

**Miller, Diane M. (CDC/NIOSH/EID)**

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**Sent:** Thursday, October 15, 2009 5:28 PM  
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**Subject:** SRS COMMENTS ON NIOSH DOCKET 083B, "SUPPLIED AIR RESPIRATOR AIR  
SOURCE SYSTEMS"  
**Attachments:** SRNS Comments on NIOSH Docket 083B .pdf

The attached document includes Savannah River Nuclear Solutions (SRNS) comments regarding NIOSH docket 083B, "Supplied Air Respirator Air Source Systems".

Sincerely  
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October 15, 2009

SRNS-J6000-2009-00051

NIOSH Docket Office  
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Reference: Docket 083B – Supplied Air Respirators (SAR)  
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**COMMENTS ON THE NIOSH SUPPLIED AIR RESPIRATOR AIR SOURCE SYSTEMS PROPOSAL**

Following are comments regarding Docket 083B, the National Institute for Occupational Safety and Health (NIOSH) proposal dealing with Supplied Air Respirator Air Source Systems discussed at the Public Meeting on 9/17/2009. We support NIOSH's efforts and hope the comments prove useful. Should the NIOSH staff have any questions or would like to discuss the comments further, please contact me at (803) 952-6521 or via e-mail, [heather.farrer@srs.gov](mailto:heather.farrer@srs.gov).

Comments

NIOSH is requesting comments on the proposal to specify air source systems to ensure a safe and adequate supply of breathing air is supplied. While it is difficult to argue with the goal, it appears driven by respirator manufacturers and distributors who mislead respirator users by implying that the compressors (or equal) they are supplying are NIOSH certified. Considering the combinations of air source systems that can be configured, this effort could result in unnecessarily constraining equipment suppliers and even end users from developing safe and cost effective approaches. The existing 1910.134 regulation within OSHA requires that satisfactory air quality be provided, and if followed, this will be sufficient to protect respirator users. Rather than attempting to regulate air source systems, it is recommended that NIOSH 1) approach the distributors, and more importantly respirator manufacturers, and insist that misleading information be corrected and 2) update as warranted and publicize the section titled Breathing Air Systems for use with Pressure-Demand Supplied Air Respirators in Asbestos Abatement in the document NIOSH Guide to Industrial Respiratory Protection September, 1987, DHHS (NIOSH) Publication No. 87-116. Document 87-116 provides much of the basic information an end-user needs to develop or select a safe air source system.

Sincerely,

Heather Farrer, Respiratory Protection Program Administrator  
Environmental, Safety and Health/Radiological Protection Department

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