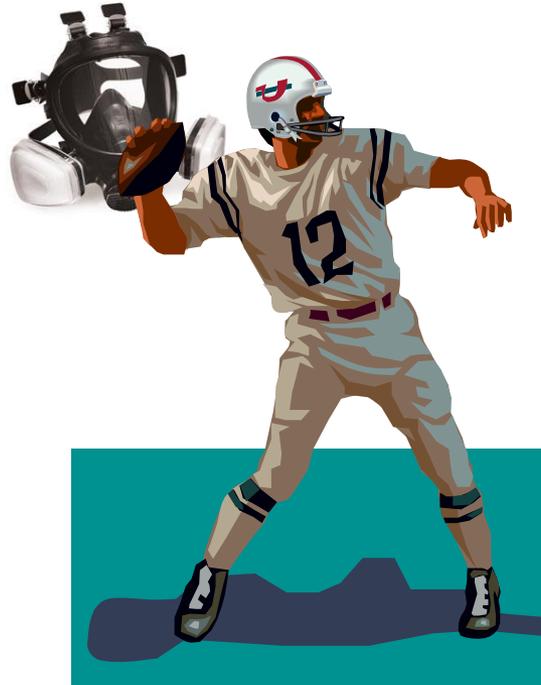


The EPAs



Respirator Football League

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The OSHAs

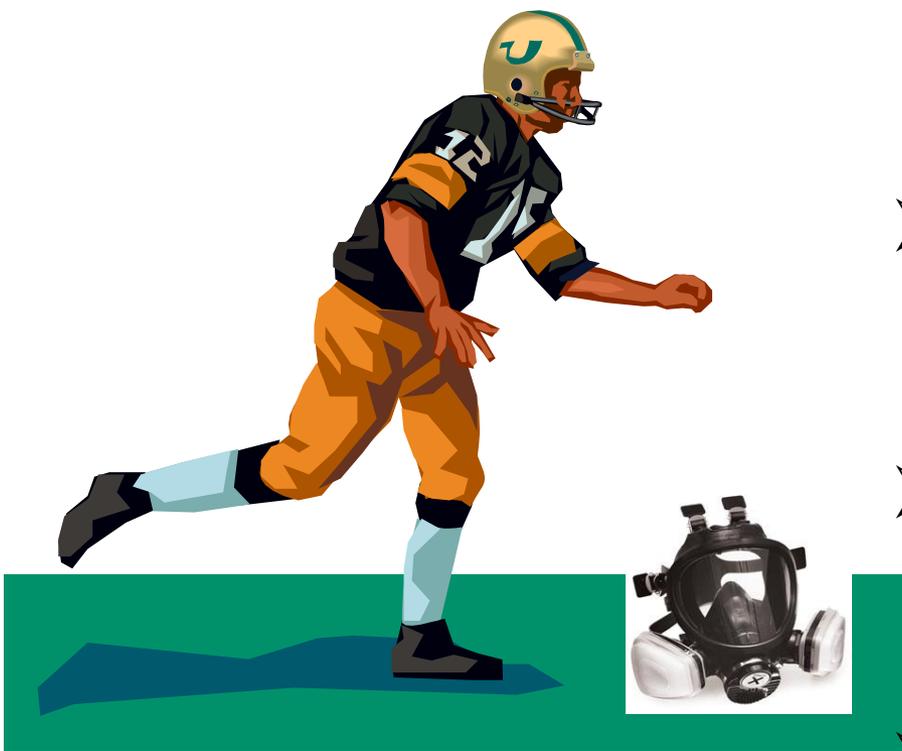
The Referee

NIOSH (Responsibilities)

- Specifies minimum approval requirements of respiratory protection devices in Title 42 CFR Part 84.
- NIOSH reviews respirator approval applications, including tech specs, drawings, etc.
- NIOSH also inspects, examines and tests the respirators to determine that the applicable requirements are met for individual, completely assembled respirators.
- Certificates of approval are issued for a RPD that meets the requirements.



The EPAs (Responsibilities)



- Registers Pesticides under the Federal Insecticide, Fungicide, & Rodenticide Act (FIFRA).
- Assigns EPA Reg. # to products that have gone through the process.
- When pesticides have specific traits, set PPE is required.
- Created the WPS in the 1990's.

OSHA's Responsibilities (Oregon)

- Enforces occupational health and safety standards such as:
- PPE, including respirators
- Enforces the Worker Protection Standard which specifies the handler **MUST** use the PPE required by the pesticide label. (The label is the law.)

