



THE LONG ISLAND  
COLLEGE HOSPITAL  
BROOKLYN, N.Y. 11201

July 22, 1994

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

Re: Proposed Rule on Respiratory Protective Devices-59 FR 28649

To Whom It May Concern:

On behalf of the Long Island College Hospital I appreciate this opportunity to comment on the above referenced proposed rule concerning NIOSH's protocols for respirator certification.

The Long Island College Hospital is a 601-bed not-for-profit teaching hospital founded in 1858. It serves a diverse population in the New York City Borough of Brooklyn. The hospital currently has over 3500 employees and their health and safety is of prime importance. The protection of these employees from infectious TB is a special concern. In that regard I support NIOSH's intention to overhaul its respirator certification process. I am a Certified Industrial Hygienist and a Certified Safety Professional with 20 years of experience with OSHA, chemical manufacturing and processing, utilities and health care.

New performance criteria for particulate respirators which will coincide with those of the CDC for protection against TB will permit more cost-effective respirators without sacrificing safety. I hope that NIOSH will give consideration to the establishment of test procedures for respirators which may be used against biohazardous aerosols to determine if special needs exist for that type of hazard. Perhaps test aerosols of such small sizes as called for in the proposal (0.06-0.11 micrometers) are unnecessary when the hazard is a large (>1 micrometer) microbe.

NIOSH should also state a firm position in the final rule as to what level of particulate respirator (Type A, Type B, Type C) is adequate for large airborne microbes such as *M. tuberculosis*. This issue was discussed in the preamble to the proposal (pg. 26852) and reaffirmed in the final rule. NIOSH is encouraged to take the same position on TB respirators in the final rule as it does in the preamble to the proposal, i.e. that the lowest level of approved particulate respirator (Type C filter) would meet the CDC guidelines and would be acceptable for TB.

JUL 25 1994

It is important to determine the effectiveness of and the need for respirators against infectious diseases in general and TB in particular. NIOSH should accelerate its work in this crucial area.

Sincerely,

A handwritten signature in cursive script, appearing to read "James R. Cohn". The signature is written in black ink and is positioned above a horizontal line.

James R. Cohn, CIH, CSP  
Safety Manager

cc: A. Tannen, EVP, LICH  
S. Phillips, Ph.D., AVP, LICH  
T. McBreen, RN, HANYS