

Facial Hair & Respirator Fit Testing Policy

Background

The purpose of this technical data bulletin is to reiterate 3M's position on workers with facial hair and respirator fit testing based on the Occupational Safety and Health Administration (OSHA) Respiratory Protection Standard [29 CFR 1910.134(g)(1)(i)]. This standard addresses the use of respirators and facial hair. OSHA states that tight-fitting respirators are not permitted to be worn by employees who have facial hair that comes between the sealing surface of the facepiece and the face or that interferes with the valve function. Any condition that interferes with the face-to-face facepiece seal or valve function is also addressed.

OSHA's intent and enforcement policy is stated in Compliance Directive CPL 2.120, Inspection Procedures for the Respiratory Protection Standard. It defines the presence of facial hair to be "more than one day's growth." This implies the worker needs to have been clean-shaven in the faceseal area within the last 24 hours prior to the fit test.

The list of other conditions that interfere with the faceseal includes facial scars, wearing of jewelry, the use of headgear that projects under the facepiece seal, or anything else that interferes with the seal between the respirator and the face.

The OSHA Respiratory Protection Standard (29 CFR 1910.134) prohibits fit testing of employees if there is any hair growth between the skin and facepiece sealing surface, such as stubble beard growth, beard, moustache, or sideburns which cross the respirator sealing surface (Appendix A.I.A.9.).

Policy

3M is in full agreement with OSHA that nothing – be it facial hair or any other condition or article of clothing - should be permitted in the sealing area of a tight-fitting respirator or allowed to interfere with respirator valve function – and that respirator fit testing should not be conducted on people for whom this is the case. Furthermore, a medical evaluation to determine a worker's ability to use a respirator must be completed before being fit tested.

Therefore, 3M does not support conducting qualitative or quantitative fit tests on people wearing negative-pressure respirators (half and full facepiece air-purifying respirators) or positive-pressure tight-fitting respirators with any facial hair that extends under the respirator seal or interferes with valve function.

Further, our use limitation instructions provide that all tight-fitting respirators should not be used with "beards or other facial hair or other conditions that prevent a good seal between the face and the sealing surface of the respirator."

Frequently Asked Questions

Q: Are there any acceptable facial hairstyles?

A: The National Institute for Occupational Safety and Health (NIOSH) published this very clear and creative poster which helps workers determine which facial hairstyles are acceptable to use with filtering facepiece respirators. The poster is also available in Spanish.

Q: Is it true that facial hair under the seal can filter the air that passes between the faceseal and the skin?

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A: NIOSH does a great job of answering this question on their blog post "To Beard or not to Beard? That's a good Question!" which states, "Facial hair is not dense enough and the individual hairs are too large to capture particles like an air filter does; nor will a beard trap gases and vapors like the carbon bed in a respirator cartridge."

Q: I can pass a fit test with facial hair. Why do I have to shave it?

A: OSHA does not permit fit testing for any individual where there is facial hair or any obstruction between the face and respirator edge. OSHA regulations are mandatory, and govern all worksites in the U.S.

Q: My employees are not complying with our facial hair policy. Any suggestions?

A: There's no solution that works for every organization, so respirator program administrators need to devise an approach that works for their unique program. Some organizations require their workers to be clean-shaven as a condition of their employment if they are assigned to wear tight-fitting respirators. Others permit facial hair on the days when employees aren't required to wear their tight-fitting respirators, with the agreement that they will shave, even on the spot if need be, if the respirator needs to be worn. Others accommodate workers who don't want to shave or can't shave because of religious beliefs by allowing the use of a PAPR with loose-fitting headgear, instead of a tight-fitting respirator.

References

For more information, consider these resources:

- Centers for Disease Control and Prevention, NIOSH Science Blog (2017). "To Beard or not to Beard? That's a good Question!",https://blogs.cdc.gov/niosh-science-blog/2017/11/02/noshave/
- CDC/NIOSH Facial Hairstyles and Filtering Facepiece Respirators
 Infographic. https://www.cdc.gov/niosh/npptl/pdfs/ FacialHairWmask11282017-508.pdf or Spanish version: https://www.cdc.gov/niosh/npptl/pdfs/FacialHairWmask11282017sp-P.pdf
- CDC/NIOSH Filtering Out Confusion: Frequently Asked Questions About Respiratory Protection, Fit Testing. https://www.cdc.gov/niosh/docs/2018-129/pdfs/2018-129.pdf?id=10.26616/NIOSHPUB2018129
- Occupational Safety and Health Administration (1974). Occupational Safety and Health Standards, 1910.134, Appendix
 A. Fit Testing Procedures
 (Mandatory). https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9780



WARNING: Respirators help reduce exposures to certain airborne contaminants. Before use, the wearer must read and understand the *User Instructions* provided as a part of the product packaging. Follow all local regulations. In the U.S., a written respiratory protection program must be implemented meeting all the requirements of OSHA 29 CFR 1910.134, including training, fit testing and medical evaluation. In Canada, CSA standard Z94.4 requirements must be met and/or requirements of the applicable jurisdiction, as appropriate. **Misuse may result in sickness or death.** For correct use, consult supervisor and the *User Instructions*, or call 3M Technical Service in USA at 1-800-243-4630 and in Canada at 1-800-267-4414.



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