shall provide only the following information in accordance with CFR § 1910.134(e)(6):

- Any limitations on respirator use related to the medical condition of the employee, or relating to the workplace conditions in which the respirator will be used, including whether or not the employee is medically able to use the respirator.
- The need, if any, for follow-up medical evaluations; and
- A statement that the PLHCP has provided the employee with a copy of the PLHCP's written recommendation.

Follow-up Medical Examination

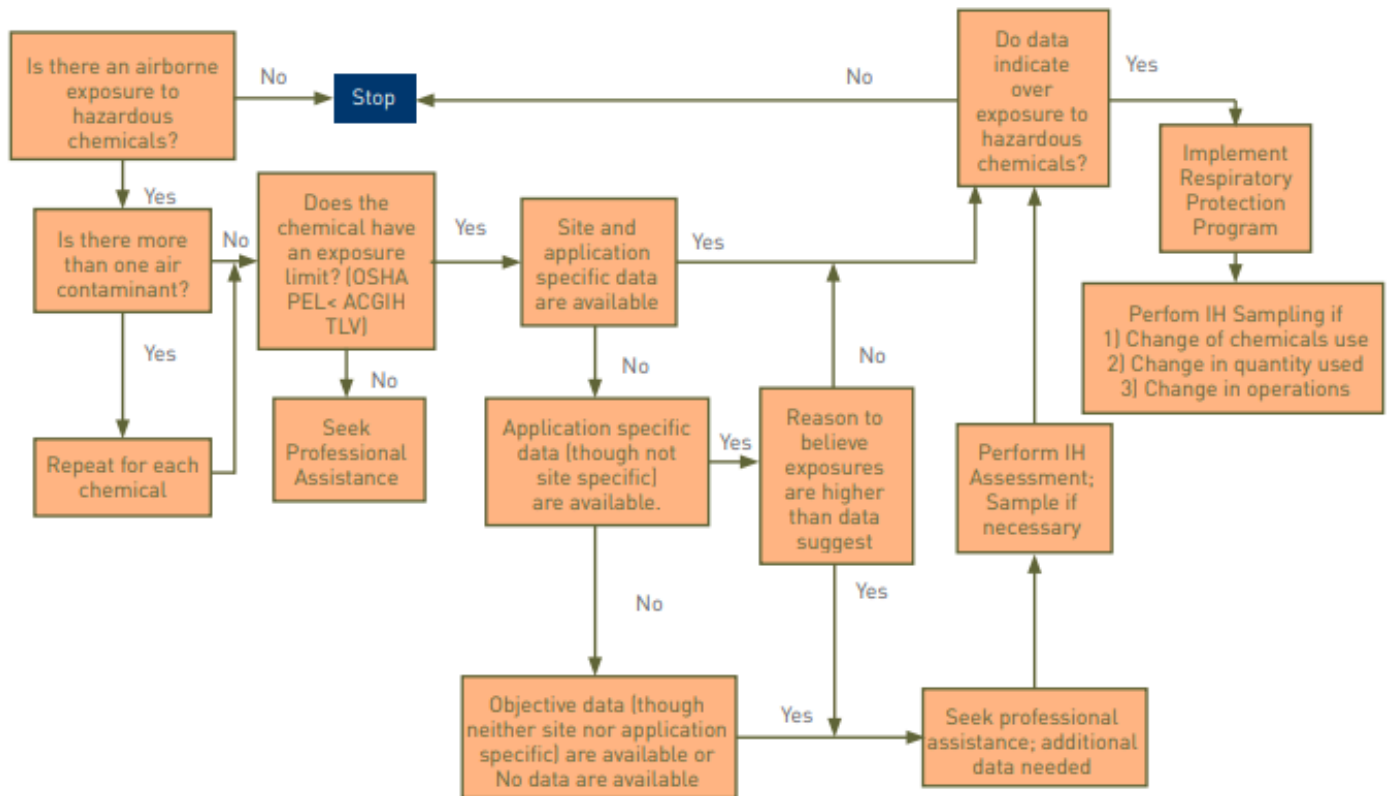
If an employee responds positively to any of questions 1 through 8 in Section 2 of OSHA's Medical Evaluation Questionnaire (See Attachment A, Appendix II), or if the PLHCP deems it necessary, a follow-up exam is provided. This exam includes any medical tests, consultations, or diagnostic procedures that the PLHCP needs, to make a final determination for safe respirator usage.

