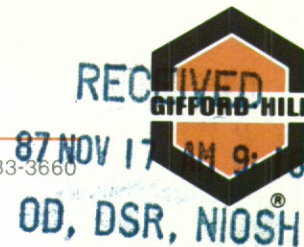


Riverside Cement Company

A Gifford-Hill Company - Member of THE BEAZER GROUP

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November 6, 1987

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

Dear Mr. Moran,

As a safety manager in an industry that produces dust as an end product I am concerned about the proposed 42 CFR 84 as written. To be perfectly frank, I am not a scientist, nor do I pretend to understand all of the intricacies of engineering required to produce an efficient, effective respirator. I am however a manager of people. People that are expected to follow safety rules as they are enforced by management. One of those rules is to wear approved respirators to protect them from nuisance dusts in the workplace.

This is not always an easy rule to enforce because employees are human beings not machines. As a part of our safety program we offer several styles of respirators so that each employee may select the one that fits him/her best. Compliance is made easier when respirators are relatively comfortable and not unpleasant to wear.

When developing rules for worker protection, it is vital to consider the employee that must wear the device. At what cost do we protect the employee from minimal, (or possibly non-existent) hazards when the price is (1) Non-Compliance, by those that we wish to protect, (2) Physical hazards associated with bulky, movement limiting and visually restricting devices (3) Negative ergonomic impacts and, (4) Increased exposure to materials through difficulty in creating and maintaining a proper fit.

I urge you to recall the proposed 42 CFR Part 84. Please examine the impact of the proposal on the workplace, workers and the management of the proposal. Examine fully what increase of protection is afforded in "real life" situations as apposed to what appears on paper. Examine the present level of protection that is created by our effective and responsible respiratory protection program, using devices that are currently available, and following rules currently in force. And most of all, I ask that you look at the proposal with prudence, wisdom and with one eye on the affected worker.

Sincerely,

Terry L. Tyson

Terry L. Tyson
 Safety Engineer

TLT/sk

*Rec'd att.
TV*