

94-032

South Carolina  
**DHEC**  
Department of Health and Environmental Control  
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Columbia, SC 29211

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*Promoting Health, Protecting the Environment*

June 6, 1994

NIOSH Docket Office  
Robert A. Taft Laboratories  
Mail Stop C34  
4678 Columbia Parkway  
Cincinnati, OH 45226

Greetings:

This is to respond to 42 CFR Part 84, the proposed rule for respiratory protective devices. We are pleased to see this first step in a series of upgrades in testing procedures. We with the Division of Tuberculosis Control of the South Carolina Department of Health and Environmental Control support the proposed standard as a first step in improving the certification process for respiratory protective devices. This first step recognizes that the certification process addresses the health care setting, which is crucial and long-overdue.

Categorizing the minimum efficiency performance standards of the filters of particulate respirators into the three proposed levels makes sense and will eliminate the need for/use of the sometimes confusing terms: HEPA, dust/mist/fume, etc. Particulate respirators will subsequently be identified by their filter types based on their filtration efficiency. This will enable manufacturers to produce a broader range of certified respirators which provide the necessary level of protection and will provide a fair and reliable method of evaluating PR use in the future. We believe that 95% filter efficiency should be acceptable for most health care worker needs and that the certification process will identify several respirators meeting this category that previously were believed to be inadequate respiratory protection.

Thank you for publishing the proposed rule for respiratory protective devices. We anxiously await the results of the NIOSH certification process.

Sincerely,



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Program Nurse Consultant  
Division of Tuberculosis Control

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