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Cc: Krevonick, Patricia L. (CIV)
Subject: Reference Docket Number 008

Attachments: NMCPHC COMMENTS ON Draft PAPR STANDARD.doc



NMCPHC
MENTS ON Draft PA

Reference Docket Number 008

To: NIOSH Docket Officer

PUBLIC COMMENTS for Proposed Concept: Powered Air-Purifying Respirator (PAPR) Standard, Subpart P, December 21, 2007

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My comments are provided in the attached file for your consideration.

Dave

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**COMMENTS ON
PAPR – Docket # 008**

24 January 2008

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Paragraphs 2.12, 3.2, 4.1.7.3.1, 4.2.5.2, 4.2.9.2, 6.2.2, 6.2.3, and Tables 5 and 13 use the term “Silent mode” for wearing tight-fitting PAPRs with the blower turned off. Paragraph 6.2 uses the term “Silent Operation.”

Comment: Paragraph 3.2 of *Statement of Standard for Chemical, Biological, Radiological, and Nuclear (CBRN) Powered Air-Purifying Respirators (PAPR) of 6 October 2006* uses the term “Blower Off Mode” for wearing tight-fitting PAPRs with the blower turned off. For clarity, NIOSH respirator certification standards should use the same terminology to avoid confusion.

Paragraph 3.2.1 states that: “CBRN PAPR is a tight-fitting full facepiece PAPR meeting the additional requirements for CBRN protection.”

Comment: On the NIOSH, NPPTL website (<http://www.cdc.gov/niosh/npptl/stps/pdfs/CET-PAPR-STP-CBRN-0552.pdf>), paragraph 1.2. of the *Standard Testing Procedure (STP) of 17 November 2006 for determining the Laboratory Respirator Protection Level (LRPL) for CBRN Tight-Fitting PAPRs* states:

“This STP is used to test CBRN tight-fitting (facepiece seals and neck seal hoods) PAPR...”

Since there is an STP in place to perform LRPL testing of neck sealing hooded CBRN PAPRs, are these hooded PAPRs covered in the draft PAPR Standard and can they receive NIOSH Tight-Fitting CBRN PAPR approval?

Paragraph 4.1.7.4 states that: “Lenses shall meet the requirements of the impact and penetration sections of ANSI Z87.1-2003 or the lenses shall be prominently and permanently labeled to indicate that they are not impact resistant.”

Comment: Instead of permanently labeling lenses that are not impact resistant, label respirator lenses that meet the ANSI Z87.1-2003 requirements. Justification for this labeling recommendation is because ANSI Z87.1-2003 requires tight-fitting full face respirators, helmets, and loose fitting respirators to meet the high impact level, optical, and markings requirements of this standard. ANSI Z87.1-2003 requires compliant respirators to be marked “Z87+” on the lens and “Z87” on the lens frame. Marking lenses that do not meet ANSI Z87.1-2003 requirements may cause confusion with manufacturer markings indicating that the lenses do meet ANSI Z87.1-2003 requirements.

In "Table 8: Vapor challenge with GB," shouldn't there be a column entitled "*Breathing Machine Airflow Rate (L/min)*" under which the required flow rate of 40 L/min be listed as in Table 3 of the *Statement of Standard for Chemical, Biological, Radiological, and Nuclear (CBRN) Powered Air-Purifying Respirators (PAPR) of 6 October 2006*?

Paragraph 5.2.4 states that: "The applicant shall specify the canister capacity as indicated in Table 9."

Comment: Table 9 is the table for "Canister Test Challenge And Test Breakthrough Concentrations Change." Change "Table 9" to "Table 10," which correctly addresses canister capacity.

In "Paragraph 4.1.14 FMEA," spell out FMEA (Failure Mode and Effects Analysis).

Paragraph 5.2 is entitled "LCBRN Receiver requirements."

Comment: "LCBRN Receiver" is not defined anywhere in the draft standard. If paragraph 5.2 is going to be called "LCBRN Receiver" this term needs to be defined and discussed.