

Pitt County Memorial Hospital, Inc.

a constituent of

**University
Medical Center**

Of Eastern Carolina-Pitt County



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July 14, 1994

NIOSH Docket Office
Robert A. Taft Laboratories
Mailstop C-34
4676 Columbia Parkway
Cincinnati, 45226 OH

RE: Proposed Rule 42 CFR Part 84

Ladies and Gentlemen:

This letter is support of the proposed rule 42 CFR Part 84. As you know the healthcare industry is mandated by the Occupational Safety and Health Administration to provide HEPA filter air purifying respirators to those employees exposed to Tuberculosis. It is our understanding that this requirement is based on criteria set forth by the Centers for Disease Control and that the hepa filter particulate respirator is the minimum level of protection that is certified by NIOSH/MSHA and meets the CDC Criteria.

At this point, only two manufacturers make disposable HEPA filter particulate respirators which has created a significant shortage in the availability of this type of respirator. Additionally, the elevated cost of the HEPA filter respirator has impacted the total cost of healthcare, and, we might add, may be overkill in light of evidence suggesting less costly respirators provide adequate worker protection.

In closing, we wish to applaud NIOSH in expeditiously addressing this issue and hope this accelerated pace will continue so that this proposal may become a final rule at the earliest possible date.

Sincerely,

James L. Riggs, M.S., CSP
Director, Safety and Environmental Management

William A. Young
Administrator, Special Medical Services

JUL 19 1994