Miller, Diane M. (CDC/NIOSH/EID)

Comments on
genda oct 23 2009.

(See attached file: Comments on Agenda oct 23 2009.pdf)

Craig E. Colton, CIH
Division Scientist
Regulatory Affairs & Technical Service
3M Occupational Health and Environmental Safety Division 3M Center Building 235 - 2E-91 St. Paul, MN 55144-1000
651-733-6297
 651-736-7344 Fax
cecolton@mmm.com

3M

October 23, 2009

National Institute for Occupational Safety and Health (NIOSH)
Docket Office, Mail Stop C-34
Robert A. Taft Laboratories
4676 Columbia Parkway
Cincinnati, OH 45226
nioshdocket@cdc.gov

RE: Docket #NIOSH 192

To whom it may concern:

This is in response to your request of October 5, 2009 for input regarding the
2010 PPT Program Stakeholder Meeting agenda. In that letter, the National
Institute for Occupational Safety and Health (NIOSH) published a proposed
agenda.

In this letter, NIOSH indicated that this meeting would be centered on user-
oriented discussions structured to provide PPT-related information and training to
NIOSH and receive user input to its program planning.

General Comment

NIOSH indicates this is to get information to and from PPE users. It is not clear as
to whom NIOSH is referring; end users as employers or end users as wearers.
This venue does not seem to be the most appropriate one for obtaining
information from wearers as this notice does not get to them nor do they usually
have the resources to attend such a meeting. With this in mind we assume you
mean employers that purchase PPE for their employees as the end users.
Proposed Topic and Comment

1.   End-user benefits of respirator certification training sessions

Is this topic to discuss providing training to end users on the benefits of respirator
certification, or to discuss the benefits to end users of respirator training sessions
where the end user obtains a certification?

In the first case, the law requires they use certified respirators with or without benefits being known. The people who decide to violate the law are not doing so based on the benefits of having it tested and certified by NIOSH. Our experience indicates that people are most interested in knowing how to determine or ensure they have a NIOSH approved respirator.

2. Respiratory protection
    a. Overview
    b. Color coding elements for filters
    c. Differences between surgical masks and N95s
    d. CBRN protection
    e. Care and maintenance of respiratory protection
    f. Fit testing

We are not quite sure what NIOSH is requesting. These seem to be past tele-webs or papers that have been made public. The response to these courses should indicate their usefulness once the attendance results are corrected for the people follow all things related to respirators whether it is beneficial or not. In our opinion, the color code is marginally useful due to the inconsistencies and the broad categories covered sometimes. The category covered by the color "olive" has so many entries that it is not useful. Therefore, this is not worth spending much time on this unless the color coding is changed.

Items "c" and "d" are appropriate for a very narrow audience which raises questions as to useful it is to spend many resources on these topics.

Care and maintenance, excluding SCBA, is fairly straight forward. We do not have customers requesting much more information than what is already in the respirator user manuals. The one exception, possibly, is disinfecting or sanitizing respirators after they are used against various infectious agents such as *Mycobacterium tuberculosis*, anthrax, SARS, and flu virus.

We presume the topic on fit testing is about how it should be performed to comply with OSHA. OSHA has quite explicit protocols in its standard on respiratory protection. These people are not interested in how NIOSH necessarily performs fit testing for respirator certification. These classes are best conducted by people that have a great deal of experience with doing fit testing as a part of a respiratory protection program.

3. The NIOSH Certified Equipment List

Once upon a time the NIOSH Certified Equipment List (CEL) was a very useful document. Unfortunately, it lost much of its usefulness in the mid-nineteen eighties. One of the shortfalls is you can not search on the approval number. Another one is once you find your approval listing; there is no way to tell if you have an approved respirator. Both of these use to be capabilities of the NIOSH

CEL. We believe this is very fertile territory for NIOSH to invest funds and make this a useful product helping both respirator users and manufacturers. We encourage NIOSH to get some people together that are interested in this tool being improved and then NIOSH funding its improvements.

4. Protective Clothing
    a. Permeation issues
    b. Needs

5. Hearing protection

6. Fall protection

7. Surveillance projects
8. Physiology
9. Communications from NPPTL – what channels of communication work best for you? What information do you need / want?
10. New PPT Technology (NIOSH-funded grants)
11. Why users should be involved in development of PPE approval requirements
12. Prioritizing PPT research

NIOSH research should be prioritized by soliciting input from various organizations. The Industrial Safety Equipment Association (ISEA) once provided input on this topic and we recommend that it be followed.

Topics 7 through 11 are of minor interest to us compared to the topics commented on.

If NIOSH requires more information or wants to discuss these comments, please contact me at 651-733-6297.

Sincerely,

Craig E. Colton

Craig E. Colton, CIH
Division Scientist
3M Occupational Health and Environmental Safety Division