

United Mine Workers of America



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October 2, 2009

NIOSH Mailstop: C-34
Robert A. Taft Lab.
4676 Columbia parkway
Cincinnati, OH 45226

To Whom It May Concern:

Attached are our comments on the recent Concept papers for Total Inward Leakage (for Respirators other than Filtering Face pieces and Half-Masks) and Supplied Air Respirators, which were to be presented at the September 17, 2009 public meeting, which you were assigned to attend in Pittsburgh, PA.

Should you have any further questions regarding these comments, please do not hesitate to contact me.

Sincerely,

Dennis B. O'Dell, Administrator
UMWA Department of
Health and Safety

Attachment

Lucille Watkins (UMWA HS DEPT)

From: James P. Lamont [jlamont@umwa.org]
Sent: Tuesday, September 29, 2009 11:58 AM
To: dodell@umwa.org; safety@umwa.org; rbowersox@umwa.org
Subject: NIOSH comments



Dennis.doc

Dennis:

The comments below are what we believe needs to be considered to be added in the rule.

NIOSH: Comments on Total Inward Leakage (for respirators other than Filtering Faceplates and Half-Masks)

· TIL (total inward leakage) pass-fail should not be based on the type of respirator or intended use. If a respirator is needed, it should provide the user the best possible protection with no leakage. Any and all tests for these types of respirators shall be uniform and guarantee at all times fresh air without contaminants to the user.

· NIOSH should not consider accepting TIL test results from independent laboratories. NIOSH shall continue to use one set of rules for fit testing to keep it standard and uniform across the board.

· The air supply and mask shall be approved as one unit. The mask, hose and air supply is a unit and needs to be approved as one. To separate, would compromise the safety of the user and the integrity of the unit.

Jim and Ron

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Jim and Ron