

ALUMINUM COMPANY OF AMERICA

MASSENA OPERATIONS

P.O. BOX 150

MASSENA, NEW YORK 13662



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OD. DSR, NIOSH

1987 December 09

Mr. John Moran, Director
 Division of Safety Research
 National Institute for Occupational
 Safety and Health
 944 Chestnut Ridge Road
 Morgantown, WV 26505

Dear Mr. Moran:

Alcoa's Massena Operations is a large aluminum reduction and fabrication facility which uses a wide variety of respiratory protection devices in its daily operation. We take the following exceptions to the requirements of the proposed 42 CFR 84, Revisions of Tests and Requirements for Certification of Permissibility of Respiratory Protective Devices.

NIOSH's testing of respirators is non-bias, consistent and provides the wearer with confidence that this respirator did meet the test requirements. NIOSH should not defer the performance testing of respirators to the respirator manufacturers.

Workplace testing of respirators is still in its experimental stage and many technical issues need to be resolved. It is our hope that NIOSH will develop workplace testing methodologies and publish them in the Federal Register for public comment prior to the adoption of 42 CFR 84.

The adoption of 42 CFR 84 will require the non-mining industries to use only respirators which have been certified and tested in mines. This practice will limit respirator selection and may jeopardize the safety and health of the non-mining respirator user. All workers deserve the right to have respirators tested and certified by NIOSH under conditions which relate to their own workplace. In addition, this requirement will have a chilling effect upon the development of new types of respiratory protection.

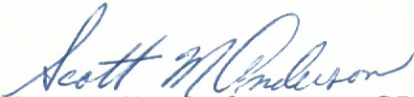
Requiring all particulate filters to pass a challenge aerosol test of 0.2 to 0.3 micrometer oil mist will eliminate the use of disposable type respirators. Alcoa Massena Operations relies on the 3M 9906 respirator to protect many of its smelting employees from nuisance dust and particulate fluorides. This respirator has served us well and has gained wide employee acceptance. Many employees voluntarily wear this respirator even though their exposures are below the allowable exposure limits. Respirators

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passing the oil mist test would be more difficult to breathe through, more costly and less comfortable to wear. The increased filtering efficiency will be offset by a decrease in wearer acceptance and use of the respirator.

It is our hope that the needs of the respirator wearer are considered when promulgating 42 CFR 84. If the certification requirements force the development and use of respirators which are unacceptable to wear, then this regulation will be detrimental to worker protection.

Sincerely,



Scott M. Anderson, CIH
Sr. Industrial Hygienist

SMA/shs

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