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To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR); Doyle, Glenn (CDC/NIOSH/EID)
Subject: 039-A - Subpart-Q-CC-SCBA-Concept Comments

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Comments

I attended the recent meeting in Pittsburgh on August 20, 2008. One item I neglected to interject concerns static dissipation of external components of a CC-SCBA. This is a requirement of EN145 and I believe impending ISO standards. I believe this is an essential requirement for mining applications and should be adopted into subsection Q. I believe the EN145 standard states the requirement as follows (I am not in my office and do not have the actual document at hand at the time of writing this comment):

"All external components shall be constructed of materials that do not contain alloys of aluminum, magnesium or titanium; or alloys of such materials, that upon impact could give rise to the generation of static sparks"

Biomarine currently adheres to this standard for all BioPak 240R units and I am positive that Draeger also complies with this standard for the BG4 so enacting this requirement should not be a major issue for either of these manufacturers.

Furthermore:

"All external components, excluding facepieces, breathing hoses and harnesses, shall have a surface resistance value not exceeding 10^9 ohms".

I am not exactly sure of the requirements but they can be referenced directly from the European standard EN145. Again I am sure that both Biomarine and Draeger adhere to this standard for all CC-SCBVA units produced.

Due to EN145 certification requirements, Biomarine now employs a static dissipative coating on all oxygen cylinders (both in the USA and worldwide) to provide additional protection against static discharge. This may also be a stipulation that may be included in subsection Q.