

B46-487



CHEMICAL MANUFACTURERS ASSOCIATION

SANDRA L. TIREY  
ASSISTANT VICE PRESIDENT  
REGULATORY AFFAIRS

October 25, 1996

Ms. Diane Manning  
Docket Office Manager  
Robert A. Taft Laboratories  
National Institute of Occupational Safety and Health  
M/S C-34  
4676 Columbia Parkway  
Cincinnati, OH 45226

**RE: *Revision of NIOSH Procedures for Certifying Respiratory Devices Used to Protect Workers in Hazardous Environments***

Dear Ms. Manning:

The Chemical Manufacturers Association (CMA) is pleased to submit the following comments to the National Institute for Occupational Safety and Health (NIOSH) on its revisions to procedures for certifying respiratory devices used to protect workers in hazardous environments (61 Fed. Reg. 24740; May 16, 1996). CMA is a nonprofit trade association whose member companies represent more than 90 percent of the productive capacity for basic industrial chemicals in United States. CMA member companies represent a significant class of "users" of the respirators affected by NIOSH's proposed revisions.

CMA believes that the majority of NIOSH's certification procedures are adequate and we do not see a need to change most of the basic certification tests. For example, the current test methods for gas and vapor removing cartridges are capacity tests. CMA believes that the existing cartridges have sufficient capacity for their intended use. Therefore, CMA believes there is no need to change the testing of gas and vapor cartridges at this time. Likewise, supplied air respirators (i.e. airline) do not appear to have any deficiencies in performance. Construction materials and air flows also appear adequate for intended uses.

However, CMA supports efforts to update the testing of powered air purifying respirators (PAPRs) and self-contained breathing apparatus' (SCBAs). As NIOSH has noted, new filter tests should be incorporated into the PAPR certification testing. With regard to SCBAs, NIOSH should review other test methods that have already been developed such as the NFPA performance test methods before attempting to develop its own. NFPA has a series of performance tests for SCBAs for use in the fire service. The NFPA tests for air flow appear to provide greater assurance that the SCBA will perform as expected.

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Ms. Diane Manning .

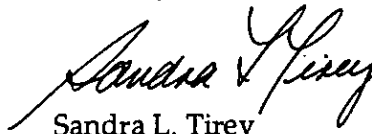
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Finally, CMA believes that NIOSH should be ISO 9000 certified before undertaking private sector testing. ISO certification would provide NIOSH with greater credibility and provide assurances to respirator users that: (1) test procedures are properly documented, (2) that persons who perform the test are trained, and (3) that test equipment is operating properly. These steps should be taken by NIOSH before the Agency contracts with private sector laboratories to conduct testing.

CMA supports NIOSH's efforts to improve its certification procedures. If you have any question concerning CMA's comments, please contact Kari P. Barrett of my staff at #703/741-5219.

Sincerely,



Sandra L. Tirey  
Assistant Vice-President  
Regulatory Affairs

cc: Kari P. Barrett