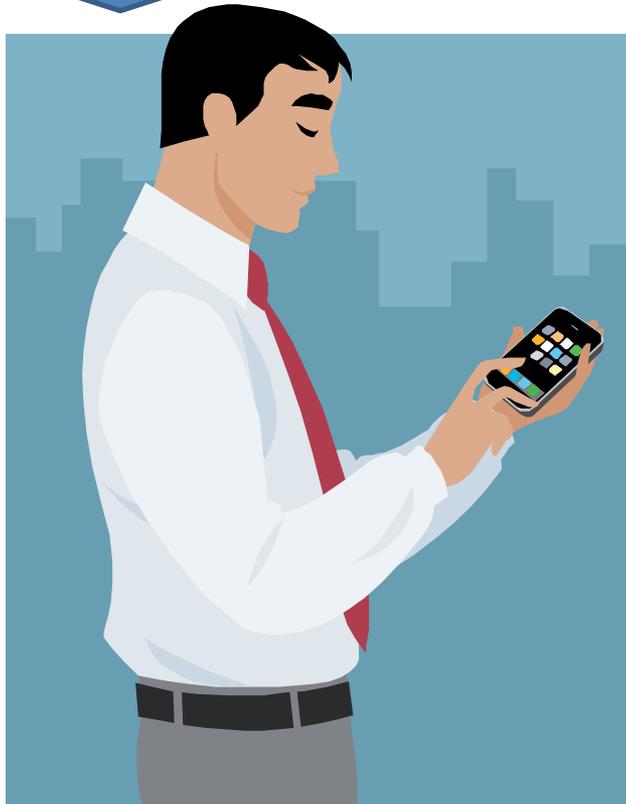


So What's the Problem?



Federal OSHA & Pesticides

We don't deal with pesticides on farms,
we **deal** with pesticides during
manufacturing, but on farms, that's the
EPA, but respirators are US.



OCCUPATIONAL

The Environmental Protection Agency

And the Worker Protection Standard



Respirators you say? I do believe OSHA knows about that, not US.



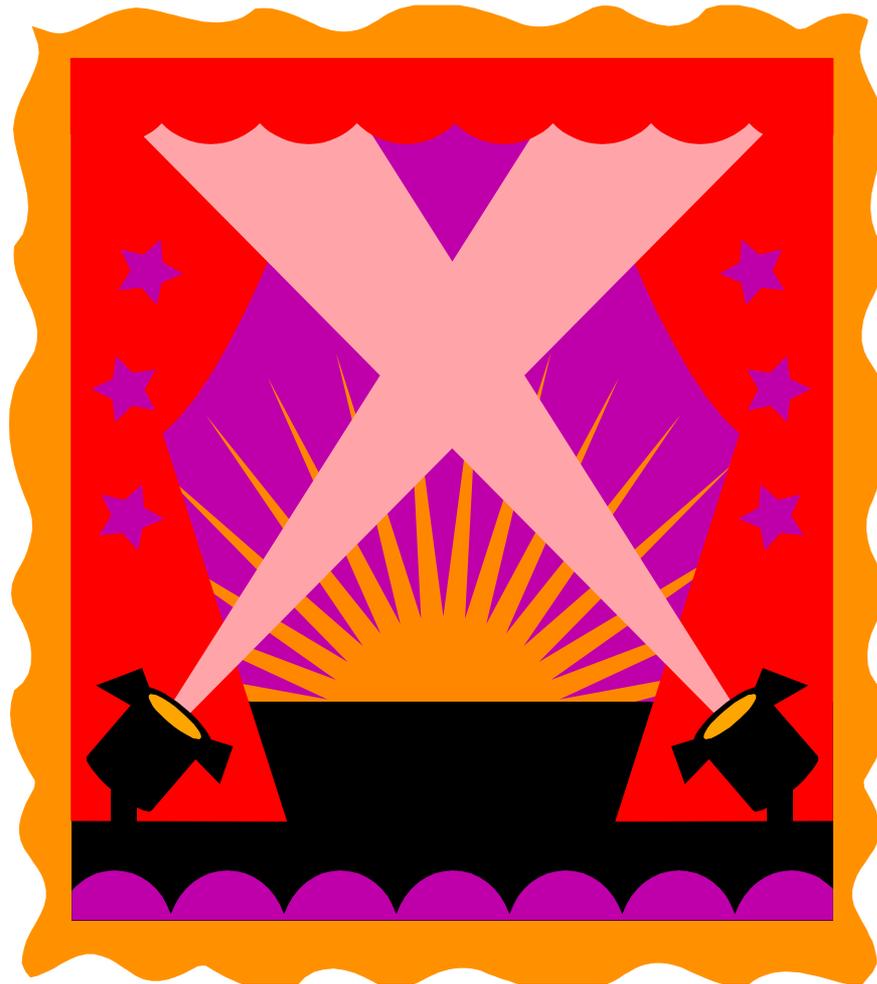
HOLD EVERYTHING!



NIOSH

And that brings us to:

TC 21-C



EPA Required Label Language

- **Pre- 1998 Language-**
- “dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C”). Examples include: granular formulations, dusts mixed with water, dry powders mixed with water
- **Post 1998 Language**
- “dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any N, R, P or HE filter.”

