The Honorable Helen Delich Bentley  
House of Representatives  
Washington, D.C. 20515  

Dear Mrs. Bentley:  

Thank you for your letter on behalf of your constituents regarding the proposed regulations governing the certification of respirators.

The current regulations under which the Mine Health and Safety Administration and the National Institute for Occupational Safety and Health test and certify respirators (30 CFR Part 11) were originally promulgated in 1972. During the last several years, there has been a growing consensus among the respirator manufacturers and user community that these requirements need revision to reflect the technical advances in the field and the increased knowledge regarding environmental factors in the workplace. Some of the steps taken to develop the proposed rule are outlined in the enclosed preamble (52 FR 32402).

We are, of course, anxious to receive comments on both the technical and policy elements of this proposed rule. Toward that end, in October we announced two public hearings (52 FR 37639). The first took place in San Francisco on January 20, 1988, and the second was January 27-28, 1988, in Washington, D.C. Enclosed is a copy of the opening statement from those hearings which clarifies many of the misunderstandings of this regulation. We have also extended the comment period until March 28, 1988 (53 FR 5595).

We look forward to hearing from all parties concerned, and I assure you that all comments received will be placed into the record and will be carefully considered in any final rulemaking decision.

Sincerely yours,

J. Donald Millar, M.D.  
Assistant Surgeon General  
Director  

Enclosure
Page 2 - The Honorable Helen Delich Bentley

cc:
NIOSH/W
NIOSH/Docket Office

CDC: NIOSH: LSparks
NIOSH #3262
Doc. 3195C
Mr. John Moran
Director of the Division of Safety Research
NIOSH
944 Chestnut Ridge Road
Morgantown, West Virginia 26505

Dear Mr. Moran:

I have taken the liberty of sending to your attention copies of letters received in my Washington office concerning the revision of tests and requirements for certification of permissibility of respiratory protective devices used in mining.

These letters are being submitted for your review during the public hearing comment period. I request that you and your staff carefully examine the full implications of the comments. Your full consideration of this matter is respectfully requested.

Thank you for your prompt attention. If I may be of assistance to you, please feel free to call.

Sincerely,

Helen Delich Bentley
Member of Congress
Steven P. Wicelinski, Ph.D.
29 Cherry Manor Court
Reisterstown, MD 21136

January 29, 1988

House of Representatives
House Office Building
Washington, DC 20515

Attention: Representative Helen Bentley

Dear Representative Bentley:

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 Mine Safety Appliances Company of Pittsburgh, Pennsylvania, 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 percent 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 MSA trust that we can count on your support in this matter of critical interest to Pennsylvania labor and industry.

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

Thanks for your assistance on this matter.

Sincerely,

Steven P. Wicelinski

Steven P. Wicelinski, Ph.D.
Young Choi  
921 Beaverbank Circle  
Towson, MD  21204  

February 2, 1988

House of Representatives  
House Office Building  
Washington, DC  20515

Attention:  Representative Helen Bentley

Dear Representative Bentley:

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 Mine Safety Appliances Company of Pittsburgh, Pennsylvania, 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 percent 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 MSA trust that we can count on your support in this matter of critical interest to Pennsylvania labor and industry.

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

Thanks for your assistance on this matter.

Sincerely,

Young Choi
House of Representatives
House Office Building
Washington, DC 20515

Attention: Representative Helen Bentley

Dear Representative Bentley:

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 Mine Safety Appliances Company of Pittsburgh, Pennsylvania, 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 percent 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 MSA trust that we can count on your support in this matter of critical interest to Pennsylvania labor and industry.

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

Thanks for your assistance on this matter.

Sincerely,

Franklyn G. Greene
House of Representatives  
House Office Building  
Washington, DC  20515

Attention: Representative Helen Bentley

Dear Representative Bentley:

I am an employee of the Catalyst Research Division of Mine Safety Appliances Company (MSA) in Baltimore County. I am writing to request your help in repealing proposed regulations (42CFR84) which were issued for comment on August 27, 1987, by the National Institute of Occupational Safety and Health (NIOSH).

My employer, MSA, is the world's leading manufacturer of respiratory protective equipment. MSA believes these proposed regulations to be ill-conceived. They will result in increased risk to workers and will damage the competitive posture of US manufacturers. Specific problems with these proposed regulations are as follows:

1. 42CFR84 will result in bulkier and less comfortable respirators. As a result, workers will resist wearing this protective equipment. This may lead to an increased incidence of workplace injuries.

2. 42CFR84 requires certification testing in mines. However, 90% of respirator users do not work in mining environments. Consequently, most respirators will be certified in occupational environments alien to their intended workplaces. Such a practice could place the majority of workers using respirators at risk.

3. 42CFR84 will cost our industry $700 million to implement. This cost will have to be passed down to our customers. This will increase the cost of many domestic products.

From a personal viewpoint, I worry that anything resulting in higher costs may jeopardize my job. Please lend your support in fighting these regulations. I need my job, US workers need cost effective protective equipment, and goods produced in the US must remain competitive with products produced in other countries.

