

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

From: Cristine Fargo [cfargo@safetysafetyequipment.org]
Sent: Monday, October 19, 2009 3:06 PM
To: NIOSH Docket Office (CDC)
Subject: NIOSH Docket: 083B - Supplied Air Respirators
Attachments: ISEA-SAR Comments to Docket 2009-October 19.pdf

To NIOSH Docket Officer:

Attached please written comments on behalf of the International Safety Equipment Association (ISEA) on the subject concept paper, dated August 10, 2009.

Please don't hesitate to contact me if you have any questions.

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Via email: nioshdocket@cdc.gov

October 19, 2009

NIOSH Docket Office
Robert A. Taft Laboratories – M/S C34
4676 Columbia Parkway
Cincinnati, OH 45226

RE: Supplied Air Respirators (SAR) – NIOSH Docket #083B; Concept paper dated August 10, 2009

The International Safety Equipment Association (ISEA) is the leading trade association representing manufacturers of respiratory protective devices certified by NIOSH. ISEA applauds NIOSH's efforts to prepare regulations that reflect contemporary product offerings and submits the following comments on the August 10, 2009 concept paper:

Section 4.1.4.6 indicates that helmets either meet requirements of ANSI Z89.1-2003 or be marked to indicate that the device does not meet the impact and penetration criteria of this standard. The ANSI Z89.1 standard imposes unique markings for compliant product and such compliance is based on the performance criteria of the standard in total, as opposed to being able to meet only certain criteria. ISEA believes that it is unnecessary to require a non-compliant device to be labeled. The absence of the required ANSI Z89.1 markings and labeling is indicative that the device is not compliant. Also, this standard has been recently updated and is designated ANSI/ISEA Z89.1-2009.

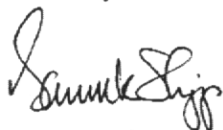
Similarly, Section 4.1.5.2 indicates that all lenses shall be designed and constructed to meet the impact and penetration requirements of ANSI Z87.1-2003 or be marked that they are not impact resistant. The ANSI Z87.1 standard imposes markings for products that meet baseline criteria, including basic impact penetration and penetration. The standard also allows for a designation for a device that maintains a higher level of impact protection, as noted by a "+" on the lens. The absence of the required ANSI Z87.1 markings and labeling are indicative that the device is not compliant. Therefore, ISEA believes that it is unnecessary for a non-compliant product to be labeled.

With respect to Section 4.4.3.8, ISEA members ask NIOSH to clarify or provide specific examples of quick disconnects that are designed in a manner such that improper fitting is "readily obvious." As currently written, this language is vague and may be subjectively applied depending on the person conducting the evaluation of the design.

ISEA encourages NIOSH to publish the standard test protocol for live agent testing to allow manufacturers an opportunity to review the methodology prior to its implementation, as applied in Section 6.4.

Thank you for your consideration of ISEA's input. We look forward to NIOSH's continued progress on this important regulatory effort.

Sincerely,



Daniel K. Shipp
President