

Sellstrom MANUFACTURING CO.

EYE, EAR, FACE AND HEAD PROTECTIVE EQUIPMENT

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December 17, 1987

Senator Alan Dixon
SH-331 Hart Senate Office Building
Washington, D.C. 20510

Dear Senator Dixon:

The National Institute for Occupational Health and Safety (NIOSH) currently certifies respirators for use in general industry, mining and construction. On August 27, 1987, NIOSH proposed (42 CFR 84, Federal Register) regulations which will have a disastrous impact on worker safety and on our industry.

The Industrial Safety Equipment Association, of which Sellstrom Manufacturing Co., Palatine, Illinois, is a part, feels strongly that this proposal must be withdrawn.

The proposal provides no protocol, nor specific requirements, so it is impossible for us to exercise our right to comment on it in a meaningful way. This denies us due process.

While our industry recognizes the value of regulation and, by and large, has little problem with the concept of workplace testing, the fact of the matter is that the technology is not available to conform to the proposed change. This is not the way to improve a process; it will, in fact, destroy a process which works but needs tuning.

Even though 90 per cent of the respirators in use today are used for non-mining (industrial and construction) purposes, the proposal requires that we test all respirators under mining conditions thereby ignoring the safety interest of the majority of workers who use respirators.

Finally, the proposed changes will cost our industry up to \$700,000,000 which will threaten the very viability of the industry as well as worker safety.

The management and employees of Sellstrom Manufacturing Co., Palatine, Illinois, trust that we can count on your support in this matter of critical interest to Illinois, labor and industry.

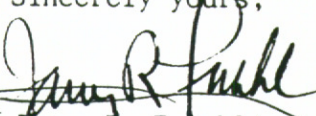
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We urge you to immediately contact Health and Human Services Secretary, Dr. Otis Bowen to request that the proposed ruling be withdrawn.

Enclosed is a fact sheet which outlines the proposal, our objections and recommendations.

Sincerely yours,


James R. Franklin
Vice President, Sales

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