Thank you for your help.

Sincerely,

Andrew J. Olert
2303 Pentland Drive  
Baltimore, Maryland 21234  
February 4, 1988  

House of Representatives  
House Office Building  
Washington, DC 20515  

Attention: Representative Helen Bentley  

Dear Representative Bentley:  

I am an employee of the Catalyst Research Division of Mine Safety Appliances Company (MSA) in Baltimore County. I am writing to request your help in repealing proposed regulations (42CFR84) which were issued for comment on August 27, 1987, by the National Institute of Occupational Safety and Health (NIOSH).  

My employer, MSA, is the world's leading manufacturer of respiratory protective equipment. MSA believes these proposed regulations to be ill-conceived. They will result in increased risk to workers and will damage the competitive posture of US manufacturers. Specific problems with these proposed regulations are as follows:  

1. 42CFR84 will result in bulkier and less comfortable respirators. As a result, workers will resist wearing this protective equipment. This may lead to an increased incidence of workplace injuries.  

2. 42CFR84 requires certification testing in mines. However, 90% of respirator users do not work in mining environments. Consequently, most respirators will be certified in occupational environments alien to their intended workplaces. Such a practice could place the majority of workers using respirators at risk.  

3. 42CFR84 will cost our industry $700 million to implement. This cost will have to be passed down to our customers. This will increase the cost of many domestic products.  

From a personal viewpoint, I worry that anything resulting in higher costs may jeopardize my job. Please lend your support in fighting these regulations. I need my job, US workers need cost effect protective equipment, and goods produced in the US must remain competitive with products produced in other countries.  

Thank you for your help.  

Sincerely,  

Leander A. Daniel
House of Representatives  
House Office Building  
Washington, DC  20515  

Attention:  Representative Helen Bentley  

Dear Representative Bentley:  

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 Mine Safety Appliances Company of Pittsburgh, Pennsylvania, 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 percent 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 MSA trust that we can count on your support in this matter of critical interest to Pennsylvania labor and industry.  

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

Thanks for your assistance on this matter.  

Sincerely,  

Nancy R. Mobberly
Andrew Peltz  
2106 Flintshire Road  
Apartment 301  
Baltimore, MD 21237  

February 3, 1988  

House of Representatives  
House Office Building  
Washington, DC 20515  

Attention: Representative Helen Bentley  

Dear Representative Bentley:  

I am an employee of Catalyst Research in Owings Mills, MD, and live within your jurisdiction. We are a part of the Instrument Division of Mine Safety Appliances Company in Pittsburgh, PA. I've become aware of a NIOSH proposal which would affect respirator certification and could affect my job as a Technician, at Catalyst Research.  

The National Institute for Occupational Safety and Health wants to limit respirator testing and certification to mining applications at the expense of general industry and construction.  

This proposal (42 CFR 84, Federal Register) is a bad one, and I'm writing to ask you to use your influence to have NIOSH withdraw it.  

In my 3.5 years with MSA, the company has been strongly committed to selling only approved products.  

The costs of changing the design of respirators to meet the peculiar requirements of the NIOSH proposal will be staggering to MSA alone, not to mention our competitors. Additionally, the requirements will be changed to require a heavy, bulky product for which there is little support in the professional and user community. We're going to have to pass the huge testing costs along to the consumer who will pay a lot of money for a respirator that will probably be too large, too unwieldy, and too uncomfortable for most workers. The underground miner works in relatively cool surroundings, compared to the refinery or construction worker. Yet, under the NIOSH proposal, they all must wear the same respirator designed for specific mining requirements.  

Why is NIOSH trying to make such fundamental changes to a system that's working?  

Please talk to Dr. Otis Bowen, Health and Human Services Secretary, and let me know what he says.  

Thanks for your help.  

Sincerely,  

Andrew Peltz
House of Representatives  
House Office Building  
Washington, DC  20515  

January 22, 1988  

Attention: Representative Helen Bentley  

Dear Representative Bentley:  

I am an employee of Catalyst Research in Owings Mills, MD, and live within your jurisdiction. We are a part of the Instrument Division of Mine Safety Appliances Company in Pittsburgh, PA. I've become aware of a NIOSH proposal which would affect respirator certification and could affect my job as a Mechanical Engineer, at Catalyst Research.  

The National Institute for Occupational Safety and Health wants to limit respirator testing and certification to mining applications at the expense of general industry and construction.  

This proposal (42 CFR 84, Federal Register) is a bad one, and I'm writing to ask you to use your influence to have NIOSH withdraw it.  

In my 5 years with MSA, the company has been strongly committed to selling only approved products.  

The costs of changing the design of respirators to meet the peculiar requirements of the NIOSH proposal will be staggering to MSA alone, not to mention our competitors. Additionally, the requirements will be changed to require a heavy, bulky product for which there is little support in the professional and user community. We're going to have to pass the huge testing costs along to the consumer who will pay a lot of money for a respirator that will probably be too large, too unwieldy, and too uncomfortable for most workers. The underground miner works in relatively cool surroundings, compared to the refinery or construction worker. Yet, under the NIOSH proposal, they all must wear the same respirator designed for specific mining requirements.  

