



Alabama Hospital Association

54-190

April 6, 1995

Docket Office  
Docket H049  
US Department of Labor  
Occupational Safety and Health Administration  
Room N2625  
200 Constitution Avenue, NW  
Washington, D.C. 20210

OSHA  
DOCKET OFFICER  
DATE APR 6 1995

RE: Proposed Respiratory Protection Standards

Dear Sirs:

I am writing on behalf of the Alabama Hospital Association and its members in regards to your proposed standards regarding the use of respiratory protection being developed to protect healthcare workers from occupational exposure to tuberculosis (TB).

We believe the proposed standard includes a number of new or modified requirements that represent significant burdensome and unnecessary changes from current practice that would adversely affect the delivery of care in Alabama. Below are summarized our objections to the proposed standard.

1. As proposed, employers would be required to provide employees with a choice of respirators from at least two (2) manufacturers. Presently the only requirement is that a respirator be available in three (3) sizes. Cost of maintaining multiple respirators would be excessive to employers and not provide any additional safety for employees.
2. Three (3) alternatives for medical evaluations are being proposed. We support the third alternative that would utilize a questionnaire administered by a trained individual to identify workers in need of further evaluation. This alternative would eliminate the need for costly needless medical examinations.
3. Fit Testing. Under the proposal, fit testing would be required on an annual basis. This is a significant change from current standard that requires only initial fit testing. Additional fit testing should only be required when there are individual changes requiring such testing.

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4. Use of Respirators. Under the proposed standard, disposable respirators that cannot be cleaned and sanitized would need to be discarded at the end of the task or work shift, whichever came first. The current standard allows the use of disposable respirators after and until the structural integrity is compromised which often is beyond the use for one (1) work shift. We believe it would be cost prohibitive to require a new respirator for every task in the healthcare setting.

5. Fit Checking. We believe that the use of challenge agents for fit checking is unnecessary and burdensome and will adversely affect prompt delivery of care in the hospitals in Alabama.

We appreciate your considering these comments.

Sincerely,

A handwritten signature in cursive script that reads "Gregg B. Everett" followed by a stylized monogram "Gm".

Gregg Brantley Everett  
Senior Vice President and General Counsel

GBE:dcm