

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

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**From:** GZimmermann@SperianProtection.com  
**Sent:** Thursday, January 15, 2009 11:52 AM  
**To:** NIOSH Docket Office (CDC)  
**Subject:** 148 - Development Plan for Air-Fed Suit Respirator Performance Requirements  
**Attachments:** NIOSH response letter.doc

To Whom It May Concern,

Please accept our general comments to your documentation regarding development of the air fed suit standard.

Thank You

Bacou-Dalloz becomes



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Thursday, January 15, 2009

NIOSH Docket Office

**Subject: Comments to Air Fed Suit DEV Plan Nov 20 08 PDF Docket 0148**

To Whom It May Concern:

We are extremely pleased to see that both NIOSH and ASTM are collaborating in regards to the development of an air fed suit standard for general industry. Spierian Protection Clothing is a world leader in the design, development, and manufacture of air fed suit systems that are used globally in various industries.

Our experience, and client base, where NIOSH approved respirators are the norm, have indicated the need to have at their disposal, supplied air suit configurations. The need is quantified due to the particular occupational risk in specific applications. In manufacturing environments where potent compounds and active ingredients are manufactured, companies are in need of supplying to their workers effective "whole body" protection. Furthermore, these respirator/PPE combinations offer an effective way to not only supply the best protection, but have the added benefit, if designed correctly, in supplying distributed air to the user, that helps him perform his job, in comfort, thus improving worker efficiency and safety.

We feel that general industry needs to have the ability to have an initial short term solution, so that they can use suit systems as quickly as possible, and that these suits, are able to be NIOSH approved as respirators within an existing subpart. The majority of our experiences have indicated that "air fed Suits" where the suit is the respirator, via a supplied air hose connection, is where suits need to be approved. This market area, represents the highest risk areas for contamination to a worker (nuclear, pharmaceutical, biological environments), and should be dealt with as quickly as possible.

In the long term, we feel that PAPR type suit systems must be dealt with as well.



The latter suit systems give operators the flexibility of movement along with the ability of supplying the worker similar whole body protection as would a conventional supplied air suit. *There is definitely an immediate need for a NIOSH approved air-fed suit respiratory standard to be promulgated as expediently as possible.*

At present, we are willing to supply all the necessary support to both ASTM and NIOSH in order to see successful implementation of this project. All tables supplied in your document are quite extensive. It is, however, important to decide which test methods are most applicable, as well as carefully establishing minimum levels of approval that are acceptable.

Should you require further comments, please do not hesitate to contact the undersigned.

Regards,

Gary Zimmermann  
Business Development Manager  
Sperian Protection Clothing