

Selection of Respiratory Protection Against Carcinogens

A Letter Sent by the AIHA Board of Directors to NIOSH

In the June 1991 issue of the American Industrial Hygiene Journal, the American Industrial Hygiene Association Board of Directors published the following letter sent to Dr. J. Donald Millar, Director of the National Institute for Occupational Safety and Health. The text of the letter is reprinted with the kind permission of AIHJ.

"In September of 1987, the National Institute for Occupational Safety and Health (NIOSH) published a revised version of the NIOSH *Respirator Decision Logic* (NIOSH Publication 87-108). One of the changes from the original 1975 *Decision Logic* requires that, for protection against Department of Labor-regulated carcinogens or materials identified as carcinogens by NIOSH, only two types of respirators are recommended.

"(1) A self-contained breathing apparatus (SCBA) with a full facepiece operated in pressure demand or other positive pressure mode, or

"(2) A supplied-air respirator with a full facepiece operated in pressure demand or other positive pressure mode with an auxiliary SCBA operated in pressure demand mode.

"This mechanical approach to respirator selection utilizes solely the material's toxicity and not the ability of a specified respirator/respirator program to effectively control the exposure. The American Industrial Hygiene Association (AIHA) does not believe that this is appropriate. After considering the physical state and chemistry of an air contaminant, respirator selection should be based on the ability of the respirator/respirator program to reduce an exposure to below the applicable standard. This selection concept should apply to all materials whether they are carcinogens, suspected carcinogens or non-carcinogens.

"We therefore urge NIOSH to reconsider its position on the use of respirators for protection against carcinogens."

End of Letter

Editors Note

For those of you in other parts of the world who are not familiar with NIOSH's *Respirator Decision Logic*, publication Number 87-108, it provides a potential respirator user with a respirator selection system that uses information current at the time of publication.

In the Foreword to this publication Dr. Millar states in part: "The initial *Respirator Decision Logic* was developed in 1975 as part of the National Institute for Occupational Safety and Health/Occupational Safety and Health Administration (NIOSH/OSHA) Standards Completion Program and was updated in 1978. Due to technical advances in respirator design and research, NIOSH has again revised the *Respirator Decision Logic*.

"This revision retains many aspects of the original *Respirator Decision Logic*, but it differs in five areas: odor warning properties with respect to air-purifying cartridge/canister respirators, recognition of the problems in assigning protection factors, changes in protection factors for certain respirator classes, respirator recommendations for carcinogens, and medical recommendations.

". . . Since NIOSH maintains that there is no safe exposure to carcinogens, only the most protective respirators should be used to protect workers from exposure to carcinogens in the workplace. . ."