

84b-450

Public Comments on NIOSH Respirator Certification

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MSA

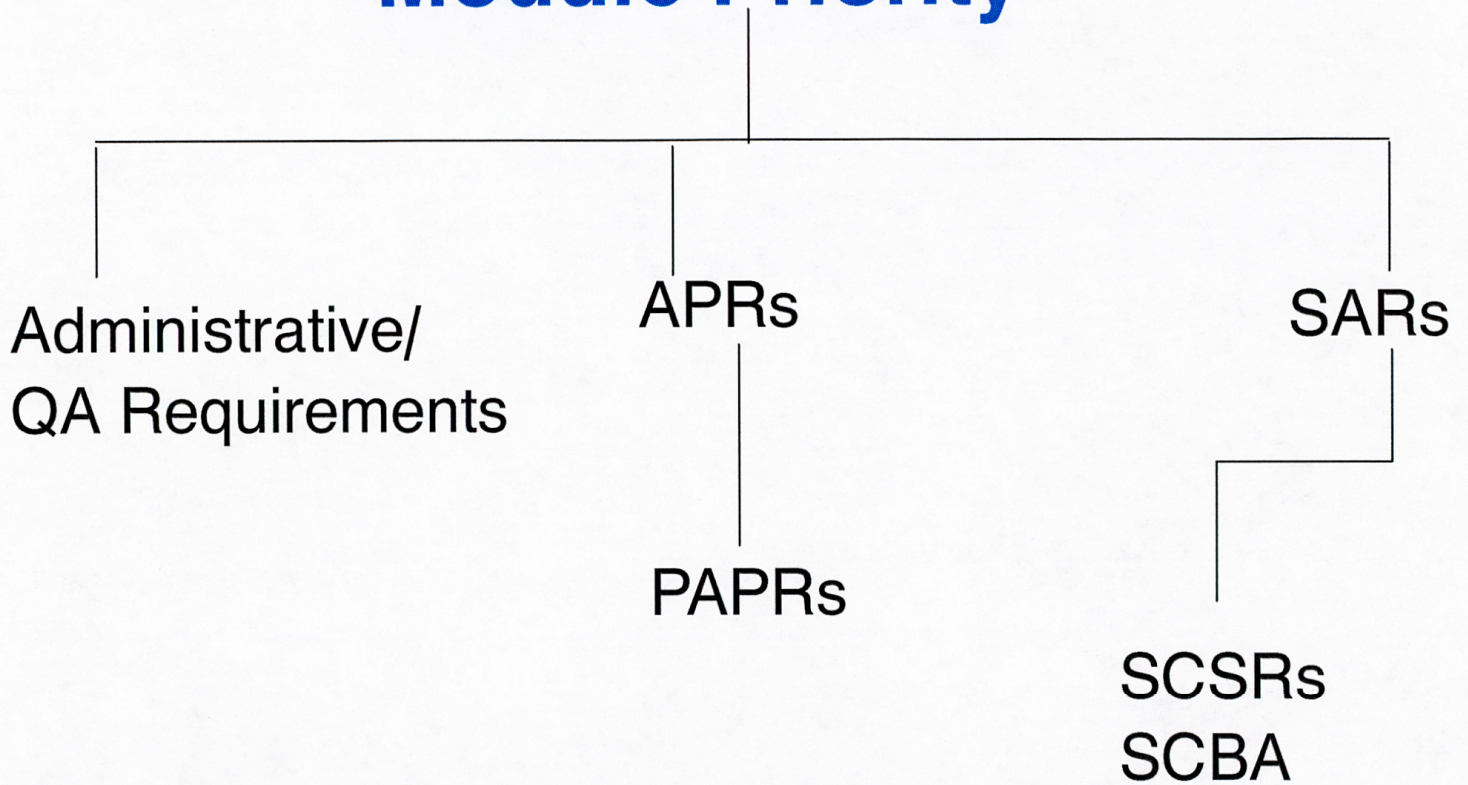
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42 CFR 84

MSA:

- Supports NIOSH Modular Approach
- Appreciate NIOSH's Openness to Improving Administrative Procedures

Module Priority



Other Modules Prioritized Once Above Are Complete

Administrative/QA Module

- Private Sector Labs Capable
- Experience with SEI/NFPA Proves Labs' Capability
- NIOSH Audits of Private Labs Necessary
 - NIOSH Testing Procedures Must Be Thoroughly Developed
- Manufacturers Who Are ISO 9001 Registered Should Have Reduced Depth & Frequency of Audits

Private Sector Labs

- NIOSH Maintains Authority To Release Product For Testing
 - Lab of Manufacturer's Choosing
- NIOSH Approves Technical Data Package Pending Test Results

Quality Assurance

- ISO 9001 Audits Can Be Used Instead of NIOSH Audits
- Also, Where Products Are Tested After NIOSH Approval (E.g., NFPA) Annual NIOSH Post Production Audits Can Be Reduced
- Example:
NFPA Test Results Can Be Sent To NIOSH To Show Compliance

PAPR Module

- Current Regulations Require Heavy Burdensome Products To Comply
 - Many Applications Do Not Require Long Service Life
 - Battery and Filter Size Could Be Reduced
 - Respirator Acceptance Would Increase
- Current Regulations Are Design Restrictive
 - Breath-Responsive PAPRs Technologically Feasible; Designed For Positive Pressure

PAPR Module

- Flow Rate Measurement
 - Possible To Pass NIOSH Tests But Be Negative Pressure In Use
 - Different Classes, And Perhaps Later Different APFs Should Be Established
- If We Address These Issues Now. . .
 - Increase Worker Protection
 - Use of Higher APF Products
 - Known Performance

Self Contained Self Rescuers

- Underground Mining Industry Relies Heavily on These Respirators
- Current Tests Are "Man-Tests"
 - Subjective For Duration Measurement
 - Test Subjects Vary From Test to Test
 - Statistically Invalid
- Metabolic Simulator Protocol Needed
- Optimization of Design Cannot Be Achieved Without It
 - Standard Now Forces Heavy Unit Designs

SCBA Module

- Recommend Incorporation of NFPA Standard's Requirements Into NIOSH

Time To Market Is Key

- MSA Wants Quality Products In the Market in A Timely Fashion
- Manufacturers Will Pay Extra For Speed In Approval

