



COMMUNITY HOSPITALS OF WILLIAMS COUNTY, INC.

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July 18, 1994

NIOSH Docket Office
Robert A. Taft Laboratories
Mail Stop C34
4678 Columbia Parkway
Cincinnati, OH 45226

Dear Sirs:

I am writing this letter to express my support of the proposed NIOSH rule on Respiratory Protective Devices, 42 CFR Part 84, Federal Register Volume 59, No. 99, pp 26850-26893. I feel that the proposed rule is an important first step in replacing existing Mine Safety and Health Administration (MSHA) regulations with public health regulations. I think it is also important that the proposed rule has addressed the upgrading of current testing requirements of particulate filters.

I realize that this is just the first step in a series of upgrades in testing procedures, but is an important beginning. And with the proposed rule changes, outdated respirator testing procedures have been replaced with better methods for evaluating the ability of respirators to filter toxic substances. Also, with the recommendation to adopt the 1993 CDC TB Guidelines in regards to criteria for respirator performance, manufacturers will be able to produce a broader range of certified respirators that meet the necessary requirements at a lower cost.

Therefore, in conclusion, I wish to note that I support the proposed standard as a first step in improving the certification process because this proposal recognizes the need to address the health care setting, that the 95% filter efficiency against 0.3 micron test particles should be acceptable for HCW needs, and that manufacturers should be able to produce the proposed respirator criteria with greater ease and at a lower cost to the provider.

Sincerely yours,

Ron Grunden
LTC Administrator
Community Hospitals of Williams County, Inc.

JUL 21 1994