Respirator Selection

"Respirators shall be provided by the employer when such equipment is necessary to protect the health of the employee. The employer shall provide the respirators which are applicable and suitable for the purpose intended. The employer shall be responsible for the establishment and maintenance of a respiratory protection program. "(29 CFR § 1910.134(a)(2))

Stony Creek Services Inc. has performed an exposure assessment identifying the respiratory hazard(s) found in its workplace. The decision matrix used in this process is shown in Figure 1.

**Figure 1: Center for the Polyurethanes Industry
MDI Exposure Assessment Decision Matrix for Selecting Respiratory Protection**



Based on this information, and in accordance with all OSHA Standards, the Program Administrator selects the respirator to be used.

Respirator Fit Testing

“Fit testing. This paragraph requires that, before an employee may be required to use any respirator with a negative or positive pressure tight-fitting facepiece, the employee must be fit tested with the same make, model, style, and size of respirator that will be used. This paragraph specifies the kinds of fit tests allowed and the procedures for conducting them, and how the results of the fit tests must be used.” (29 CFR § 1910.134(f))

Fit testing is required by OSHA for employees wearing respirators with a negative or positive pressure, tight-fitting facepiece. The fit test is conducted using the respirator that the employee will be wearing on the job.

Fit testing is conducted in accordance with 29 CFR § 1910.134(f):

- Before initial use of the respirator.
- If a different respirator facepiece (size, style, model or make) is used.
- 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.)
- On an annual basis.

The company uses a qualitative fit test (QLFT) or a quantitative fit test (QNFT) method designated in Table 2.8. If an employee passes either test but notifies the employer that the fit is unacceptable, the employee is allowed to select a different respirator and is retested.

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Table 2 OSHA Acceptable Fit-Testing Methods*		
	QLFT	QNFT
Half-Face, Negative Pressure, APR (<100 fit factor)	Yes	Yes
Full-Face, Negative Pressure, APR (<100 fit factor) used in atmospheres up to 10 times the PEL	Yes	Yes
Full-Face, Negative Pressure, APR (>100 fit factor)	No	Yes
Powered Air-Purifying Respirator, tight-fitting PAPR	Yes	Yes
Supplied-Air Respirators (SAR), or SCBA used in Negative Pressure (Demand Mode) (>100 fit factor)	No	Yes
Supplied-Air Respirators (SAR), or SCBA used in Positive Pressure (Pressure Demand Mode)	Yes	Yes
SCBA-Structural Fire Fighting, Positive Pressure	Yes	Yes
SCBA/SAR-IDLH, Positive Pressure	Yes	Yes
Mouth-bit Respirators	Fit-testing is not required	
Loose-fitting Respirators (e.g. hoods, helmets)	Fit-testing is not required	

Respirator Use

General Use Instructions

Each time a respirator is worn, the wearer must conduct a user seal check (29 CFR § 1910.134(g)(1)(iii)). Employees may select either the positive or negative pressure check. Additional PPE, combined with respirator use, may be necessary to adequately prevent exposure. The use of eye, face or skin protection may be required during certain processes. Consult the process supervisor for other required equipment.

In accordance with 29 CFR § 1910.134(g)(1), tight-fitting facepiece respirators are not permitted for use if:

- An employee has facial hair that interferes with either the sealing surface of the respirator and the face or interferes with the valve function.
- Corrective glasses/goggles or other personal protective equipment interfere with the seal of the facepiece.
- Any other condition interferes with the facepiece seal. In accordance with 29 CFR § 1910.134(g)(2), the employee must vacate the respirator use area for the following reasons: To wash his/her face and respirator facepiece, as necessary to prevent respirator-induced eye or skin irritation;
- If a vapor or gas breakthrough is detected.
- If there is a change in breathing resistance.
- If there is facepiece leakage; or
- To replace the respirator/filter or change the cartridge/canister

Cleaning, Maintenance, and Storage

Requirement: "Procedures and schedules for cleaning, disinfecting, storing, inspecting, repairing, discarding, and otherwise maintaining respirators" (29 CFR §1910.134(c)(1)(v)). Respirators are to be regularly cleaned and disinfected according

to the manufacturer's instructions. APRs are to be cleaned and disinfected as often as necessary to be maintained in a sanitary condition SARs and emergency use respirators are to be cleaned and disinfected after each use according to 29 CFR § 1910.134(h)(1)(iii).