Why is NIOSH trying to make such fundamental changes to a system that's working?  

Please talk to Dr. Otis Bowen, Health and Human Services Secretary, and let me know what he says.  

Thanks for your help.  

Sincerely,  

Thomas Lentz
Allen E. Bayer  
1338 Mantle Street  
Baltimore, MD 21234  

January 21, 1988  

House of Representatives  
House Office Building  
Washington, DC 20515  

Attention: Representative Helen Bentley  

Dear Representative Bentley:  

I am an employee of Catalyst Research in Owings Mills, MD, and live within your jurisdiction. We are a part of the Instrument Division of Mine Safety Appliances Company in Pittsburgh, PA. I’ve become aware of a NIOSH proposal which would affect respirator certification and could affect my job as a Materials Control Manager, at Catalyst Research.  

The National Institute for Occupational Safety and Health wants to limit respirator testing and certification to mining applications at the expense of general industry and construction.  

This proposal (42 CFR 84, Federal Register) is a bad one, and I’m writing to ask you to use your influence to have NIOSH withdraw it.  

In my 4 years with MSA, the company has been strongly committed to selling only approved products.  

The costs of changing the design of respirators to meet the peculiar requirements of the NIOSH proposal will be staggering to MSA alone, not to mention our competitors. Additionally, the requirements will be changed to require a heavy, bulky product for which there is little support in the professional and user community. We’re going to have to pass the huge testing costs along to the consumer who will pay a lot of money for a respirator that will probably be too large, too unwieldy, and too uncomfortable for most workers. The underground miner works in relatively cool surroundings, compared to the refinery or construction worker. Yet, under the NIOSH proposal, they all must wear the same respirator designed for specific mining requirements.  

Why is NIOSH trying to make such fundamental changes to a system that’s working?  

Please talk to Dr. Otis Bowen, Health and Human Services Secretary, and let me know what he says.  

Thanks for your help.  

Sincerely,  

Allen E. Bayer
January 22, 1988

House of Representatives
House Office Building
Washington, DC 20515

Attention: Representative Helen Bentley

Dear Representative Bentley:

I am an employee of Catalyst Research in Owings Mills, MD, and live within your jurisdiction. We are a part of the Instrument Division of Mine Safety Appliances Company in Pittsburgh, PA. I've become aware of a NIOSH proposal which would affect respirator certification and could affect my job as a Project Engineer, at Catalyst Research.

The National Institute for Occupational Safety and Health wants to limit respirator testing and certification to mining applications at the expense of general industry and construction.

This proposal (42 CFR 84, Federal Register) is a bad one, and I'm writing to ask you to use your influence to have NIOSH withdraw it.

In my 10 years with MSA, the company has been strongly committed to selling only approved products.

The costs of changing the design of respirators to meet the peculiar requirements of the NIOSH proposal will be staggering to MSA alone, not to mention our competitors. Additionally, the requirements will be changed to require a heavy, bulky product for which there is little support in the professional and user community. We're going to have to pass the huge testing costs along to the consumer who will pay a lot of money for a respirator that will probably be too large, too unwieldy, and too uncomfortable for most workers. The underground miner works in relatively cool surroundings, compared to the refinery or construction worker. Yet, under the NIOSH proposal, they all must wear the same respirator designed for specific mining requirements.

Why is NIOSH trying to make such fundamental changes to a system that's working?

Please talk to Dr. Otis Bowen, Health and Human Services Secretary, and let me know what he says.

Thanks for your help.

Sincerely,

Vincent V. Dobbs
House of Representatives
House Office Building
Washington, DC 20515

Attention: Representative Helen Bentley

Dear Representative Bentley:

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 Mine Safety Appliances Company of Pittsburgh, Pennsylvania, 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 percent 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 MSA trust that we can count on your support in this matter of critical interest to Pennsylvania labor and industry.

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

Thanks for your assistance on this matter.

Sincerely,

[Signature]

Paul M. Bachman
228 Highfalcon Road
Baltimore, Maryland 21136
February 3, 1988

House of Representatives
House Office Building
Washington, DC 20515

Attention: Representative Helen Bentley

Dear Representative Bentley:

I am an employee of the Catalyst Research Division of Mine Safety Appliances Company (MSA) in Baltimore County. I am writing to request your help in repealing proposed regulations (42CFR84) which were issued for comment on August 27, 1987, by the National Institute of Occupational Safety and Health (NIOSH).

My employer, MSA, is the world's leading manufacturer of respiratory protective equipment. MSA believes these proposed regulations to be ill-conceived. They will result in increased risk to workers and will damage the competitive posture of US manufacturers. Specific problems with these proposed regulations are as follows:

1. 42CFR84 will result in bulkier and less comfortable respirators. As a result, workers will resist wearing this protective equipment. This may lead to an increased incidence of workplace injuries.

