



The Charlotte-Mecklenburg
Hospital Authority

R. Stuart Dickson
Chairman

Harry A. Nurkin, Ph.D.
President

July 21, 1994

NIOSH Docket Office
Robert A. Taft Laboratories
Mail Stop C34
4676 Columbia Parkway
Cincinnati, Ohio 45226

Niosh Representative,

Charlotte-Mecklenburg Hospital Authority would like to express its support of the NIOSH proposed rule on Respiratory Protective Devices (42 CFR part 84 FED Register Vol. 59, No. 99 pp. 26850-26893) as a first step in improving the certification process. It is imperative that the unique need for respiratory protection in the health care setting be recognized and addressed. It is the opinion of the CMHA Task Force that the 95% filter efficiency should be acceptable for most HCW needs.

It is our hope that changes in the certification process be implemented quickly and appropriate clarification of the OSHA Enforcement Policies occur soon. Current policies have created a very expensive and difficult to implement burden on the health care community. Scientific studies have not shown benefit to the HCW to justify the use of HEPA Filter respirators over 95% efficient particulate.

Sincerely,

David G. Rupan, MD
Hospital Epidemiologist

Jeanie Rutherford
Manager, Employee Health

/cdm

JUL 26 1994