94-099

Greenville Memorial Hospital

July 1, 1994

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

Dear Sir(s):

This is in response to 42 CFR Part 84, the proposed rule for respiratory protective devices. We are encouraged to see this initial step in a series of upgrades in testing procedures. We with the Greenville Hospital System, Greenville, SC support the proposed standard as a first step in improving the certification process for respiratory protective devices. The proposal addresses the health care setting, which is crucial (due to present controversies surrounding the use of respirators in the healthcare environment).

Categorizing the minimum efficiency performance standards of the filters of particulate respirators into three levels as proposed makes sense and will eliminate the need for use of sometimes confusing terms (e.g. HEPA, dust/mist/fume, etc.). Particulate respirators will subsequently be identified by their filter types based on filtration efficiency. This will enable manuafacturers to produce a broader range of certified respirators which provide the necessary level of protection and a fair and reliable method of evaluating PR use in the future.

We believe that 95% filter efficiency should be acceptable for most health care worker needs. The proposed certification process would then identify several respirators meeting this category that previously were believed to be inadequate respiratory protection.

Thank-you for publishing and requesting comment to the proposed rule for respiratory protective devices. We look forward to the results of the NIOSH certification process.

Sincerely,

Connie Steed, RN, CIC
Nurse Epidemiologist

JUL 11 1994

Greenville Hospital System
701 Grove Road Greenville, SC 29605