



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

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Centers for Disease Control
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National Institute for Occupational
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1095 Willowdale Road
Morgantown, WV 26505-2888

June 25, 1999

Major Ellen England
Department of the Air Force
IERA/RSHI
2513 Kennedy Circle
Brooks AFB Texas 78235

Dear Major England:

This letter is in response to your letter of June 3, 1999, in which you reported difficulties with identifying airline respirator hoses due to removal of painted or ink-stamped manufacturer's information. You noted the importance of using the correct hose and air-delivery system components, and that removal of these markings by abrasion can contribute to incorrect assembly of airline respirators.

The current approval regulations in Title 42, Code of Federal Regulations, Part 84 (42 CFR 84) require all sub-assembly component parts (including airline hoses) to be marked to assure proper use of the respirator (ref. § 84.33(g)). The National Institute for Occupational Safety and Health (NIOSH) has a policy that these parts be marked with the indicated numbers in a legible and permanent manner so that the marking cannot be removed without evidence of its previous presence. Painted, ink-stamped, embossed, tagged, or stamped manufacturer's information have been accepted for compliance with these requirements. Your letter suggests that the painted or ink-stamped marking method is inadequate. This information will be further evaluated as to its impact upon the current federal regulations as well as NIOSH policy.

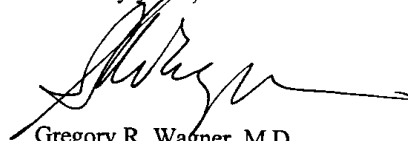
You suggested revision of the approval regulations to require embossing or a permanent tag for hose markings to make them more indestructible. We would appreciate any specific suggestions you have for objective evaluation criteria which could be used for determining the adequacy (permanency and indestructibility) of markings.

As discussed in a subsequent telephone call with Roland Berry Ann of the Respirator Branch, your letter is being submitted to the NIOSH Docket for consideration in future rulemaking and policy development activities. Any additional comments or suggestions you wish to have considered for improving the respirator approval program can also be submitted to the Docket Office as well. The Docket Office address is:

NIOSH Docket Office
Robert A. Taft Laboratories
M/S C34
4676 Columbia Parkway
Cincinnati, OH 45226
Phone: 513-533-8450
Fax: 513-533-8285
email: niocindocket@CDC.gov

Thank you for your interest and input for improving worker safety and health.

Sincerely yours,



Gregory R. Wagner, M.D.
Director
Division of Respiratory Disease Studies

cc:
Docket Office

NIOSH:DRDS:RB:BERRY ANN:BASILE:06/24/1999
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