

KNAUF FIBER GLASS

GmbH



November 2, 1987

Director, Division of Safety Research
NIOSH
944 Chestnut Ridge Road
Morgantown, WV 26505

Dear Sir:

I have recently become aware of the possible new standards for respirators and their certification, specifically, 42CFR Part 84. I would like to convey my concerns in trying to implement a standard which is unrealistic and might cause more harm than good. I have no doubt that a better respirator is necessary; however, in trying to force the industry into the standards required the respirator will become unwieldy and uncomfortable. It is difficult at this time to get employees to wear respirators because of their level of discomfort and their restrictions for sight and movement.

When a new law is implemented requiring a larger and more uncomfortable respirator the chances of the employee using it are reduced. I would rather see your office work with the manufactureres in trying to develop a more realistic standard that can be implemented in phases and possible take the air capturing mechanisms away from the facial area and put it potentially on the back with a hose or a chest pack. It is important that we keep the facial are open for comfort, ease of use and safety.

If I was in your position and had to vote on the proposed standard at this time I would try to reject it.

Sincerely,
KNAUF FIBER GLASS GmbH

A handwritten signature in dark ink that reads "Richard N. Cunningham". The signature is written in a cursive style with a large, sweeping flourish at the end.

Richard N. Cunningham
Vice President Research/Product
Development/Quality Assurance

RNC/am

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