

for certain operations that are performed at constantly changing locations, a need for respirators does exist."(1)

The final standard should acknowledge that respirator use will be the only adequate control for some activities and it should allow employers the flexibility to select protective equipment based on an assessment of the potential for exposure and the individual performance capability of the respirator.

Infeasibility of supplied air respirators in insulation removal

Air line respirators or self-contained breathing apparatus (SCBA) create safety hazards in a complicated removal operation where workers are constantly climbing and descending ladders or scaffolding because of the increased risk of tripping or falling. In addition, the limited data available in the Du Pont study suggest that contrary to the general assumption, supplied air respirators may not provide appreciably better protection than air purifying respirators. In view of the documented effectiveness of elastomeric half-mask and disposable respirators, Du Pont urges OSHA to permit use of these protective devices in insulation removal operations where expected concentrations will not exceed the use limits applicable for a particular type of respiratory protection equipment.

OSHA should provide additional opportunity to comment on the proposed standard

The preamble to the proposed standard discusses many regulatory possibilities which are not contained in the actual proposed standard. It is, therefore, difficult to identify precisely what the Agency is proposing and provide meaningful input. Consequently, Du Pont requests that OSHA not proceed from this comment period directly to a final standard; instead, the Agency should reissue a revised proposal reflecting the information received in this proceeding and solicit additional comments on this revised version.

---

(1) See testimony of the NIOSH transcript of the OSHA asbestos hearings on June 21, 1984, page 73.