

RACAL AIRSTREAM, INC.
ROCKVILLE, MARYLAND

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COMMENTS ON THE ROLE OF NIOSH IN THE
TESTING AND CERTIFICATION OF PERSONAL
PROTECTIVE EQUIPMENT AND HAZARD
MEASURING INSTRUMENTS - DONALD H. BURD

Ladies and Gentlemen, I am Donald Burd, Manager of Quality Assurance for Racal Airstream, Inc., Rockville, Maryland. We are manufacturers of devices which have been classified by NIOSH as powered air-purifying respirators. I am intimately familiar with the present requirements for documentation and quality plans.

Racal Airstream, Inc. and I welcome some of the recommended changes as proposed in the Federal Register of Wednesday, June 18, 1980. We eagerly await these changes as a means of making life easier for those of us involved in the preparation of the submittal documents without reducing the quality of our product to the end user. Reduction in the number of detailed drawings, detailed quality plans and procedures, and detailed control of incidental changes all work to the betterment of the product as effort can be oriented toward product excellence instead of documentation overkill. From this standpoint the whole process of certification and approval will become more efficient permitting the products to reach the end user in shorter time without making the testing and certification process less effective. It is, however, most important that we (who are intimately involved with testing and certification) be informed of the progress of NIOSH changes well in advance of implementation dates so that we may offer our comments prior to final proposal implementation.

I would like to introduce a new problem; one not covered by the consultant's report nor these proposals. The problem deals with multi-purpose Protective Devices a phenomenon of the technology of the present and a reality of the future. The unit we at Racal Airstream, Inc. manufacture is a combination hardhat, faceshield and respiratory protective device. Presently the respiratory protection component is tested by NIOSH and when certification is complete we put on labels showing that the unit has been approved by NIOSH. Our product also meets the OSHA requirements by fully complying with the

applicable ANSI standards. There are, however, combination devices for sale in the marketplace today which apparently offer face and head protection and carry NIOSH certification. For technical users knowledgeable of NIOSH responsibilities this presents no problem since technical users understand that NIOSH approval only represents approval of the respiratory protection function. Less sophisticated users may believe, however, that NIOSH approval extends to and includes head and face protection. This can be, as a minimum, misleading and, as an extreme, dangerous.

As an example let me take you through the testing preparatory to permitting a Racal Airstream helmet to be used in an underground coal mine. First, NIOSH tests and approves the helmet as a respiratory device. Second, MSHA examines the helmet for intrinsic safety as it applies to use in gassy coal mines (not the same as the NIOSH/MSHA approval for respiratory protection). An independent testing laboratory then tests the helmet for head protection (ANSI 89.1 & 89.2) and face protection ANSI 87.1). A similar sequence of testing and certification goes on for using Racal Airstream helmets in grain elevators (NIOSH-respiratory protection; Independent Laboratories-head protection, face protection, and intrinsic safety).

Because of a move in technology to combination devices it is necessary that NIOSH consider programs to certify Multi-purpose Combination Protection Devices. In fact, NIOSH should consider the need to certify standard hard hats and standard faceshields. Head and eye injuries still persist in industry and can be as deleterious to health and welfare as respiratory injury. If certification of respiratory protective equipment in non-IDLH situation is considered important by NIOSH then it is also important to other personal protective equipment. This suggests a very close linkage between NIOSH requirements and requirements of other applicable standards organizations such as ANSI.

When these criteria are being developed, let's not overlook the impact these standards will have on overseas standards for technical and leadership reasons. Wherever possible, attempts should be made to be compatible with these overseas standards and requirements.