2. 42CFR84 requires certification testing in mines. However, 90% of respirator users do not work in mining environments. Consequently, most respirators will be certified in occupational environments alien to their intended workplaces. Such a practice could place the majority of workers using respirators at risk.

3. 42CFR84 will cost our industry $700 million to implement. This cost will have to be passed down to our customers. This will increase the cost of many domestic products.

From a personal viewpoint, I worry that anything resulting in higher costs may jeopardize my job. Please lend your support in fighting these regulations. I need my job, US workers need cost effective protective equipment, and goods produced in the US must remain competitive with products produced in other countries.

Thank you for your help.

Sincerely,

Tom Shütt
House of Representatives  
House Office Building  
Washington, DC 20515  

Attention: Representative Helen Bentley  

Dear Representative Bentley:

I am an employee of the Catalyst Research Division of Mine Safety Appliances Company (MSA) in Baltimore County. I am writing to request your help in repealing proposed regulations (42CFR84) which were issued for comment on August 27, 1987, by the National Institute of Occupational Safety and Health (NIOSH).

My employer, MSA, is the world's leading manufacturer of respiratory protective equipment. MSA believes these proposed regulations to be ill-conceived. They will result in increased risk to workers and will damage the competitive posture of US manufacturers. Specific problems with these proposed regulations are as follows:

1. 42CFR84 will result in bulkier and less comfortable respirators. As a result, workers will resist wearing this protective equipment. This may lead to an increased incidence of workplace injuries.

2. 42CFR84 requires certification testing in mines. However, 90% of respirator users do not work in mining environments. Consequently, most respirators will be certified in occupational environments alien to their intended workplaces. Such a practice could place the majority of workers using respirators at risk.

3. 42CFR84 will cost our industry $700 million to implement. This cost will have to be passed down to our customers. This will increase the cost of many domestic products.

From a personal viewpoint, I worry that anything resulting in higher costs may jeopardize my job. Please lend your support in fighting these regulations. I need my job, US workers need cost effective protective equipment, and goods produced in the US must remain competitive with products produced in other countries.

Thank you for your help.

Sincerely,

Kenneth Fullerton
House of Representatives  
House Office Building  
Washington, DC 20515

Attention: Representative Helen Bentley

Dear Representative Bentley:

I am an employee of the Catalyst Research Division of Mine Safety Appliances Company (MSA) in Baltimore County. I am writing to request your help in repealing proposed regulations (42CFR84) which were issued for comment on August 27, 1987, by the National Institute of Occupational Safety and Health (NIOSH).

My employer, MSA, is the world's leading manufacturer of respiratory protective equipment. MSA believes these proposed regulations to be ill-conceived. They will result in increased risk to workers and will damage the competitive posture of US manufacturers. Specific problems with these proposed regulations are as follows:

1. 42CFR84 will result in bulkier and less comfortable respirators. As a result, workers will resist wearing this protective equipment. This may lead to an increased incidence of workplace injuries.

2. 42CFR84 requires certification testing in mines. However, 90% of respirator users do not work in mining environments. Consequently, most respirators will be certified in occupational environments alien to their intended workplaces. Such a practice could place the majority of workers using respirators at risk.

3. 42CFR84 will cost our industry $700 million to implement. This cost will have to be passed down to our customers. This will increase the cost of many domestic products.

From a personal viewpoint, I worry that anything resulting in higher costs may jeopardize my job. Please lend your support in fighting these regulations. I need my job, US workers need cost effective protective equipment, and goods produced in the US must remain competitive with products produced in other countries.

Thank you for your help.

Sincerely,

Sue Lampe
House of Representatives  
House Office Building  
Washington, DC 20515  

February 5, 1988

Attention: Representative Helen Bentley

Dear Representative Bentley:

I am an employee of Catalyst Research in Owings Mills, MD, and live within your jurisdiction. We are a part of the Instrument Division of Mine Safety Appliances Company in Pittsburgh, PA. I've become aware of a NIOSH proposal which would affect respirator certification and could affect my job as Personnel Clerk, at Catalyst Research.

The National Institute for Occupational Safety and Health wants to limit respirator testing and certification to mining applications at the expense of general industry and construction.

This proposal (42 CFR 84, Federal Register) is a bad one, and I'm writing to ask you to use your influence to have NIOSH withdraw it.

In my 10 years with MSA, the company has been strongly committed to selling only approved products.

The costs of changing the design of respirators to meet the peculiar requirements of the NIOSH proposal will be staggering to MSA alone, not to mention our competitors. Additionally, the requirements will be changed to require a heavy, bulky product for which there is little support in the professional and user community. We're going to have to pass the huge testing costs along to the consumer who will pay a lot of money for a respirator that will probably be too large, too unwieldy, and too uncomfortable for most workers. The underground miner works in relatively cool surroundings, compared to the refinery or construction worker. Yet, under the NIOSH proposal, they all must wear the same respirator designed for specific mining requirements.

