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

From: cecolton@mmm.com
Sent: Thursday, October 16, 2008 12:23 AM
To: NIOSH Docket Office (CDC)
Cc: Szalajda, Jonathan V. (CDC/NIOSH/NPPTL)
Subject: NIOSH DOCKET –NIOSH – 139

Attachments: October15 Letter on Universal connector.pdf

October15 Letter on Universal ...

Attached are comments to be added to The Potential Modification of the NIOSH Statement of Standard for a Chemical, Biological, Radiological, and Nuclear (CBRN) Full Facepiece Air-Purifying Respirator (APR) NIOSH Docket 139.

(See attached file: October15 Letter on Universal connector.pdf)

Thank you.

Craig E. Colton, CIH
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3M

October 15, 2008

NIOSH Docket Officer
RE: NIOSH DOCKET –NIOSH – 139
Robert A. Taft Laboratories, M/S C34
4676 Columbia Parkway
Cincinnati, OH 45226
NIOCINDOCKET@CDC.GOV.

RE: The Potential Modification of the NIOSH Statement of Standard for a Chemical, Biological, Radiological, and Nuclear (CBRN) Full Facepiece Air-Purifying Respirator (APR) NIOSH Docket 139

Dear Docket Officer:

3M Company (3M), through its Occupational Health and Environmental Safety (OH&ES) Division, is a major manufacturer and supplier of respiratory protective devices throughout the world. 3M has invented, developed, manufactured and sold approved respirators since 1972. 3M employs experienced engineers and technical professionals for the development of respirators. Our sales people have trained and fit tested hundreds of thousands of respirator wearers throughout the world. Our technical staff has performed basic research on the performance of respirators and their uses, presented and published these data in numerous forums and assisted customers with the development and administration of effective respirator programs. 3M has designed and received approval on CBRN full Facepiece Air-purifying Respirators. In sum, we have substantial experience in all phases and applications of respiratory protection. We are pleased to provide the National Institute for Occupational Health and Safety (NIOSH) with our comments on The Potential Modification of the NIOSH Statement of Standard for a Chemical, Biological, Radiological, and Nuclear (CBRN) Full Facepiece Air-Purifying Respirator (APR).

3M appreciates the opportunity to add our comments and knowledge to docket 139.

Sincerely,

Robert A. Weber, CIH
Manager of Technical Service and Regulatory Affairs
3M Occupational Health & Environmental Safety Division

RAW:CEC/llb
Enclosures

3M Comments on The Potential Modification of the NIOSH Statement of Standard for a Chemical, Biological, Radiological, and Nuclear (CBRN) Full Facepiece Air-Purifying Respirator (APR)

July 2008

The following comments are in response to the above mentioned announcement and NIOSH's request for input from stakeholders and manufacturers to determine the following:

1. Opinions on NIOSH's current design requirement for the single 40-mm thread canister mechanical connector.
2. Rationale and data to maintain the current design requirement.
3. Rationale and data to support adding an alternative design for DoD applications for canister mechanical connectors.
4. Identification of alternative approaches to implement the alternative design concept for the canister mechanical connector.
5. Other comments on the subject.

I. General Comments

As NIOSH pointed out in this request for comment, "Because of their experiences in responding to the terrorist events of 2001, emergency responders identified the need for the interoperability of canisters and facepieces as a respirator user issue that NIOSH needed to address." In recognition of and in support of this concern, NIOSH incorporated, over the objections of respirator manufacturers, a single, universal design using a single 40-mm DIN thread. Now, in contrast to NIOSH's strong rhetoric about the need for a single, universal connector, NISOH is considering, at DoD's request, the introduction of another connector. This unilateral proposal to overrule NIOSH's prior decision in favor of a single, universal connector not only defeats the original concept but places manufacturers and end users in a quandary. If this exception is allowed, then the concern is that additional requests will be submitted seeking yet another thread size and soon the market will flooded with exceptions and the rule for a single, universal thread will have vaporized.

The 40 mm DIN thread was chosen by NIOSH because it was the most common thread at the time of the standard. The Department of Defense (DoD) participated in this rulemaking and was one of the groups supporting the development of this particular thread as the single, universal connector. Moreover, DoD was aware at that time of the efforts being exerted to create the Joint Service General Purpose Mask (JSGPM) and had ample time to ensure that the JSGPM would use the 40 mm thread. DoD's influence for the incorporation of the 40 mm thread, however, was not sufficient and ultimately a different connector was adopted.

Now, DoD wants the JSGPM to be NISOH certified as a CBRN full facepiece air purifying respirator and herein is the dilemma. NIOSH specifies the single, universal 40 mm thread and the JSGPM respirator has another type connector. Upon further reflection,

it does not appear necessary that the JSGPM be NISOH certified as a CBRN product. This point was expressed at the at the NIOSH Public Meeting on August 20, 2008 that DoD where information was provided that DoD would not have a need to use CBRN canisters supplied by more than one source. In other words, interchangeability, the lynchpin for the single, universal thread, is not at play in these circumstances. Nonetheless, because civilian employees in DoD will use JSGPM respirators, they want added assurance that they meet OSHA and NIOSH requirements.

We believe there are other ways for DoD to address and resolve these needs without changing the current 40 mm DIN thread size requirement. In a recent letter to NIOSH, DoD indicates that outside of the common connector requirement, the JSGPM meets the CBRN Full Facepiece Air-purifying Respirator Statement of Standard. If this is the case, DoD:

1. could have the respirator tested against the standard to demonstrate this fact and then present the information to OSHA and request a variance to the requirement in 29 CFR 1910.134 to use a NIOSH approved respirator. These data could also be used to show civilian personnel that the respirator is appropriate along with the variance from OSHA.
2. could submit the respirator for NIOSH approval for categories other than CBRN such as a gas mask for particles and other gases and vapors. This approach provides them with a NIOSH approval for the respirator and data proving its effectiveness for the expected hazard. This is similar to what is done with industrial respirators today such as one with an organic vapor approval which is then used for toluene even though it was not tested against toluene by NIOSH. The industrial gas mask requirements do not specify a common connector.

If NIOSH accepts DoD's position on this request and thereby goes against industry consensus for a single, universal connector, we submit that NIOSH would need to develop and issue a formal proposed concept to change this requirement and hold public meetings on this subject. NIOSH would then need to allow all manufacturers to resubmit their CBRN respirator with alternative canister connector designs.