
From: leslie.h.holland@uscg.mil on behalf of Holland, Leslie H
To: Hearl, Frank J. (CDC/NIOSH/OD)
Sent: 6/11/2010 6:48:58 PM
Subject: Respirator issue - oil spill response

Mr. Hearl -

Thank you for enabling the Coast Guard to provide feedback regarding the "NIOSH Recommendations for Protecting Deepwater Horizon Response Workers" (Draft 7: June 9: 6:30 p.m.).

The concerns from the Coast Guard center on the recommended guidance regarding use of respiratory protection.

The document as reviewed provides excellent exposure scenario guidance and references. However, the next step in the exposure assessment process, quantitative sampling, is not fully integrated with these exposure scenarios to substantiate or negate the need for respiratory protection.

As such, feedback from our folks in the Gulf is that the guidance appears to suggest near "blanket" use of respiratory protection is warranted, although this is not the intent.

Current Coast Guard operations occur well outside of the source "zone". Potential airborne exposures of concern are limited to weathered crude components and dispersant. For the current operations, exposure levels for these chemicals, relative to each of the Coast Guard's well-defined work tasks, are below the TLV/PEL or non-detectable. As such, with well defined exposure characterizations, based on quantitative data, we currently do not have a requirement for respiratory protection to control for inhalation of weathered crude constituents or dispersants. Our safety officers remain sensitive to the potential impacts on exposure in the event of changes to our operational profile.

Our recommendation is that the guidance be supplemented with air monitoring data associated with the exposure scenarios provided. In this way, there NIOSH can provide definitive recommendations based on data.

Thank you for your consideration. I will be on leave next week but will be checking my e-mail periodically should you have any questions.

V/R
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