Why is NIOSH trying to make such fundamental changes to a system that's working?

Please talk to Dr. Otis Bowen, Health and Human Services Secretary, and let me know what he says.

Thanks for your help.

Sincerely,

Joan A. Sheubrook
William Groom  
37 Colleton Court  
Baltimore, MD 21236  

January 27, 1988

House of Representatives  
House Office Building  
Washington, DC 20515

Attention: Representative Helen Bentley

Dear Representative Bentley:

I am an employee of Catalyst Research in Owings Mills, MD, and live within your jurisdiction. We are a part of the Instrument Division of Mine Safety Appliances Company in Pittsburgh, PA. I've become aware of a NIOSH proposal which would affect respirator certification and could affect my job as a Manufacturing Engineer, at Catalyst Research.

The National Institute for Occupational Safety and Health wants to limit respirator testing and certification to mining applications at the expense of general industry and construction.

This proposal (42 CFR 84, Federal Register) is a bad one, and I'm writing to ask you to use your influence to have NIOSH withdraw it.

In my 5 years with MSA, the company has been strongly committed to selling only approved products.

The costs of changing the design of respirators to meet the peculiar requirements of the NIOSH proposal will be staggering to MSA alone, not to mention our competitors. Additionally, the requirements will be changed to require a heavy, bulky product for which there is little support in the professional and user community. We're going to have to pass the huge testing costs along to the consumer who will pay a lot of money for a respirator that will probably be too large, too unwieldy, and too uncomfortable for most workers. The underground miner works in relatively cool surroundings, compared to the refinery or construction worker. Yet, under the NIOSH proposal, they all must wear the same respirator designed for specific mining requirements.

Why is NIOSH trying to make such fundamental changes to a system that's working?

Please talk to Dr. Otis Bowen, Health and Human Services Secretary, and let me know what he says.

Thanks for your help.

Sincerely,

William Groom
House of Representatives  
House Office Building  
Washington, DC 20515

February 2, 1988

Attention: Representative Helen Bentley

Dear Representative Bentley:

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 Mine Safety Appliances Company of Pittsburgh, Pennsylvania, 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 percent 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 MSA trust that we can count on your support in this matter of critical interest to Pennsylvania labor and industry.

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

Thanks for your assistance on this matter.

Sincerely,

Christie D. Price

12K Windmill Chase  
Sparks, MD  21152
Marcell J. Foxwell  
207 Leslie Avenue  
Baltimore, MD 21236  
February 1, 1988

House of Representatives  
House Office Building  
Washington, DC 20515

Attention: Representative Helen Bentley

Dear Representative Bentley:

I am an employee of Catalyst Research in Owings Mills, MD, and live within your jurisdiction. We are a part of the Instrument Division of Mine Safety Appliances Company in Pittsburgh, PA. I've become aware of a NIOSH proposal which would affect respirator certification and could affect my job as an Electronic Technician, at Catalyst Research.

The National Institute for Occupational Safety and Health wants to limit respirator testing and certification to mining applications at the expense of general industry and construction.

This proposal (42 CFR 84, Federal Register) is a bad one, and I'm writing to ask you to use your influence to have NIOSH withdraw it.

In my 10 years with MSA, the company has been strongly committed to selling only approved products.

The costs of changing the design of respirators to meet the peculiar requirements of the NIOSH proposal will be staggering to MSA alone, not to mention our competitors. Additionally, the requirements will be changed to require a heavy, bulky product for which there is little support in the professional and user community. We're going to have to pass the huge testing costs along to the consumer who will pay a lot of money for a respirator that will probably be too large, too unwieldy, and too uncomfortable for most workers. The underground miner works in relatively cool surroundings, compared to the refinery or construction worker. Yet, under the NIOSH proposal, they all must wear the same respirator designed for specific mining requirements.

Why is NIOSH trying to make such fundamental changes to a system that's working?

Please talk to Dr. Otis Bowen, Health and Human Services Secretary, and let me know what he says.

Thanks for your help.

Sincerely,

[Signature]

Marcell J. Foxwell
House of Representatives
House Office Building
Washington, DC 20515

Attention: Representative Helen Bentley

Dear Representative Bentley:

I am an employee of Catalyst Research in Owings Mills, MD, and live within your jurisdiction. We are a part of the Instrument Division of Mine Safety Appliances Company in Pittsburgh, PA. I've become aware of a NIOSH proposal which would affect respirator certification and could affect my job as an Administrative Assistant, at Catalyst Research.

The National Institute for Occupational Safety and Health wants to limit respirator testing and certification to mining applications at the expense of general industry and construction.

This proposal (42 CFR 84, Federal Register) is a bad one, and I'm writing to ask you to use your influence to have NIOSH withdraw it.

In my 9 years with MSA, the company has been strongly committed to selling only approved products.

