

Dragon, Karen E. (CDC/NIOSH/EID)

From: Robert.Sell@Draeger.com
Sent: Friday, March 23, 2007 3:40 PM
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Subject: Concept Standard for CBRN SAR - NIOSH Docket Number (NIOSH - 083)
Attachments: CBRN SAR Comments - NIOSH Docket No 083-March 2007.doc

Dear Sir / Madam:

Attached please find comments from Draeger Safety concerning the above mentioned NIOSH Docket #083. If there should be any questions, please do not hesitate to contact me.

Regards

Bob Sell

Sr. Project Engineer - Protection

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March 23, 2007

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Reference: DOCKET NUMBER NIOSH - 083
CBRN SAR Concept Paper - October 2006

Dear Sir / Madam:

Draeger Safety manufactures respirators for various markets and applications therefore we offer the following comments in response to the NIOSH Concept Standard for Chemical, Biological, Radiological, and Nuclear (CBRN) Type C and Type CE Positive Pressure, Pressure Demand full Facepiece Supplied Air Respirator (SAR) posted October 6, 2006.

The following Draeger Safety comments are being submitted for consideration and we will comment step-by-step through the draft protocol:

Title:

- In the title of the standard, "...Type C and Type CE..." seems to imply that this respirator is to include head and neck protection as a mandatory requirement. We feel that this should be an optional item and the wording may be better suited to say, "...Type C and / or Type CE..."
- Since it is identified in Section 1.0 that a cylinder rated for 15 minutes is also required we suggest that the title be changed to include the wording: Concept Standard for Chemical, Biological, Radiological, and Nuclear (CBRN) Combination Self-Contained Breathing Apparatus (SCBA) and Type C and / or Type CE Positive Pressure, Pressure Demand Full Facepiece Supplied Air Respirator (SAR)" the current wording does not reflect the SCBA portion of the respirator.

Section 1.0 Purpose:

- Please refer to the above comments concerning the name of the standard.
- Insert after the last sentence of this section the following statement:

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“Connection of the SAR portion of the SCBA must occur in the non-contaminated atmosphere prior to entry into the IDLH (contaminated area) atmosphere. Only disconnection from the SAR can occur in the IDLH atmosphere as required for escape.”

Airline hose lengths in excess of the current 300 foot limit can be used. The manufacturer shall specify the maximum hose length that meets the requirements identified in Section 2.2.

Section 2.2 42 CFR, Part 84 Requirements:

- The pertinent requirements of 42 CFR, Part 84 Subpart H for SCBA should also be included in this section since there is the requirement for a minimum of 15 minutes duration for a cylinder.

Section 3.1 Durability Conditioning – Table 1

- Typographical error for Cold Constant in the Test Condition section: -32°C is equal to -25° F.

Section 4.1 Chemical Agent Permeation and Penetration Tests

- This section identifies that all components and accessories for the respirator shall be challenged by the agents, but it does not identify which mode of operation is to be used during the tests or if there would be a mode transfer during the test. We suggest that of the three tests being performed that two tests performed be performed in the SAR mode and one test be performed in the SCBA mode.

Section 4.2 LRPL Test Requirement:

- We suggest that the measure LRPL for the Combination SCBA / SAR be 500. Other than the use of an airline hose this respirator is a SCBA. The same SCBA concentrations for the challenge agents are being used so why not utilize the same LRPL requirements?

General Comments:

- Any reference to SAR should be changed to identify the respirator as a Combination SCBA / SAR.
- Along with the release of this standard, we also suggest that NIOSH have a Guidance Document prepared and released at the same time.

Draeger Safety thanks NIOSH for the opportunity to provide comments. Please consider our comments concerning the ongoing changes to the standard.

If there should be any questions concerning this matter, please do not hesitate to contact me at 412-788-5685 or via e-mail at Robert.Sell@Draeger.com.

Respectfully,

Robert Sell

Robert Sell
Sr. Project Engineer