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

From: Doug.Anderson@NeutronicsInc.com
Sent: Monday, August 18, 2008 4:30 PM
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

Name
Doug Anderson

Organization
Biomarine Incorporated

Email
Doug.Anderson@NeutronicsInc.com

Address
456 Creamery Way
Exton, PA 19341
USA

Comments
DRAFT SUBPART Q: CLOSED-CIRCUIT SELF-CONTAINED BREATHING APPARATUS, MAY 28, 2008

Section 84.516: Permeability resistance; minimum requirements

This section places the CCSCBA in operational status in saturated atmospheres of gasoline, kerosene and toluene. This may cause difficulties in trying to specify rubber components that have chemical resistance to these compounds as well as sarin and mustard agents. EPDM is a good rubber to use for barrier seals and components against agent permeation but this material is not recommended for use with gasoline, kerosene and toluene. It appears as if this requirement is presenting an exercise in material compatibility and not really contributing to the safety or function of the CCSCBA. Wouldn't issues of permeability be covered by leakage testing, facepiece fitting, etc? Selecting specific compounds to test permeation (other than agents) seems unnecessary unless these specific compounds are expected to be encountered on a regular basis.