The costs of changing the design of respirators to meet the peculiar requirements of the NIOSH proposal will be staggering to MSA alone, not to mention our competitors. Additionally, the requirements will be changed to require a heavy, bulky product for which there is little support in the professional and user community. We're going to have to pass the huge testing costs along to the consumer who will pay a lot of money for a respirator that will probably be too large, too unwieldy, and too uncomfortable for most workers. The underground miner works in relatively cool surroundings, compared to the refinery or construction worker. Yet, under the NIOSH proposal, they all must wear the same respirator designed for specific mining requirements.

Why is NIOSH trying to make such fundamental changes to a system that's working?

Please talk to Dr. Otis Bowen, Health and Human Services Secretary, and let me know what he says.

Thanks for your help.

Sincerely,

Vivian L. Freeman
3201 Seiter Lane  
Jarrettsville, Maryland 21084  
January 26, 1988

House of Representatives  
House Office Building  
Washington, DC 20515

Attention: Representative Helen Bentley

Dear Representative Bentley:

I am an employee of the Catalyst Research Division of Mine Safety Appliances Company (MSA) in Baltimore County. I am writing to request your help in repealing proposed regulations (42CFR84) which were issued for comment on August 27, 1987, by the National Institute of Occupational Safety and Health (NIOSH).

My employer, MSA, is the world's leading manufacturer of respiratory protective equipment. MSA believes these proposed regulations to be ill-conceived. They will result in increased risk to workers and will damage the competitive posture of US manufacturers. Specific problems with these proposed regulations are as follows:

1. 42CFR84 will result in bulkier and less comfortable respirators. As a result, workers will resist wearing this protective equipment. This may lead to an increased incidence of workplace injuries.

2. 42CFR84 requires certification testing in mines. However, 90% of respirator users do not work in mining environments. Consequently, most respirators will be certified in occupational environments alien to their intended workplaces. Such a practice could place the majority of workers using respirators at risk.

3. 42CFR84 will cost our industry $700 million to implement. This cost will have to be passed down to our customers. This will increase the cost of many domestic products.

From a personal viewpoint, I worry that anything resulting in higher costs may jeopardize my job. Please lend your support in fighting these regulations. I need my job, US workers need cost effect protective equipment, and goods produced in the US must remain competitive with products produced in other countries.

Thank you for your help.

Sincerely,

Richard C. Levin
Patrick Rissmiller  
1312 Walker Road  
Freeland, Maryland 21053  
January 25, 1988

House of Representatives  
House Office Building  
Washington, DC 20515

Attention: Representative Helen Bentley

Dear Representative Bentley:

I am an employee of the Catalyst Research Division of Mine Safety Appliances Company (MSA) in Baltimore County. I am writing to request your help in repealing proposed regulations (42CFR84) which were issued for comment on August 27, 1987, by the National Institute of Occupational Safety and Health (NIOSH).

My employer, MSA, is the world's leading manufacturer of respiratory protective equipment. MSA believes these proposed regulations to be ill-conceived. They will result in increased risk to workers and will damage the competitive posture of US manufacturers. Specific problems with these proposed regulations are as follows:

1. 42CFR84 will result in bulkier and less comfortable respirators. As a result, workers will resist wearing this protective equipment. This may lead to an increased incidence of workplace injuries.

2. 42CFR84 requires certification testing in mines. However, 90% of respirator users do not work in mining environments. Consequently, most respirators will be certified in occupational environments alien to their intended workplaces. Such a practice could place the majority of workers using respirators at risk.

3. 42CFR84 will cost our industry $700 million to implement. This cost will have to be passed down to our customers. This will increase the cost of many domestic products.

From a personal viewpoint, I worry that anything resulting in higher costs may jeopardize my job. Please lend your support in fighting these regulations. I need my job, US workers need cost effective protective equipment, and goods produced in the US must remain competitive with products produced in other countries.

Thank you for your help.

Sincerely,

Patrick Rissmiller
Kenneth R. Harp  
3512 Pleasant Plains Drive.  
Reisterstown, MD  21136  
January 25, 1988  

House of Representatives  
House Office Building  
Washington, DC  20515  

Attention: Representative Helen Bentley  

Dear Representative Bentley:  

I am an employee of the Catalyst Research Division of Mine Safety Appliances Company (MSA) in Baltimore County. I am writing to request your help in repealing proposed regulations (42CFR84) which were issued for comment on August 27, 1987, by the National Institute of Occupational Safety and Health (NIOSH).  

My employer, MSA, is the world's leading manufacturer of respiratory protective equipment. MSA believes these proposed regulations to be ill-conceived. They will result in increased risk to workers and will damage the competitive posture of US manufacturers. Specific problems with these proposed regulations are as follows:  

1. 42CFR84 will result in bulkier and less comfortable respirators. As a result, workers will resist wearing this protective equipment. This may lead to an increased incidence of workplace injuries.  

2. 42CFR84 requires certification testing in mines. However, 90% of respirator users do not work in mining environments. Consequently, most respirators will be certified in occupational environments alien to their intended workplaces. Such a practice could place the majority of workers using respirators at risk.  