Cleaning

Follow these general steps for cleaning and disinfecting respirators, refer to the manufacturer for specific directions:

- Disassemble respirator, removing all filters, canisters, or cartridges.
- Wash the facepiece and associated parts in a mild detergent with warm water. Do not use organic solvents or bleach.
- Rinse thoroughly in clean, warm water.
- Wipe the respirator with disinfectant wipes (70% isopropyl alcohol) to kill germs.
 - Air dry in a clean area. If a clean area is not available, use clean disposable paper towels to blot excess moisture.
- Reassemble the respirator and replace any defective parts (noting the condition of the head straps and valve flaps).
- Place in a clean, dry plastic bag or other airtight container.

The Program Administrator is responsible for ensuring there are adequate cleaning and disinfecting supplies. If supplies are low, employees can notify their Supervisor or the Program Administrator.

Maintenance

After leaving the respirator use area, employees can do limited maintenance on their equipment only in an area that is free from respiratory hazards. Respirators are to be properly maintained so that they function properly and adequately protect the employee. Maintenance involves a thorough visual inspection for cleanliness and/or defects. Worn or deteriorated parts must be replaced before equipment use. No components are replaced or repairs made beyond those recommended by the manufacturer. Repairs or adjustments to respirators are to be made only by persons appropriately trained to

perform such operations and shall use only the respirator manufacturer's NIOSH-approved parts designed for the respirator according to 29 CFR § 1910.134(h).

The following checklist may be used when inspecting respirators:

Facepiece: cracks, tears, holes, facemask distortion, cracked or loose lenses/face shield

Head straps: breaks, tears, broken buckles/clasps, overstretched elastic bands

Valves: residue/dirt, cracks or tears in valve material, absence of valve flap

Filter/Cartridges: proper cartridge for hazard, approval designation, intact gaskets, cracks or dents in housing.

Air Supply Systems: breathing air quality/grade, condition of supply hoses, hose connections, settings on regulators and valves

Defective respirators or those with defective parts are taken out of service immediately (29 CFR §1910.134(h)(4)). Employees should notify their supervisor about all respirator defects. It is the supervisor's responsibility to give the defective equipment either to the Program Administrator or to the individual charged with replacement/repair. The Program Administrator then decides whether to:

- Temporarily take the respirator out of service until it can be repaired;
- Have it repaired; or
- Dispose of it if the problem is irreparable.

Storage

APRs are stored in a clean, dry area, following the manufacturer's recommendations. Employees inspect and clean their own respirators according to the provisions of this program. The equipment is stored in plastic bags or air-tight containers. Each bag/container is marked with an employee's name, and only that particular employee can use it for their equipment storage. (29 CFR §1910.134(h)(2)).

A supply of respirators and replacement components are stored in the original manufacturer's packaging in the Company vehicles or warehouse.

Cartridge and Canister Change-Out Schedules In the application of product containing MDI, the use of an air-purifying respirator (APR) may be permitted if the airborne MDI concentration is no greater than 10 times the American Conference of Governmental Industrial Hygienists (ACGIH) threshold limit value (TLV) or OSHA PEL. If an APR is selected, the cartridge must be equipped with an end of service life indicator (ESLI) certified by NIOSH, or a change-out schedule, based on objective information or data that will ensure that the cartridges are changed out before the end of their service life, must be developed and implemented. When using an APR respirator, a pre-filter combined with an organic vapor cartridge is recommended. APR cannot be used if (1) the employee is working in the zone of the contaminant (e.g., visible overspray is evident on the workers body), or (2) in the construction industry where spray foam application is inside a structure or a confined space with inadequate ventilation. In these situations, PAPR or SAR are provided. Contact the respirator manufacturer or the product supplier for their recommendation on specific cartridge use. The basis for the change-out schedule must be described in the employer's written respirator program. Employees wearing APR with particulate pre-filters for protection against wood dust and other particulates must change their cartridges when they experience difficulty breathing (i.e. resistance) while wearing their mask, according to the manufacturer.

