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NIOSH Docket
083-A Airline 12S...

Reference NIOSH Docket Number 083-A

To: NIOSH Docket Officer

My comments are provided in the attached file for your consideration.

Dave

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COMMENTS ON
NIOSH Docket Number 083-A
Draft Concept of Subpart J: Supplied-Air Respirators
Technical Performance Standard, July 1, 2008
18 September 2008
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Industrial Hygiene, Acquisition Technical Support Division

Paragraph 4.2.3.1 states that breathing gas must meet minimum requirements of "*Type I-Grade D breathing air set forth in the Compressed Gas Association Commodity Specification for Air, G-7.1, 5th Edition, 2004.*"

Recommend changing "Type I-Grade D" to "Grade D."

Comment: Compressed Gas Association Commodity Specification for Air, G-7.1 pamphlet has not used the "Type I" and "Type II" designations since the 1973 edition. Starting in the 1989 edition, the quality verification level for breathing air used in the G-7.1 pamphlet has been "Grade D."

Paragraph 4.1.5.2 states that:

"All lenses of respiratory inlet coverings shall be designed and constructed to be impact and penetration resistant via the requirements of ANSI Z87.1-2003, American National Standard for Occupational and Educational Personal Eye and Face Protection Devices or the lenses shall be prominently and permanently labeled to indicate that they are not impact resistant."

Recommend changing this text to:

"All lenses of respiratory inlet coverings shall be designed and constructed to meet the high impact, optical, and marking requirements of ANSI Z87.1-2003."

Comment: Current text only specifies lens impact and penetration resistance testing. However, Section 8.3, High Impact Testing Requirements, of ANSI Z87.1-2003 requires lens high velocity impact testing in addition to impact and penetration testing. Respirators passing both high impact testing and optical testing receive the Z87.1+ lens marking. Since this technical performance standard for supplied air respirators is open for review, it is the ideal time to incorporate the full testing and labeling requirements in the supporting ANSI standard.

Paragraph 5.2 requires lens materials to meet lens quality requirements of several different American Society for Testing and Materials (ASTM) standards.

Recommend replacing lens specifications from ASTM standards with the optical requirements for respirator lenses in Section 8.4 of ANSI Z87.1-2003.

Comment: If a respirator passes both high impact and optical requirements of ANSI Z87.1-2003, it is labeled with the Z87.1+ marking, easily identifying respirators that comply.

Also recommend requiring “Flammability” and “Cleanability” testing per Sections 8.6 and 8.8 of ANSI Z87.1-2003 since they are the only other applicable requirements in this supporting ANSI standard.

Paragraph 6.2.1 makes reference to requirements in Sections 5.3.1.2 – 5.3.1.4. There are no Sections 5.3.1.2 – 5.3.1.4.

Paragraphs 5.1.3 and 6.1.2 have the same typographical error. Change “base” to “based” for the following text: “...base on the high work rate....”