August 7, 1996

NIOSH Docket Office
Robert A. Taft Laboratories, M/S C34
4676 Columbia Parkway
Cincinnati, Ohio 45226

RE: WRITTEN COMMENTS IN PREPARATION OF RESPIRATOR CERTIFICATION RULEMAKING

Dear Sir or Madam:

Arizona Public Service Company (APS) is an investor owned Electrical Utility providing electrical service to the Southwestern United States. There are times during our electrical generation, transmission and distribution operations that require the use of respirators to minimize potential exposure to chemical or physical agents. APS has had a Respiratory Protection Program for many years which uses the OSHA standard requirements as a minimum standard. NIOSH's intention to privatize the respirator certification may have impacts on the future success of our respiratory protection program. Although many of the proposed changes will have no direct effect, we would like to forward a few general comments.

APS agrees in principal to the proposal to privatize the respirator certification process. Our only concern involves potential influence over the certification process by the various manufactures. We would like to go on record as opposing any provision that may give manufacturers control over the certification process.

Additionally, in response to questions raised by Issue #1, APS believes that NIOSH should require private sector laboratories who perform respirator certification and product audit testing to be certified. NIOSH should assign the testing of a manufacturer's respirators and perform periodic monitoring of the private laboratories service.

Finally, in response to questions raised by Issue #4, APS believes that NIOSH should allow and certify multiple manufacturer's respirator replacement parts only if components can be standardized. We would oppose any changes that would allow for interchangeability of non-standardized parts that may lead to user confusion or loss of respirator protection.
Arizona Public Service Company
PALO VERDE NUCLEAR GENERATING STATION
P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

These comments are submitted in an effort to improve the rulemaking process and ensure continued protection to U.S. workers as a group.

If you have any questions, please call me at (602) 250-3281.

Sincerely,

[Signature]

David P. Stangis, CIH, CSP
Senior Consultant
Environmental, Health and Safety