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January 7, 1988

Dr. Nelson Leidel
National Institute For
Occupational Safety & Health
Mail Stop D-37
1600 Clifton Road, N.E.
Atlanta, Georgia 30333

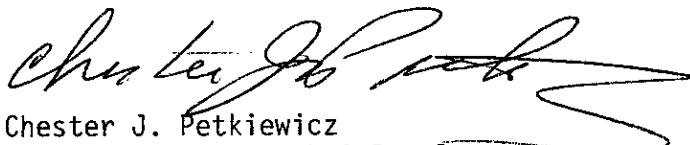
Dear Dr. Leidel,

The following is a brief summary of our presentation to be presented at the Washington DC Public Hearing January 27 or 28, 1988.

FN USA would like to voice objection to the newly proposed NIOSH standard, in particular to subpart V 84273 d) H) I) as follows:

- 1.) The chemical nature of the test aerosols must be specified. Only test aerosols which are chemically and physically inert should be used.
- 2.) Two different respirator classes should be established according to the end use of the respirators, one for protection against solid, and one for protection against liquid aerosols. Dropping DOP as the liquid oil test aerosol is strongly recommended. As an alternative paraffin oil is suggested.
- 3.) The proposed requirement "the aerosol loading shall be continued until there is no further increase in penetration" should be dropped. Only the penetration at a given loading should be part of the requirement.
- 4.) We recommend that only one air flow rate be specified for determining the penetration values.

Sincerely,


Chester J. Petkiewicz
Director of Research & Development

NIOSH

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