

SJM^H

STONEWALL JACKSON

memorial hospital

July 15, 1994

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

Dear Mr. Taft;

As a member of the American Hospital Association, Stonewall Jackson Memorial Hospital supports the recent NIOSH ruling on Respiratory Protective Devices that includes changes in the current procedures for testing and certifying air purifying respirators used for TB control. As you are aware, the "Class C" respirators which would provide 95% filter protection at the 0.3 micron particle size, would slightly exceed the CDC's performance criteria and would be more economically priced than the more stringent HEPA respirators.

It is our hope that these new regulations have been placed on an accelerated time schedule and will result in a final rule within the next six months, so that a broader range of certified respirators are available by the end of this year.

As Infection Control Practitioner for Stonewall Jackson Memorial Hospital, I realize the importance of using certified respirators that meet CDC criteria, but also I am aware of the need for cost containment when possible. At this time, we are using HEPA respirators for high risk procedures. These masks cost \$76.00 for a box of 10, as compared to the dust-mist respirators which cost \$20.00 per box of twenty. So, as you can see, there is a substantial savings in using PR masks.

Our hospital is a 72-bed facility with 10 beds in the Skilled Care Unit and we qualify as a low risk facility for TB.

Sincerely,

Rose Clark, R.N., ICP

Rose Clark

RC/lm

David D. Shaffer, Administrator

D. Shaffer

JUL 18 1994