



AMERICAN PUBLIC HEALTH ASSOCIATION

1015 Fifteenth Street, N.W., Washington, D.C. 20005 • (202) 789-5600

WILLIAM H. McBEATH, M.D., M.P.H., *Executive Director*

December 23, 1987

National Institute for Occupational
Safety and Health (NIOSH)
NIOSH Docket Office
Mail Stop E-23
1600 Clifton Road, NE
Atlanta, GA 30333

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NIOSH
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Dear Sir/Madam:

The American Public Health Association wishes to comment on the proposed regulations regarding respirator certification.

APHA supports the need for revision of currently existing regulations regarding the certification of permissibility of respiratory protective devices used in mines and mining, as the current standards clearly are in need of upgrading. We believe, however, that the regulations currently proposed need further revision. We are particularly concerned about the proposal for "self-certification". According to section 84.30, "The manufacturer shall conduct all tests and meet all requirements of the revised 42 CFR Part 84, and shall provide NIOSH with a written report. This report may be used as the basis for issuance of a certificate of approval, or, NIOSH may conduct any test or tests it deems necessary". Rather than having the respirator manufacturers perform their own certifying tests, there should be an independent certifying group performing these tests. However, this group should be financially supported by the manufacturers.

APHA does not object to the workplace or simulated workplace test requirements. However, because of the variability inherent in respirator testing, we would emphasize that the improved respiratory certification requirements do not imply that respiratory protection is a final solution to the problem of workplace exposures, but rather a temporary solution pending the installation of adequate engineering controls.

Thank you for your consideration of our comments.

Very truly yours,

William H. McBeath, MD, MPH
Executive Director