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

From: Demedeiros, Edna [Edna.DeMedeiros@Honeywell.com]
Sent: Tuesday, December 15, 2009 10:55 AM
To: NIOSH Docket Office (CDC)
Cc: Josloff, Rick; Debellis, Marianne; Feiner, Lynn
Subject: Honeywell Safety Products' comments Regarding Proposed TIL Rule RIN0920-AA33
Importance: High
Attachments: Honeywell's comments regarding NIOSH TIL proposal 12 15 09.pdf

Dear Docket Officer,
Attached please find Honeywell's Safety Products' comments regarding RIN0920-AA33 concerning the proposed TIL rule for half mask respirators.

Thank you,

Edna deMedeiros, CIH
Manager of Filtration Research

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To NIOSH Docket RIN0920-AA33
Honeywell's Comments Regarding NIOSH Proposed Rule Modifying Part 84
Subpart K Total Inward Leakage (TIL)

December 15, 2009

- Honeywell requests that the comment period be extended for an additional 4 months minimum.
- Do all test subjects need to meet both the bivariate test panel (2 dimensions) and the PCA panel (10 dimensions)?
- If the Bivariate panel represents approximately 98% of US respiratory wearers and requires only 2 measurements why must the test subjects also meet the PCA panel which represents 95.2% of the male and 97.6% of the female workforce and requires 10 measurements? (according to Draft APR-STP-0068) This is much more costly and time consuming for both manufacturers and end users.
- Minimum test time for 35 subjects if they all pass test on first try is 4.5 hours. This test time could increase to 14 hours per respirator if each sample passed on 3rd try. Extremely costly and time consuming for manufacturers and end users.
- Need to define TIL test as sequence of 7 exercises.
- Need to state that a passing test is an average of the 7 exercises called out in 5.8 of test procedure 0068.
- Grimace test should be excluded from Fit Test Procedure.
- Grimace test should also be removed from Appendix C on pg. 13.
- Numbering in test procedure after 5.8 is incorrect.
- Section 5.9 in test procedure discussing testing is very confusing and needs clarification.
- Where did particle concentration of 1500-3000 particles/cc come from? I spoke to John Morton of TSI and he did not know where the upper limit came from.
- Test equipment references such as the TSI PortaCount Pro+ should include or equivalent.
- Can we view the original test data and procedure which generated these new proposed requirements?
- Testing should be conducted in a chamber with size and test concentration specified and verified by TSI/NIOSH
- There is a difference between TIL and Fit Testing which is confusing in the proposed rule since N95 filters allow particle penetration.