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Sent: Tuesday, November 04, 2003 11:29 AM
To: NIOSH Docket Office
Subject: Some questions on proposed CBRN PAPR regulation

Section 3.7

Based on the statement "where its design requires" in the Introduction to the Section, is the requirement in 3.7.5.1 (b) mandatory, i.e., if the PAPR is designed to be powered by disposable (non-rechargeable) batteries, is a charge indicator required? In this case, if the battery voltage is reduced in use, the required flow meter alarm would provide the appropriate warning.

Section 3.9

Research demonstrates that flow rates higher than the proposed 115lpm might be required to maintain positive pressure in the mask for some first responder missions, such as search and rescue. Yet other missions, e.g., medical personnel in a hospital type setting, may be handled well by the proposed flow rates. Would NIOSH consider having two standards, one with flow requirements as proposed that could be issued as scheduled, and a second "high performance" standard, perhaps based on the NFPA/NIOSH CBRN flow requirements, that might be issued at a later date, to allow time for further development by manufacturers?

Section 4.2

1. Is it permissible to specify different service lives for various chemicals? Canisters could be labelled similar to the EN standard, e.g., "P240/CK60/CH240/F120/HCN180/HS60/NO15/CG60/PH180/SO60;" or if only certain chemical durations were lower than others, those chemicals could be designated separately, e.g., "CBRN120; exceptions: NO15; CK60."
2. Is it permissible to submit a PAPR canister for fewer threats and still receive CBRN certification? E.g., it could be desirable to allow users responding to a biological attack to use a P-100 filter only, or those recovering bodies to use a P-100/CH filter, rather than the more expensive multithreat canister, with the same PAPR. This could allow significant cost savings in the case of a long mission and would assure better protection than use of a non-CBRN NIOSH approved industrial respirator.