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Sent: Thursday, January 15, 2009 3:33 PM
To: NIOSH Docket Office (CDC)
Cc: Vojtko, Richard J. (CDC/NIOSH/NPPTL); Szalajda, Jonathan V. (CDC/NIOSH/NPPTL)
Subject: Docket 008A- Powered Air Purifying Respirators
Importance: High
Attachments: Comments for NIOSH Docket 008A 1 14 09.pdf

Attached please find comments from North Safety Products regarding the NIOSH proposed concept: PAPR Standard Subpart P 12/21/2007 and from the NIOSH public meeting PAPR section from the meeting on 12/2/08 at the Hyatt Regency in Pittsburgh, PA regarding standards development.

Thank you for this opportunity to comment on this proposal.

Regards,

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Comments for NIOSH Docket 008A – Powered Air Purifying Respirators

Definitions:

2.3.2 Helmet: a loose fitting non flexible respiratory inlet covering that is designed to offer impact and penetration protection of the head as described herein. This description conflict with 4.1.6.5 which states that helmets not designed to provide head protection shall be labeled to indicate that they do not impact and penetration protection.

2.4 Canister PAPR and 2.5 Chemical Cartridge PAPR should both be able to be of intrinsically safe design and be designed to operate in the silent mode.

2.8 Do you plan on offering Breath Response for both Breath Assisted and Positive Pressure Monitoring Models?

4.1.2.2 Define low pressure in the breathing zone. Do you mean negative pressure?

4.1.6.5 Clarify if helmets must provide impact and penetration protection or not?

4.1.7.4 North Safety Products does not think that impact and penetration of the lens should be a requirement.

4.1.9.3 Recommend: " Low pressure indicator shall be configured so that it may not be disabled when the blower is operating?" Wouldn't this low pressure indicator be turned off when in the silent mode?

4.1.10.3 Define **condition** of the battery.

4.1.10.4 Recommend: "The low power indicator shall not be configured to be switched off when blower is in operational mode."

4.1.11.4 Will this requirement be for both breath assisted and positive pressure monitoring models?

4.1.12.1 ESLI for organic vapors and acid gases should remain as an option, should not be a requirement.

4.2.4.1.1 Will breath assisted need to remain above ambient pressure throughout test? What will be the test criteria for breath assist?

4.2.7 Chemical cartridge testing:
North Safety Products strongly recommends that NIOSH keep the current allowance for multiple gas type approvals where the minimum required test times are halved. To discontinue this practice would add additional weight to the cartridges which would increase worker discomfort. This would also add cost to the end item which would be passed onto the end user.

4.2.7.1.1 Entire statement is very confusing. Is statement just for dual cartridge PAPRs? This statement conflicts with 4.2.7.3.

4.2.7.3 Table 2 would have to be changed to include breath assist.

4.2.7.4 Carbon Monoxide testing needs definition if it is a design requirement.

4.2.8.6.6 Efficiency requirements at end of test need to be added and recommend that filter efficiency is either increasing or remaining the same for 5 consecutive readings.

4.2.10.1 LRPL test needs to be defined in more detail for both types of PAPRs, breath assist and positive pressure monitoring models.

4.2.10.2 Practical performance test tasks need to be clearly defined and consistent for all applications.

6.1 Flammability and Heat Resistance need criteria.

6.2 Silent Operation: Is this an option for all tight fitting types of PAPRs or just tight fitting CBRN PAPRs?

6.2.3 Exhalation missing from resistance description.

6.3 Hydration device needs criteria.

6.5 Intrinsic Safety: Can the testing for intrinsically safe certification be performed in parallel to the NIOSH PAPR testing? This would greatly assist manufacturers to offer better PAPR products to end users in the quickest time frame.