

Dragon, Karen E. (CDC/NIOSH/EID)

From: Mike Kay [mikekay@ocenco.com]
Sent: Tuesday, May 01, 2007 5:00 PM
To: NIOSH Docket Office (CDC)
Subject: Long-Term Field Evaluation (LTFE) NIOSH Docket Number (NIOSH - 101)

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

Re: LTFE Program Concept, Docket No. NIOSH-101

To whom it may concern,

Ocenco welcomes the opportunity to provide comment on the proposed changes to the NIOSH Long Term Field Evaluation Program.

1) The Code of Federal Regulations limits the level of inhaled carbon dioxide for a sixty-minute SCSR at 2.0%, and defines oxygen-deficient atmospheres as less than 19.5%. It is known that increasing levels of inhaled carbon dioxide will diminish a person's decision-making skills and increase anxiety level. There is no benefit to the agency taking the risk of allowing inhaled gas concentrations of 4% carbon dioxide and 15% oxygen over the duration of the device. To the contrary, no data has been presented that demonstrates that these concentrations are safe and will not impair a miner's ability to make a successful escape. Allowing an aging mining population to be exposed to these gas concentrations during a mine escape is not in the interest of safety.

2) The ABMS/3 provides repeatable, accurate results; validation testing conducted at NIOSH in December 2006 on breathing simulator CDC97003 found the VO₂ and VCO₂ to be within 0.1% error. NIOSH's statement at the March 23, 2007 LTFE meeting, that low oxygen concentrations were established on the basis of potential inaccuracies in breathing simulator measurements is unfounded. Regardless, measurement inaccuracies are not corrected by reducing the level of inhaled percent oxygen.

Respectfully submitted,

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