TESTIMONY PREPARED FOR THE NIOSH PANEL REGARDING 42 CFR PART 84, RESPIRATORY PROTECTION MODULES

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MODULE PRIORITY RANKING

- WRITTEN EVALUATION TO BE SUBMITTED BY MID-AUGUST WILL HAVE RECOMMENDATIONS FORMULATED VIA A DECISION MATRIX
INTERNATIONAL STANDARDS

- THERE ARE SEVERAL PERTINENT EUROPEAN STANDARDS PROVIDING EXCELLENT GUIDANCE

- EXAMPLES INCLUDE: EN 140; EN 147 and EN 403
QUALITY CONTROL

- RANDOM SELECTION AT THE DISTRIBUTION OR MANUFACTURING SITE BY AN AUDITOR MUST BE THE METHOD OF OBTAINING RESPIRATORS FOR NIOSH LAB TESTING

- GOV'T MUST QUICKLY REIMBURSE VENDOR

- MANUFACTURERS MUST NOT BE ALLOWED TO SELECT THE CERTIFYING LABORATORY FOR PRODUCT CERTIFICATION. IN FACT, THERE MUST BE INTRA AND INTER LABORATORY CHECKS AND BALANCES. ADDITIONALLY, THERE MUST BE BLIND, AND IF POSSIBLE, DOUBLE BLIND CONTROLS
RESPIRATORY PROTECTIVE ESCAPE DEVICE

(RPED)
THREE PRODUCT ABSORPTION/FILTERING

EFFICIENCY LEVELS

- NONE or VIRTUALLY NONE

- TOXICS, EXCEPT CARBON MONOXIDE

- TOXICS AND CARBON MONOXIDE
RPED MARKETING

- ONLY THE TOXIC & CARBON MONOXIDE (COMBINATION) VERSIONS BE LEGAL FOR CONSUMER PURCHASE

- THE TOXIC ONLY VERSION MAY BE ACCEPTABLE FOR USE BY HIGHLY TRAINED INDIVIDUALS, AND UNDER CERTAIN SPECIFIC CONDITIONS, BUT EVEN THIS MAY CREATE A FALSE SENSE OF SECURITY

- PURCHASE AND USE COMBINATION VERSIONS