

**From:** [Piedmont, Ariel](#)  
**To:** [Ireland, Cynthia D. \(LNI\)](#)  
**Cc:** [Lundeen, David](#)  
**Subject:** FW: Sound Transit Comments: Wildfire Smoke Permanent Rule  
**Date:** Tuesday, August 23, 2022 12:53:59 PM  
**Attachments:** [image001.png](#)

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External Email

Cynthia,

Thank you for providing the presentations on August 10<sup>th</sup> this opportunity to comment on the proposed Wildfire Smoke Permanent Rule.

**We at Sound Transit remain extremely concerned with this rule and how it may affect our ability to provide safe public transit in the Puget Sound Region on elevated smoke days. Our primary areas of concern are the exclusion of public transit vehicles from the enclosed vehicle exemption and the trigger for required use of higher than APF 10 respirators for employees who perform outdoor work on the rare days when smoke levels may exceed 555 ug/m3.**

For the enclosed vehicles, we remain committed to researching and implementing effective filtration options to minimize employees, contractor and customer exposure to wildfire smoke and indoor generated air pollutants. If in vehicle smoke levels exceed the L&I trigger threshold for requiring full face respirators, we are concerned that use of a full face respirator while operating a moving public transit vehicle impairs communication and vision in a manner that poses a greater hazard, to our employees, contractors and customers than smoke exposure. The inability for us to provide safe public transit while meeting the L&I rule will likely result in shutting down service on extreme smoke days leaving the region's most vulnerable residents without reliable transportation in a time of increased need. Furthermore, interpretation of "frequently" in the statement "where doors are frequently opened to board and deboard passengers is unclear:

- Is a train that operates between Seattle and Everett and will open doors 4 times (in Seattle, briefly in Edmonds, briefly in Mukilteo and in Everett) over approximately an hour "frequent?"
- Is a commuter bus that makes 10 stops in Seattle over a few minutes and then 5 more stops along I-5 between Seattle and Lakewood "frequently" opening doors?

For our employees and contracted security staff who provide security outdoors remain concerned that any trigger requiring use of a full face respirator will greatly impair communication and the ability to maintain situational awareness and physical safety in a manner that poses a greater hazard than smoke.

For any trigger level that might require use of a full face respirator, Sound Transit proposes that L&I include language that would allow employers to meet the specified 8 hour time weighted average exposure to wildfire smoke PEL through use of engineering controls, personal protective equipment and/or administrative controls such as limiting duration of outdoor exposure on an extreme smoke

day in a half face respirator with an APF of 10.

**At the August 10<sup>th</sup> presentation you specifically requested input with regards to selecting trigger thresholds for a partial respirator program and/or a required use respiratory protection program. Sound Transit seeks to maintain the 2022 emergency rule language which did not have any trigger for a required use respiratory protection program below 555 ug/m3. We are already struggling to fill vehicle operator, security staff, and numerous other outdoor work related positions that are already limiting our ability to provide scheduled public transit service; any additional barriers that might limit staffing, such as requiring staff to shave, will further reduce our ability to provide the Puget Sound with safe, reliable public transit.**

To the extent that L&I chooses to implement trigger thresholds for partial respirator program and/or a required respiratory protection program, Sound Transit requested they be select the most elevated PM2.5 level triggers to limit the number of days where our ability to provide safe and reliable public transit service is jeopardized. Furthermore, Sound Transit requests that L&I include language that would allow employers to meet the specified 8 hour time weighted average exposure to wildfire smoke PEL through use of engineering controls, personal protective equipment, and/or administrative controls such as limiting the duration of outdoor work.

Best Regards,

Ariel Piedmont, MS, CIH, CSP

Industrial Hygiene Program Manager

Pronouns: He/Him/His

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