

# **RESPIRATOR LABEL DESCRIPTIONS**

**PROPOSED CHANGES TO CHAPTER 10 OF  
THE LABEL REVIEW MANUAL**

**TPSA CONFERENCE – FEBRUARY 2019**

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# WHAT'S HAPPENING?

- Last spring, EPA announced draft revisions to respirator descriptions on pesticide labels
  - The document is a proposed revision of the respirator section of Chapter 10 in the Label Review Manual
  - See <https://www.epa.gov/pesticide-registration/label-review-manual-chapter-10-revised-respirator-descriptions-public-comment>
- Was open for public comment until June 11, 2018
- OPP workgroup will review comments & adjust the approach as necessary. The final approach will be incorporated into LRM Chapter 10.

# RESPIRATORS 101

The revised respirator descriptions focus on the two most commonly required respirators for pesticides.



Particulate filtering facepiece respirator



Elastomeric half mask respirator with OV cartridge + combination filter

# CHANGES IN NIOSH TERMINOLOGY






**OLD DESIGNATION:  
TC-21C DUST-MIST  
RESPIRATOR**



**CURRENT DESIGNATION:  
TC-21C POWERED AIR-  
PURIFYING RESPIRATOR**



# CHANGES IN NIOSH TERMINOLOGY

- NIOSH/MSHA\*  • NIOSH
- Dust/mist  • Particulate
- Pre-filter approved for pesticides  • N, R or P filters to be used in combination with a chemical cartridge or combination gas/vapor/particulate cartridge
- Canister approved for pesticides  • Canister
- N, R, P or HE filters  • N, R or P filters

(HE filters used only on powered air purifying respirators)

\* National Institute for Occupational Safety and Health/Mine Safety and Health Administration

# TRANSLATING RESPIRATOR DESCRIPTIONS

## PRE-1995 RESPIRATOR DESCRIPTION

Wear a dust/mist filtering respirator (MSHA/NIOSH approval number TC-21C) or a NIOSH-approved respirator with any N, R, P or HE filter.

## 2018 RECOMMENDED RESPIRATOR DESCRIPTION

Wear a minimum of a NIOSH-approved particulate filtering facepiece respirator with any N\*, R, or P filter; OR a NIOSH-approved elastomeric particulate respirator with any N, R, or P filter; OR a NIOSH-approved powered air-purifying respirator with an HE filter.

# ANALYSIS OF 2018 RECOMMENDED RESPIRATOR DESCRIPTION

**Wear a minimum** of a NIOSH-approved particulate filtering facepiece respirator with **any N, R, or P filter**; OR a NIOSH-approved elastomeric particulate respirators with any N, R, or P filter; OR a NIOSH-approved powered air-purifying respirator with a HE filter.

Identifies the least expensive respirator that must be worn; clearly allows handler to use a more protective respirator.



There are nine classes of particulate filters based on:

- Filter efficiency: 95, 99, 100
- Resistance to oil
  - N = **N**ot oil-resistant
  - R = Oil-**R**esistant
  - P = Oil-**P**roof
- Any N, R or P filter allows handler to wear N95, N99, NI00, R95, R99, R100, P95, P99 or PI00



# TRANSLATING RESPIRATOR DESCRIPTIONS

## PRE-1995 RESPIRATOR DESCRIPTION

Wear a respirator with an organic vapor (OV) removing cartridge with a pre-filter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an OV cartridge or canister with any N, R, P or HE filter.

## 2018 RECOMMENDED RESPIRATOR DESCRIPTION

Wear a minimum of a NIOSH-approved elastomeric half mask respirator with organic vapor (OV) cartridges and a combination N, R, or P filter; OR a NIOSH-approved gas mask with OV canisters; OR a NIOSH-approved powered air-purifying respirator with OV cartridges and combination HE filters.

# ANALYSIS OF 2018 RECOMMENDED RESPIRATOR DESCRIPTION

Wear a minimum of a NIOSH-approved elastomeric half mask respirator with organic vapor (OV) cartridges and a combination N, R or P filter; OR a NIOSH-approved gas mask with OV canisters; OR a NIOSH-approved powered air-purifying respirator with OV cartridges and combination HE filters.

Identifies the least expensive respirator that must be worn; clearly allows handler to use a more protective respirator.



The label must specify the type of chemical cartridge. Organic vapor (OV) cartridges are appropriate for many but not all pesticides. Exceptions include sulfur dioxide (acid gas) and fumigants (chemical specific).

Combination N, R or P filters can be designed to add onto the chemical cartridge (as shown above) or the filter and chemical cartridge can be one piece (shown to the right)



# WHEN/HOW SHOULD LABELS BE UPDATED?

- From respirator description web page (<https://www.epa.gov/pesticide-registration/label-review-manual-chapter-10-revised-respirator-descriptions-public-comment>)
- **Upon release of the revised chapter**, EPA will expect registrants who seek label amendments for other reasons to also revise their personal protective equipment (PPE) statements to include the updated descriptions at the same time.
  - Should those registrants wish to revise only the PPE statements to incorporate the new respirator descriptions they will be advised to submit a fast track amendment with the changes.
- For existing products that are not updated following the release of the revised chapter, EPA will require the submission of labels with the revised descriptions of respirators during the registration review process.

# RESOURCES

- OPP Respirator Web Page
  - <https://www.epa.gov/pesticide-registration/label-review-manual-chapter-10-revised-respirator-descriptions-public-comment>
- Respiratory Protection for Occupational Users of Pesticides, Rutgers University
  - <https://njaes.rutgers.edu/pubs/publication.php?pid=E358>
- Worker Protection Standard (WPS) Respiratory Protection Guide, Pesticide Educational Resources Collaborative
  - <http://www.pesticideresources.org/wps/respirators.html>
- OSHA Respirator Web Site
  - <https://www.osha.gov/SLTC/respiratoryprotection/index.html>
- OPP Contact
  - Nancy Fitz, 703-305-7385, [fitz.nancy@epa.gov](mailto:fitz.nancy@epa.gov)