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Moon Township, PA 15108
July 19, 1994

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

To Whom It May Concern;

I wish to take this opportunity to submit comments on 42 CFR Part 84, Respiratory Protection Devices (ref. FR Vol. 59, No. 99 5/24/94). I am the supervisor of the respiratory protection program at a nuclear power plant. Due to the brief comment period allotted and the tiers of review required to respond on behalf of my company, I am submitting personal comments.

While I applaud NIOSH on the overall effort to revise 30 CFR Part 11, I have serious concerns about several items that are summarized in this letter.

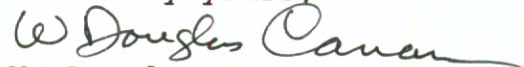
1. While I am all in favor of lowering the prices of respirators and/or respirator filters, I am concerned about decreasing the protection of particulate filters with the proposed tier system. I realize that the need for respiratory protection against TB in the health care industry is immediate, but I do not favor creating filters for "solid only" and "liquid and solid" certification. I do not think that this practice permits an adequate safety buffer, and may very well permit unintentional selection of improper filters when the safety professional knows the composition of his contaminant, let alone when he does not.
2. I disagree with the switch from mono-dispersed, thermally-generated DOP, to poly-dispersed, neutralized, cold-nebulized DOP. I am not convinced that there is sufficient data to support a less conservative testing method.
3. I favor some type of service life indication or limitation when approving electrostatic filters. Since testing has proven that this type of filter becomes less effective with use, I feel that it is mandatory to provide the user with some sort of warning up-front. Most respirator users (and I would submit, safety professionals), are ignorant of the loss of effectiveness that can occur when using electrostatic filter media. I use only respirators that include mechanical filtering media. I cannot in good conscience use a filter that degrades with use; I would rather have a slight increase in breathing resistance.

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4. Regarding the duration of particulate filter testing, I am in favor of a method that would continue the testing period until the filter performance leveled off, not just when 200 milligrams of loading is obtained. I contend that a more challenging test would be in the best interest of worker protection.

I appreciate the opportunity to respond to this notice. While increased costs are affecting everyone today, I do not think that this is the time to lower the standards that are in place to protect our working force.

Sincerely yours,



W. Douglas Canan