

July 27, 1994

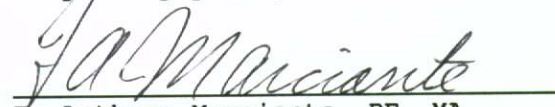
NIOSH Docket Office
Robert A. Taft Laboratories
Mail Stop C34
4678 Columbia Parkway
Cincinnati, Ohio 45226

Dear Gentlemen:

I wish to add my voice to those from many hospitals across the country in protest to the arbitrary requirement of the HEPA filter respirator as a minimum requirement for prevention of occupational exposure to Tuberculosis. As an engineer and business man I am accustomed to making decisions based on facts and quantifiable data. There appears to be little or none of these behind the promulgation of OSHA's enforcement policy relating to occupational exposure to TB. With all the national focus on Health Care cost control, I would have expected that OSHA would consider the economic impact or the requirements on health care providers, prior to issuing a policy. Such practice creates a credibility gap in the mind of health care practitioners.

Although Holmes Regional Medical Center, Inc. , always mindful of the safety of it's employees, has adopted a HEPA filter mask for use in suspected TB cases, the economic impact of fit testing and distribution of these devices is substantial to the hospital. In the future I hope OSHA will be considerate of the economic impact of regulations prior to publication, and not find itself in the position of having to rescind a policy after proper testing is accomplished.

Very truly yours,



F. Anthony Marciante, BE, MA
Director Materials Management