



ST. JOSEPH HOSPITAL

June 22, 1994

Robert A. Taft Laboratories
NIOSH Docket Office
Mail Stop C34
4676 Columbia Parkway
Cincinnati, OH 45226

Dear Mr. Metzler,

I have reviewed the information in the Federal Register Vol. 59, No. 99 dated Tuesday, May 24, 1994. This is entitled, Proposed Rules. I am sure you are aware of the concern that has been generated over drug resistant TB increases, and the CDC Guidelines to protect Health Care workers and control the progression of the disease.

I, likewise, share the concern and the urgency on putting better protective mechanisms in place; however, the current classifications of "Respirators" is causing a high level of concern.

My background is Pulmonary Medicine/Respiratory Care, and I have been involved in implementing Respirator Protection programs in Virginia and in Rhode Island. The current classification of respirator has allowed the disposable mask type units to be classified as respirators. However, due to the fact that one has to place his hands over the mask, creating a false seal, these masks cannot be effectively fit-checked for positive or negative seal. The masks are not worn this way.

The definition of respirator as given on Page 26862, Section 84.2 - Subsection (AA) is: (the underlined sentences are my suggested additional definitives).

- (1) "Respirator means any device designed to provide the wearer with respiratory protection against inhalation of a hazardous atmosphere." (Added): This device must have one-way air flow which involves inspiratory and expiratory valves. The inspiratory flow must be fitted appropriately for the hazardous atmosphere, and the device must be

JUN 28 1994

able to ensure negative and positive fit-check while wearing unit as usual working conditions.

(Also Add) Mask: Respiratory protective mask means any device that protects the wearer against inhalation of a hazardous atmosphere, but does not provide one way airflow.

My major concern is the use of the disposable devices and the false fit test and fit check and lack of control of these. If TB protection has been indeed an urgent need, we must insure proper equipment. The disposable devices need to be tested to assure they give this level of protection. The term "Respirator" needs to be removed from these devices due to the unreliable testing of proper use.

Please take my suggestions into consideration. Please feel free to contact me if necessary. Thank you.

Sincerely yours,

A handwritten signature in cursive script that reads "Skip Bangley".

Charles E. Bangley BS RRT

CEB/wc