

NEOTERIK

NEOTERIK HEALTH TECHNOLOGIES, INC.

54-23

January 9, 1995

The Docket Office
Docket H-049
U.S. Department of Labor
Occupational Safety and Health Administration
Room N2625
200 Constitution Avenue, N.W.
Washington, DC 20210

OSHA
DOCKET OFFICER
DATE JAN 9 1995

Gentlemen,

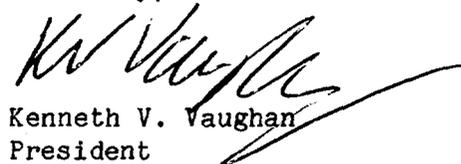
We are submitting these comments concerning the NPRM for respiratory protection, 29 CFR Part 1910, 1915 and 1916, published in the Federal Register on November 15, 1994.

We are commenting on Page 58923, where OSHA asks for comments on whether employees should be able to choose PAPRs rather than negative pressure respirators because of their reduced breathing resistance.

We recommend that employees should be able to choose PAPRs because of their reduced breathing resistance. This needs to be an explicit statement in the Rules, so that the respirator program administrator is relieved of the extra task of justifying the need for PAPRs in the respirator program. Our experience, like that of OSHA, is that few employees make such a request. However, this is a reason for including the right to choose a PAPR. If it was not an important consideration, those few people who ask for one would not do so. Since not many employees take advantage of the opportunity, the additional cost is not very high. However, some employers may dismiss an employee's request for a PAPR simply because only a few are needed. Also, if the employee does not have the right to select a PAPR, it is possible that employers will not even make employees aware of the advantages of PAPRs.

We recommend that the right to choose a PAPR which is already in standards like the Coke Oven standard and cotton dust standard must be extended to all employees.

Sincerely,



Kenneth V. Vaughan
President

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