Deadline to Change the Respirator Language?

APRIL 1ST, 2000



BUT, the EPA only got part of the message....

- In 1998 NIOSH changed their criteria according to Title 42 CFR Part 84.
- TC - 21C Dust/Mist respirator changed to:
- TC - 84A Particulate Respirator;
- TC - 23C : OV + pre-filter changed to TC-84A – with “pre-filter” changing to “combination”
- TC - 21C became the requirement for a particulate powered air purifying respirator.

What one is it?

Label says: Mixers/loaders supporting aerial applications and chemigation applications must wear also: **A Dust/Mist filtering respirator MSHA/NIOSH approval number prefix TC-21C.**



Which would YOU select?



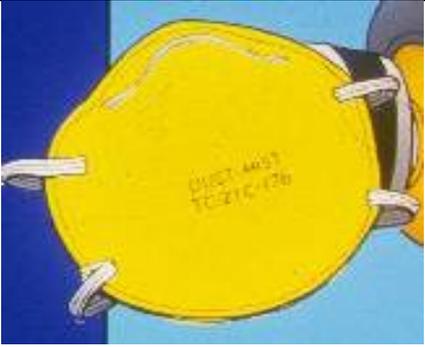
3M™ 8200 Series Respirators N-95 are great for sweeping, sanding or working in other dusty environments

NIOSH approved **TC-84A**-1289-03
\$17.10/ for 20



Full face helmet provides comfortable, NIOSH-approved protection against dusts, mists, molds and fumes

NIOSH Approval No. **TC-21C**-633. Imported
\$1,102.00/ for 1

Old NIOSH Language Pre-1995	What that looked like	New NIOSH Language Post-1995	What this looks Like NOW	
<p>“dust mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C)”</p>		<p>TC-21 C Powered Air Purifying Respirator (PAPR)</p>		
<p>“dust/mist”</p>	<p>Term no longer used in NIOSH approval schedules</p>	<p>Particulate</p>		 <p>NIOSH approval prefix: TC-84A</p>

Language: Old label with product not containing oil

“dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C)”

Language required per PRN 98-9:

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

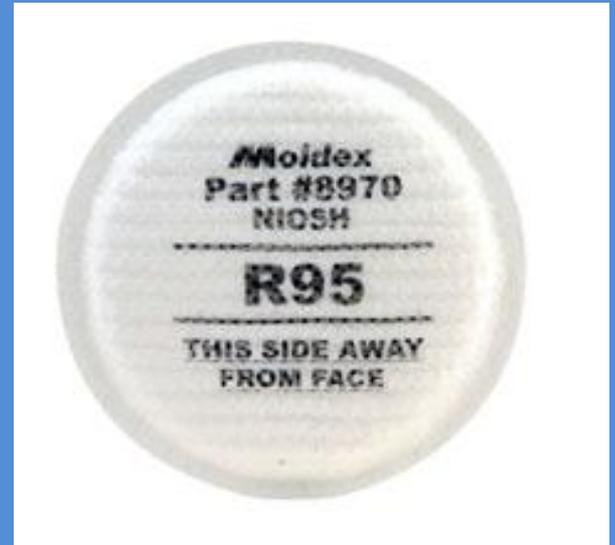
**** Particulate TC-84A**

Red denotes language no longer used in NIOSH approval schedules

HE filter can only go on a PAPR

Translating NIOSH Language

Old NIOSH Language Pre-1995	What that looked like	New NIOSH Language Post-1995	What this looks Like NOW	
<p>“respirator with an organic vapor removing removing cartridge with a prefilter approved for pesticides (MSHA /NIOSH approval number prefix TC-23C)</p>		<p>Respirator with organic removing cartridge with a combination filter (N, R or P) NIOSH approval prefix TC-84A</p>		
<p>“pre-filter”</p>	<p>Term no longer used in NIOSH approval schedules</p>	<p>Combination</p>	<p>N, R or P filter</p>	
<p>TC-23C</p>		<p>Elastomeric With Organic Vapor cartridge NIOSH approval prefix TC-23C</p>		



Filters



GRAMOXONE Label says: Applicators and other handlers other than Mixers and Loaders must wear: A dust mist NIOSH –approved respirator with any N, R, P or HE filter.

N-95



R-99



HE Filters



**PARTICULATE
FILTERS**



P-100

HE Filters

TC -23C



TC-21C



TC-23C

Label says: For exposures in enclosed areas wear a respirator with an organic vapor removing cartridge **with a prefilter approved for pesticides** (MHSA/NIOSH approval number prefix TC-23C).



Correct?

TC-84A

Hmm, LOOKS like this one has an organic vapor cartridge....



And that looks like a prefilter (altho it SAYS COMBINATION) but the NIOSH prefix is Wrong.....

Call or Email me with the label:

Garnet Cooke

Garnet.r.cooke@state.or.us

(503)378-4730