

St. Luke's

HOSPITAL OF DULUTH

915 East First Street
Duluth, MN 55805
218/726-5555

July 19, 1994

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

Dear Docket Officer:

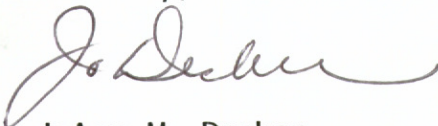
This letter is in support of the proposed NIOSH rule on respiratory protective devices published on 5/24/94. (42 CFR PART 84 Fed Register Vol. 59, No. 99 pp. 26850-26893)

St. Luke's Hospital is a 267-bed acute-care hospital located in Northeastern Minnesota. Although we have an extremely low incidence of T.B. in our area and our facility, less than one case per year, we do recognize the need for a certification process that addresses the COC's performance criteria for respiratory protection against T.B.

We urge you to implement these new testing procedures as soon as possible to open up the market for more practical and economical respiratory protection for health care workers against T.B.

We are also seeking support from Federal OSHA to delay or to issue an administrative stay on the HEPA respiratory requirement from the current OSHA enforcement policy until the proposed NIOSH rule stated above is finalized and industry has tested the devices.

Sincerely,



JoAnn M. Decker
VP Nursing

JMD/lmb

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Healthcare Quality & Service