

# PUBLIC SUBMISSION

**As of:** April 14, 2009  
**Tracking No.** 80943f0d  
**Comments Due:** April 10, 2009

**Docket:** [HHS-OS-2009-0002](#)

Quality Assurance Requirement for respirators

**Comment On:** [HHS-OS-2009-0002-0002](#)

Quality Assurance Requirements for Respirators,

**Document:** [HHS-OS-2009-0002-0004](#)

Comment on FR Doc # E9-04621

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## Submitter Information

**Name:** Aaron Tripler

**Organization:** American Industrial Hygiene Association

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## General Comment

American Industrial Hygiene Association Comments Attached

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## Attachments

[HHS-OS-2009-0002-0004.1](#) Comment on FR Doc # E9-04621

**Public Submission: HHS-OS-2009-0002-0004.1****Bookmark:**  [Learn more](#) Public Subr**Docket** [HHS-OS-2009-0002](#)**Docket Title** Quality Assurance Requirement for respirators**Docket Type** Rulemaking**Document** [HHS-OS-2009-0002-0002](#)**Document Title** Quality Assurance Requirements for Respirators,**Public Submission** [HHS-OS-2009-0002-0004.1](#)**Public Submission Title** Comment on FR Doc # E9-04621**Views** **Add Comments****How To Comment****Title** Comment on FR Doc # E9-04621**Subject****Abstract****Document Type** PUBLIC SUBMISSIONS**CFR Citation****Page Count** 0**RIN****FR Volume Number****Federal Register Number****Date Posted** 04/06/2009**Comment Start Date** 03/04/2009**Comments Due** 04/10/2009**Submitter Information****Comment Tracking Number** 80943f0d**First Name** Aaron**Last Name** Tripler**Organization Name** American Industrial Hygiene Association**General Comment****Comment** American Industrial Hygiene Association Comments Attached



April 6, 2009

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

RE: NIOSH Docket RIN 0920-AA10

Docket Officer:

The American Industrial Hygiene Association (AIHA) expresses its appreciation to the Department of Health and Human Services and the National Institute for Occupational Safety and Health (NIOSH) for the opportunity to comment on the notice of proposed rulemaking for Approval Tests and Standards for Closed-Circuit Escape Respirators proposed in the *Federal Register* on December 10, 2008. AIHA appreciates the opportunity to have our comments received and considered.

As the premier association of occupational and environmental health and safety professionals, AIHA members serve on the front line of worker health and safety. AIHA members, as well as employees and employers, rely on federal and state rules and regulations to improve the health and safety of the workplace and protect employees. We applaud the institute for taking this step in proposing this rule.

Comments on this proposed rule were compiled by the AIHA Respiratory Protection Committee whose members provide a forum for exchanging ideas and information on control of exposure to toxic and irritating substances and oxygen-deficient atmospheres through the use of respiratory protection.

AIHA appreciates the opportunity to work with NIOSH to help achieve the mutual goal of protecting American workers and we look forward to further opportunities to work with the institute on this and similar issues and regulatory priorities.

If AIHA can be of any further assistance, please contact me. Thank you.

Sincerely,

Lindsay E. Booher, CIH, CSP  
AIHA President

**AIHA**  
**Respiratory Protection Committee**  
**Comments on**  
**DEPARTMENT OF HEALTH AND HUMAN SERVICES**  
**42 CFR PART 84**  
**Approval Tests and Standards for Closed-Circuit Escape Respirators**  
**Notice of Proposed Rulemaking**

**NIOSH Docket RIN: 0920-AA10**

The Respiratory Protection Committee is supportive of the NIOSH proposed improvements in requirements for closed circuit escape respirators (CCER). The proposal is well written and the proposed requirements are properly supported with appropriate references and test data.

The Respiratory Protection Committee offers the following comments for NIOSH consideration:

1. Metabolic simulator testing has advantages over human testing for the reasons stated. The Respiratory Protection Committee supports retaining some human subject testing to assess the human factors associated with CCER respirators.
2. There is uncertainty concerning the benefit of changing from duration ratings to capacity ratings. The oxygen (O<sub>2</sub>) capacity will help physiologists and other knowledgeable professionals in the selection process. The obvious problem is that the consumers (employers and end users) are not familiar with oxygen consumption. The table of Capacity Versus Work Activity is helpful, but it is doubtful that users (wearers) will relate to running at 3 mph vs. 5 mph. It is suggested that NIOSH add a requirement for a plain-language equivalent label or instruction, expressed in egress TIME rather than liters of oxygen. For example: This Cap X CCER would last about Y minutes on a Z pound worker walking at a normal pace. If that worker runs and/or performs additional strenuous activity, the duration will be reduced to about T minutes. If you are heavier, the service time will be reduced. For a 250 pound worker, the service times for walking might be as little as Q minutes and for running as little as M minutes. Users should be trained to understand the relationship of capacity to work activity. This training should be included in periodic training on CCER use.
3. The Respiratory Protection Committee supports the variety of new environmental conditioning and requirements for sensors (durability, temperature, moisture, etc.). These requirements are particularly beneficial for respirators like CCERs which can not be effectively inspected prior to use. The Respiratory Protection Committee supports the need for these requirements.
4. The Respiratory Protection Committee agrees that service life and storage plans are essential requirements for CCER respirators.
5. The Respiratory Protection Committee agrees with NIOSH that eye protection should be provided with the CCER respirator.

These proposed requirements which have been considered for several years are an improvement over current requirements.