OSHA CROSSTELL 21-05

AFSAS OSHA EVENT # 8832 / OSHA Inspection # 1523750

Travis AFB (AMC) | OSHA Region: 9

04 April – 12 May 2021

BLUF: Medical employees using a tight-fitting facepiece respirator were not fit tested annually.

Notice 1 Item 1: Other than Serious

The severity of notice classification was reduced from "**Serious"** to "**Other than Serious"** during the informal settlement agreement process. The notice states that both initial and annual fit tests were not conducted; it was clarified that initial respiratory fit testing was performed for all medical staff on the Respiratory Protection Program. This clarification resulted in an informal settlement agreement reclassifying Notice 1 Item 1 to Other-than-Serious.

29 CFR l 910.134(f)(2): Employee(s) using tight-fitting facepiece respirators were not fit tested prior to initial use of the respirator or annually refitted:

The employer did not provide an initial nor annual fit test to all employees required to wear respirators. The employer required employees to wear 3M Model 1805 N95 filtering facepieces or 3M Model 1860 elastomeric half mask respirators to protect against the SARS-CoV-2 virus while providing care to suspected and confirmed positive COVID-19 patients.

Lessons Learned:

Communication between workplace supervisors and the Aerospace Medicine Team (Public Health & Bioenvironmental Engineering) is critical to ensure accurate employee rosters and timely completion of Medical Surveillance Exam requirements to include annual fit tests.

Preventing Reoccurrences:

Workplace specific written Respiratory Protection operating instructions must clearly define which workplace processes within the Medical Treatment Facility require the use of tight-fitting facepiece respirators for protection of employees with exposure to people with suspected or confirmed COVID-19. Workplace supervisors shall not allow employees to perform processes where a respirator is required if their annual fit test is not current.

Resources:

29CFR1910.134, *Respiratory Protection*

29CFR1910.502, *Healthcare*

AFI 48-137, *Respiratory Protection Program*

OSHA, *Updated Interim Enforcement Plan for Coronavirus Disease 2019*