

Miller, Diane M. (CDC/NIOSH/EID)

From: Szalajda, Jonathan V. (CDC/NIOSH/NPPTL)
Sent: Tuesday, September 21, 2010 2:02 PM
To: NIOSH Docket Office (CDC)
Cc: Doak, Clayton B. (CDC/NIOSH/EID)
Subject: FW: NIOSH Docket Re: Respiratory Fit-Testing

Please include with Docket 137's comments.

Thanks, Jon

-----Original Message-----

From: Szalajda, Jonathan V. (CDC/NIOSH/NPPTL)
Sent: Tuesday, September 21, 2010 2:01 PM
To: Doak, Clayton B. (CDC/NIOSH/EID)
Cc: Ahlers, Heinz W. (CDC/NIOSH/NPPTL)
Subject: RE: NIOSH Docket Re: Respiratory Fit-Testing

Clayton -- this should be submitted to the Docket Office for inclusion with Docket 137

Thanks, Jon

-----Original Message-----

From: Ahlers, Heinz W. (CDC/NIOSH/NPPTL)
Sent: Tuesday, September 21, 2010 9:24 AM
To: Szalajda, Jonathan V. (CDC/NIOSH/NPPTL)
Cc: Doak, Clayton B. (CDC/NIOSH/EID)
Subject: FW: NIOSH Docket Re: Respiratory Fit-Testing

Jon?

-----Original Message-----

From: Doak, Clayton B. (CDC/NIOSH/EID)
Sent: Tuesday, September 21, 2010 9:12 AM
To: Ahlers, Heinz W. (CDC/NIOSH/NPPTL)
Subject: FW: NIOSH Docket Re: Respiratory Fit-Testing

Heinz,

Is there a docket open on fit testing?
Thank you.

Clayton

-----Original Message-----

From: CDC-INFO
Sent: Sunday, September 19, 2010 7:42 PM
To: brucev@bright.net
Subject: RE: NIOSH Docket Re: Respiratory Fit-Testing

Thank you for your submission to CDC-INFO.

Your comments have been forwarded to the CDC's National Institute for Occupational Safety and Health for their information.

Thank you for contacting CDC-INFO. Please do not hesitate to call 1-800-CDC-INFO, e-mail cdcinfo@cdc.gov, or visit www.cdc.gov if you have any additional questions.

CDC-INFO is a service of the Centers for Disease Control and Prevention (CDC) and the Agency for Toxic Substances and Disease Registry (ATSDR). This service is provided by Vangent, Inc. under contract to CDC and ATSDR.

KN/fl

[THREAD ID:1-1UOZWU] [SR No.:1-112052746]

-----Original Message-----

From: brucev@bright.net
Sent: 9/16/2010 07:04:25 PM
To: cdcinfo@cdc.gov
Subject: NIOSH Docket Re: Respiratory Fit-Testing

I could not find the proper link to post my comments. But I could not let the request go unanswered, so please forward/post accordingly.

Personal observations obtained during fit-testing:

1. A low FF (10) for any 1/2 face particulate filtering respirators is a joke. I have never had anyone fail, has anyone?
2. Qualitative fit-testing is so open to employee interpretation/feedback, that it was literally a joke between employees. I have had employees coach each other prior to the test to not admit to smelling or tasting the contaminant! But, I have also actually had employees state that they could not smell/taste a challenge agent and then immediately run from my office to vomit or used my trash can to vomit into, because they could no longer deny a proper fit. So is a qualitative fit-test an effective test? (I did not rely on the OSHA specified minimum of a cough or cough reflex to fail an employee during a fit-test, if they puked, they failed! OSHA did not include vomiting in the final standard.)
3. When fit-tested via a quantitative method (Portacount) for all 1/2 face, negative pressure respirators the employees could not only not deny an improper fit and when stressing the employees to ensure that any leakage would be measurable during the fit-test, compliance has been 100%. The end result is that employees feel more confident that the respirator specified to protect them actually fits/works and I (the employer) feel confident in the adequacy of the fit-test. Essentially, employee subjectivity to recognizing an agent is removed, results are easily quantified, verified and proven to both the employer and employee. As a responsible employer, not only do I need to know that the respirator is effective, but I need the employee to know how critical it is that the respirator is worn as instructed/trained. At times, I require respiratory protection for compounds that have no established/published OELs; essentially the respirators are being worn as a last line of defense to prevent from any potential unknown exposures (oxygen deficiency is impossible in our situations).
4. Due to practicing EHS for decades, numerous published articles on the lack of reproducible fit-tests for particulate masks (essentially obtaining a proper seal 1/3 of the time during respirator fit-testing training), I include that 1/2 face particulate filtering respirators (dust masks) are never allowed to be used as respiratory protection and that employees are required to wear (at a minimum) a 1/2 face negative pressure respirator, if not greater even when a published OEL is not available due to the nature of our operations. I won't ask about the influence received from filtering face-piece respirator manufacturers, their "supportive documentation", etc., and neither am I a respirator manufacturer, representative, etc. Simply, I am an EHS compliance specialist, responsible for ensuring that all employees are protected at all times, and in my experience, proven effective performance is the only acceptable measure I will continue to rely on 1/2 face-negative pressure respirators in-lieu of 1/2 filtering (dust masks) every time.
5. Qualitative vs. quantitative fit-testing has been proven, published and undeniable in my experience. Although OSHA may have to consider the obvious economic disadvantages between the two alternatives, I am not obligated to follow the minimum "legally acceptable", but potentially ineffective (morally at least) fit-test methods.

6. The OSHA QNFT fit-testing procedure allows an employee to fail one of the tests/requirements, as long as they have passed the overall FF required. However, due to the tasks being routinely performed by our employees being identical to the fit-testing procedures, I do not allow them to fail any of the tests. I have never had an employee fail when re-fitted with a different respirator from a proven (quantifiable) fit-test.

BruceV