

PHOENIX FIRE DEPARTMENT

Volume 1 – Management Procedures

RESPIRATORY FIT TEST PROGRAM

M.P. 110.19	Date Revised: 04/26
This policy is for internal use only and does not expand an employee's legal duty or civil liability in any way. This policy should not be construed as creating a duty to act or a higher duty of care with respect to third-party civil claims against employees, the Phoenix Fire Department (PFD) or the City of Phoenix. A violation of this policy, if proven, can only form the basis for non-judicial administrative action by the employer in accordance with the laws and rules governing employee discipline.	
Related Policies: M.P. 202.02, M.P. 202.05B, OSHA 29 CFR 1910.134	

Purpose

It is the policy of the Phoenix Fire Department to provide its members with appropriate respiratory protection to safeguard them from injury during Fire Department activities. This protection must align with the diverse services the Department provides and comply with applicable OSHA standards.

This program establishes the standards and procedures for respiratory protection, ensuring the highest level of safety for our members through proper testing and compliance.

Scope

There are many different types of protection used within the various sections within the Phoenix Fire Department as members respond to a variety of environments requiring different levels and types of protection. This program details the standards and methods used to ensure the highest level of safety for our members and ensure compliance with OSHA standards for respiratory protection in accordance with OSHA 29 CFR 1910.134.

Frequency

All members working in a position requiring respiratory protection as defined by OSHA 29 CFR 1910.134 must be tested for proper fit:

- Before using respiratory protection for the first time
- At least once annually
- When returning from transitional work assignment
- If out of the field due to injury, illness, or any other leave during the annual fit testing process
- After any changes that could affect the fit of respiratory protection including, but not limited to, facial scarring, dental changes, cosmetic surgery, or an obvious change in body weight
- If member identifies leakage in mask or can smell vapor or fumes while wearing respiratory protection
- Anytime a member has concerns about the fit of their respiratory protection

Program Roles and Responsibilities

Department Safety Officer

The Department Safety Officer (DSO) is the Deputy Chief of Safety and Prevention and acts as the director of the respiratory protection program. The DSO reports to the Executive Team. Responsibilities of the DSO include:

- Provides direction and oversight to the Program Manager
- Develop, implement, and evaluate the Respiratory Protection Program
- Ensures compliance with OSHA 29 CFR 1910.134 standards
- Provides direction and oversight to the Program Manager
- Assist with identifying the task or environment requiring the use of a respirator
- Recommend appropriate respirators and filtering media for tasks that require the use of a respirator

Respiratory Protection Program Manager

The program manager is a Safety Officer and is the point of contact for program delivery. The Program manager reports to the DSO and is responsible to:

- Oversee operations of the annual Respiratory Fit Test Program
- Ensure members are tracked for completion throughout the annual respiratory fit test program
- Reviews and sends communication provided by Program Coordinators prior to and during the annual respiratory fit test program to ensure compliance of all members. Communication includes but is not limited to bulletins, emails, schedule information, and any pertinent changes to the program
- Ensure testing site locations have been reserved by program coordinators
- Coordinate with the command training center to schedule all field units and staff members needing fit testing
- Provide resource with a report of the total number of each size SCBA mask and mesh distributed during annual fit testing as well as the total number of each size SCBA mask used by members
- Oversee the process of ensuring all fit test machines are calibrated annually. This includes acquiring a quote from the vendor, ensuring the quote has been approved, and work to coordinate between program coordinators and resource management to ensure machines needing calibrated are sent appropriately
- Ensures efficiency in the program and works with the DSO to ensure budget is properly managed
- Evaluate the effectiveness of the program

Program Coordinators

The program coordinators implement and oversee the delivery of the Respiratory Fit Test Program. Program coordinators report to the Program Manager and are responsible to:

- Ensure all equipment is in proper operating condition
- Track for completion of all tested members

- Provide completion and non-completion reports to the Program Manager during testing and upon completion of annual testing program
- Draft communication information including emails, bulletins, and necessary information to members and managers, and sends to Program Manager for final review and delivery
- Build out of service schedule for units and staff members for placing into company activity calendar
- Compile accurate report of numbers of masks of each size and mesh used during annual fit test and delivers to Program Manager upon annual fit test completion
- Compile accurate report of total number of each size masks used in the field upon annual fit test completion

Test Facilitators

Test facilitators are scheduled by Program Coordinators to deliver the respiratory fit test to all members in the field. All fit test facilitators will be knowledgeable and proficient in the use of quantitative and qualitative fit testing equipment and processes and documentation. Additionally, test facilitators will ensure they are proficient in the setup, cleaning and storage of fit test equipment, understand the different types of respirators and their respective testing procedures and the limitations and capabilities of each.

Operations Member Roles and Responsibilities

District Commanders

District Commanders will receive compliance updates throughout the fit testing process and will work with Battalion Chiefs to ensure all members are aware and are tested during the annual testing period. In addition, District Commanders are also responsible for removing members from Operations who are not compliant with their fit testing. Members will be pulled from Operations and placed on their own leave until back in compliance and cleared through the Safety Section.

Battalion/Division Chiefs

Battalion Chiefs will receive compliance updates and ensure all members in their battalion/section complete fit testing during the testing period. Battalion/Division Chiefs will communicate with District Commanders if there is a non-compliance or scheduling issue to ensure all the members within their battalion/section are compliant.

Company Officers

Company Officers are responsible for ensuring their crew shows up when scheduled for fit testing. Additionally, Company Officers will ensure any members who are off duty on the scheduled day attend another session prior to the completion of the scheduled program.

As direct supervisors, the Company Officer is required to ensure no member utilizes any tight-fitting respirator if they have facial hair that comes between the sealing surface of the facepiece and the face or that interferes with valve function (ref. OSHA 29 CFR 1910.134(g)(1)(i)(A))

All Members

All members are personally responsible for their compliance with respiratory protection fit test standards. Members whose duties require respiratory protection shall:

- Ensure the required annual physical is complete annually
- Attend their scheduled fit testing session
- Ensure there is no facial hair at points where SCBA face-piece is designed to seal with the face. (Refer to MP 102.02 Uniforms, Insignias and Hair Regulations)
- If unable to attend on the day scheduled, attend another session during the program period to ensure annual compliance.
- If unable to attend anytime throughout the duration of annual fit testing, the member must coordinate with the Safety Section to be tested prior to returning to work.
- Members will be pulled from Operations and placed on their own leave while out of compliance.

If significant physical changes happen such as facial surgery, weight change, facial scars, that may affect the proper fit of a mask, members must request a fit test from the Safety Section to ensure proper seal of all respiratory protection.

Documentation

Any member requiring the use of tight-fitting respiratory protection will be required to be medically evaluated prior to face-piece fit testing. Documentation for qualitative and quantitative testing for all members must be kept until the next annual test is completed.

Documentation should be stored in a secure database to ensure safety of the information.

Understanding of OSHA Standards

The Phoenix Fire Department fit testing program is based on and will remain in compliance with OSHA's respiratory protection standard, **29 CFR 1910.134**, including the requirements for fit testing, types of tests, and recordkeeping. Facilitators must be familiar with the requirements of 29 CFR 1910.134.