Lessons Being Learned

CBRN Standard for SCBA

December 28, 2001

NIOSH will follow a flexible program for test and evaluation of SCBA for a limited period of 1 year.
Lessons Being Learned

CBRN Standard for SCBA
Lessons Being Learned

CBRN Standard for SCBA

Unable to:
Test against Sarin and Mustard Gas
Reliably predict testing outcome
Sample products to meet requirements
Lessons Being Learned

CBRN Standard for SCBA

Identify & Recognize Surrogate Agents

Priority
Lessons Being Learned
CBRN Standard for SCBA

Identify & Recognize Surrogate Agents

Continue flexible SCBA CBRN approval process.

Follow a similar path for the CBRN full facepiece air purifying respirator standard.
Lessons Being Learned

Publicly Validate Protocol

- Results and test repeatability must be trusted
- CBRN SCBA protocol was inadequately validated
- Thoroughly validate the process and publish the results
Lessons Being Learned

Opportunity to Comment

- Most likely use scenario and rationale behind conditions
- Avoid unacceptable market conditions
Proposed CBRN Full-Facepiece APR Standard

Identification and acceptance of surrogate agents

Priority
Proposed CBRN Full-Facepiece APR Standard

* NIOSH should not regulate interchangeability

Section (6)(a)
Interchangeable consumable filter cartridges and canisters
Reflections on September 11th

- Transportation infrastructure in the United States was shut down
- PPE needs filled locally
- Improve availability by creating stockpiles
- 100,000 Respirators & 200,000 Cartridges shipped to WTC in first 48 hours
- Not a supply issue, logistic & training issue
Reflections on September 11th

- Multiple government agencies were taking responsibility
- Rescue workers did not know where to get the products
- Not familiar with product use and maintenance requirements
- Develop an emergency logistics program to address large-scale events
Proposed CBRN Full-Facepiece APR Standard

- **NIOSH should not regulate interchangeability**

  - MSA fully supports the comments by the ISEA
  - Respirator developed as a system
  - Mixing manufacturer components will not provide the desired results
Proposed CBRN Full-Facepiece APR Standard

NIOSH should not regulate interchangeability
Proposed CBRN Full-Facepiece APR Standard

- NIOSH should not regulate interchangeability
- NIOSH should maintain a systems level approval approach focusing on performance, not design
- NIOSH should support the development of emergency logistics programs
Factors accepted - assigned protection
Forces test concentrations beyond
Air Puriﬁng Respirators
Beyond accepted use conditions of
unknown atmospheres
For entrance or use in IDLH or
approve air-puriﬁng respirators
NIOSH should not recommend or

Facepiece APR Standard
Proposed CBRN Full-
Proposed CBRN Full-Facepiece APR Standard

CBRN APR Concerns

APF Based on Test Concentration

Test Agent

(Log Scale)

APF
Proposed CBRN Full-Facepiece APR Standard

- NIOSH should not recommend or approve air-purifying respirators for entrance or use in IDLH or unknown atmospheres

- SCBA with chemically protective clothing are the only responsible recommendation
Proposed CBRN Full-Facepiece APR Standard

- NIOSH should follow a formal rule making process
  - Details of the standard not final
  - New respirator category worthy of a formal rule making process
Proposed CBRN Full-Facepiece APR Standard

- MSA supports the comments provided by the ISEA
- Recommend that NIOSH positions search for acceptable surrogates as their number one priority
- Maintain focus on performance requirements
- Do not approve any APR for entrance or use in IDLH or unknown atmospheres
- Follow formal rule making process
NIOSH
Public Meeting
Proposed CBRN Full-Facepiece APR Standard