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Sent: Monday, September 30, 2019 12:27 PM

To: Berg, Eric@DIR <EBerg@dir.ca.gov>; Kirkham, Chris@DIR <CKirkham@dir.ca.gov>; Berg, Eric@DIR <EBerg@dir.ca.gov>

Subject: Comments Regarding Cal/OSHA Draft Permanent Wildfire Smoke Standard

To Whom It May Concern,

On behalf of the San Francisco Public Utilities Commission, Health & Safety Division I am providing the following comments with regards to the *Proposed Revision to Emergency Regulation Section 5141.1 Protection from Wildfire Smoke*.

- 1.1. Without knowing what MERV filtration level will be required it is not possible to determine the feasibility and cost of meeting the standard.
- 1.2. Vehicle filters do not generally have MERV ratings.
2. **There does not appear to be a factual or technical basis for reducing the triggering threshold for voluntary N95 respirator use from an AQI of 151 to 101.**
 - 2.1. Requiring respirators to be made available for use when AQIs are greater than 100 will greatly impact the availability of N95 respirators, possibly reducing available stocks needed for aerosol transmissible disease outbreaks which could be fostered by the exposure of the population to elevated quantities of airborne particulates.
3. **Subparagraph (g)(4)(A) states in part "...the employer shall provide a sufficient number of respirators to all employees for voluntary use in accordance with section 5144 and encourage employees to use respirators". Employers "encouraging" employees to use respirators is not consistent with the concept of voluntary respirator use. It creates liability for employers encouraging employees to voluntarily use respirators in the absence of medical screening and other means to verify that it is safe for the employee to wear a respirator. We recommend that the statement be modified to read "...and educate employees on their use and limitations."**

Thank you again for the opportunity to provide comments on the draft standard. If you have any questions or would like additional information please do not hesitate to contact me by phone at (415) 550-3903,

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