

Arizona Public Service CompanyPALO VERDE NUCLEAR GENERATING STATION
P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

August 7, 1996

**NIOSH Docket Office
Robert A. Taft Laboratories, M/S C34
4676 Columbia Parkway
Cincinnati, Ohio 45226****RE: WRITTEN COMMENTS IN PREPARATION OF RESPIRATOR
CERTIFICATION RULEMAKING**

Dear Sir or Madam:

Arizona Public Service Company (APS) is an investor owned Electrical Utility providing electrical service to the Southwestern United States. There are times during our electrical generation, transmission and distribution operations that require the use of respirators to minimize potential exposure to chemical or physical agents. APS has had a Respiratory Protection Program for many years which uses the OSHA standard requirements as a minimum standard. NIOSH's intention to privatize the respirator certification may have impacts on the future success of our respiratory protection program. Although many of the proposed changes will have no direct effect, we would like to forward a few general comments.

APS agrees in principal to the proposal to privatize the respirator certification process. Our only concern involves potential influence over the certification process by the various manufactures. We would like to go on record as opposing any provision that may give manufacturers control over the certification process.

Additionally, in response to questions raised by *Issue #1*, APS believes that NIOSH should require private sector laboratories who perform respirator certification and product audit testing to be certified. NIOSH should assign the testing of a manufacturer's respirators and perform periodic monitoring of the private laboratories service.

Finally, in response to questions raised by *Issue #4*, APS believes that NIOSH should allow and certify multiple manufacturer's respirator replacement parts **only** if components can be standardized. We would oppose any changes that would allow for interchangeability of non-standardized parts that may lead to user confusion or loss of respirator protection.

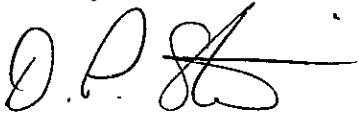
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These comments are submitted in an effort to improve the rulemaking process and ensure continued protection to U.S. workers as a group.

If you have any questions, please call me at (602) 250-3281.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. P. Stangis', with a long horizontal flourish extending to the right.

David P. Stangis, CIH, CSP
Senior Consultant
Environmental, Health and Safety