

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

From: Marsick, Dan [Dan.Marsick@hq.doe.gov]
Sent: Tuesday, September 29, 2009 10:47 AM
To: NIOSH Docket Office (CDC)
Subject: Comments on Docket 148A - Air-fed Ensembles

General:

The NIOSH concept paper does not sufficiently mention the need to assess the quality and extent of the manufacturers' suggested programs for donning, doffing and care.

The NIOSH concept seems to be intended for air suits that are to be used in IDLH environments. This type of air suit usage is more challenging than that intended for DOE supplied-air suits. DOE STD 1167-2003 specifies that DOE accepted supplied-air suits are not to be used in IDLH environments.

Although the tests specified in the NIOSH concept are taken from existing standards, many of these tests are not used currently by DOE to certify air suits. It is not clear to me that all air suits used in DOE could meet a standard based largely on the NIOSH concept

Specific:

1) p. 3 – 11th text line

change "...evaluated for the use of the manufacturer's written..."

to "...evaluated for the appropriateness and completeness of the manufacturer's written..."

Reason: Unless you evaluate the actual program of the user, you would not be able to evaluate the use of the manufacturer's instructions. I do not see any proposal for submitting user programs to NIOSH. NIOSH is more concerned about the hardware.

2) p. 3 – last text line

"Seam penetration and permeation resistance and seam strength shall also be determined."

Question: What standards will be used for this?

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