3. 42CFR84 will cost our industry $700 million to implement. This cost will have to be passed down to our customers. This will increase the cost of many domestic products.  

From a personal viewpoint, I worry that anything resulting in higher costs may jeopardize my job. Please lend your support in fighting these regulations. I need my job, US workers need cost effective protective equipment, and goods produced in the US must remain competitive with products produced in other countries.  

Thank you for your help.  

Sincerely,  

Kenneth R. Harp
207 Graythorn Road
Baltimore, Maryland  21220
January 29, 1988

House of Representatives
House Office Building
Washington, DC  20515

Attention: Representative Helen Bentley

Dear Representative Bentley:

I am an employee of the Catalyst Research Division of Mine Safety Appliances Company (MSA) in Baltimore County. I am writing to request your help in repealing proposed regulations (42CFR84) which were issued for comment on August 27, 1987, by the National Institute of Occupational Safety and Health (NIOSH).

My employer, MSA, is the world's leading manufacturer of respiratory protective equipment. MSA believes these proposed regulations to be ill-conceived. They will result in increased risk to workers and will damage the competitive posture of US manufacturers. Specific problems with these proposed regulations are as follows:

1. 42CFR84 will result in bulkier and less comfortable respirators. As a result, workers will resist wearing this protective equipment. This may lead to an increased incidence of workplace injuries.

2. 42CFR84 requires certification testing in mines. However, 90% of respirator users do not work in mining environments. Consequently, most respirators will be certified in occupational environments alien to their intended workplaces. Such a practice could place the majority of workers using respirators at risk.

3. 42CFR84 will cost our industry $700 million to implement. This cost will have to be passed down to our customers. This will increase the cost of many domestic products.

From a personal viewpoint, I worry that anything resulting in higher costs may jeopardize my job. Please lend your support in fighting these regulations. I need my job, US workers need cost effective protective equipment, and goods produced in the US must remain competitive with products produced in other countries.

Thank you for your help.

Sincerely,

Varnell Gentle
Tracy Wolf
6C Queensbridge Court
Cockeysville, MD 21030

January 28, 1988

House of Representatives
House Office Building
Washington, DC 20515

Attention: Representative Helen Bentley

Dear Representative Bentley:

I am an employee of Catalyst Research in Owings Mills, MD, and live within your jurisdiction. We are a part of the Instrument Division of Mine Safety Appliances Company in Pittsburgh, PA. I've become aware of a NIOSH proposal which would affect respirator certification and could affect my job as a QA & RA Manager, at Catalyst Research.

The National Institute for Occupational Safety and Health wants to limit respirator testing and certification to mining applications at the expense of general industry and construction.

This proposal (42 CFR 84, Federal Register) is a bad one, and I'm writing to ask you to use your influence to have NIOSH withdraw it.

In my 10 years with MSA, the company has been strongly committed to selling only approved products.

The costs of changing the design of respirators to meet the peculiar requirements of the NIOSH proposal will be staggering to MSA alone, not to mention our competitors. Additionally, the requirements will be changed to require a heavy, bulky product for which there is little support in the professional and user community. We're going to have to pass the huge testing costs along to the consumer who will pay a lot of money for a respirator that will probably be too large, too unwieldy, and too uncomfortable for most workers. The underground miner works in relatively cool surroundings, compared to the refinery or construction worker. Yet, under the NIOSH proposal, they all must wear the same respirator designed for specific mining requirements.

Why is NIOSH trying to make such fundamental changes to a system that's working?

Please talk to Dr. Otis Bowen, Health and Human Services Secretary, and let me know what he says.

Thanks for your help.

Sincerely,

Tracy DeWitt Wolf

Tracy Wolf
8304 Nunley Drive, Apt. E  
Baltimore, Maryland  21234  
January 27, 1988

House of Representatives  
House Office Building  
Washington, DC  20515  

Attention: Representative Helen Bentley  

Dear Representative Bentley:  

I am an employee of the Catalyst Research Division of Mine Safety Appliances Company (MSA) in Baltimore County. I am writing to request your help in repealing proposed regulations (42CFR84) which were issued for comment on August 27, 1987, by the National Institute of Occupational Safety and Health (NIOSH).  

My employer, MSA, is the world's leading manufacturer of respiratory protective equipment. MSA believes these proposed regulations to be ill-conceived. They will result in increased risk to workers and will damage the competitive posture of US manufacturers. Specific problems with these proposed regulations are as follows:  

1. 42CFR84 will result in bulkier and less comfortable respirators. As a result, workers will resist wearing this protective equipment. This may lead to an increased incidence of workplace injuries.  

2. 42CFR84 requires certification testing in mines. However, 90% of respirator users do not work in mining environments. Consequently, most respirators will be certified in occupational environments alien to their intended workplaces. Such a practice could place the majority of workers using respirators at risk.  

3. 42CFR84 will cost our industry $700 million to implement. This cost will have to be passed down to our customers. This will increase the cost of many domestic products.  

