



March 11, 2003

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LETTER TO ALL MANUFACTURERS

Subject: Upgrade of Previously-Deployed SCBA Configurations to CBRN Approval Status

This letter is to inform manufacturers that NIOSH will immediately begin accepting extension of approval applications for the evaluation of components and procedures to upgrade previously-deployed (field-deployed) NIOSH-approved Self Contained Breathing Apparatus to CBRN-approved configurations. The purpose of this program is to:

1. test and evaluate retrofit kits used to upgrade field-deployed SCBA
2. assure upgraded SCBA's comply with approved CBRN SCBA configurations
3. assure the quality of the components and procedures used to upgrade previous versions of the SCBA establish the CBRN-approved configuration.

Background

NIOSH announced plans to begin accepting applications to test and evaluate self-contained breathing apparatus (SCBA) for use against chemical, biological, radiological, and nuclear (CBRN) agents in a December 28, 2001, NIOSH Letter to All Respirator Manufacturers. Since January 2002, NIOSH has been processing applications for CBRN SCBA approval in accordance with the requirements identified in the December 28, 2001, NIOSH letter. Approvals for CBRN SCBA have now been issued and applications for approval to this protection are expected to continue. Both manufacturers and users have expressed the desire and need to upgrade equipment placed in service prior to issuance of the CBRN approval. NIOSH believes the CBRN SCBA Retrofit Kits will greatly increase the number of emergency responders who are afforded the increased protection provided by the NIOSH-approved CBRN SCBA respirators. Because of this, NIOSH will immediately begin accepting applications to test and evaluate CBRN SCBA Retrofit Kits.

Requirements for the CBRN SCBA Retrofit Kit Program

1. Retrofit of field-deployed SCBA to the CBRN protection must be performed by manufacturer-trained and authorized technicians, who ensure the upgrades comply with the approved CBRN-SCBA configuration, quality assurance and performance requirements.
2. The CBRN SCBA Retrofit Kit must, as a minimum, contain the following:
 - a. CBRN SCBA Retrofit Kit Instructions,
 - b. Replacement components, parts, materials, and operation instructions required to upgrade the SCBA's configuration to the approved CBRN configuration level,
 - c. Registration materials for recording SCBA information as required by the manufacturer,
 - d. CBRN SCBA Retrofit Approval Label (See [Attachment A](#)).

3. As a minimum, Retrofit Kit Instructions must include:

- a. Identification of minimum technician qualifications, i.e., who can perform the retrofit and the level of manufacturer training required.
- b. Information to identify specific SCBA models that are capable of being retrofitted to the CBRN SCBA configuration as determined by the manufacturer.
- c. Identification of the requirements for inspections and operational tests of the SCBA prior to performing the retrofit that are required to verify the SCBA complies with manufacturer quality and performance specifications for SCBA's eligible to be retrofit.
- d. Detailed procedures for replacing components, parts, and/or materials required to establish the CBRN SCBA configuration.
- e. Guidance concerning the CBRN SCBA operating instructions and differences from normal SCBA operating instructions.
- f. Post retrofit inspections and tests required to verify work has been performed properly and that the CBRN SCBA operation is in accordance with NIOSH, NFPA, and the manufacturer requirements. As a minimum, the post retrofit inspection and test must verify leak tightness of assembly and components, positive pressure (static face piece pressure), exhalation resistance, bypass function, remaining service life alarm operation, pressure gauge accuracy, and flow performance.
- g. Directions for installation of the NIOSH CBRN SCBA Retrofit Approval Label.

4. The application must include the quality assurance provisions that will identify the resulting configuration and protections for each SCBA updated under the CBRN SCBA Retrofit Program.

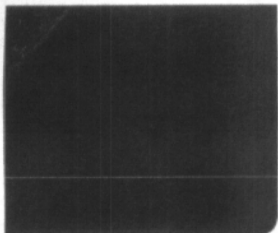
5. The application shall include two CBRN SCBA Retrofit Kits and two NIOSH certified NFPA 1981, 1997 Edition or 2002 Edition, compliant SCBA's. The installation of the CBRN SCBA Retrofit Kits may be performed by a manufacturer trained and authorized technician in the presence of NIOSH representatives or prior to submission, with a notarized statement certifying the CBRN SCBA Retrofit Kit requirements have been followed for installation of the submitted SCBA's. The two SCBA's should be supplied from a metropolitan fire department and must be representative of the oldest SCBA's remaining in service under the NFPA edition under which they were listed as compliant. The application is to include a description of the estimated frequency of use for the submitted SCBA's since the being placed into service, and how this has been determined to be typical of the model's normal firefighter usage. The submitted SCBA will be tested and evaluated to the special tests for Chemical Agent Permeation and Penetration Resistance Against Distilled Mustard (HD) and Sarin (GB) identified in the December 28, 2001 NIOSH letter.

Procedures for submitting an extension of approval application for procedures to upgrade previously-deployed (field-deployed) NIOSH-approved Self Contained Breathing Apparatus to CBRN-approved configurations are identified in [Attachment B](#). The required NIOSH fee is \$10,000.

Sincerely yours,



Roland J. Berry Ann
Branch Chief
Respirator Branch
National Personal Protective Technology Laboratory



[Attachment A, CBRN SCBA Retrofit Approval Label](#)

[Attachment B, Procedures for Applying for CBRN SCBA Retrofit Kit Approval](#)

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Attachment A

CBRN Retrofit Label

CBRN Agent Approved
(Retrofit)

See Instructions for Required Component Part Numbers, Accessories, and Additional Cautions and Limitations of Use

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Attachment B

Procedure for Applying for CBRN SCBA Retrofit Kit Approval

Applications may be made by submitting a request by e-mail to npptl@cdc.gov or by mail to:

Attention: Records Room
Respirator Branch
NIOSH
National Personal Protective Technology Laboratory (NPPTL)
P.O. Box 18070
626 Cochrans Mill Road
Pittsburgh, PA 15236

Each applicant must state that it is an application for approval of a CBRN SCBA Retrofit Kit and must contain a unique application reference number. The first three digits of this applicant-assigned reference number must be the NIOSH-assigned applicant's code. This number must appear on each hardware sample package. The cost for processing a completed application is \$10,000. The applicant-assigned reference number or NIOSH-assigned task number must appear on the payment check, bank draft, or money order. The cost must be paid to the Institute as a condition of approval.

Sample hardware must be submitted to the Respirator Branch in Pittsburgh, PA for testing under the extension of approval application. The NIOSH-assigned task number for each application can be obtained either by requesting it in the e-mail submission or by submitting a stamped, self-addressed post card with the applicant-assigned reference number with the mailed application. NIOSH will note the assigned task number and promptly return the post card or provide an e-mail notification. Foreign manufacturers may send a completed fax form that NIOSH will fax to them with the assigned task number. Subsequent inquiries must refer to the NIOSH-assigned task number (TN) of the applicant-assigned reference number.

Each application for approval of a CBRN SCBA Retrofit Kit must include the following:

- a. Documentation that NIOSH has approved the CBRN SCBA for which the CBRN SCBA Retrofit Kit is applicable. This can be accomplished by identifying the NIOSH certification number(s) with all applicable component parts, major assemblies, and accessories.
- b. A fee to initiate required testing and evaluation of the extension of approvals for the CBRN SCBA Retrofit Kit. NIOSH will not issue approval until fees are paid in full.
- c. Hardware submitted to the Respirator Branch, NPPTL, Pittsburgh, PA.

NIOSH may request additional documentation or test samples from the manufacturer if it determines that such documentation or samples are necessary to evaluate the application.

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