



NATIONAL STEEL AND SHIPBUILDING COMPANY

November 3, 1987

Director  
Division of Safety Research  
NIOSH  
944 Chestnut Ridge Road  
Morgantown, WV 26505

Dear Sir:

We are concerned about the proposed standard for respirator certification, 42 CFR Part 84, and the impact it would have upon workers currently using respirators.

Respiratory protection for workers in the shipbuilding and repair industry is vital as an effective means of control to harmful materials found in an ever changing work place. Important to the use of respiratory protection devices is an acceptance by the workers to use the provided respirators.

According to the proposed protocol, nearly all non-high efficiency respirators will fail the liquid oil test requirement and that no organic vapor chemical cartridge will meet the 85% relative humidity\50 minute service life requirement. Furthermore, workplace testing in mining operations may be laudable for a few, but ignores the many.

In summary, 42 CFR 84 must not become final as it has been proposed. Much work remains to clarify requirements and resources must be committed to develop a consensus standard (i.e. ANSI Committee) for respirator certification for use in all industrial applications.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry D. Thedell", is written over a horizontal line.

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