

From: [Anne Katten](#)
To: [Berg, Eric@DIR](#); [Neidhardt, Amalia@DIR](#)
Subject: Comment on Wildfire Smoke Rule Appendix B and revised regulatory Text
Date: Friday, May 24, 2019 10:59:08 AM

Eric and Amalia,
Thank you for preparing and circulating the appendices and revised regulation text.

In Appendix B, currently there is just instruction to replace respirator filters when damaged, dirty or difficult to breathe through. There should also be instruction specific to filtering facepiece respirators to replace them at least at the end of the shift, for many reasons including that redonning increases the risk of poor fit, as well as contamination, and to replace sooner if they become damaged, soiled or difficult to breathe through. This change should be made for the emergency regulation.

Possible text:

Filtering facepiece respirators should be replaced at the beginning of each workshift and more frequently if they get damaged, dirty or difficult to breathe through.

For the permanent regulation we would recommend trying to reduce the literacy level of Appendix B and getting input from worker organizations on terms and phrasing that workers find more accessible.

Will Appendix B be translated into Spanish? Are other languages being considered?

We also hope that the threshold for mandatory respirator use will be reconsidered in the permanent regulation. We are dissapointed that the threshold has been raised from an AQI of 301 to 501, especially since the AQI tops out at 500 so no one can ever know if it is above 501. Adequate fit of respirators in critical at the low as well as high end of the range for hazardous PM 2.5 levels.

We will send you several additional comments concerning the permanent regulation soon.

Thank you

Anne Katten
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