



1420 63rd Street • Kenosha, WI 53140 • (414) 657-5111

December 7, 1987

Director  
 Division of Safety Research  
 NIOSH  
 944 Chestnut Ridge Road  
 Morgantown, WV 26505

I am referring to the new standard for respirator certification, 42 CFR Part 84, that you are proposing which in our opinion would have a negative impact on the American Brass Plant located in Kenosha, WI.

It would seem under your proposal, few respirators currently available today could pass the certification test requirements of the proposed new standard.

We are concerned that respirators designed to meet your specifications would be so onerous to wear -- bulky, hot, heavy, hard to breathe through, and generally uncomfortable, that employees at our plant would most likely refuse to wear them.

The additional cost factor and impact potential on our bottom line is naturally another concern at this plant in addition to getting employees to wear them.

We trust you will take the concerns outlined in this letter into consideration and withdraw the proposal.

Sincerely,

AMERICAN BRASS COMPANY

*William L. Beardsley*  
 William L. Beardsley  
 Employee Relations Supervisor

WLB:mks  
 cc: W. Girman  
 K. Webb

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