



UAW-CHRYSLER  
SKILL DEVELOPMENT  
AND TRAINING CENTER

2211 EAST JEFFERSON AVE. DETROIT, MICHIGAN 48207

84-110

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January 7, 1988 12 PM 12: 24

NIOSH

NIOSH  
Docket Office  
Mail Stop E-23  
1600 Clifton Rd., N.E.  
Atlanta, GA 30333

Dear Sir or Madam:

First off, I wish to apologize for the delay in submitting these comments, but, it has only recently come to my attention that NIOSH proposed eliminating their long standing practice of certifying respirators for general industry use.

I feel this would be a great disservice to health professionals who rely on NIOSH as an independent third party which certifies respiratory protective equipment. If we lose this independent evaluation, we open the door for potential abuse of the certification process. Although, I sincerely believe no one would knowingly allow this to happen.

The proposed new regulation as written appears to have many areas which need clarifying or further definition, such as a lack of a defined field testing protocol.

I agree that we need real world protection factors, but I also believe in order to properly evaluate the regulation we need the testing protocols and the proposed detail for field testing. These protocols should reflect real world situations which will provide meaningful information to the user.

NIOSH has proposed that the workplace be defined as mines or mining operations. How do these sites correlate to automotive operations such as spray painting or lead solder grinding which are concerns to myself? Clearly, all work sites need to be addressed when determining work place protection factors. Here again NIOSH should outline minimum guidelines.

In conclusion, I agree with NIOSH that respirator certification is necessary, but I feel the regulation as proposed needs additional clarification in many areas before proceeding further. I am concerned that the regulation as proposed will have a negative impact on respirator users as far as feasibility in complying as well as economically. Finally, a third party certification program must be established to show compliance with the respiratory protection standards developed.

Thank you for the opportunity to comment.

Respectively yours,

*Alan C. Barbaglia, C.I.H.*

Alan C. Barbaglia, C.I.H.  
UAW-Chrysler National Training Center  
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Detroit, MI 48207



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