Miller, Diane M. (CDC/NIOSH/EID)

From: Jeff.Gutshall@MSANet.com
Sent: Monday, October 19, 2009 1:56 PM
To: NIOSH Docket Office (CDC)
Subject: NIOSH Docket #083B
Attachments: Docket083B.pdf

Please see the attached comments.

Jeff Gutshall
Manager, Standards Compliance, Protection
Mine Safety Appliances Co.
724-776-7740

Mine Safety Appliances Company · John T. Ryan Memorial Lab
P.O. Box 439, Pittsburgh, PA 15230-0439

Telephone: (724) 776- 7700 Writer's Direct Dial: (724) 776-7740

October 19, 2009

NIOSH Docket Office
Robert A. Taft Laboratories M/S-C34
Supplied Air Respirators (SAR) – NIOSH Docket #083B
4676 Columbia Parkway
Cincinnati, OH 45226

Re: Supplied Air Respirators (SAR) – NIOSH Docket #083B

MSA is a global leader in the development, manufacture and supply of sophisticated safety products that protect people's health and safety. Our comprehensive line of products is used by workers around the world in the fire service, homeland security, construction and other industries, as well as the military. Principal products include self-contained breathing apparatus, gas masks, gas detection instruments, head protection, respirators and thermal imaging cameras.

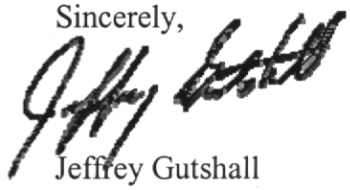
In general, the draft requirements should be revisited with an open mind in an effort to remove references to current technology that could inhibit future innovation. For example, definition 2.3 states that an SAR/SCBA requires an integrated SCBA cylinder. This would prevent the approval of such a device that would somehow accommodate the intended requirement with hardware/processes that avoid the presence of an SCBA cylinder. Such is the nature of innovation. The requirements should be written around performance, not how the hardware is currently designed. What about a nasal or mouthpiece user to respirator interface? The definitions and requirements as presented currently make this document a barrier to innovation.

The inclusion of the air source compressors or pumps in this subpart is problematic. A new subpart with performance (not design/size/weight) requirements for these products should be considered. The respirator approval holder should not be forced to evaluate and incorporate all compressor/pump products into their quality system. Pump/compressor manufacturers should be able to have their products evaluated as independent approvals with well-defined performance characteristics. These can then be matched to respirators with compatible performance requirements. This approach would also eliminate the problems, added cost, and certain user confusion resulting from two approvals for exactly the same respirator, one for portable air sources one for fixed installation air sources.

Reference to ANSI Z359.1 is problematic as that standard will be replaced soon, and the need for such capabilities is a workplace issue, not a respiratory protection concern. Also, NIOSH respirators are used in markets outside of the U.S. and fall protection standards can differ in those markets. It is more likely that the airline respirator will be a separate safety item used along with a suitable fall protection system if one is needed.

References to impact standards for head, eye and face are acceptable as these components of the respirator can negate the ability to use separate protective products. However, the wording should allow for frequent updates to those standards without a revision to this subpart.

Sincerely,



Jeffrey Gutshall
Manager, Standards Compliance
Protection Products