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**American Iron and Steel Institute**

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OD, DSR, NIOSH

OUR NEW ADDRESS  
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December 28, 1987

NIOSH  
Director  
Division of Safety Research  
944 Chestnut Ridge Road  
Morgantown, W.VA. 26505

*Rec'd  
1/6  
Docket office*

Re: 42 CFR Part 84 (F.R. Vol. 52, No. 166,  
August 27, 1987, pp 32402-43- Respirator Certification

Dear Sir:

Hazard Communication programs have heightened employee awareness relative to chemical substances health effects. Consequently employees are requesting respirators to reduce workplace exposures. Because this proposed rule would make respirators more cumbersome, more costly, and less acceptable to wear it would undermine progress in prevention of occupational disease, and threaten the health and safety of millions of workers who use respiratory protection to prevent exposure to chemical agents. AISI urges NIOSH to reconsider and withdraw its proposal pending further discussions with respirator manufacturers and major industrial users.

According to some respirator manufacturers, few, if any, of the respirators now on the market (which currently provide adequate protection) will meet the requirements of the proposed standard. In addition, product revisions required to meet the proposed standard would likely make these products even more cumbersome and difficult to wear in the working environment. Given the specter of this possibility, AISI questions the need for the change in certification procedures.

Since March of 1980, all respirators used in industry have been certified by NIOSH. The current NIOSH certification procedure has been able to provide users with a wide array of respirators which, when worn properly, have been able to provide sufficient protection against potentially harmful materials. We are not aware of any scientifically validated studies which associate a failure in the current NIOSH certification procedure with the occurrence of occupationally related disease or illness. We are also concerned that the proposed respirator performance criteria are limited strictly to the technical aspects of respirator performance and have not given due consideration to human factors and the acceptability of the product by the respirator wearer. We question whether it is prudent public policy to provide employees with the most technically advanced respirators if they are cumbersome, uncomfortable, and difficult to wear.





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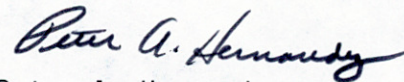
AISI is also concerned that NIOSH has established arbitrary performance criteria, eg.:

- o The assigned protection factors found on page 32409 are not consistent with recognized protection factors established by ANSI Z88.2 and NIOSH has not presented data to support a need to lower these factors. We urge NIOSH to adopt the generally recognized and accepted ANSI factors.
- o All respirator filters will be required to meet a loading filter efficiency test with both a liquid oil and solid aerosol. Yet, few workplaces have liquid oil contaminants. NIOSH should have separate approvals for respirators intended to protect against liquid and solid particles.
- o The proposed rule requires that gas and vapor respirators be equilibrated and then tested at 85% humidity with a 50 minute service life requirement. We believe this 85% humidity criterion is unduly restrictive and does not represent typical usage conditions.

This proposed rule will unnecessarily increase the cost of new respirators and require users to make costly revisions to their respiratory protection programs if it does not eliminate the five-year recertification requirement and grandfather all respiratory protection devices approved by NIOSH/MSHA under 30 CFR Part 11. Grandfathering of approved devices would ensure that an adequate number of respirator models would continue to be available. It would also decrease the NIOSH workload in recertifying respirators which have already proven to provide adequate protection. This would enable NIOSH better direct resources toward respirator research.

AISI strongly recommends that NIOSH withdraw and reconsider its proposal. We would be pleased to meet with NIOSH representatives to discuss this matter further.

Sincerely,



Peter A. Hernandez  
Vice President  
Employee Relations