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From:

Sent: Friday, August 22, 2008 12:12 AM

To: NIOSH Docket Office (CDC)

Subject: 123 - Reevaluation of NIOSH limitations on and precaution for safe use of positive-pressure closed-circuit SCBA

Comments relative to the flame and heat testing experiments conducted at ETL laboratories on the BioPak 240R with the Scott Health and Safety AV3000 facepiece.

After consulting with Scott Health and Safety on the performance of the AV3000 facemask during the trials enacted at ETL Laboratories in New York, Scott has provided the following information:

1. Scott does not advocate the use of the AV3000 facepiece in applications of open flame or high radiant heat where the user first installs a Nomex (or any other type) head cover over the head of the user followed by placement of the AV3000 head harness over top of such head covering. The AV3000 design utilizes a head harness that provides a face seal by tightening head harness straps that are connected to the face seal rubber components on the lower two connection points. Any material not associated with the AV3000 design that is positioned between the lower head harness straps and the user's face will serve to create a leak path to the external environment. This is most evident during the use of an AV3000 facepiece in applications of positive pressure of the attached CC-SCBA. Note that this is the exact leak point identified in the ETL trials.
2. Scott Health and Safety strongly requests that they be present in any future trials or tests of CC-SCBA units involving the AV3000 facepiece.
3. Scott Health and Safety trains and instructs users of the AV3000 facepiece to install any head coverings, helmets or any other protective gear on the OUTSIDE of the AV3000 head harness. Thus it appears as if we did not properly consult Scott Health and Safety on the correct configuration of utilizing the AV3000 facepiece thus contributing to the results obtained at the ETL trials.

8/22/2008