



ASSOCIATION FOR PROFESSIONALS IN  
INFECTION CONTROL AND EPIDEMIOLOGY, INC.

*New England Chapter*

July 12, 1994

NIOSH Docket Office  
Robert A. Taft Laboratories  
Mail Stop C34, 4678  
Columbia Parkway  
Cincinnati, Ohio 45226

Dear Sirs:

We, the Association for Professionals in Infection Control and Epidemiology, New England Chapter, are writing this letter to express our organization's full support of the NIOSH Proposed Rule on Respirator Devices (42 CFR Part 84 as published in the Federal Register Vol. 59, No. 99 pp. 26850-26893). This proposal will replace outdated procedures with better methods for evaluating a respirator's ability to filter toxic substances.

Within the proposal is the recommendation that health care workers exposed to infectious TB wear respirators that meet performance criteria outlined by the CDC in the draft 1993 TB Guidelines. We believe the proposal enables manufacturers to produce a broader range of certified respirators which provide the necessary level of protection.

This proposal essentially removes the earlier NIOSH recommendation to use Powered Air Purifying Respirators (PAR's) and allows options other than the currently mandated HEPA particulate respirators (PR). While the entire 43 page document documents all technical aspects of respiratory devices for manufacturers, Sub-part K, Particulate Respirators describes the key criteria for the proposed filter standards affecting health care workers. We believe the three levels of minimum efficiency described allow for current respirators and/or masks on the market to be evaluated objectively.

Sincerely,

A handwritten signature in blue ink that reads "Margaret Dopirak" with a small "1/m" written below it.

Margaret Dopirak  
President, APIC-NE

MD/pav

JUL 15 1994