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**JUL 05 2011**

**OCCUPATIONAL SAFETY AND HEALTH  
STANDARDS BOARD**

June 28, 2011

Marley Hart, Executive Officer  
Occupational Safety and Health Standards Board  
2520 Venture Oaks Way, Suite 350  
Sacramento, CA 95833

Subject: Petition to amend GISO 5199 (g)(3)(b)

Dear Ms. Hart;

On behalf of the Public Agency Safety Management Association-South Chapter, I would like to propose amending GISO 5199 (g)(3)(b) to permit Paramedics and other emergency medical personnel to use N-100 respirators in lieu of P-100 respirators in non-oil environments. In environments where oil aerosols may be present in the atmosphere a P-100 respirator or respiratory protection that provides greater protection, including but not limited to an SCBA, would still be required.

Currently, a variance has been granted to a Fire Agency allowing the use of an N-100 respirator under the conditions that have been specified above. The amended regulation would extend these same requirements to other Fire agencies and other emergency medical service providers performing similar emergency operations under the same conditions as outlined above, namely, providing high hazard emergency medical services in non-oil environments.

In conclusion, I ask that the Standards Board amend GISO 5199 (g)(3)(b) in order to allow for the use of N-100 respirators in non-oil environments. If you have any questions please contact me at (714) 765-4399.

Sincerely,

Bill Taylor, CSP  
Public Agency Safety Management Association-South Chapter, President