

94-081



June 28, 1994

NIOSH Docket Office,
Robert A. Taft Laboratories,
Mail Stop C34
4676 Columbia Parkway
Cincinnati, OH 45226

Ref: Public comment on the proposed 42 CFR part 84

Dear Sir or Madam:

For the past 18 years Miller-Nelson Research Inc has provided respirator testing for both the end user and well as the manufacturers. This includes both NIOSH certified equipment as well as new respirators for gases and vapors not covered by any of the current regulations in 30 CFR part 11.

One product which is commonly submitted to us for evaluation is the so called fire escape masks. As you are aware, the largest cause of death in fires occurs from the inhalation of smoke and combustion products rather than the accompanying flames. Clearly there is a need for escape devices for the general population from the unexpected fire situation (i.e. MGM Grand, World Trade Center etc.)

Currently there are no provisos in the proposed regulation to cover this most important aspect of personnel safety. Several of the other countries (Japan, Australia to name a few) have such regulations.

In summary, 42 CFR part 84 should contain a section dealing with fire escape masks for the general population. Such a section should set, at a minimum, standards for carbon monoxide, acid gases, organic vapors and particulate matter. The target service life for such a mask should be 10 - 20 min.

Sincerely yours

Gary O. Nelson
President

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