

**Dragon, Karen E. (CDC/NIOSH/EID)**

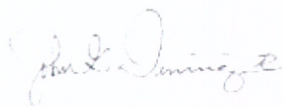
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**From:** Dinning, John [jdinning@tycoint.com]  
**Sent:** Thursday, March 31, 2011 3:43 PM  
**To:** NIOSH Docket Office (CDC)  
**Subject:** NIOSH Docket 221 Comments  
**Attachments:** Scott Safety's Reply to NIOSH Docket 221 3-31-11.pdf

Good afternoon,

Please find the comments from Scott Safety regarding the NIOSH Docket 221.

Sincerely,



John G. Dinning IV  
North American Product Line Manager, Fire Service





A Tyco International Company

March 31, 2011

National Institute for Occupational Safety and Health (NIOSH)  
Docket Office, Mail Stop C-34  
Robert A. Taft Laboratories  
4676 Columbia Parkway  
Cincinnati, OH 45226

Scott Safety would like to submit its comments regarding NIOSH Docket Number 221. The docket states, "NIOSH has initiated a program to update portions of Title 42 Code of Federal Regulations Part 84 (42 CFR Part 84) to promote improved performance and reliability of the various types of respiratory protective devices." Scott Safety fully supports the intent of the docket to improve performance and reliability of respiratory protective devices.

It is Scott Safety's belief the only way to continue to guarantee the same level of respirator performance and reliability is to continue to approve the complete respirator ensemble rather than approving individual components. There are three factors behind our stance: quality, dimensional tolerances and rigorous internal testing prior to applying for respirator approvals. If any one of the key components is removed from the quality assurance plan, falls out of the tolerances or fails due to lack of testing, the performance and reliability of the ensemble would be in jeopardy.

*Quality* - Each respirator manufacturer follows a strict quality assurance program for the complete respirator to ensure the user has a reliable life-saving device. Using the pressure vessel (cylinder) as an example, at Scott Safety, each cylinder is inspected upon receipt to ensure that it meets our detailed specifications. If the cylinder does not meet our specifications, it is rejected. It is not uncommon that Scott Safety rejects a portion of the cylinders received due to non-conformance. This quality assurance will be lost if cylinders are approved outside of the respiratory system. End-users of the respiratory device are not equipped to perform proper inspection processes and unbeknownst to them, could possibly use a product that would not have been accepted by the respirator manufacturer.

*Dimensional Tolerances* - Each respirator manufacturer has developed strict dimensional tolerances for components to ensure the complete respirator functions properly. If the component falls outside of the specified tolerances, it will have an adverse affect on the fit, form and function of the respirator. This can result in a respirator not performing as expected and possibly causing the wearer to be subjected to the contaminants in the ambient atmosphere, or in the case of a supplied-air respirator, vital air being lost through a leak point in the pneumatic assembly.

*Testing* - Each component, along with the entire respirator ensemble, is subjected to rigorous internal testing prior to be submitted to NIOSH for approvals. As a leading manufacturer of respiratory devices, Scott Safety conducts testing that far exceeds the minimum requirements listed in the standards. It is not uncommon for development of robust testing procedures and testing to cost in excess of \$500,000 prior to submittal. This is done to not only ensure the respirators will meet the demands of our customers but more importantly to provide manufacturers with a comprehensive and repeatable testing process ensuring protection for respirator wearers in atmospheres where there simply cannot be component compromise. A respirator is only as good as its weakest component. If the respirator manufacturer loses the ability to test the complete ensemble, the performance and reliability of the complete respirator will be lost.

Scott Safety's mission is to provide respiratory equipment that users can trust. It is our fear that the acceptance of any third-party approved components and removing manufacturer final assembly testing and quality control approval will jeopardize the performance and reliability of the respirator and place the user in harm's way. The only way to minimize the risks to users and ensure a high level of performance and reliability is to continue with the current standards approval process.