Alamance County Hospital Alamance Memorial Hospital

soon to be...



June 10, 1994

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

Gentlemen:

I would like to state my support of the proposed standard of three levels of minimum efficiency performance standards describing filter elements.

PAPRs and HEPA particulate respirators will interfere with communication during patient care and should not be the only available protection for preventing nosocomial tuberculosis (TB). The use of Type C filters of 95% efficiency and the use of other engineering controls as negative air pressure rooms and patient education will prevent transmission of TB to health care workers and not put an undue burden on the health care system.

It has been proven that TB prevention is accomplished by early diagnosis and treatment, therefore hospitals should use more resources in these areas than in purchasing expensive respirators and training employees in their use, especially in hospitals that average less than one TB patient per year.

I certainly agree that employees must be protected and provided with education and equipment to prevent transmission of disease. However, I do not agree that PAPRs and HEPA filter respirators are all that will provide the degree of protection needed.

Sincerely,

Ruby Gregory, RN

Infection Control Nurse Alamance Memorial Hospital

Ruly Dregory, RM.



Philip S. Massey, Ph.D. State Director

S.C. DEPARTMENT OF DISABILITIES AND SPECIAL NEEDS WHITTEN CENTER

P.O. Box 239 Clinton, SC 29325 Telephone and TDD: (803) 833-2733 FAX: (803) 833-5668

Judy E. Johnson, Ed.D. Deputy State Director Regional Centers

CATHY MORRIS, R.N.

June 13,1994

Employee Health/Infection Control

NIOSH Docket Office

Robert A. Taft Laboratories

Mail Stop C34 4678 Columbia Pkwy.

Cincinnati, Ohio 45226

Dear Sir:

This letter is written in support of the proposed rule change on Respiratory Protection Devices. I feel this proposal will upgrade testing procedures for evaluating a respirator's ability to filter toxic substances and will enable manufacturers to produce a broader range of certified respirators which provide the necessary level of protection. This certainly will improve the certification process by providing a fair and reliable way of evaluating PR use in the future.

Your attention to this matter will be greatly appreciated.

Sincerely,

Cathy Morris