

Respiratory Health Guidance

Processing Issues Subcommittee
Science & Policy Work Group

Is using a respirator required?

For processors attempting to remediate heavy metals from marijuana, respirator use is required per MED rule 5-315 and Rule 6-315. *Even if you are not attempting heavy metals remediation, however, respirator use may be required in accordance with other local, state, or federal laws.* All marijuana businesses who have employees working in dusty places or around other respiratory hazards should ensure they are protecting their employees appropriately. Many marijuana businesses stand to benefit from the implementation of respiratory protection programs and there are resources available to those who want to learn more.

Why respirators?

Respirators are an effective tool for protecting employees from the acute or long-term negative health effects caused by inhaling airborne contaminants. When attempting to remediate plant material contaminated with residual heavy metals, ensuring employees do not inhale contaminated dusts is paramount. There are a few steps a company must take to deploy respirators to their employees, including (but not limited to):

1. Developing a respiratory protection program
2. Having employees medically cleared to wear a respirator by an occupational health specialist
3. Having employees undergo a third party fit test with their respirator.

What is a respiratory protection program?

Simply put, a respiratory protection program is a company's written plan describing proper respirator use and upkeep. OSHA details specific sections that must be covered in a respiratory protection here: <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134>

How do I implement respirators at my business?

You should start with developing your written respiratory protection program following the guidelines listed by OSHA. Additionally, you will want to identify an occupational health partner (typically a hospital or health care provider) who will perform, at minimum, medical clearances and fit tests for your employees. Often, these providers can offer additional guidance and assistance to evaluate your program and help you through the process. Use search terms such as 'respirator medical clearance' and 'occupational health' to identify providers near you.

Mercury poses special hazards

In the context of remediating heavy metals from contaminated plant material, mercury poses special respiratory hazards which must be accounted for. Mercury can easily vaporize and form mercury vapor, which is acutely toxic. Since working with mercury poses significant risk, additional precautions must be taken and these must be accounted for in your respiratory protection program, i.e. ensure that respirator cartridges are NIOSH approved for mercury vapor (MV). You must work with a certified industrial hygienist to ensure your business is equipped to safely and legally handle mercury vapor prior to remediating plant material for mercury contamination.