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April 3, 1998

Ms. Diane Miller
NIOSH Docket Officer
4676 Columbia Parkway
Mailstop C-34
Cincinnati, Ohio 45226

Re: National Institute for Occupational Safety and Health; Draft Document
"Review of NIOSH Report to Congress on Workers' Home
Contamination Study Conducted Under the Workers' Family
Protection Act (29 U.S.C. 671a)" (63 Fed. Reg. 5,952, Feb. 5, 1998).

Dear Ms. Miller:

The Textile Rental Services Association of America (TRSA) is a nonprofit trade association representing 1,700 member companies. TRSA members are for-profit companies engaged in textile maintenance and rental services to commercial, industrial, and institutional accounts. Textile rental companies serve hygienically clean textile items to millions of customers in commerce, industry, and the professions. Major customers of most uniform and linen supply services and commercial laundrers include: automobile service and repair facilities; food processing companies, pharmaceutical manufacturers, and other manufacturing facilities; hotels, restaurants; hospitals, nursing homes, doctors' and dentists' offices and clinics; retail stores, and supermarkets, and a variety of other industrial and service companies. The combined textile rental industry had estimated 1996 sales of about \$8.9 billion. Linen supply and industrial laundering companies employ more than 120,000 people. TRSA is the major industry association with members in both the linen supply and industrial uniform rental industries.

TRSA appreciates the opportunity to comment on the Workers' Family Protection Act Task Force review of the NIOSH report to Congress on workers' home contamination published in the *Federal Register*, Feb. 5, 1998. TRSA initially became involved in issues relating to the proper handling of personal protective equipment at the time of OSHA's first preliminary rulemaking—the Coke/Oven Emissions Standard in 1967. OSHA's Coke Emissions Standard was the first of many rules that would be implemented to protect workers, and their families, from harmful exposure to hazardous substances in the workplace.

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Since the promulgation of the Coke/Oven Emission Standard, TRSA member companies have been providing and servicing protective clothing for workers in many other industries regulated by OSHA. The industry has successfully implemented a program of offering specialized garments and outerwear for protecting healthcare workers from occupational hazards posed by bloodborne pathogens and more recently, the textile rental industry has offered uniquely designed flame-resistant garments to electrical workers.

TRSA supports the goals of the Workers' Family Protection Act to prevent or mitigate future contamination by hazardous materials that could adversely affect the health and safety of workers and their families. The issue of home-contamination is certainly an issue that warrants study. However, in the absence of scientific data, the extent and the scope cannot be factually determined. TRSA agrees with the task force recommendation that a surveillance program is critical in terms of quantifying the home contamination risks posed by occupational hazards.

However, TRSA has concerns related to two task force recommendations. We are concerned with the recommendation that an investigative strategy include "an assessment of the performance of existing protective clothes (i.e., single use disposables and clothing that be laundered) as barriers for chemical biological, thermal and physical hazards." In addition, we are concerned with the recommendation that calls for research on and development of, new types of materials for protective clothing and gloves, including evaluation of their performance characteristics."

It is TRSA's position that the task force's recommendation for an assessment of the performance of existing protective clothing—single use-disposables and clothing that can be laundered should not be included as part of an investigative strategy at this time. This recommendation is inappropriate. Clearly, the task force is not suggesting that the performance of protective clothing be evaluated when the type of hazard posed—whether chemical, biological, etc.—has not yet been defined. Moreover, new materials for protective garments cannot be developed and their performance evaluated without identifying the specific hazards that may be transported from the workplace.

TRSA believes that the task force concerns regarding the decontamination of reusable garments through commercial laundering are unfounded. We also take issue with the task force's statement that where workers are exposed to non-soluble contaminants, such as asbestos, disposable single use garments are recommended. In effect, the task force is promoting disposables as the only option for workers. It should be noted that the TRSA member companies provide a valuable service by providing hygienically clean garments that protect workers and their families from hazardous chemicals and substances transported from the workplace via clothing.

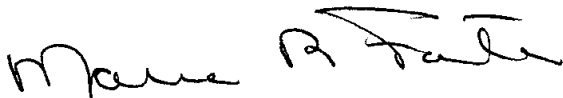
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The task force should not make any statements that appear to promote one market segment, i.e. disposables or reusables, over the other. Further, any discussion of disposables should address environmental concerns related to landfills and the fact that the textile rental industry minimizes solid waste through reuse and recycling. TRSA has provided NIOSH with data to support the use of reusables vs. disposables from both a cost and environmental standpoint.¹ This study by Mullen and Lehrburger, clearly demonstrates that reusable textile products provide a full level of worker protection at a lower cost and on a more environmentally friendly basis. According to the study, using reusable products would reduce the amount of solid waste entering the nation's waste stream by 1.5 million tons, almost 4.5 million cubic yards of landfill space each year. Aside from the environmental and health concerns posed by landfills, alternative methods of exposure such as medical waste incineration serve as a source of dioxins, which can cause cancer and other health problems.

Finally, the industry's experience with the Bloodborne Pathogen Standard has demonstrated that reusables protect healthcare workers from the hazards associated with occupational exposure. In its regulation addressing bloodborne pathogens, OSHA does not make any recommendations related to disposables or reusables. The rule states that for employees who have occupational exposure, "The employer must clean, launder, and dispose of personal protective equipment."² This leaves it to the discretion of the employer to choose "appropriate" protective clothing. OSHA does not address the issue of reusable or disposable garments nor should the task force. The task force should ensure that its recommendations do not go beyond the scope of the Workers' Family Protection Act and its own mission.

We have enclosed a copy of the Mullen/Lehrburger study comparing reusable and disposable products for your review. Again, TRSA appreciates the opportunity to comment on this important issue. We would be glad to answer any questions that you may have or provide further information that would be of assistance.

Very truly yours,



Marie R. Fath
Director of Government Affairs

¹ J. Mullen & C. Lehrburger, A Solid Waste and Laundering Assessment of Selected Reusable and Disposable Products (1991).

² 29 C.F.R. 1910.1030, Occupational Exposure to Bloodborne Pathogens.