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# MIOSHA

Michigan Occupational Safety and Health Administration (MIOSHA)  
Department of Labor and Economic Opportunity (LEO)

# AGENCY INSTRUCTION

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DOCUMENT IDENTIFIER:

MIOSHA-STD-15-1R2

DATE:

June 26, 2023

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**SUBJECT: Respiratory Protection Standard, Part 451, Enforcement Policies**

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- I. Purpose. This Instruction adopts OSHA Instruction, CPL 02-00-158, Inspection Procedures for the Respiratory Protection Standard, dated June 26, 2014. CPL-02-00-158 establishes interpretations and enforcement policies and provides instructions to ensure uniform enforcement of MIOSHA General Industry and Construction Standard, Part 451, Respiratory Protection.
- II. Scope. This instruction applies to the Construction Safety and Health Division (CSHD), General Industry Safety and Health Division (GISHD), and the Consultation Education and Training (CET) Division.
- III. References.
  - A. Construction Standard Part 601, [Air Contaminants for Construction](#).
  - B. General Industry and Construction Standard Part 451, [Respiratory Protection](#).
  - C. General Industry Standard Part 301, [Air Contaminants for General Industry](#).
  - D. MIOSHA [Field Operations Manual](#) (FOM), as amended.
  - E. MIOSHA Standard Interpretation, Part 451, Respiratory Protection, [PLHCP \(Physician or Other Licensed Healthcare Professional\)](#).
  - F. Occupational Safety and Health Administration Instruction, CPL 02-00-158, June 26, 2014, [Inspection Procedures for the Respiratory Protection Standard](#).
  - G. Occupational Safety and Health Administration Standard, 29 CFR 1910.134, [Respiratory Protection](#).
- IV. Distribution. MIOSHA Staff; Federal OSHA; S-drive Accessible; MIOSHA Messenger; and Internet Accessible.
- V. Cancellations. All previous versions of this agency instruction.
- VI. Next Review Date. This instruction will be reviewed in five (5) years from date of issuance.
- VII. History. History of previous versions includes:  
MIOSHA-STD-15-1R1, March 13, 2018  
MIOSHA-STD-15-1, January 21, 2015
- VIII. Contact. [Adrian Z. Rocskey](#), Director GISHD; [Lawrence Hidalgo](#), Director CSHD; and [Tarah M. Kile](#), Director CET

- IX. Originator: [Barton G. Pickelman](#), Director
- X. Significant Changes.
  - A. Updated document contact information for CET Director.
  - B. Updated links to all referenced standards.
- XI. Background. MIOSHA General Industry and Construction Standard [Part 451](#), Respiratory Protection, adopted the federal Respiratory Protection Standard, [29 CFR 1910.134](#), as amended, by reference. On June 26, 2014, federal OSHA issued an updated instruction, [CPL-02-00-158](#), Inspection Procedures for the Respiratory Protection Standard, which provides guidelines for the enforcement of the standard. The updated OSHA instruction includes policies and procedures that address changes to the federal Respiratory Protection Standard, 29 CFR [1910.134](#), that were effective in August 2006.
- XII. Action. MIOSHA is adopting the 2014 OSHA instruction, Inspection Procedures for the Respiratory Protection Standard, with the following exceptions.
  - A. Whenever the OSHA instruction references an OSHA occupational safety or health standard, the equivalent MIOSHA standard shall be consulted in its place. For example, permissible exposure limits (PELs) listed in General Industry Standard [Part 301](#), Air Contaminants for General Industry, or Construction Standard [Part 601](#), Air Contaminants for Construction, must be utilized in lieu of the PELs listed in the equivalent OSHA Standard.
  - B. Whenever another OSHA Instruction is referenced, the equivalent MIOSHA Instruction shall be consulted. In situations where there is not an equivalent MIOSHA Instruction, procedures appropriate for the situation as written in the MIOSHA [FOM](#) shall be followed (e.g., procedures for classification and grouping of citations are present in the MIOSHA [FOM](#), but not in a MIOSHA Instruction).
  - C. Whenever procedures/policies in the federal instruction reference the OSHA FOM, the equivalent policies and procedures in the MIOSHA [FOM](#) shall be followed.
  - D. To determine if a particular physician or licensed health care professional (PLHCP) is legally permitted to administer/evaluate the medical questionnaire/examination requirements of [Part 451](#), contact the Michigan Department of Licensing and Regulatory Affairs (LARA) [Bureau of Community and Health Systems](#) to determine the scope of practice for a particular PLHCP. To determine if an individual is licensed, contact the LARA [Bureau of Professional Licensing](#). See also the interpretive quip on the MIOSHA website at: [Part 451–Standard Interpretation](#).