

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

From: Cristine Fargo [cfargo@safetysafetyequipment.org]
Sent: Thursday, November 19, 2009 2:08 PM
To: NIOSH Docket Office (CDC)
Subject: Docket 148A - Air-Fed Ensembles
Attachments: ISEA-AFE Comments - 2009-1119.pdf

To Docket Officer:

Attached please find comments on NIOSH's concept paper for air-fed ensembles (Docket 148A).

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Via email: nioshdocket@cdc.gov

November 19, 2009

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

RE: Air-fed Ensembles (AFE) Standard – NIOSH Docket #148A; proposed concept paper dated August 25, 2009

The International Safety Equipment Association (ISEA) is the leading trade association representing manufacturers of respiratory protective devices certified by NIOSH and of protective apparel, including chemical protective clothing. ISEA applauds NIOSH's efforts to prepare regulations that reflect contemporary product offerings and submits the following comments on the August 25, 2009 concept paper:

General

NIOSH should consider changing the description of the products covered by the standard to more accurately reflect the terminology used in the industry and the marketplace. ISEA suggests that the terms "supplied air suit" and "powered air-purifying suit" are appropriate, well-understood and have been recognized for over thirty years.

Section 2.4, Air-fed ensembles; non-respiratory performance requirements

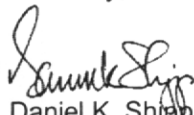
NIOSH indicates that seam penetration, seam permeation resistance and seam strength and permeation resistance shall be determined for materials used in the construction of the ensemble. NIOSH must specify the exact method by which these characteristics are evaluated in order to ensure that all materials are subject to the same criteria.

NIOSH must also be clear as to the circumstances whereby it would seek to conduct testing to confirm submitted test results. To allow NIOSH to do so at its discretion without a clear understanding of its reasoning is subjective and lacks transparency. Furthermore, NIOSH must establish an arbitration mechanism whereby differing results between NIOSH tests and applicant submitted tests can be addressed.

The proposed concept indicates that all visors (lenses) shall 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 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 is indicative that the device is not compliant. Therefore, ISEA believes that it is unnecessary for a non-compliant product to be labeled.

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