Equipment Malfunction During Use

Air-Purifying Respirators (APR) If an APR or any of its component's malfunctions (breakthrough, facepiece leakage, or faulty valve), the wearer must leave the respirator use area immediately and notify the supervisor about the malfunction. The supervisor is then responsible for ensuring that the employee receives the necessary repair parts or a new functional respirator. **Supplied-Air Respirator (SAR)** Usually, employees using SAR work in pairs. If one experiences an SAR malfunction, then he/she notifies the partner of the problem by using hand signals. The partner then escorts the affected employee outside the respirator use area.

Supplied-air respirators use only Grade D breathing air as described in ANSI/Compressed Gas Association Commodity Specification for Air, G-7.1-1989*. The Program Administrator will maintain a Certificate of Analysis from the supplier that (1) Grade D breathing air is contained in the cylinders used to supply breathing air; (2) cylinders are tested and maintained as required in the Shipping Container Specification Regulations of the Department of Transportation; and (3) the moisture content in the cylinder does not exceed a dew point of -50 degrees Fahrenheit at 1 atmosphere pressure for each shipment of cylinders received or for the purification system used to clean breathing air in a hose/compressor system.

*The oxygen content (v/v) is between 19.5% and 23.5%; hydrocarbon (condensed) content is 5 mg/m³ or less; carbon monoxide content is 10ppm or less; and carbon dioxide content is 1,000.

TRAINING

“Training of employees in the proper use of respirators, including putting on and removing them, any limitations on their use, and their maintenance” is required by 29 CFR §1910.134(c)(1)(viii)

The Program Administrator provides training to respirator users and their supervisors on:

- Contents of **Stony Creek Services Inc.** respiratory protection program.

- Responsibilities of employees and supervisors.
- Requirements of OSHA’s respiratory protection standard. All training occurs prior to any respirator use in the workplace. Supervisors receive their training prior to supervising employees required to use respirators.

The training program covers the following topics:

- Elements of **Stony Creek Services Inc** respiratory protection program.
- The information covered under OSHA Standard 29 CFR § 1910.134

- Respiratory hazards encountered at the worksite • Proper selection and use of respirators • Additional PPE • Respirator limitations
- How to perform user seal (fit) checks
- Fit testing
- Emergency respirator use procedures
- Respirator maintenance and storage
- Medical signs and symptoms limiting effective respirator use.

Employees are required by OSHA to demonstrate their understanding of the topics covered in the training through hands-on exercises and a written quiz. The Program Administrator documents respirator training. Refer to Appendix IV, of this document for a copy of the Respirator Protection Training Quiz. This documentation includes the type, model, and size of respirator on which each employee has been trained and fit tested.

Employees are retrained annually, or as needed (i.e., relocation to another department using a different type of respirator)

Program Evaluation

“This section requires the employer to conduct evaluations of the workplace to ensure that the written respiratory protection program is being properly implemented, and to consult employees to ensure that they are using the respirators properly” (29 CFR § 1910.134(l)).

The Program Administrator and other responsible supervisors conduct periodic evaluations of the workplace to ensure that the provisions of this program are being implemented. These evaluations can include regular consultations with both the employees using respirators and their supervisors. There may be other topics that a company determines are appropriate. This can identify areas for improvement and address problems.

Records’ reviews, site inspections, and periodic air monitoring also assist in program review.

Documentation and Recordkeeping

The Program Administrator maintains the following records:

- A written copy of this program and the OSHA standard (this information is available to any interested employee).
- Training and fit testing records. These records are updated as new employees are trained, when existing employees receive refresher training, and/or when new fit testing is conducted.
- Written recommendations from the PLHCP on an employee's ability to use respirators. Medical evaluations are maintained in accordance with the OSHA Medical Records Standard (29 CFR § 1910.1020).

The OSHA website hosts additional information about topics such as respiratory fit testing procedures, user seal check procedures, respiratory cleaning procedures, and the OSHA Respiratory Medical Evaluation Questionnaire. You should access OSHA's website at www.osha.gov for more information.