



ASSOCIATION FOR PROFESSIONALS IN  
INFECTION CONTROL AND EPIDEMIOLOGY, INC.

APIC - Hawaii

July 11, 1994

NIOSH Docket Office  
Robert A. Taft Laboratories  
Mail Stop C34  
4676 Columbia Parkway  
Cincinnati, Ohio 45226

Dear Sirs:

Our state chapter of Association for Professionals in Infection Control and Epidemiology (APIC - Hawaii) met in June to discuss our opinions regarding the May 24, 1994 Federal Register document on 42 CFR Part 84, Respiratory Protective Devices; Proposed Rule. We appreciate the opportunity to comment on the proposed rule as regards how this will effect the day to day operations in a healthcare facility. Our association is particularly interested in this proposed rule as it relates to certification criteria for air-purifying respirators for use by personnel caring for patients with known or suspected pulmonary tuberculosis.

The APIC - Hawaii chapter members, present at the June meeting, are in full support of the NIOSH efforts to provide both adequate respiratory protection against TB for healthcare workers and still provide a broad range of respiratory protection devices. It is extremely important to us that a variety of devices be evaluated since we have experienced difficulties in meeting the needs of most healthcare personnel with the HEPA masks that are currently recommended. Size and shape of the bridge of the nose, the need to wear eye protection, long duration of procedures with the need for more active (e.g. deeper) breathing are a few of the variables which have been obstacles to wearing the more restrictive HEPA filter masks over the dust, mist and dust, mist, fume masks.

We look forward to the publication of the final rule and to the availability of a variety of cost effective and practical for healthcare use air-purifying respirators that meet NIOSH certification criteria and the CDC guidelines.

Sincerely,

Carolyn Sanders, Secretary  
APIC - Hawaii

Jan Pang, President  
APIC - Hawaii

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