



## Submitted Electronically

October 31, 2025

OSHA Docket Office  
Docket No. OSHA-2025-0006  
Occupational Safety and Health Administration  
U.S. Department of Labor  
200 Constitution Avenue, N.W.  
Washington, D.C. 20210

RE: NAIMA's Comments on OSHA's Proposed Rule Regarding "Amending the Medical Evaluation Requirements in the Respiratory Protection Standard for Certain Types of Respirators" – Docket No. OSHA-2025-0006

To Whom It May Concern:

### INTRODUCTION

The North American Insulation Manufacturers Association ("NAIMA") appreciates this opportunity to submit comments on the Occupational Safety and Health Administration's ("OSHA") Proposed Rule regarding "Amending the Medical Evaluation Requirements in the Respiratory Protection Standard for Certain Types of Respirators" (90 Fed. Reg. 28,463 (July 1, 2025)). NAIMA is the trade association for North American manufacturers of fiber glass, rock wool, and slag wool insulation products. NAIMA's members, in certain circumstances, subject to the Respiratory Protection Standard are required to implement respiratory protection programs to protect workers from exposure to respirable fibers. Specifically, OSHA identifies N95 series dust respirators (certified by NIOSH), half-mask respirators with appropriate filters (N95 or higher), and full-face respirators for higher exposures as appropriate for fiber glass and mineral wool workers. In addition, NAIMA's Product Stewardship Program recommends these respirators to installers, fabricators, and other workers when exposures exceed the recommended PEL of 1 f/cc. NAIMA's exposure database documents that exposures are consistently below recommended exposure limits.<sup>1</sup> OSHA's Proposed Rule to remove medical evaluation requirements for this very type of respirator makes the proposal immediately relevant to NAIMA's members.

OSHA's Proposed Rule is proposing to remove some medical evaluation requirements in the Respiratory Protection Rule for certain types of respirators. As OSHA notes in the Proposed Rule,

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<sup>1</sup> G.E. Marchant, et al., "A Synthetic Vitreous Fiber (SVF) Occupational Exposure Database: Implementing the SVF Health and Safety Partnership Program," *Applied Occupational and Environment Hygiene*, 17(4): 276-285, 2002. Marchant, Gary; Bullock, Christopher; Carter, Charles; Connelly, Robert; Crane, Angus; Fayerweather, William; Johnson, Kathleen; and Reynolds, Janis (2009) "Applications and Findings of an Occupational Exposure Database for Synthetic Vitreous Fibers," *Journal of Occupational and Environmental Hygiene*, 6:3, 143-150. Gary Marchant, Robert Connelly, Angus Crane, William Fayerweather, Edward Puhala & Kelly Sandin (2021): "Occupational exposure to glass wool fibers: an update," *Journal of Occupational and Environmental Hygiene*, DOI: 10.1080/15459624.2021.1901906.

this change would only impact filtering facepiece respirators (hereinafter “FFRs”) and loose-fitting powered air-purifying respirators (hereinafter “PAPRs”). NAIMA and its members fully support OSHA’s Proposed Rule.

#### OSHA CORRECTLY CONCLUDES THAT EVIDENCE DOES NOT SUPPORT A CONCLUSION THAT ALL RESPIRATORS IMPOSE PHYSIOLOGICAL BURDENS

NAIMA supports OSHA’s conclusion, based on valid peer-reviewed evidence, that medical evaluation for FFRs and PAPRs is not justified. The vast majority of work tasks at manufacturing facilities and the jobs performed by installers and fabricators do not trigger any mandated respiratory use because the exposures are so low, yet some workers choose to continue to wear the respirator for comfort. Those voluntarily using these respirators display no signs of physiological distress. This type of respiratory protection has been used for well over 30 years in the fiber glass and mineral wool insulation industry. That expanse of firsthand experience over a significant passage of time using this type of respiratory protection should afford our comments additional credibility.

Moreover, these very FFRs and PAPRs were used widely during COVID-19, and there was no call for medical evaluations. As OSHA notes, workers across industries throughout the world were wearing these very same respirators for entire shifts every workday during the entire pandemic. NAIMA is aware of no data that this widespread use of these respirators caused any adverse physiological outcomes. Many of NAIMA’s companies mandated respiratory protection use during the pandemic and would have observed firsthand if adverse outcomes were going to happen. With this lack of data, OSHA cannot justify continuing to mandate medical evaluations for this type of respiratory protection. NAIMA strongly urges OSHA to adopt the proposed amendment.

#### SIGNIFICANT COST SAVINGS WILL RESULT FROM THE IMPLEMENTATION OF THIS AMENDMENT

NAIMA and its members can affirm that the elimination of the annual medical questionnaire for FFRs and PAPRs will result in sizable cost savings. OSHA notes that only those employees using either FFR or PAPR will no longer have to complete a medical questionnaire or receive a medical evaluation. Often, these types of respirators are the only ones used in the manufacturing of the insulation products, so the elimination of the requirements surrounding the use of these respirators will have significant cost savings.

That cost savings will also be repeated when the annual follow-up for medical exams has also been eliminated. Similarly, a reduction in recordkeeping requirements will offer cost savings.

NAIMA and its members are deeply grateful when regulatory revision results in cost savings and that OSHA highlights that cost savings is particularly appreciated. For too long, costs to the regulated community have been deemed irrelevant and unimportant, but NAIMA and its members assert that cost and cost savings are most definitely relevant and important. NAIMA strongly supports this amendment in part because of the cost savings that will result.

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Companies concur that the Proposed Rule will have a positive fiscal impact on them.

NAIMA fully supports the adoption of the proposed amendment. Again, NAIMA appreciates the opportunity to submit these comments. If you have any questions, please do not hesitate to contact NAIMA.

Sincerely,

A handwritten signature in blue ink that reads "Angus E. Crane". The signature is written in a cursive style with a long horizontal flourish at the end.

Angus E. Crane  
Executive Vice President, General Counsel