

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

From: Keith Burns [kburns@safetytechint.com]
Sent: Thursday, January 15, 2009 4:28 PM
To: NIOSH Docket Office (CDC)
Cc: Vic Desantis
Subject: STI Comments to NIOSH Docket 148
Attachments: STI AirFedSuit Docket Comments-15Jan09.doc

Docket Officer,

Attached please find SafetyTech International's comments regarding NIOSH Docket 148.

Keith D. Burns
SafetyTech International, Inc.
5703 Industry Lane
Frederick, MD 21704
Ph: 301-624-5600
888-744-6462
Fx: 301-624-5688
kburns@safetytechint.com

*SafetyTech*TM

International, Inc.

A Subsidiary of TVI Corporation

5703 Industry Lane | Frederick, MD 21704

15 January 2009

NIOSH Docket Office
NIOSH Mailstop: C-34
Robert A. Taft Lab.
4676 Columbia Parkway
Cincinnati, OH 45226

Submitted via email to: nioshdocket@cdc.gov

Reference: Development Plan for Air-Fed Suit Respirator Performance Requirements,
NIOSH Docket 148

Dear Docket Officer:

SafetyTech International, Inc. (STI), a manufacturer of powered and non-powered air purify respirators, offers the following comments for consideration regarding the above referenced NIOSH docket item.

ASTM Committee F23 has been working on a draft standard for an Air-Fed Protective Ensemble since January 2007. The ASTM document is in its fourth draft. Since NIOSH has been collaborating with ASTM on that effort, STI encourages NIOSH to take advantage of the work that has already been accomplished to support development of the NIOSH standard.

The ASTM draft defines the air-fed protective ensemble as a protective ensemble with respiratory protective equipment (supplied air respirator or PAPR) that provides a source of air directly into the ensemble without the use of a tight-fitting facepiece being worn by the user. NIOSH has identified their goal to develop a respirator certification standard for air-fed suits where the suit acts as the respirator. STI's interpretation of this goal, in conjunction with the ASTM draft specification, is that the suit component of a protective ensemble will serve as a component of the respirator in the absence of a traditional respirator tight-fitting or loose-fitting facepiece. In a sense, the suit component acts as the respirator facepiece. STI encourages NIOSH and ASTM to continue to closely coordinate their efforts so as not to generate conflicting or ambiguous requirements and to ensure all specifications are accurately and consistently defined. Currently, there is already a difference in nomenclature. NIOSH uses "Air-Fed Suit Respirator" while ASTM uses "Air-Fed Protective Ensemble". We hope that nomenclature and terminology will be standardized or better defined to reduce any confusion since a dual certification process is implied by the draft materials currently available for review.

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On 7 May 2008, NIOSH conducted a respirator/ensemble systems integration meeting to discuss concerns (originating from a specific ensemble/respiratory combination) regarding the use of negative pressure APRs with protective ensemble that may compromise the respiratory protection due to interference with the fit of the respirator. In this meeting NIOSH indicated that any ensemble design that directly integrates with a NIOSH approved respirator or potentially interferes with fit of the respirator must be evaluated for potential impact on 42 CFR Part 84 and other established NIOSH requirements. STI hopes that these concerns will be separately addressed from the air-fed suit respirator as they are clearly two different configuration issues. STI encourages NIOSH to remain in harmony with ASTM on the development of the Air-Fed Suit standard and to avoid creating a standard that could be misinterpreted as to applying to a larger scope than intended.

STI would favor a NIOSH decision to create a new subpart to 42 CFR Part 84 to address air fed suit respirators rather than incorporating such requirements into existing subparts by respirator type. This will provide some separation between the air-fed suit respirator requirements and the traditional respirator requirements which should result in fewer constraints during the development of the new requirements as well as yield a more user friendly requirement document for industry. Suggest incorporating a new TC number category to represent air-fed suit respirators. New cautions and limitations will also be required.

SafetyTech International appreciates the opportunity to contribute to the standards development process. If there are any questions or concerns regarding this submission, please feel free to contact me.

Sincerely,
Keith D. Burns
Engineer