From a personal viewpoint, I worry that anything resulting in higher costs may jeopardize my job. Please lend your support in fighting these regulations. I need my job, US workers need cost effective protective equipment, and goods produced in the US must remain competitive with products produced in other countries.  

Thank you for your help.  

Sincerely,  

Mary Ann Cremen
214 Eastspring Road
Timonium, Maryland 21093
January 25, 1988

House of Representatives
House Office Building
Washington, DC 20515

Attention: Representative Helen Bentley

Dear Representative Bentley:

I am an employee of the Catalyst Research Division of Mine Safety Appliances Company (MSA) in Baltimore County. I am writing to request your help in repealing proposed regulations (42CFR84) which were issued for comment on August 27, 1987, by the National Institute of Occupational Safety and Health (NIOSH).

My employer, MSA, is the world's leading manufacturer of respiratory protective equipment. MSA believes these proposed regulations to be ill-conceived. They will result in increased risk to workers and will damage the competitive posture of US manufacturers. Specific problems with these proposed regulations are as follows:

1. 42CFR84 will result in bulkier and less comfortable respirators. As a result, workers will resist wearing this protective equipment. This may lead to an increased incidence of workplace injuries.

2. 42CFR84 requires certification testing in mines. However, 90% of respirator users do not work in mining environments. Consequently, most respirators will be certified in occupational environments alien to their intended workplaces. Such a practice could place the majority of workers using respirators at risk.

3. 42CFR84 will cost our industry $700 million to implement. This cost will have to be passed down to our customers. This will increase the cost of many domestic products.

From a personal viewpoint, I worry that anything resulting in higher costs may jeopardize my job. Please lend your support in fighting these regulations. I need my job. US workers need cost effect protective equipment, and goods produced in the US must remain competitive with products produced in other countries.

Thank you for your help.

Sincerely,

Vis Klasons
House of Representatives  
House Office Building  
Washington, DC 20515  

Attention: Representative Helen Bentley  

Dear Representative Bentley:  

I am an employee of the Catalyst Research Division of Mine Safety Appliances Company (MSA) in Baltimore County. I am writing to request your help in repealing proposed regulations (42 CFR 84), which were issued for comment on August 27, 1987, by the National Institute of Occupational Safety and Health (NIOSH).  

My employer, MSA, is the world's leading manufacturer of respirator protective equipment. MSA believes these proposed regulations to be ill-conceived. They will result in increased risk to workers and will damage the competitive posture of US manufacturers. Specific problems with these proposed regulations are as follows:  

1. 42 CFR 84 will result in bulkier and less comfortable respirators. As a result, workers will resist wearing this protective equipment. This may lead to an increased incidence of workplace injuries.  

2. 42 CFR 84 requires certification testing in mines. However, 90% of respirator users do not work in mining environments. Consequently, most respirators will be certified in occupational environments alien to their intended workplaces. Such a practice could place the majority of workers using respirators at risk.  

3. 42 CFR 84 will cost our industry $700 million to implement. This cost will have to be passed down to our customers. This will increase the cost of many domestic products.  

From a personal viewpoint, I worry that anything resulting in higher costs may jeopardize my job. Please lend your support in fighting these regulations. I need my job, US workers need cost effect protective equipment, and goods produced in the US must remain competitive with products produced in other countries.  

Thank you for your help.  

Sincerely,  

Charles A. Spencer
Bernard Codd  
1029 Kingsbury Road  
Reisterstown, MD 21136  

January 29, 1988  

House of Representatives  
House Office Building  
Washington, DC 20515

Attention: Representative Helen Bentley

Dear Representative Bentley:

I am an employee of Catalyst Research in Owings Mills, MD, and live within your jurisdiction. We are a part of the Instrument Division of Mine Safety Appliances Company in Pittsburgh, PA. I've become aware of a NIOSH proposal which would affect respirator certification and could affect my job as a Research Engineer, at Catalyst Research.

The National Institute for Occupational Safety and Health wants to limit respirator testing and certification to mining applications at the expense of general industry and construction.

This proposal (42 CFR 84, Federal Register) is a bad one, and I'm writing to ask you to use your influence to have NIOSH withdraw it.

In my 3 years with MSA, the company has been strongly committed to selling only approved products.

The costs of changing the design of respirators to meet the peculiar requirements of the NIOSH proposal will be staggering to MSA alone, not to mention our competitors. Additionally, the requirements will be changed to require a heavy, bulky product for which there is little support in the professional and user community. We're going to have to pass the huge testing costs along to the consumer who will pay a lot of money for a respirator that will probably be too large, too unwieldy, and too uncomfortable for most workers. The underground miner works in relatively cool surroundings, compared to the refinery or construction worker. Yet, under the NIOSH proposal, they all must wear the same respirator designed for specific mining requirements.

Why is NIOSH trying to make such fundamental changes to a system that's working?

Please talk to Dr. Otis Bowen, Health and Human Services Secretary, and let me know what he says.

Thanks for your help.

Sincerely,

Bernard Codd