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To: [Ireland, Cynthia D. \(LNI\)](#)
Subject: Wildfire smoke perminate rule
Date: Thursday, August 11, 2022 10:07:49 AM

External Email

I would like to comment on the perminate rule making.

Please do not add in the required mask use for the lower AQI levels as suggested and discussed at the stakeholder meeting. The 2022 Emergency rule should be adopted as the perminate rule.

We are a Public utility and we operate under chapter 296 - 45. We have ran into challenges with finding masks that are FR rated. Also finding forced air, or SCBA that are FR rated, and not bulky so we can safely work around energized parts creates more of a risk. We have found that the best option for us is to only respond to emergency's during unhealthy conditions as a feasible way to reduce exposure. Also to empower employees with the stop work authority if conditions are unhealthy. We would prefer to delay work until conditions improve. To add a partial respirator program, or a required use respiratory protection program will not be helpful to us. It would create added work and cost with little to no benefit. For the potential couple days out of the year this seems to be a lot of effort to create a respirator program. I feel we can be prepared for these potential days with educated employees, controls in place to minimize the exposure without the mandatory respirator programs.

In the stakeholder meeting it was discussed that the fire departments operate under a different rule. Maybe chapter 296 - 45 could have some different guidelines specific to the scope of work.

Thank you for your time and effort on keeping Washington safe.



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