

COMMENTS ON PROPOSED REVISION OF 30 CFR
Parts 70, 75 and 90

Centurion Safety Products Ltd is a U.K based manufacturer of personal protective equipment offering head, face, hearing and respiratory protection to wearers. It has been manufacturing this equipment for 124 years and selling its products World-wide. It is pleased to have the opportunity to submit written comments on the above document.

Our comments are in four parts:-

1. Centurion believes that MSHA ought to make a change to its respiratory philosophy. Its current requirement is that workers in over exposure situations use general-purpose respirators. If MSHA were to recognise that the contaminants that can cause problems are coal and silica products along with particulates from diesel emissions, products which are currently called respirators would not be required. Furthermore more efficient and hence more beneficial to the wearer products could be manufactured.
2. The inclusion by name of any equipment within the Federal Register achieves 2 things, firstly it publicly endorses the equipment and, secondly it restricts the selection obviating equipment that might be just as good, if not better. To this end we believe that changes should be made to Section Appendix B 4.0 Programme Elements, which removes the 3M model number and substitutes some other form of words.
3. Centurion would like to point out that the restriction of only being able to utilise NIOSH approved respirators currently means that those working in over exposure conditions are encumbered by respirators which have been designed to protect from all agents, rather than just coal and silica particulates. We would like MSHA to consider an alternative specification which stipulates the contaminants, the particle size range, and the efficiency of the device. If required Centurion would be happy to furnish this information.
4. The requirement that only HEPA filters can be used automatically de-selects filtering media which have been specifically designed to filter out coal and silica dust of the size that cause respiratory diseases. The mandatory use of filters requires products to be manufactured which are heavier, require more battery power, are more cumbersome and hence more uncomfortable than could be provided if this restriction were alleviated.

AB14-COMM-2
rec'd email 5/13/03