

NIOSH Docket Office, Reference: NIOSH DOCKET -002  
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Ocenco Incorporated offers the following response to the June 30<sup>th</sup> CBRN Escape Respirator concept paper proposal to limit respirator service life to five years:

- Service life is directly related to the quality and reliability of the respirator. Limiting the service life to five years will force a reduction in the quality and reliability of respirators with longer service lives as manufactures cut costs in an effort to compete with low end, marginal devices.
- A five year service life limit will drive up the cost of ownership, reducing the incentive for employers to purchase CBRN respirators. New respirators must be purchased every five years and old respirators will need to be disposed of or refurbished. Many of these respirators contain hazardous materials that must be shipped and disposed of in accordance with Federal regulations. We know from experience that customers recognize these costs and greatly prefer the advantages offered by longer service life devices.
- Eight, 10 and 15 year service lives have been approved for SCSRs used in mining, military, and industrial applications. These environments contain levels of shock, vibration, moisture, and temperature extremes equal to or greater than those seen in the general working environment for which the CBRN respirators are intended. The latest NIOSH Long Term Field Evaluation report confirms that the majority of SCSRs that pass their inspection criteria can be relied upon to provide a safe level of support capability for mine escape.
- No data has been presented that supports the five year service life limit. It is possible that five years is too long for some respirators, too short for others. Service life is a function of the design of the respirator and the conditions of use, and each respirator must be individually evaluated as such. We respectfully ask that NIOSH forward any data that supports the five year limit.

Ocenco recommends that NIOSH apply the current SCSR service life policy to the new CBRN respirators. Each manufacture should be required to: 1) develop a Service Life Plan wherein the service life of the device is dependent upon the conditions of use, 2) support their SLP with verifiable data, and 3) clearly defined the conditions of use in the user instruction manual. Validation of the service life will be established through periodic auditing and testing of deployed devices.

I look forward to your comments or questions.

Sincerely,

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