

54-158

The Docket Office
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U.S. Department of Labor
Occupational Safety and Health Administration
Room N2625
200 Constitution Avenue, N.W.
Washington, D.C. 20210

OSHA
DOCKET OFFICER
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TIME _____

Comments on the proposed revision of the Respiratory Protection Standard.

(d) (2):

This is a burdensome requirement for the employer. If 3 different types of respirators are used in the workplace, the employer will have to stock 18 different respirators in sufficient quantity for employee use. Additionally, filters and replacement parts will have to be stocked for 6 different types. The cost will mount very quickly.

OSHA should review the current respirators available. Many manufactures provide only 2 sizes.

(d) (3):

Will the term "each work situation" be interpreted as meaning each work location? If this is the case, this requirement will be costly and time consuming.

(d) (5):

The employer has the responsibility to "assure" that employees properly use respirators, but this revision makes mention of the employee responsibilities.

The current Respiratory Protection Standard places certain responsibilities on the employee (1910.134 (a)(3)). This requirement should not be deleted in the revision.

(e):

Under the current regulation, most medical evaluations consist of a brief questionnaire and a pulmonary function test (PFT).

Revision Alternative 1: This version requires evaluation by a physician for any employee wearing a respirator more than 5 hours in any week during the year.

Revision Alternative 2: The only difference between 1 and 2 is (2) in Alternative 2 (i.e., "Upon completion of ..."). Considering liability issues, many health labs may shy away from a "written opinion" on an employee's fitness to wear a respirator.

Revision Alternative 3: This version is even more stringent.

Can a sliding scale be developed? Employees using respirators less than 5 hours any week are at the low-end. Employees with moderate level of use are in the middle. Those with life-saving or heavy work use are at the high-end. This might make it easier for employers who only periodically have employees using respirators.

(f):

Requiring fit testing exercises to last 1 minute each and having this a documented routine is over-kill. They was no problem with the current fit testing requirements.

General Comment:

This revision could work very well in a fixed plant setting.

However, many companies operate in a field setting. Employees may be spread over a large geographical area. In these situations, employees do not always have direct supervision and may not report to a fixed facility every day. These are highly skilled and trained employees who carry a great deal of authority and responsibility. OSHA's revision makes dealing with the Respiratory Protection Standard much more difficult for companies working in a field setting.

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