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NIOSH

December 23, 1987

Mr. John Moran
Director
Division of Safety Research
NIOSH
944 Chestnut Ridge Rd.
Morgantown, WV 26505

Dear Mr. Moran,

This is in response to the August 27, 1987 Federal Register notice of proposed rulemaking concerning respirators. The Association of American Railroads, representing the major railroads in the United States and Canada, is concerned about the impact this rulemaking would have on our industry. As we understand the respirator approval process, NIOSH and MSHA approval is required by OSHA before a respirator can be approved for industrial use. While the proposed rule applies to certification of respirators used in coal and other mines, it affects all other OSHA approved respirators. Thus, respirators used by railroad personnel for protection against dust and chemical exposure must undergo the testing described in the proposed rule. We believe that NIOSH should reexamine the proposed rule under these circumstances and reconsider the recommendations in view of their far reaching effects.

We fully support the comments submitted by Norfolk Southern Corporation, dated December 23, 1987. Without data substantiating the claims of poor respirator performance in the field, we cannot offer more detailed comments. We further agree that design changes made necessary by the proposed rule should be considered in terms of reduced likelihood of employee usage because of increased discomfort.

Sincerely,

Peter Conlon

Peter C.L. Conlon
Manager
Environmental and Hazardous
Material Research

cc: M.J. Rush
A.G. Jordan
C.N. Scott