Public Comments on NIOSH Respirator Certification

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MSA:
- Supports NIOSH Modular Approach
- Appreciate NIOSH's Openness to Improving Administrative Procedures
Module Priority

- Administrative/QA Requirements
- APRs
  - PAPRs
  - SARs
    - SCSRs
    - SCBA

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