

U.S. Department of Labor

Occupational Safety and Health Administration
Washington, D.C. 20210



March 8, 1999

Ms. Mary Kiester
System Safety Engineer
Landsat 7 Program
LMMS
230 Mall Boulevard
Room U2101
King of Prussia, PA 19406

Dear Ms. Kiester:

This is in response to your letter to the Occupational Safety and Health Administration (OSHA) dated November 16, 1998. We apologize for the long delay in getting this response to you. You requested that we provide you with a clarification of the requirement that a medical evaluation be provided to employees whose only respirator use would be the use of an escape-only respirator, used to escape from a building in the event of an emergency. These employees have been trained in the use of the five minute Emergency Life Support Apparatus (ELSA) escape only respirator.

OSHA's current policy states that the employer does not have to provide a medical evaluation for employees whose only respirator use would be the use of escape-only respirators. The ELSA is a NIOSH-approved escape-only respirator which provides less than 30 minutes of breathing air. Please note that the employer would still be responsible for compliance with all other provisions of the respirator standard, as applicable, such as the written program and training requirements. If the employer were to provide any other self-contained breathing apparatus (SCBA) which provides 30 minutes of breathing air and which would be used to enter potentially IDLH atmospheres, the employer would have to provide a medical evaluation in accordance with 1910.134(e).

We hope this addresses your concerns. Should you have further questions, please feel free to call OSHA's Office of Health Compliance Assistance at (202) 693-2190.

Sincerely,

Richard E. Fairfax
Director
Directorate of Compliance Programs