3M Technical Data Bulletin

#165–Fit Testing Policy

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Policy

When performing training and fit testing of respirator users, it is 3M's position that fit testing wearers with facial hair that protrudes under the respirator seal or interferes with respirator valve function shall not be done. In addition, fit testing will not be conducted when any other condition that interferes with the face-to-facepiece seal or valve function exists. A medical evaluation to determine a worker's ability to use a respirator must be completed before being fit tested. Therefore, 3M Sales Representatives will not conduct fit tests on people wearing negative pressure respirators (half and full facepiece air purifying respirators) or positive pressure tight-fitting respirators [6000 Series and 7000 Series Respirators with Airline, Powered Air Purifying Respirator (PAPR) with 6000 Series and 7000 Series full facepieces]:

- that have facial hair (well trimmed moustaches and sideburns that do not protrude under the face seal or interfere with valve function are acceptable) or,
- that have not been medically evaluated for their ability to use a respirator.

Further, our use limitation instructions provide that all tight-fitting respirators should not be used with "beards or other facial hair that prevents direct contact between the face and the edge of the respirator."

Discussion

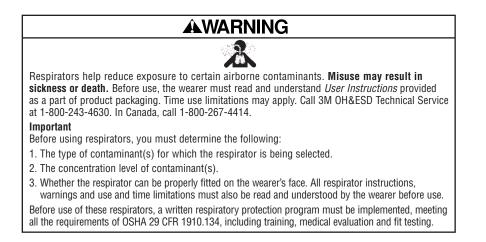
The OSHA Respiratory Protection Standard addresses the issue of respirator use and facial hair [29 CFR 1910.134(g)(1)(i)]. This paragraph states that tight-fitting respirators are not permitted to be worn by employees who have facial hair that comes between the sealing surface of the facepiece and the face or that interferes with valve function. This paragraph includes any condition that interferes with the face-to-facepiece seal or valve function.

OSHA's intent and enforcement policy is stated in Compliance Directive CPL 2.120, Inspection Procedures for the Respiratory Protection Standard. It defines the presence of facial hair to be "more than one day's growth." This implies the worker needs to have been clean shaven in the face seal area within the last 24 hours prior to the fit test.

The list of other conditions that interfere with the face seal include facial scars, wearing of jewelry or the use of headgear that projects under the facepiece seal. The OSHA respiratory protection standard (29 CFR 1910.134) prohibits fit testing of employees if there is any hair growth between the skin and facepiece sealing surface, such as stubble beard growth, beard, moustache, or sideburns which cross the respirator sealing surface (Appendix A.I.A.9.).

We are in full agreement with OSHA that facial hair should not be permitted in the sealing area of a tight-fitting respirator or allowed to interfere with respirator valve function and that respirator fit testing should not be conducted on these people. Therefore, 3M continues the following policy of not conducting either qualitative or quantitative fit tests on workers with any facial hair that extends under the respirator seal or interferes with valve function. This includes all negative pressure respirators (half and full facepiece air purifying respirators) and positive pressure tight-fitting respirators [6000 Series and 7000 Series Respirators with Airline, Powered Air Purifying Respirator (PAPR) with 6000 Series and 7000 Series full facepieces]. Similarly, these respirators should not be used on such workers.

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