



July 15, 1994

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

Dear Sir:

St. Joseph Hospital is a 309 bed community hospital. We have written our TB control plan. We strongly support the proposed standard of establishing a "Class C" respirator which provides 95% filter protection at 0.3 micron particle size. The Center for Disease Control draft guidelines for prevention of TB, October 12, 1993 mentions that some dust mist or dust, mist, fume filters meet criteria but need NIOSH certification. All healthcare workers who need to use the respiratory protection should be included in an initial and follow up protection program.

Expanding the standard to include the Class C respirator provides the following:

1. respiratory protection for the healthcare workers
2. nonthreatening situation for the patient and facilitates communication with the patient
3. a cost effective yet safe situation for the hospital, workers, and patients

The proposed change in the standard is based on scientific knowledge that TB control and healthcare worker protection can be achieved with the consistent use of a certified Class C respirator. The mask issue is an important piece of the total picture of TB control. Identification, isolation, and treatment also play an important part in TB control.

It is important that you implement the new testing and certification to open up the market for a practical and economic protection program for health care workers against TB.

Sincerely,

Melanie Strine R.N.

Melanie Strine, RN, Infection Control Nurse

MS/cek

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